



West Hampshire
Clinical Commissioning Group

HEALTH AND SAFETY POLICY AND ARRANGEMENTS

Version 1.11

Subject and version number of document:	Health and Safety Policy and Arrangements Version 1.11
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Author:	Deputy Director Performance and Planning Reviewed by Programme and Delivery Manager
CCG owner:	Chief Finance Officer
Links to other policies:	<ul style="list-style-type: none"> • Incident Management Policy & Guidance • Information Incident Management and Reporting Procedures • Alcohol & Substance Misuse Guidance • Maternity, Paternity, Adoption Leave and Shared Parental Leave and Pay Guidance • Managing Stress Policy
Review date:	November 2020
For action by:	All staff of the Clinical Commissioning Group
Policy statement:	The purpose of this policy is to ensure as far as is reasonably practicable, the health, safety and welfare of West Hampshire Clinical Commissioning Group staff and other persons.
Responsibility for dissemination to new staff:	Line managers
Mechanisms for dissemination:	All policies are published on both the CCG intranet and website. All new and revised policies are promoted through the CCG staff newsletter.
Training implications:	All staff at induction.
Resource implications:	There are no resource implications in relation to this policy.
Further details and additional copies available from:	Website: https://westhampshireccg.nhs.uk/document-tag/safety-and-incidents-policies/
Equality analysis completed?	Yes. The policy has been assessed for impact on employees, contractors and visitors with different protected characteristics. The policy is most relevant to people of different ages, genders, those with a range of disabilities, and women who are pregnant or new mothers. The policy has been amended to better reflect the different needs of these protected characteristic groups.

	In addition reference has been included to monitoring of the relevant protected characteristics of employees, contractors and visitors involved in or reporting incidents and risks.
Consultation process:	Executive Team, Policy Sub Group, Corporate Governance Committee (now Finance Committee)
Approved by:	Policy Sub Group via Chair's Approval
Date approved:	27 November 2019

Website Upload:

Website	Location in FOI Publication Scheme	https://westhampshireccg.nhs.uk/document-tag/safety-and-incidents-policies/
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Amendments Summary:

Amend No	Issued	Page(s)	Subject	Action Date
1	May-15	18 & 37	Security section added to document	
2	Sept-15	6 and 25	Section 8.1: to be reviewed annually DSE Assessment updated to reflect current process	Sept 15
3	Apr 16	8, 15, 24 & 25	DSE Assessment updated to reflect current process	Apr 16
4	May 18	30, 36, 38, 39, 40, 47, 51	Minor amendments to reflect structure changes and new life threatening allergy risk.	May 18
5	Oct 18	8, 16, 30, 34 and 41	Update job titles, ref to e-expenses, competent person, location of first aid supplies and to reflect current processes (v1.8)	26 Oct 18
6	May 19		Update job titles of individuals now responsible for Health & Safety (v1.9)	May 19
7	Sept 19		Update to reflect changes in location of services / structure changes / responsibilities and queries from May 2019 Policy Sub Group (V1.10)	Sept 19
8	Nov 19	Throughout	Update throughout to reflect queries from November 2019 Policy Sub Group, particularly vehicles owned by staff (V1.11)	Nov 19

Review Log:

Include details of when the document was last reviewed:

Version Number	Review Date	Reviewer	Ratification Process	Notes
1.3	02/12/2014	Emergency Management and Risk Manager	Policy Sub Group	Full review and security section added to document.
1.5	19/04/2016	Emergency Management and Risk Manager	Policy Sub Group	Full review. Minor amendments re DSE assessment.
1.6	21/06/2017	Emergency Management and Risk Manager	Policy Sub Group.	Full review. No amendments to content required.
1.7	25/04/2018	Emergency Management and Risk Manager	Policy Sub Group	Full review. Minor amendments to reflect structure changes and new life threatening allergy risk.
1.9	7/05/2019	Programme and Delivery Manager	Policy Sub Group	Full review. Minor amendments to reflect structure changes / responsibilities (see 6 above)
1.10	27/09/2019	Programme and Delivery Manager	Policy Sub Group	See amend 7 above.
1.11	26/11/2019	Programme and Delivery Manager	Chair's Action (Policy Sub Group)	See amend 8 above

HEALTH & SAFETY POLICY AND ARRANGEMENTS

INTRODUCTION

1. PURPOSE

1.1 The purpose of this policy is to:

- Ensure, as far as is reasonably practicable, the health, safety and welfare of West Hampshire Clinical Commissioning Group staff;
- Ensure, as far as is reasonably practicable, the health, safety and welfare of other persons. for example contractors, visitors, general public who may be affected by West Hampshire Clinical Commissioning Group's activities including travelling on West Hampshire Clinical Commissioning Group business and at non NHS sites;
- Satisfy the requirements of the relevant regulations as they apply, and any other associated, relevant regulations;
- Supplement and enhance associated, and appropriate internal policies

2. SCOPE and DEFINITIONS

SCOPE

- 2.1 This policy applies to those members of staff that are directly employed by West Hampshire Clinical Commissioning Group and for whom the CCG has legal responsibility. For those staff covered by a letter of authority/honorary contract or work experience the organisation's policies are also applicable whilst undertaking duties for or on behalf of West Hampshire Clinical Commissioning Group.
- 2.2 Further, this policy applies to all third parties and others authorised to undertake work on behalf of West Hampshire Clinical Commissioning Group.
- 2.3 As such any accidents and incidents in the Continuing Healthcare (CHC) office in Fareham are recorded with Fareham Borough Council if health and safety related as the CHC team is located in their building and would be covered by the Fareham Borough Council Health & Safety policy.

DEFINITIONS

- 2.4 Terms are defined as necessary within the appropriate Policy Arrangement.

3. PROCESS/REQUIREMENTS

- 3.1 Processes and requirements are dealt with in each section of the Policy.

4. ROLES and RESPONSIBILITIES

- 4.1 Roles and Responsibilities are dealt with in the 'Organisation' section of the Policy.

5. TRAINING

- 5.1 There are no statutory minimum training requirements. Training required is commensurate with the job role, responsibilities and risks encountered or likely to be encountered. Training needs/ types are outlined in the 'Training' section of the Policy.

6. EQUALITY ANALYSIS

- 6.1 West Hampshire Clinical Commissioning Group aims to commission and procure services, policies and measures that are fair and equitable. As part of its development, this policy and its impact on staff, service users and the public have been reviewed in line with West Hampshire Clinical Commissioning Group's Legal Equality Duties. The purpose of the assessment is to minimise and if possible remove any disproportionate adverse impact on employees, service users and the public on the grounds of race, socially excluded groups, gender, disability, age, sexual orientation, religion/ belief, pregnancy or maternity and marriage and civil partnerships.
- 6.2 The equality analysis (Appendix A) highlights that employees, contractors and visitors of different ages, genders, those with a range of disabilities, and women who are pregnant or new mothers are most likely to be impacted upon. The policy has been amended in the relevant sections to remove or reduce any potential negative equality impact.
- 6.3 There is also a need to monitor the protected characteristics of employees, contractors and visitors who are involved in health and safety incidents or who report risks and concerns. This will enable responsible managers and the CCG to identify any trends and take further necessary action.

7. SUCCESS CRITERIA / MONITORING THE EFFECTIVENESS OF THE POLICY

- 7.1 The effectiveness of the Policy will be reviewed regularly in line with the provisions laid out in the 'Monitoring and Review' section. Results will be kept in accordance with the provisions laid out in the 'Records and Documents' section.

8. REVIEW

- 8.1 This document may be reviewed at any time at the request of either staff side or management, but will automatically be reviewed on an annual basis.

