



Version: 10

## HS01 HEALTH AND SAFETY POLICY

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## STATEMENT OF INTENT

The Betsi Cadwaladr University Health Board (hereafter known as the BCUHB) recognises its legal and moral responsibilities and will, in consultation with its employees, create and maintain – so far as is reasonably practicable – a working environment which will ensure the health, safety and welfare of its employees and any other persons who may be affected by its activities.

- All Employees are to comply with the requirements of the Health & Safety etc Act 1974 and other relevant legislation. The BCUHB expects other organisations and individuals with which we do business to demonstrate the same level of commitment to this policy.
- In order to achieve a high level of cost effective Health and Safety performance and to ensure that compliance with legal requirements is our minimum standard, the BCUHB will be committed to a programme of continual improvements. In so doing we aim to reduce the risk of ill health, accidents and near miss incidents in the workplace.
- The management of risk to our own employees, and those who may be affected by our activities, will be given the highest priority. These risks will be recognised and reduced to as low a level as is reasonably practicable by a comprehensive risk assessment programme. The BCUHB acknowledges that all risks can never be eliminated, but will ensure that the human and material resources necessary to minimise these risks are made available and that any residual risk is within the skill and experience level of the workforce to control successfully.
- Whereas the BCUHB recognises the importance of every employee contributing to the success of its policy, it accepts that each member of senior management is responsible for the operation of this policy in the areas for which they are accountable, and that it will be implemented through the management structure. Specialists will be available to advise and assist as necessary.
- A system of partnership working between management and employee representatives will be maintained through the BCUHB Health and Safety Assurance Structure to promote and monitor good practices relating to Health and Safety at work.
- All staff are expected to co-operate by taking reasonable care for their own safety and that of others who may be affected by their actions, and to comply with regulations and systems of work that are in place to protect all employees and others in the workplace.

- A copy of this statement, and the BCUHB Health and Safety Policy will be available and accessible to each employee and included in the Corporate Bulletin and on the Health & Safety intranet page.

## **1. Introduction**

The BCUHB Health and Safety Policy and Strategic Approach embraces the concepts of sensible Health and Safety by ensuring control measures are proportionate to risk. Awareness will be key in ensuring that staff can deliver on their service priorities whilst ensuring risks are managed in a sensible, proportionate and legally compliant way.

## **2. Scope**

This policy shall apply to all premises and undertakings of the Betsi Cadwaladr University Health Board.

## **3. Aim**

The overall aim of this policy is to promote a continual positive culture and to encourage ownership at every level as well as the development and sustainability of high quality support services and systems. This will be achieved through a strong, visible and consistent leadership and be delivered in a timely, efficient, effective and affordable manner. This will ensure the organisation meets its legislative obligation to safeguard the health, safety and welfare of patients, staff, visitors, property, as well as the organisation itself. This will enable the Health Board to meet and, where possible, exceed the statutory obligations placed upon the organisation to safeguard everyone who might otherwise be affected by the actions and/or omissions of BCUHB.

## **4. Health and Safety Management**

Effective management is the application of sound organisational processes to the topic of health & safety, incorporating good leadership and a trained, skilled, workforce operating in an open trusting environment, together with a safety culture which supports the management arrangements.

The Health Board's safety management will be based on the principles highlighted in HSG 65 and this will include an effective policy with attaching procedures and management guidance, health & safety organisation, planning and implementation, performance measurement and auditing and reviewing of performance.

## **5. BCUHB Safety Improvement Project Plan**

Planning is an integral part of the Health Board's operations and BCUHB recognises that legislation requires it to make arrangements for effective planning.

Accordingly a Corporate Health & Safety Improvement Project Plan has been devised. This detailed plan will ensure that the aims set out in the Strategic Approach is met and actions are identified, which are monitored and reviewed on a regular basis.

The Strategic Health and Safety Committee is responsible for agreeing the Improvement Project Plan and for monitoring progress against it.

Directorates/Areas and /Corporate Functions will be required to provide the Strategic Health and Safety Committee with progress against their action plans.

The Strategic Health and Safety Committee reports directly to the Quality and Assurance Committee on risk issues, which in turn reports to the Health Board.

## **6. BCUHB Organisation for the Management of Health and Safety**

The Health Board of the BCUHB recognises its responsibilities for the management of Health and Safety and have determined that effective management of Health and Safety will be maintained through its Directors, and supporting management structures. Responsibilities for the management of Health and Safety is clearly identified in this Policy and supporting operational procedures.