9. REFERENCES AND LINKS TO OTHER DOCUMENTS

- 9.1 References and links are included at the start of each Policy 'Arrangement' where they may help the reader to understand the context of the Policy or additional documents and procedures that supplement the arrangement

10. HEALTH AND SAFETY POLICY: STATEMENT

- 10.1 We are committed to running West Hampshire Clinical Commissioning Group ('West Hampshire CCG') in such a way as to ensure, as far as is reasonably practicable, the health and safety of our staff whilst at work and also that persons not in our employment (Contractors, Visitors etc.), are not exposed to risks to their health or safety.

10.2 Whilst conducting any business presents various hazards and risks, we know from experience that if we properly plan our work with health and safety in mind then none of our activities should harm our staff or others. The central message is therefore:

10.3 We will not tolerate any behaviour or condition which could foreseeably result in the serious injury to anyone as a result of West Hampshire CCG's activities.

10.4 In general West Hampshire CCG aims to provide and maintain safe working conditions, equipment and systems of work. Our Policy will be made freely accessible to our employees and any other person(s) who may be affected by our activities.

10.5 Our Health and Safety Objectives are to:

- Establish and maintain an organisational structure with clearly defined responsibilities for implementing the policy and monitoring its effectiveness.
- Identify the health and safety hazards within our organisation and eliminate associated risks where reasonably practicable, avoiding personal risks before other kinds of loss.
- Evaluate the risks that cannot be avoided using the technique of risk assessment and reduce these risks to as low a level as is reasonably practicable using effective controls.
- Actively review and develop our health and safety standards, and revise them when there are changes in legislation, industry best practice or the technology available to us.
- Promote a culture of health and safety best practice and compliance with all relevant health and safety legislation.

10.6 West Hampshire CCG will provide adequate support and resources for achieving these objectives, and actively encourage continuous improvement in our health and safety performance. We will consult with employees on health and safety issues and ensure that they are given adequate instruction, information, supervision and training to carry out their jobs safely and without risks to health.

10.7 If any employee has any concerns about health and safety matters they must raise them with their Manager.

10.8 Whilst the Directors accept overall responsibility for ensuring compliance with health and safety law, various general and specific duties have been delegated to achieve this.

10.9 Health and Safety must be one of the primary concerns of all employees and regarded as an integral part of their normal duties. West Hampshire CCG considers that serious or persistent disregard of Health and Safety arrangements to be a disciplinary matter.

Signature:



Mike Fulford
Chief Operating Officer, West Hampshire Clinical Commissioning Group

Date: 10 January 2020

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ORGANISATION

This section outlines the way that we are organised for health and safety purposes and should be read in conjunction with the Organisation diagram.

West Hampshire CCG recognise that all members of management and employees can potentially be prosecuted for failing in their health and safety responsibilities and that this can lead to fines as well as damage to our reputation.

The responsibility for health, safety and welfare of employees and others who may be affected by our activities is a shared one. While the duties of each level within the organisation will differ, it is incumbent on each employee of West Hampshire CCG to discharge these to the best of their ability and be accountable for doing so.

Delegated Management Responsibility

The Deputy Director of Performance and Delivery has been designated by the Board as West Hampshire CCG's Lead Officer on Health and Safety. The postholder has the overall responsibility for effective oversight of the planning and implementation of the Health and Safety Policy in order to achieve our strategic objectives, ensuring that adequate resources are made available.

The Programme and Delivery Manager has been designated West Hampshire CCG's main Health and Safety Co-ordinator and competent person. The postholder has day-to-day responsibility for co-ordinating managerial effort in implementing effective Health and Safety Policies, Risk Assessments and Staff Training in line with our strategic objectives, making the case to Senior Management for resources where appropriate.

All Managers and Supervisors within West Hampshire CCG should liaise closely with each other to ensure all duties have been clearly assigned.

Employees

Every employee has health and safety responsibilities in Statutory and Civil law as well as under their contract of work. Employees should be aware that managers can only be expected to make workplace adjustments for known problems and that they are under a legal duty to inform their managers about any problems concerning the arrangements for their health or safety in the workplace

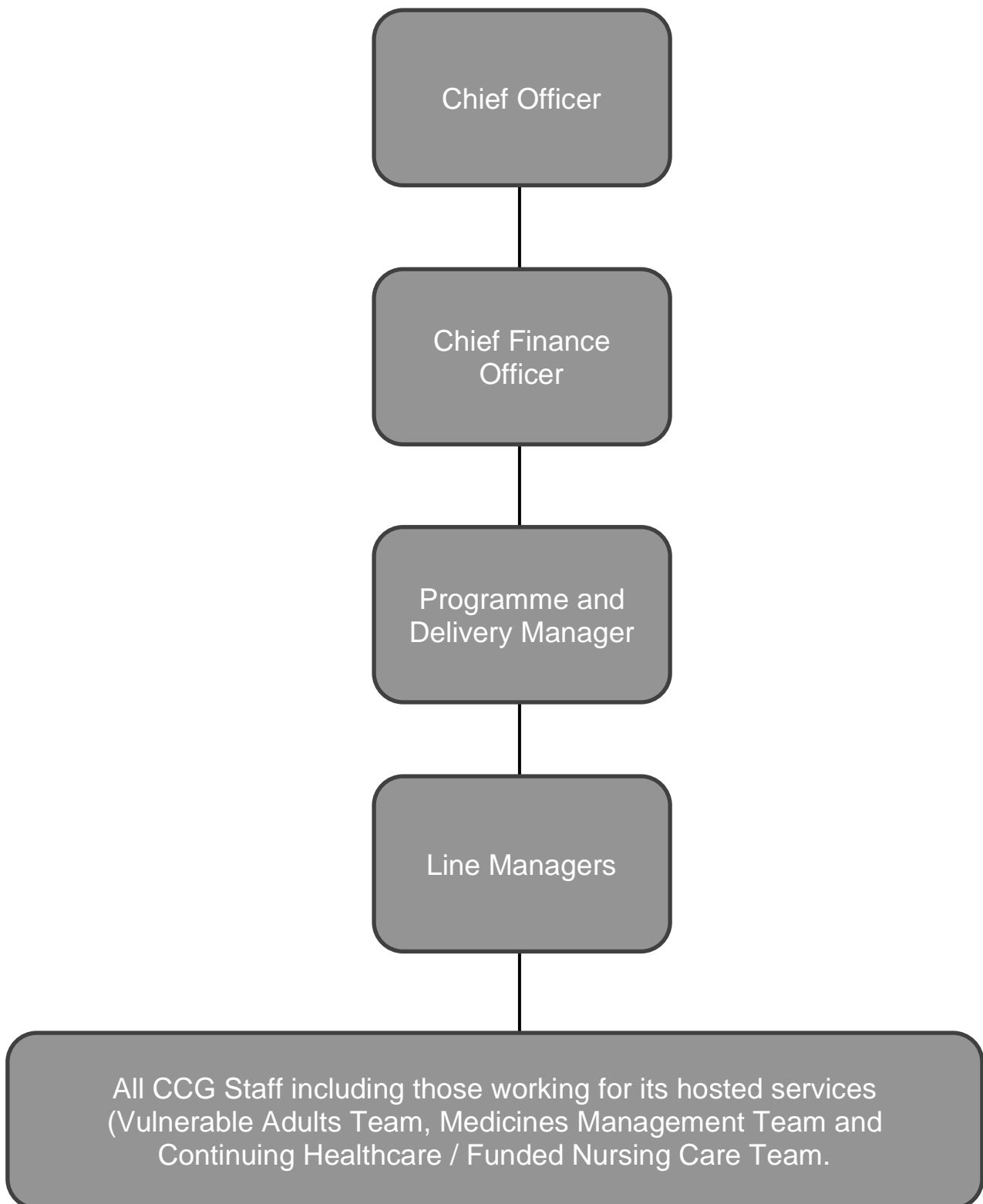
Competent Persons

In order to comply with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, the Programme and Delivery Manager is the CCG's 'Competent Person' to advise on the strategic and practical management of risk and compliance with statutory duties. We will use internal or external occupational health advisers where necessary to provide specialist expertise if/when required (see also 'Occupational Health' Arrangement)

Contractors

In the case where we need to employ specialist contractors to deliver any services for, or on behalf of West Hampshire CCG, these providers will be required to work in accordance with our policies, procedures and systems as well as complying with their own legal responsibilities.

Organisation Structure for Health and Safety



Programme and Delivery Manager (Health and Safety Co-ordinator)		
Health and Safety Policy	Assists in keeping West Hampshire CCG's Health and Safety Policy under review and relevant to our activities.	
	Arranges for the implementation of the Health and Safety Policy and procedures.	
	Supports West Hampshire CCG by co-ordinating the work needed to integrate health and safety into other procedures/structures in order that health and safety implications are considered alongside other decisions (e.g. new services offered, purchasing, recruiting, training etc.) both before, and following, their introduction.	
Premises/Area - specific matters	Checks, or arranges checks, to ensure that the parts of our buildings and physical environment that West Hampshire CCG are responsible for are in such condition as to not present risks to the health and safety of staff, contractors, visitors etc. and that adequate provisions are made for the welfare of staff.	
Delegation and Discipline	Ensures that the Health and Safety Policy is being implemented by clear delegation of health and safety duties and responsibilities, whether this is necessary for the safety of other staff, contractors etc., or where this relates to the safety behaviour of individual staff members.	
	Investigates and reports on serious non-compliance with our Health and Safety Policies and procedures.	
Information, Instruction, Training and Supervision	Info/Instruction	Reviews written procedures and verbal instructions given to staff to ensure health and safety principles are followed and any work is carried out safely.
	Training	Ensures that induction training for new staff has appropriate health and safety content and that staff are regularly updated as part of regular mandatory training.
		Promotes and supports a high standard of health and safety training for all staff.
	Supervision	Carries out regular supervisory checks of staff to check on safe working practices and in accordance with West Hampshire CCG procedures.
Ensures that those that need supervision for safety reasons get it e.g. arising out of risk assessment.		
Equipment/ Machinery	Carries out, or arranges for the carrying out of, regular checks to ensure that equipment that West Hampshire CCG is responsible for is in sound, safe working order.	

External Liaison	Liaises with external health and safety advisers, trainers etc. on health and safety matters as appropriate with the aim of raising awareness of relevant health and safety legislative requirements and their application within West Hampshire CCG.
	Provides day-to-day contact and problem-solving on health and safety matters which may occur with other Employers.
	In liaison with West Hampshire CCG's Managers, ensures that Contractors employed within their area are supervised/ monitored as necessary.
Incident Response	Assesses, investigates and sets up an action plan to address reported incidents using the Datix system.
	Ensures incident reports are completed and brought to the attention of the Management Team.
Monitoring Progress	Monitors progress towards individual health and safety targets and problem-solving, including the completion of prioritised risk assessments where necessary.
	Provides verbal and written reports to West Hampshire CCG showing clearly our health and safety status and the progress made towards the achievement of our West Hampshire CCG's health and safety objectives.

<i>Health and Safety Duties of All Managers and Supervisors:</i>	
Health and Safety Policy Awareness/ Improvement	Makes themselves fully familiar with West Hampshire CCG's Health and Safety Policy.
	Contributes to the formulation and revision of the Policy.
Policy Implementation and Discipline	Arranges for the implementation of the Health and Safety policy and procedures in liaison with the other Managers, and manages the implementation of such within his/her area of responsibility.
	Investigates and reports on serious non-compliance with our Health and Safety Policies and procedures.
Risk Assessments	Conducts or coordinates risk assessments on a prioritised basis, reviewing and revising them as necessary, and ensures the controls identified are implemented in safe systems of work.
	Makes sure that the results of risk assessments are transmitted to those affected by the risks.
Safety Behaviour	Demonstrates personal concern for health and safety at work through example and commitment, and encourages those that they manage or supervise to do the same.
Safety Equipment	Ensures that all necessary safety equipment is available, adequate, properly maintained and used as specified (including Personal Protective Equipment).

Information, Instruction, Training and Supervision	Info/Instruction	Ensures that all new employees have been taken through our health and safety induction and informed of their core health and safety duties, and that further information and instruction is provided at key stages e.g., refresher training, return to work etc.
		Makes sure that employees have been made aware of any foreseeable hazards connected with their work and risk reduction measures arising from risk assessments.
		Draws staff's attention to safe working procedures for their area of work, seeks input and responds to comments/suggestions for improvement.
		Keeps records of information and instructions issued to staff and of those who have been on training, along with details of content.
	Training	Assists with the analysis of staff training needs and encourage/instruct staff who need it to go on internal and external training courses.
	Supervision	Ensures that those that need supervision for safety reasons get it e.g. as part of controlling hazards arising out of risk assessment.
Pays particular attention to those being trained-up or lacking experience and others in the 'Potentially Vulnerable Groups' section of our health and safety Policy.		
Consultation with Staff	Consults with staff on health and safety matters in order to resolve local issues and refers strategic items to the attention of our Programme and Delivery Manager	
Incident Response	Ensures that West Hampshire CCG's incident reporting procedure is adhered to.	
	Involves themselves in the investigation of incidents in their areas of responsibility and in the development of incident prevention measures.	
Monitoring Progress	Monitors progress towards individual health and safety targets and report this regularly through to their Senior Manager.	
	Notifies their Manager of any concerns there are in fulfilling the above responsibilities.	

Health and Safety Duties of All Employees:	
Safety Behaviour	Acts with due care for the health, safety and welfare of themselves and others.
	The above includes acting responsibly and not indulging in any action which could be considered unsafe to themselves or others (e.g. pranks, horseplay etc.).
	Employees must not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare.
	Keeps their general work environment in a tidy and safe condition.
Safety Equipment	Makes proper use of protective clothing and safety equipment provided (and in accordance with any training or instruction provided by or on behalf of West Hampshire CCG).
	Reports any loss or obvious defect in equipment and takes reasonable care of it.
Co-operation	Cooperates with West Hampshire CCG's Managers by: <ul style="list-style-type: none"> ▪ Contributing to the writing of risk assessments; ▪ Cooperating with other employees in implementing West Hampshire CCG's health and safety Policy, and ▪ Complying with instructions and procedures for health and safety whilst at work.
Following Information, Instructions and Training Given	Undertakes mandatory Health and Safety training.
	Makes full and proper use of everything provided to them in accordance with any training or instructions given.
	Follows any system of work presented to them e.g. in procedure documents.
	Does not operate work equipment which is associated with obvious foreseeable risk unless they have authorization to do so.
Incident Response	Makes sure that an appropriate and accurate record is made on West Hampshire CCG's Datix Incident Reporting System following an incident or near-miss which has (or could have) led to injury or ill-health.
	Co-operates with any investigation which may be undertaken with the object of preventing incidents or their recurrence.
Reporting Concerns	Informs their manager(s) of any shortcomings in respect of the protection arrangements for health and safety and anything that could be considered as representing a serious or immediate danger to health and safety.
	Reports to their supervisors any defects in equipment, structures or safety procedures which they are aware of and of any incidents which have led or might have led to injury or damage.

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1.1 Accidents and Hazards (Reporting and Investigation)

It is the Policy of West Hampshire CCG to maintain an efficient accident and incident reporting procedure by following the steps detailed West Hampshire CCG Incident Management Policy and Guidance.

Accidents and incidents in the Continuing Healthcare (CHC) office in Fareham should also be recorded with Fareham Borough Council if health and safety related as the CHC team is located in their building.