## **7. Roles & Responsibilities**

### **7.1 Chief Executive**

The responsibility for the organisation of Health and Safety arrangements within the BCUHB rests with the Chief Executive. The Chief Executive is responsible for ensuring that compliance with current Health and Safety legislation is met and that structures and programmes are in place to maintain and improve Health and Safety within the BCUHB.

### **7.2 The Health Board**

The Board of the BCUHB has overall accountability for the activities of the organisation. The health board shall ensure that they receive appropriate assurances in respect of compliance with the Health and Safety at Work etc Act 1974 and supporting legislation.

### **7.3 Board Level Director**

The Chief Executive has appointed the Chief Operating Officer as Board level director for Health and Safety, and will lead on health and safety issues at board level.

The Board Level Director shall be responsible, through a process of nomination, for the development, monitoring and implementation of the Health and Safety management system. In addition the Board Level Director shall:

- Ensure that sufficient competent persons are employed to provide advice and guidance to the BCUHB in relation to health and safety management.
- Ensure the co-ordination of all health and safety activities within the BCUHB.
- Submit an annual report to the Health Board detailing Health and Safety performance.

#### **7.4 Director of Workforce and Organisational Development**

The Director of Workforce and Organisational Development shall ensure that suitable and sufficient resources are available for the provision of an effective Occupational Health and Wellbeing Service within the BCUHB. This service shall provide as a minimum:

- A pre-employment health assessment service for all potential employees of the BCUHB, as appropriate and to a level relevant to the proposed work of the applicant
- Health surveillance for relevant occupations.
- Health assessments for night workers in accordance with the European Working Time Directive (EWTD).
- Immunisation programmes for employees.
- An advice and assistance service to staff in respect of the following:
  - Diseases and other illnesses that are or could be attributed to occupational hazards.
  - Healthy life style programmes.
  - Confidential counselling for staff members who are, or feel they are, suffering ill health as a result of their occupation, such ill health could involve work with hazardous substances, infective agents or stress caused by factors at work or elsewhere.

The role of the Director of Workforce & Organisational Development is;

- to provide a strategic and policy framework and guidance for the identification of training needs for line managers
- to provide guidance to Mandatory trainers on the development of appropriate packages of training to meet these needs identified with the responsibility for the design & delivery of training being with the mandatory trainers
- to ensure a corporate and local induction process is in place for new employees that will include content on Health and Safety responsibilities

- to ensure an activity and compliance reporting system is in place to enable regular reports are provided.

## **7.5 Directors**

They shall, in addition to any other specific duties:

- Ensure that management structures and responsibilities are identified and functioning for the effective management of Health and Safety across their areas of responsibility.
- Facilitate effective communications and partnership working with staff in respect of Health and Safety management.
- Provide assurance to the Board Level Director for Health and Safety that effective management arrangements are in place and functioning across their areas of responsibility.
- Escalate any significant issues identified, that cannot be dealt with locally.

## **7.6 Director of Estates and Facilities**

The Director of Estates and Facilities shall, so far as is reasonably practicable, ensure that risks to the Health and Safety of staff and others from workplace environments, in property owned or leased by BCUHB, are eliminated and/or reduced where possible. Ensure that Health and Safety is incorporated into the maintenance and management of Health Board property and that communication at operational level is an integral part of the process.

## **7.7 Director of Strategy**

The Director of Strategy shall, so far as is reasonably practicable, ensure that risks to the Health and Safety of staff and others from workplace environments, in new build and/or refurbished property owned by BCUHB, are eliminated and/or reduced. Ensure that Health and Safety is incorporated at the design stage of new build, and that communication at operational level is an integral part of the process.

## **7.8 Managers and Head of Departments**

All Managers are accountable to the Chief Executive for ensuring that this policy is properly applied in their area of control. In particular, they shall:

- Implement BCUHB Policies, procedures and programmes
- Ensure adequate supervision of all staff and students is provided, commensurate with their skills and competency
- Ensure that staff receive appropriate training and information necessary for them to carry out their role safely and competently
- Keep detailed local training records of all staff
- Ensure that all incidents that occur in their area are reported and investigated in accordance with the Datix Incident Reporting System.