1.2 Consultation and Communication with Employees on Health and Safety

West Hampshire CCG recognises that the safety culture within our organisation depends on effective consultation and communication between Management, Employees and other interested parties.

The Health and Safety Executive (HSE) in the guidance issued to the Health and Safety (Consultation with Employees) Regulations 1996 state that:

'The difference between providing information to your employees and consulting them is that consultation involves listening to their views and taking account of what they say before any decision is taken'.

It is West Hampshire CCG policy to adhere to the above principles.

This dialogue will ensure that those affected will be aware of issues that affect their health and safety and that the CCG is made aware of potential dangers (and other issues of health and safety). The CCG will deliver on this commitment through a Board paper / report or other less formal means such as staff newsletters, team meetings and communications through line managers.

1.3 Co-operation with other Employers and Contractors

West Hampshire CCG recognise its duties under Regulation 11 of the Management of Health and Safety at Work Regulations 1999 to ensure that there is co-operation and co-ordination where the workplace is 'shared' with other employers.

We also recognise our duties under Regulation 12 of the Management of Health and Safety at Work Regulations 1999 to provide information to employers of any outside undertaking working on our premises and under Regulation 15 to provide information to temporary workers.

We work alongside the Commissioning Support Unit (CSU) and in close liaison with NHS Property Services Ltd. We will also occasionally need to invite contractors onto our premises to carry out specific works.

It is the delegated duty of the Managers of the respective section to ensure that this co-operation is facilitated where necessary between the CCG and any other company. In particular, employees of other companies must be informed of any known risks to them which are a consequence of sharing the workplace and the preventive measure in place to avoid such risks.

1.4 Display Screen Equipment

West Hampshire CCG accepts the responsibility for ensuring that risks to health arising from Display Screen Equipment ('DSE') use are assessed and eliminated or reduced in

accordance with the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended in 2002).

In addition, all employee workstations should, wherever possible, meet the minimum standards as set out in the Regulations.

The Regulations lay down health and safety requirements aimed at protecting DSE users against visual, postural and other problems that can be associated with their use. We are committed to eliminating or minimising any risks to health that may arise from DSE use as far as is reasonably practicable.

This policy aims to ensure that all managers have access to all necessary information to ensure that the legislative requirements are met. The aim is that all employees are aware of the risks to health and safety that may arise from the use of DSE and are given the appropriate support in order to minimise them. In pursuance of this, the existence of the Policy will be drawn to the attention of employees and any other interested parties. The CCG undertakes to provide online mandatory annual DSE assessments for all staff, with professional advice available from competent staff employed by the occupational health service provider.

In accordance with the HR process, the CCG pays the total of the eye sight test and a £50 contribution to glasses, if stated they require glasses exclusively for visual display use. Staff must pay for the eye test and any corrective appliance. They will then need to claim via e-expenses and scanned evidence of the VDU prescription and receipts need to be provided.

1.5 Driving of Vehicles

West Hampshire CCG recognises that it has a general duty to ensure that, where employees are required to drive as part of their work e.g. to and from customer premises, so far as is reasonably practicable they and others are not put at risk by work-related driving activities.

This Policy Arrangement covers all vehicles used on Group business with the exception of those that are specifically regulated, such as Large Goods Vehicles (LGV), passenger service vehicles (PSV) and vehicles fitted with tachographs. This Policy also does not cover commuting, as this is not covered under Health and Safety laws as it is carried out by the employee outside of their contracted working hours.

Much of the guidance on driving issued by Enforcing Authorities is aimed at professional drivers i.e. those for whom driving represents the majority of their working role.

At West Hampshire CCG, none of our staff are in this category and so we will interpret and apply all relevant guidance as appropriate to our particular set of circumstances.

The main areas that need to be covered are that:

- Drivers are licensed and fit/competent to drive
- Vehicles are suitable and properly maintained, and
- Journeys are planned with safety in mind.

1.6 Electrical Safety

West Hampshire CCG undertakes to comply so far as is reasonably practicable with the Electricity at Work Regulations 1989.

All of the systems within the CCG will, so far as is reasonably practicable be constructed, maintained, used, and be suitable so as to prevent danger (i.e. risk of injury).

All employees must play their part by making sure that equipment is not used if it not in good working order e.g. if there are damaged leads, cracked or damaged plugs or exposed wires etc. Where such conditions are noticed, they must be reported through to their Manager who must then take appropriate action commensurate to any foreseeable risks of injury.

1.7 Fire Precautions and Emergencies

West Hampshire CCG recognises its responsibilities towards employees and to those not in our employment who may face risks arising out of fire occurring on its premises and commits to comply with its duties under the Regulatory Reform (Fire Safety) Order 2005 ('Fire Safety Order 2005').

In particular, we will:

- Ensure a suitable and sufficient assessment of the risks to which persons are exposed is carried out by a Competent Person, for the purpose of identifying the general fire precautions required to comply with the above Order.
- Identify any group of persons who might be especially at risk in case of fire e.g. persons who are mobility or otherwise impaired.
- Provide and maintain such general fire precautions as are necessary to safeguard those who use the workplace.
- Provide information, instruction and training to employees about the fire precautions in the workplace.
- List Fire Wardens for each floor on noticeboards for buildings where the CCG holds responsibility.

1.8 First Aid

West Hampshire CCG recognises its duties to ensure the provision of adequate and appropriate equipment, facilities and personnel to enable first aid to be given (Health and Safety (First Aid) Regulations 1981).

- It is the CCG's health and safety policy to comply with the Approved Code of Practice to the above Regulations. As part of this, we will provide adequately trained personnel, appoint a suitable person (e.g. the Programme and Delivery Manager or an administrator) to take charge and inform employees of first-aid provisions. The CCG's trained first aiders are displayed on each floor for buildings where the CCG holds responsibility.

1.9 Hazardous Substances ('COSHH')

West Hampshire CCG recognises its duties under the Control of Substances Hazardous to Health Regulations 2002 ('COSHH') to employees and any others at work, who may be faced with risks to health from exposure to hazardous substances.

The COSHH regulations stipulate that assessments should be carried out where there are risks from exposure to hazardous substances so that appropriate prevention and control measures can be formulated - including where necessary the provision of information, instruction and training for persons who may be exposed.

In general terms, our work does not include foreseeable use or exposure to hazardous substances. We also do not generate any hazardous substances e.g. chemicals, dusts etc. as a normal part of our work.

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Therefore, the degree of management input required is limited to ensuring that:

- staff are aware of the need to take normal precautions with the few low-hazard substances used, and where necessary the simple precautions to be adopted are explained on induction,
- managers ensure that the use of substances with hazard warning labels is kept to the absolute minimum and wherever possible less hazardous substances are purchased,
- staff report through any additional hazardous substances encountered, and
- others who may be exposed are considered where appropriate e.g. cleaners, maintenance staff, visitors, members of the public etc. where the hazardous substance is controlled by us.

The CCG will make best endeavours to ensure that up-to-date information on the potential hazards of all substances used within its premises is available.

All staff are required by the CCG to play their part in limiting exposure to any hazardous substances that may be encountered during the course of their work. Particular care must be taken with the introduction of new substances (e.g. the purchase of industrial-strength cleaning products not normally encountered in everyday life).

1.10 Information, Instruction and Training

It is the policy of West Hampshire CCG to ensure that employees are given adequate instruction, information and training to carry out their jobs safely and without risks to health, in accordance with our legal obligations under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999.

1.11 Manual Handling

West Hampshire CCG recognises its duties towards employees for manual handling operations that involve a risk of injury (Manual Handling Operations Regulations 1992).

It is the CCG's policy to comply with the Regulations by avoiding the need for manual handling operations involving risk wherever it is reasonably practicable to do so. Where there are no reasonable alternatives then we will aim to control the risk to employees who carry out manual handling operations.