- Use data from Directorate inspections, Directorate hazard profile, and consultative committees to guide actions to prevent or reduce the risk of serious incidents.

## **7.9 Employees**

All employees have a general duty while at work:

- To take reasonable care for the health and safety of themselves and of other persons (including members of the public and patients) who may be foreseeably affected by their acts or omissions at work; and
- To co-operate with the BCUHB in the discharge of its statutory duties in relation to the Health and Safety at Work etc Act 1974; and
- Not to intentionally or recklessly interfere or misuse anything provided for the purposes of health and safety; and
- To report any work situation involving serious and immediate danger to their Line Manager or Supervisor who will escalate it further if appropriate.
- To report any shortcomings in the arrangements provided for health and safety at work.

## **7.10 Trade Union Health and Safety Accredited Representatives**

### **Non Trade Union Health & Safety Representatives**

The role of the Trade Union/Non Trade Union Health and Safety Representative is to represent fellow members/employees in consultations on health and safety matters with the employer, by carrying out the functions efficiently and using the facilities and assistance provided by the employer. In this way, co-operation on these matters will improve the overall health, safety and welfare of the staff and their workplace.

The functions of a Health and Safety Representative are as follows:

- to represent fellow members/employees in consultation with the employer on health and safety related matters.
- to investigate potential hazards and dangerous occurrences and to undertake root cause analysis in conjunction with management.
- to investigate complaints.
- to make representations to the employer, both written and verbal;
- to carry out inspections.
- to receive information from the employer where elected to do so, to attend meetings of safety committees and raise relevant matters.
- to provide employers with copies of inspection reports and to receive responses in respect of inspection reports.

Note: Wherever possible the BCUHB will encourage the nomination of a Trade Union Health and Safety Representative, however when a Union Representative cannot be appointed consideration will be given to availability of a Non Trade Union Representative.



### **7.11 Health and Safety Directorate/Area Leads**

The role of the Directorate/Area Lead is as follows:

- co-ordinate /assist in the management processes within the Directorates/Areas and Corporate Functions.
- assist managers with the completion of risk assessments.
- assist managers to identify potential hazards and dangerous occurrences and to undertake root cause analysis.
- investigate complaints.
- make representations to their management team, both written and verbal.
- assist in the arrangement of any health and safety review/inspection/audit.
- disseminate health and safety information.
- attend appropriate meetings and raise relevant matters;
- provide the corporate health and safety team with copies of inspection reports where appropriate.
- attend the Health and Safety Directorate/Area Leads meeting organised by corporate health and safety.
- escalate any significant health and safety issues.

### **7.12 Corporate Health and Safety** will provide expert advice and guidance in respect of all matters pertaining to the effective management of Health and Safety within the BCUHB.

Corporate Health and Safety shall provide the following:

- Support, advice and guidance for Directors and Managers.
- The development and maintenance of a Health Board approved Health and Safety Policy.

Assistance to the above shall consist of, but not restricted to, the following areas:

- Development of the Local Health and Safety Procedures.
- Effective communication and partnership working.
- Support the development of the Local/BCUHB Health and Safety Risk Profile process.
- Development of processes and procedures.
- Suitable and sufficient arrangements for the management of Health and Safety within the organisation that will support compliance with Statutory Legislation.
- Health and Safety Courses based on a training needs analysis.
- Development of key performance indicators capable of monitoring management performance and reporting.
- Audit and inspection processes.
- A robust adverse incident reporting and root cause analysis process.
- Links with partner organisations such as, but not restricted to, the Welsh Government and the Health and Safety Executive.
- Give support to the design and project teams in respect of the Health and Safety requirements for new and existing facilities.

### **7.13 Occupational Health and Wellbeing**

The BCUHB recognises the importance of an effective Occupational Health at Work Service. The BCUHB will establish and maintain an Occupational Health at Work Service to provide support and advice to the BCUHB in respect of the employment and maintenance of a workforce which is physically and mentally fit to carry out the tasks required of it.

It shall advise management and staff on all matters relating to the effect of good health on work or work on health, with the aim of preventing ill health and promoting health, thus ensuring a healthy and safe environment. A confidential Health at Work Service will be made available to all staff throughout the BCUHB offering the opportunity for management inspired or self-referrals. It will operate in an advisory capacity and will not have any disciplinary role.

Further details in respect of the Occupational Health at Work service are to be made available in the BCUHB Occupational Health at Work Policy.