Where risks can be foreseen, control should be informed by the carrying out of assessments for those groups of employees or operations identified as being at potential risk. This may include training in Manual Handling hazards and techniques where necessary to control the risks.

1.12 Security

West Hampshire CCG recognises its duties under the Health and Safety at Work etc. Act 1974 (HSW Act) and the Management of Health and Safety at Work Regulations 1999. It is the policy of West Hampshire CCG to provide a safe and healthy workplace and working environment for all employees and for those using its premises. The CCG recognises its responsibility to ensure so far as it is reasonably practicable, the health, safety and welfare at work of our employees and non-employees, and to consider the risks, including the risk of reasonably foreseeable violence; decide how significant these risks are; decide what to do to prevent or control the risks; and develop a clear management plan to achieve this. In addition, the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) require the CCG to notify the Health and Safety Executive in the event of an

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accident at work to any employee resulting in death, major injury, or incapacity for normal work. This includes any act of non-consensual physical violence done to a person at work.

1.13 Monitoring and Reviewing of Health and Safety

Monitoring and reviewing of our health and safety practices is an important part of West Hampshire CCG's risk management system. The aim is to assess how effective our Health and Safety Policy and risk control systems are, and make timely adjustments where necessary.

In addition, there are legal imperatives in regulation 5 of the Management of Health and Safety at Work Regulations 1999, and the relevant section of the Approved Code of Practice.

1.14 Occupational Health

West Hampshire CCG acknowledges its duties towards its employees in maintaining good health and putting in place adequate controls to prevent the work we do from harming the health of our workforce.

Many of the other 'Arrangements' sections of this Policy have an Occupational Health dimension (e.g. the use of Display Screen Equipment, the prevention of harm whilst Manual Handling etc.) and should be referred to for more information where necessary.

Where other occupational health matters come to light we will investigate these as necessary and consult with external Occupational Health specialists if required.

For example, advice and assistance will be sought where a medical opinion is required on medical issues arising from pre-employment health questionnaires, long-term absence through injury or illness, making reasonable adjustments for persons with a disability, ill-health retirement, etc.

1.15 Potentially Vulnerable Groups

It is the general policy of West Hampshire CCG to ensure that all employees and others who may be potentially vulnerable (e.g. due to their age, disability or condition) are given an appropriate level of support so that they are not harmed by being in our working environment. See separate West Hampshire CCG policies, e.g. on Lone Working, Maternity, etc.

1.16 Records and Documents to be Kept Relating to Health and Safety Matters

Managers within West Hampshire CCG must make themselves aware of the health and safety documents and records that they are required to keep (see below) and ensure that these documents and records are readily retrievable.

1.17 Risk Assessments

West Hampshire CCG recognise its obligations under Regulation 3(1) of the Management of Health and Safety at Work Regulations 1999 to make a suitable and sufficient assessment of the risks to the health and safety at work of employees and others who may be affected by our activities.

These risk assessments must be recorded in writing and employees need to be notified of the significant findings.

It is the responsibility of Managers to ensure that risk assessments are conducted in respect of the activities carried out under their control and that action is then taken to eliminate any identified risks or to reduce them to an acceptable level.

Where there is the possibility that, despite this, residual risks remain unacceptably high, then a formal written safe system of work must be compiled in order to exercise a higher level of control over the risks presented by the activity.

Senior Management will ensure that where necessary, they and their staff undertake training in Risk Assessment so that staff throughout the organisation can make a valid contribution to our risk assessment process.

1.18 Work Equipment

West Hampshire CCG recognises its duties under the Provision and Use of Work Equipment Regulations 1998 ('PUWER').

The CCG will ensure, so far as is reasonably practicable, that all work equipment is suitable for its purpose and is maintained in an efficient state, in efficient safe working order and in good repair.

1.19 Workplace (Health, Safety and Welfare) Provisions

It is West Hampshire CCG's policy to comply so far as is reasonably practicable with the provisions of the Workplace (Health, Safety and Welfare) Regulations 1992 ('Workplace Regulations').

The following should satisfy the legal and moral obligations in respect of the welfare facilities required in our workplace.

- As we operate within leased office accommodation many of these areas are the responsibility of our landlords, NHS Property Services Ltd. In certain cases our lease forbids the interference with the working environment without prior permission e.g. displaying of signs and notices. We will therefore liaise closely with their representatives to ensure the necessary permissions are sought and problems identified are resolved for buildings where the CCG holds responsibility.

PART 2: HEALTH AND SAFETY ARRANGEMENTS

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2.1 Accidents and Hazards (Reporting and Investigation)

All Locations

Policy

It is the Policy of West Hampshire CCG to maintain an efficient accident and incident reporting procedure by following the steps detailed West Hampshire CCG Incident Management Policy and Guidance.

2.2 Consultation and Communication with Employees on Health and safety

All Locations

Policy

West Hampshire CCG recognises that the safety culture within our organisation depends on effective consultation and communication between Management, Employees and other interested parties.

The Health and Safety Executive (HSE) in the guidance issued to the Health and Safety (Consultation with Employees) Regulations 1996 state that:

'The difference between providing information to your employees and consulting them is that consultation involves listening to their views and taking account of what they say before any decision is taken'.

It is West Hampshire CCG policy to adhere to the above principles.

This dialogue will ensure that those affected will be aware of issues that affect their health and safety and that the CCG is made aware of potential dangers (and other issues of health and safety). The CCG will deliver on this commitment through a Health and Safety Committee or other less formal means such as staff newsletters, team meetings and communications through line managers.

Mechanism and Principles for Consultation

Consultation with staff will take place directly with staff through team meetings/staff newsletters or other staff communications.

Staff can also raise issues for wider discussion at any time with the Programme and Delivery Manager

The following principles underpin the health and safety consultative process:

- consultation will occur prior to decisions being made
- feedback will be provided to affected staff throughout the consultative process
- staff are made aware when their views are being sought and how to put their views forward

Issues for Consultation

In accordance with "A guide to the Health and Safety (Consultation with Employees) Regulations 1996", the CCG will consult staff on:

- any measure at the workplace which may substantially affect their health and safety
- personnel appointed to assist in the implementation of Health and Safety Policy e.g. Fire Wardens, First Aiders etc.
- information on risks to health and safety, preventative and protective measures
- health and safety training

- any health and safety consequences that arise as a result of introducing new systems or technology.

Communication with Staff

The full Policy will also be available on our website and made freely accessible to employees and any other person(s) who may be affected by our activities.

Employees will be made aware of any amendments to the Health and Safety Policy and any other matters affecting their health, safety and/or welfare.

Information will be provided to affected staff on:

- any risks identified by risk assessments
- preventive and protective measures needed to minimise the risks
- fire procedures and the identity of any staff nominated to take responsibility for fire protection matters
- any risks which have been notified to us by another employer whose activities may affect the health and safety of our staff.

Acknowledgement may be required from staff, to identify that they have been made aware of any such changes.

2.3 Co-operation with other Employers and Contractors

All Locations

Policy

West Hampshire CCG recognise its duties under Regulation 11 of the Management of Health and Safety at Work Regulations 1999 to ensure that there is co-operation and co-ordination where the workplace is 'shared' with other employers.

We also recognise our duties under Regulation 12 of the Management of Health and Safety at Work Regulations 1999 to provide information to employers of any outside undertaking working on our premises and under Regulation 15 to provide information to temporary workers.

We work alongside the Commissioning Support Unit (CSU) and in close liaison with our landlords, NHS Property Services Ltd. We will also occasionally need to invite contractors onto our premises to carry out specific works for buildings where the CCG holds responsibility.

It is the delegated duty of the Managers of the respective section to ensure that this co-operation is facilitated where necessary between the CCG and any other company. In particular, employees of other companies must be informed of any known risks to them which are a consequence of sharing the workplace and the preventive measure in place to avoid such risks.

Contractors hired by us

The CCG recognises that it has a legal duty to ensure that, so far as is reasonably practicable, any contractors carrying out work do so in an organised, safe and professional manner, and that they are monitored where appropriate.

Although we cannot exercise intimate control over the work of contractors it will be necessary for staff involved in hiring them to make reasonable checks to ensure that they are not commissioned in a negligent manner as this could prejudice the safety of the contractors themselves, our employees, visitors, or others.

When the work requires the co-ordination and co-operation of more than one set of contractors, or between the contractors and our own employees, we will make best

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endeavours to ensure that these arrangements are in place and fully understood before the work begins.

We will provide relevant information to any contractors or their employees who are working in our offices as to the emergency procedures in place and any health and safety risks.

We also undertake to inform contractors of any factors which may influence their safety e.g. other maintenance work being carried on nearby, changes in the normal system of work which they may have become accustomed to etc.

If there are perceived risks in work that is to be contracted out then we will request that a written risk assessment is carried out by the contractor and submitted before work is allowed to start.

NHS Property Services Ltd Contractors

NHS Property Services Ltd has responsibility to manage the contractors they hire. As far as is reasonable, we will cooperate with such work and will report through any problems experienced to the relevant NHS Property Services Ltd manager.

External Inspections

Health and Safety inspections may be made from time to time by inspectors from the Local Authority. Employees have a duty to co-operate with these inspectors.

The CCG's Programme and Delivery Manager should always be notified if a visit and inspection has been arranged by the above authorities.

In certain circumstances, Health and Safety Inspectors have the power to issue 'Improvement' or 'Prohibition' notices.

If a CCG employee is issued with such a legal Notice, or a warning that such a notice may be served, then this must be brought to the immediate attention of their line Manager and the CCG's Programme and Delivery Manager

2.4 Display Screen Equipment

All Locations

Policy

West Hampshire CCG accepts the responsibility for ensuring that risks to health arising from Display Screen Equipment ('DSE') use are assessed and eliminated or reduced in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992 (as amended in 2002).

In addition, all employee workstations should, wherever possible, meet the minimum standards as set out in the Regulations.

The Regulations lay down health and safety requirements aimed at protecting DSE users against visual, postural and other problems that can be associated with their use.

We are committed to eliminating or minimising any risks to health that may arise from DSE use as far as is reasonably practicable.

This policy aims to ensure that all managers have access to all necessary information to ensure that the legislative requirements are met. The aim is that all employees are aware of the risks to health and safety that may arise from the use of DSE and are given the appropriate support in order to minimise them.

In pursuance of this, the existence of the Policy will be drawn to the attention of employees and any other interested parties.

The CCG undertakes to provide online mandatory annual DSE assessments for all staff, with professional advice available from competent staff employed by the occupational health service provider.

Duties

All staff who have management responsibility for others who use DSE are required to implement this policy. In particular they must ensure that:

Risks to the health of their employees have been assessed on a priority basis. Initially this will take the form of issuing and then analysing staff self-assessment questionnaires. Where concerns have been expressed and in particular physical symptoms analogous with DSE-use have been reported then the manager must follow this up to ensure that the risks have been reduced as far as reasonably practicable and in accordance with the DSE Regulations.

Such records will be kept and are reviewed whenever there is a significant change in working practices or the working environment

DSE workstations comply with minimum standards and that any remedial actions identified following DSE assessments are implemented, as far as is reasonably practicable.

All employees are given adequate information and training in DSE use via the online training and assessment module and the potential risks involved, as well as statutory levels of assistance with eyesight tests etc. on application to their manager.

Employees are encouraged to plan their work so as to take intermittent breaks from DSE work.

All employees who use DSE are required to:

- Notify their Managers about any condition which they reasonably suspect could have an effect on their health and safety whilst working with DSE.
- Contribute to, and co-operate with, the self-assessment process regarding their workstation and display screen equipment.
- Comply with any measures subsequently adopted for their health and safety.
- Report any fault in their DSE and any problems they may be experiencing with the use of DSE or in their workstation.

Certain events should also trigger Managers into scheduling a review e.g.:

- When a new workstation is installed, or an existing one is substantially revised.
- When a new employee takes up post at an existing DSE workstation.
- When working practices change substantially.
- When an employee reports symptoms that might have resulted from DSE use.
- In any other circumstances where, in communication with employees, risks come to light that have not already been considered or assessed.

DSE workstation assessment process

The process for DSE workstation assessment is as follows:

- Annual self-assessment using the mandatory online DSE workstation training and assessment module. This is available online as part of the CCG's standard mandatory training package.
- Discuss outcomes with your line manager if there is a need for further assessment or alternative equipment. Your line manager can authorise minor changes such as footrests, anti-glare devices, alternative mouse or mats and keyboard rests.

- If further assessment is required or if it appears a chair with additional features may be appropriate, your online manager should arrange for Occupational Health to carry out an assessment.
- Broken chairs do not need occupational health assessment and should be replaced via your line manager requesting a replacement from the admin team.
- If the occupational health assessment indicates the requirement for a new chair, you should log the incident on Datix and your line manager should order a chair through the admin team. If an individual's circumstances or workstation changes, then they should use the online system to carry out a DSE assessment in addition to the mandatory annual assessment.

Laptop Computers

Managers are advised to consider the length of time that employees will use laptop computers and advise employees against extended periods of continual use. Because the ergonomic setup of laptops is less than ideal, laptops should not be used on a long term basis as a substitute for investing in a suitable workstation (or laptop 'docking station' or other bespoke arrangement which has the effect of a separate keyboard and mouse and raised screen). Laptops can be made available for those who need to carry out computer based work in more than one physical location, and for limited time periods.

Eye and eyesight tests

Employees who have been assigned the use of a PC or laptop are designated as DSE 'Users' and as such are entitled to a free eye and eyesight test on request. These tests are normally at intervals of not less than 2 years, or at intervals recommended by the examining optometrist/optician. However, Users who believe that they are suffering DSE-related eye problems may request an eye and eyesight test at any time.

The CCG will meet the full cost of eye tests for Display Screen Equipment (DSE) users where prescribed exclusively for display screen work (VDU) where these are not free. The CCG will contribute up to £50 towards corrective lenses and frames. Staff must pay for the eye test and any corrective appliance. Staff will then need to claim via e-expenses and scanned evidence of the VDU prescription and receipts need to be provided.

The provision of 'normal' corrective lenses will be at the employee's own expense.

2.5 Driving of Vehicles

All Locations

Policy

West Hampshire CCG recognises that it has a general duty to ensure that, where employees are required to drive as part of their work e.g. to and from customer premises, so far as is reasonably practicable they and others are not put at risk by work-related driving activities.

This Policy Arrangement covers all vehicles used on Group business with the exception of those that are specifically regulated, such as Large Goods Vehicles (LGV), passenger service vehicles (PSV) and vehicles fitted with tachographs. This Policy also does not cover commuting, as this is not covered under Health and Safety laws as it is carried out by the employee outside of their contracted working hours.

Much of the guidance on driving issued by Enforcing Authorities is aimed at professional drivers i.e. those for whom driving represents the majority of their working role.

At West Hampshire CCG, none of our staff are in this category and so we will interpret and apply all relevant guidance as appropriate to our particular set of circumstances.

The main areas that need to be covered are that:

- Drivers are licensed and fit/competent to drive.
- Vehicles are suitable and properly maintained.
- Journeys are planned with safety in mind.

Drivers

Licensing/fitness to drive

The CCG will check driving licenses on agreeing to individual employees driving for work (as opposed to 'commuting') and reserves the right to make occasional 'spot checks'.

Before driving on behalf of the CCG, employees must make their line manager aware of any driving convictions and the level of 'points' that are at any one time on their license as this may impact the future arrangements.