### **7.14 Infection Prevention**

A corporate Infection Prevention Team has staff based on each of the 3 acute sites providing a service across all of BCUHB. This is supported by a clinical microbiology service provided by Public Health Wales. The team provides advice, support and direction on all infection prevention and control issues, training for staff, support for risk assessment, and policy and procedures to protect staff, patients and the public from risks associated with infection. They link closely with the corporate health and safety team and directorate managers, and clinical staff to support safe practice.

### **7.15 Primary Care Contractors (PCC)**

The BCUHB recognises that PCC have a moral and legal duty under Health and Safety legislation to manage Health and Safety risks within their business and this includes the prevention of harm or ill health to those who are not in their employ. In the case of the relationship with the BCUHB this relates to patients/clients who are receiving NHS care.

Through effective partnership and contractual arrangements the BCUHB will provide support, advice and guidance via the Primary Care Support Unit to ensure that the wider NHS community within North Wales benefit from the full range of expertise available to manage risks associated with Health and Safety. BCUHB will agree and facilitate effective monitoring arrangements in partnership with PCC to assist with managing and mitigating risks within their environment. This will enable BCUHB and PCC to fulfil the requirements of

the Healthcare Standards for Wales in addition to the statutory legislation to ensure good practice.

Monitoring arrangements will be undertaken in line with the contractual arrangements.

### **7.16 Commissioned Services**

When NHS funded care is commissioned outside the BCUHB, the organisation shall take reasonable steps to ensure that those locations where patient/s are placed are safe and suitable for the needs of the patient/s.

The Independent Sector Care Homes have their own responsibilities in respect of compliance with Statutory Legislation; however BCUHB has statutory responsibility for ensuring that patients placed in NHS funded care are cared for in a safe and suitable environment. BCUHB will ensure that this is achieved through partnership working with other regulatory agencies including Care Standards Inspectorate Wales, the local authority and the Health and Safety Executive to ensure that effective monitoring arrangements are in place and in line with contractual arrangements with the care providers.

## **8. Assurance**

### **8.1 Assurance Structure**

The Health Board shall gain its assurance in terms of the management of Health and Safety within the Organisation through the Strategic Health and Safety Committee and supporting organisational structures.

### **8.2 The Health Board**

The Health Board will receive regular reports from the Health and Safety Committee in respect of the following:

- BCUHB Corporate risk profile (Health and Safety risk) and actions taken
- Corporate Health & Safety Improvement Project Plan
- Directorate/Corporate Function performance summary reports
- Health and Safety incidents including trend analysis, lessons learned and actions taken
- Any enforcement action issued against the BCUHB
- Any specific matters regarding Health and Safety for escalation.

### **8.3 Quality, Safety and Experience Committee**

The Quality, Safety and Experience Committee shall receive the minutes and any significant issues to be escalated from the Strategic Health and Safety Committee.

The reporting structure is described below:



#### **8.4 Strategic Health and Safety Committee**

The Strategic Health and Safety Committee will provide the means by which management and staff representatives can develop and maintain the Health and Safety management process across the BCUHB and in so doing comply with the requirements of section 2 (7) of the Health and Safety at Work etc Act 1974.

The Committee will receive activity and performance reports from the Directorates/Areas & Corporate Functions and maintain oversight of the BCUHB Health and Safety risk profile.

The Committee will send minutes and Issues of Significance to the Quality, Safety and Experience Committee so they can be considered as part of the wider quality and safety issues identified. Significant issues will be escalated to the Health Board.

#### **8.5 Directorates/Areas & Corporate Functions**

The Divisions/Areas & Corporate Functions will provide assurance to the Strategic Health and Safety Committee that effective operational management is being maintained in line with the Health and Safety Policy and supporting management arrangements.

#### **8.6 Working in Partnership**

The BCUHB recognises the value and importance of pro-active engagement with its employees and its statutory duty in relation to the requirements of the Safety Representatives and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996. In so doing the BCUHB will work in partnership with its employees through the safety representatives of recognised trade unions and other professional bodies, providing facilities and assistance to these representative groups as required. The focus being to promote a pro-active partnership, working towards ensuring that a healthy and safe environment exists for those who may be affected by the undertakings of the BCUHB.

## **9. Training**

The BCUHB recognises that Health and Safety training is essential for its staff and is a legal requirement under Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999.