Employees are expressly forbidden, by virtue of their contract and the CCG's alcohol and substance misuse guidance to work for us whilst under the influence of drink or drugs – this applies equally to driving as any other kind of work.

Reporting Accidents and Incidents

Any accident while undertaking car travel for CCG related work (not commuting) - whether or not involving damage to the car, and however minor in nature - must be reported by the employee as soon as possible to the Programme and Delivery Manager using the Datix incident reporting system (i.e. by completion of a DIF1 form).

An accident report must be completed at the time of the accident, identifying independent witnesses wherever possible.

Road Safety Laws

West Hampshire CCG requires and expects that employees driving on CCG business will do so in a responsible manner having regard to current rules and to the Highway Code.

The CCG does not condone the breaking of any national road safety laws (e.g. speed limits), or local bye-laws (e.g. parking rules).

In-car communications

In regard to mobile communications, the CCG expects all employees to obey the law i.e. not to drive whilst using a hand-held mobile phone. If a call comes in whilst driving, the standard course of action should be to wait until reaching a safe stopping area, switch off the engine, and then take the message/call back as appropriate. There is currently no national ban on the use of 'hand-free' or other devices such as satellite navigation, but staff are strongly advised to adhere to the manufacturers/suppliers guidance on their safe use during a car journey.

Insurance

Employees are required to notify the office before they have reason to drive a vehicle on behalf of the CCG so that our insurance cover can be checked to include this driver/vehicle. In addition all vehicles taken out on behalf of the CCG must be secured i.e. keys out and locked even when left for short periods as failure to do this may invalidate such insurance.

Staff must make themselves aware of the relevant breakdown cover for each vehicle prior to driving in order that a swift response is made in case of breakdown (for business continuity as well as personal safety reasons).

Vehicles

Vehicles provided (e.g. hired) on behalf of the CCG

Staff with such vehicles are responsible for:

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- daily routine maintenance e.g. checking tyres, oil, petrol and water levels and ensuring windscreens and mirrors are clean and clear of condensation, dirt etc. before driving off.
- ensuring that the tax and insurance are up-to-date.
- ensuring that, when the use is for an extended period of time, the manufacturers' periodic maintenance is duly carried out by authorised repairers.
- reporting safety defects to the Programme and Delivery Manager as well as to their line manager immediately after they are identified or as soon as is practicable.
- ensuring there is no smoking within the vehicle.
- only using the vehicle in accordance with the manufacturers' handbook and for the purpose it was originally designed e.g. in relation to maximum loads and occupancy.

The CCG reserves the right to withdraw the provision of any vehicle provided on our behalf in cases where the terms of its provision have been contravened by the member of staff concerned.

Vehicles owned by staff

Staff who wish to use their own vehicles for driving on CCG business must comply with the CCG Travel & Expenses Policy, even if there is no plan to make an expenses claim.

The Travel & Expenses Policy states the following:

The NHS has a duty of care obligation to all of its employees. To ensure compliance of this duty of care and to make sure that this obligation is fulfilled, all employee who are required to use their own vehicle and / or wish to claim for expenses for business purposes will have to submit the following documentation, details of which will be stored within the E-Expenses system:

- Driving Licence (photo card)
- Car Insurance – must include insurance cover for business use
- Car Tax – online confirmation
- MOT/Vehicle registration form – copy of online / electronic certificate

Once submitted the documents are to be kept up to date at all times by employees. The system will remind staff when documents are due to expire so the system can be updated.

Employees are expected to report any material changes e.g. endorsements on their licence, change of insurer as they occur.

Mileage claims will be rejected by the system if any or all of the documents are out of date.

Managers in approving the payments are confirming that they have had sight of the documents and that they are valid.

Journeys

It is the responsibility of all staff to plan their journeys to include an adequate number of rest breaks and in order to meet expected arrival times. Where possible, staff should aim to take breaks from driving at the level recommended by the Highway Code i.e. a 15 minute break every two hours.

Staff should also plan journeys in such a way as to ensure total travelling time (together with anticipated working time at the destination) would not cause excessive tiredness, and hence cause danger to themselves and other road users.

If at any time an employee feels too tired to safely drive, then alternative arrangements e.g. an overnight stay in approved accommodation MUST be agreed with their line manager.

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Inclement Weather

The CCG does not want to endanger staff by expecting them to drive during extreme adverse weather conditions (e.g. when roads are snow-bound, flooded etc.). In such cases, staff should discuss the planned journey with their line Manager.

Risk Assessment

If any employee feels that their health and safety whilst driving on official CCG business is being compromised due to any of the above listed factors, then they must bring this to the attention of their line Manager or the Programme and Delivery Manager so that information can be gathered and a risk assessment carried out.

The CCG has carried out a 'General Risk Assessment' (see 'Risk Assessment' section), and if necessary work-related driving risks will be given a ranking within this scheme in order that the CCG continues to take action on the highest risks first.

2.6 Electrical Safety

All Locations

Policy

West Hampshire CCG undertakes to comply so far as is reasonably practicable with the Electricity at Work Regulations 1989.

All of the systems within the CCG will, so far as is reasonably practicable be constructed, maintained, used, and be suitable so as to prevent danger (i.e. risk of injury).

All employees must play their part by making sure that equipment is not used if it not in good working order e.g. if there are damaged leads, cracked or damaged plugs or exposed wires etc. Where such conditions are noticed, they must be reported through to their Manager who must then take appropriate action commensurate to any foreseeable risks of injury.

Standards

Except for the CHC office in Fareham Council Offices, which is maintained by the owners, Fareham Borough Council.

Our mains wiring is maintained by our landlords, NHS Property Services Ltd. However, if any electrical work is organised by West Hampshire CCG, we will obtain assurances from contractors that the standards given in latest edition of the Institution of Electrical Engineers Regulations will be followed.

West Hampshire CCG will ensure so far as is reasonably practicable that each installation or appliance used within the CCG has the appropriate insulation, earthing, connections and integrity of the conductors and that there are appropriate means from protecting from excess current and cutting off the supply and isolating it. Staff must ensure that electrical circuits are not overloaded e.g. by preventing the 'piggy-backing' of plug adaptors and extension leads and by keeping leads and extensions to a minimum.

Most electrical accidents occur because persons are working on or near equipment which is thought to be isolated but which is in fact 'live', or which is known to be 'live' but those involved are without adequate training or appropriate equipment or they have not taken adequate precautions.

Working on or near exposed live conductors (greater than 50Vac or 120Vdc) is therefore not to be carried out under any circumstances by our employees.

Competent Persons

Wherever work needs to be carried out on electrical equipment, the CCG will ensure that only persons competent to do so will carry out this work and that so far as is reasonably

practicable the working environment (including working space, access to the work and provision for lighting) is arranged to minimise the risk to the health and safety of all employees or others who may be affected.

Equipment not owned by West Hampshire CCG

Managers should note that any mains-powered electrical equipment that they have allowed to be used by employees at work – whether or not it belongs to the CCG – will then come under the CCG's responsibility for ensuring its safe use.

It is therefore the CCG's general health and safety policy to not allow staff to bring onto our premises mains powered items that have not been purchased by the CCG. If a manager wishes to do so, they should discuss this with the Programme and Delivery Manager to ensure an adequate assessment of the risks is undertaken.

Testing and inspection

The general testing regime is divided into that for mains equipment such as fuse boards and 'behind the plug socket' wiring (or 'hardwiring'), and portable equipment (most items with a plug attached).

The mains equipment in our offices will be inspected and certificated on a rolling program at a minimum of 5 yearly intervals, which is the responsibility of our landlords, NHS Property Services Ltd.

The CCG retains responsibility for portable appliance testing ('PAT') as per the appropriate risk assessment.