Corporate Health and Safety shall be responsible for the content and relevance of core safety related mandatory training courses delivered 'in house'.

Based on a training needs analysis suitable and sufficient training to be able to understand what hazards and risks they may face in the workplace and how to deal with them. In so doing the BCUHB seeks to provide all staff with training commensurate with the hazards and risks to which they may be exposed and impart the knowledge and skills to be able to deal with them in a safe and effective manner thereby reducing the risks to themselves and others. This approach applies to ALL STAFF without exception.

BCUHB managers will ensure that Health and Safety procedures, risk assessments and safe systems of work, as applicable are brought to the attention of their staff and observed by them. They will make provisions such that every member of staff can participate in Health and Safety training activities.

### **9.1 Corporate Induction**

Corporate Induction will be provided by Workforce & Organisational Development and includes Health and Safety Awareness.

### **9.2 Workplace Induction**

All new employees shall benefit from a comprehensive induction to the workplace. These inductions will not only focus on the duties of the individual but are to provide staff members with information in respect of the hazards and risks they may face and the control measures in place to mitigate such risks. Workplace risk assessments shall be made available to new employees.

### **9.3 Training for Health Board Executive Directors and Independent Members**

In response to identified training needs, the BCUHB will provide suitable and sufficient training and instruction to Members of the Board in respect of Health and Safety Management.

### **9.4 Training for Directors**

In response to an identified training need, the BCUHB will provide suitable and sufficient training and instruction to Directors in respect of Health and Safety management.

### **9.5 Training for Managers**

The BCUHB will ensure, through training needs analysis, that managers receive health and safety training in respect of their role in the day-to-day management of health safety, for example providing the 'Institution of Occupational Safety & Health' (IOSH) and the 'Managing Safely' course.

### **9.6 Roles Specific to Health and Safety Training**

This training will be identified by Managers and provided to employees as a direct result of the training needs analysis and the risk assessment process. The corporate health and safety department will provide advice and guidance in respect of the training required.

This training will include but is not restricted to:

- Risk Assessment
- Workplace Induction
- Personal Protective Equipment
- Provision and Use of Work Equipment
- Working at Height
- Confined Spaces
- Electrical Regulations
- Noise at Work
- Display Screen Equipment
- Manual Handling
- Violence and Aggression
- Control of Substances Hazardous to Health (COSHH)

Records of instruction received will be maintained.

## **10. Risk Assessment**

Health and Safety risk assessments for all activities and areas of the Health Board must be undertaken by management. Those assessments must be reviewed if the activity, equipment, substance or location changes; new assessments must be done if the risk changes as a result. All assessments must be reviewed by the nominated manager at least annually in any event.

Where risks are identified, appropriate measures must be put in place by management to reduce the risk to an acceptable level or eliminate the risk. All risk assessments must take into account staff abilities and disabilities.

Where the risk cannot be reduced to an acceptable level, the appropriate Director must consider whether it is appropriate to continue the activity. This should be done with reference to the Health and Safety Risk Assessment Guidance/accompanying documents which can be found on the Corporate Health and Safety Web Page.

## **11. Performance and Monitoring**

All organisations must identify and understand the scale, nature and distribution of the hazards which are created by their activities and the BCUHB is no different. In terms of measuring the hazard burden to which the organisation is exposed we shall, through the risk assessment process, develop a comprehensive Health and Safety risk profile as part of the BCUHB organisational risk register.

The risk profile shall be so ordered as to provide a means by which the organisation at all levels can adopt a practical and realistic approach to the management of Health and Safety risk. Measurement shall be through the addition of new risks and the effective elimination and or reduction of existing risks.

The Health Board will monitor performance by means of the following:

- Health and Safety Self Assessment Performance Tool – Is a six monthly performance indicator undertaken by each Directorate/Area & Corporate Function to measure the level of compliance.
- Health and Safety Review - Is a planned visit conducted by the Corporate Health and Safety Advisers focusing on the outcome of the health and safety self assessment performance tool.
- Local Inspections – Carried out by each Department/Ward.
- Review of DATIX Incident Reports – By Directorates/Areas and Corporate Functions/Corporate Health & Safety.

## **12. External Monitoring**

Independent assurances will include but not be restricted to, participation in the Health and Care Standards and performance reports provided by the Health and Safety Executive and Welsh Audit Office following inspections and audits of the Health Board.