Following advice issued by the HSE on electrical testing in low-risk environments, our 'formal visual inspection' will be carried out in conjunction with our DSE assessments, and electrical testing will be arranged for high risk equipment e.g. kitchen appliances.

The relevant testing and inspection records are kept by the Programme and Delivery Manager for buildings where the CCG holds responsibility.

2.7 Fire Precautions and Emergencies

All Locations

Policy

West Hampshire CCG recognises its responsibilities towards employees and to those not in our employment who may face risks arising out of fire occurring on its premises and commits to comply with its duties under the Regulatory Reform (Fire Safety) Order 2005 ('Fire Safety Order 2005').

In particular, we will:

- Ensure a suitable and sufficient assessment of the risks to which persons are exposed is carried out by a Competent Person, for the purpose of identifying the general fire precautions required to comply with the above Order.
- Identify any group of persons who might be especially at risk in case of fire e.g. persons who are mobility or otherwise impaired.
- Provide and maintain such general fire precautions as are necessary to safeguard those who use the workplace.
- Provide information, instruction and training to employees about the fire precautions in the workplace.
- List Fire Wardens for each floor on noticeboards where the CCG holds responsibility for the building.

- The exception is the CHC offices in Fareham Council Offices, which is the responsibility of the owners, Fareham Borough Council and therefore CCG staff will have to comply with their Fire Safety policy and evacuation procedure.

Fire Risk Assessment

The Fire Safety Order 2005 requires the Responsible Person to conduct a fire risk assessment of the workplace, and to appoint one or more Competent Persons, to assist with carrying out any of the preventive and protective measures required by the Order.

In our currently occupied premises, many of the responsibilities fall to NHS Property Services Ltd as our Landlords e.g. provision of fire alarm system, extinguishers, emergency lighting etc. They carry out a Fire Risk Assessment for the building as a whole and our responsibility, by agreement, is to take part in this assessment and comply with any relevant control measures set out in the Assessment.

Where we carry out any subsequent survey/inspection that identifies actions which are required and are the responsibility of our landlords, NHS Property Services Ltd, they will be notified in writing as soon as possible.

Following the Risk Assessment, and any subsequent annual review, the Programme and Delivery Manager will review the significant findings, and take the responsibility to implement any measures necessary to safeguard our employees (or others in our premises) and fulfil our legal obligations under the above Order. Our Health and Safety Policy will be updated as necessary to reflect any new arrangements.

The fire risk assessment will be reviewed whenever there is reason to suspect that it is no longer valid or there has been a significant change in the matters to which it relates.

Information, Instruction and Training

West Hampshire CCG will consult with employees about nominating people to carry out particular roles in connection with fire safety and about proposals for improving fire precautions.

We will provide appropriate information, instruction and training to our employees about the fire precautions in our workplace: initially when they start working for us; from time to time throughout the period they work here, and if our activities change such that there are new or increased risks.

Information will be given on any risks to them identified by the fire risk assessment, about the measures the CCG has taken to prevent fires, and their part in implementing these, and how these measures will also protect them if a fire breaks out.

This information will be supplemented where necessary by standard 'Fire Safety Signs' put up around our premises.

West Hampshire CCG will also provide information as necessary to any contractors, their employees or others not in our direct employment but who are working on our site.

All employees must co-operate to ensure the workplace is safe from fire and its effects, and must not do anything that will place themselves or other people at risk.

Any interference with any safety systems within our premises (e.g. blocking fire exits) will be regarded as a serious breach of this Health and Safety Policy.

Emergency Evacuation Plan

In the event of an emergency, all members of staff have a responsibility to participate fully in evacuating the buildings and assist their managers as requested.

All Employees are responsible for ensuring that the designated fire escape routes in their areas are kept clear of obstructions that would hinder their use in an emergency.

The emergency evacuation procedure is the same no matter what the nature of the emergency e.g. fire, flood, bomb threats, etc. and is always initiated by sounding the fire alarm by breaking the glass at a 'call point'.

Thereafter, staff must proceed quickly to the designated external Assembly Point using the most appropriate Fire Escape route. If there is a particular hazard that would prevent the use of an exit then Fire Warden(s) will direct staff to use an alternative means of escape. Lifts must not be used, nor should staff hesitate to finish off work, pack up personal belongings etc.

A Fire Warden or local manager will visually 'sweep' the premises, checking all of the rooms are clear, and report this to the responsible person at the Assembly Point.

It should be noted that the exception is the CHC office in Fareham Council Offices, which is the responsibility of the owners, Fareham Borough Council and therefore CCG staff will have to comply with their site Fire Safety policy and evacuation procedure.

Fire Extinguishers

Where the CCG holds responsibility for the building, our landlords, NHS Property Services Ltd are responsible for ensuring that sufficient firefighting equipment and appliances are provided by outsourcing this task to a suitable contractor, and that prompt action to remedy any deficiencies is followed through.

The type and quantity of fire extinguishers will be carefully assessed to ensure that they will be available and effective in the case of emergencies. All staff are reminded that they should only fight a fire if they feel competent to do so and should put the safety of themselves and others above the need to protect property.

Emergency Lighting

Emergency lighting is provided and maintained by our landlords, NHS Property Services Ltd wherever there is a risk of workers being exposed to particular risk in the event of a power failure, where borrowed illumination is neither suitable, nor sufficient. The Emergency lighting is powered from an independent source to that of the normal lighting and is automatic i.e. it activates without the need for action by any person.

Emergency lighting will be provided throughout our buildings especially in areas where changes of level or direction require such provision.

Fire Evacuation Tests

Fire evacuation drills are carried out jointly with NHS Property Services Ltd in accordance with the individual Fire Risk Assessments – normally twice a year and the results recorded. Accidental/unintentional sounding of the fire alarm that leads to a full evacuation of the premises may substitute for any planned drill.

Gas Safety

Natural Gas

Our Landlords, NHS Property Services Ltd, are responsible for carrying out annual gas safety checks using a registered 'Gas Safe' engineer.

If any staff smell a gas leak then they should call the British Gas emergency line (0800 111 999) and inform their line manager.

If any gas appliances are damaged then this must be reported through to NHS Property Services Ltd.

Medical Gases

West Hampshire CCG will maintain any medical gas bottles and associated equipment (regulators etc.) in accordance with best practice. In particular, any such stored gas will be declared to our landlords, NHS Property Services Ltd, and stored in accordance with any stipulations generated by the Fire Risk Assessment.

No Smoking Policy

As well as the hazard to health, smoking materials present a potential fire hazard, particularly in the areas in and around areas where flammable and combustible materials are stored (including paper, cardboard etc.).

West Hampshire CCG has a 'No Smoking' Policy which bans smoking in all areas of our buildings.

This complies with our duties under the Health Act 2006 which came into force on 1st July 2007 and prohibited smoking in all enclosed workplaces.

The CCG will also take reasonable steps to ensure that anyone working, visiting or using the areas subject to the smoking ban are aware of the legal prohibition.

Any staff who smoke must refrain from smoking in external areas where they impinge on any entrances and exits or where there is a possibility of creating a fire risk.

2.8 First Aid

All Locations

Policy

West Hampshire CCG recognises its duties to ensure the provision of adequate and appropriate equipment, facilities and personnel to enable first aid to be given (Health and Safety (First Aid) Regulations 1981).

It is the CCG's Health and Safety Policy to comply with the Approved Code of Practice to the above Regulations. As part of this, we will provide adequately trained personnel, appoint a suitable person (e.g. the Programme and Delivery Manager or an administrator) to take charge and inform employees of first-aid provisions. The CCG's trained first aiders are displayed on each floor of its buildings.

Definitions

First Aiders and 'Appointed Persons' (also covered by this section - see definitions ¹below) play an important role in providing an immediate response to accidents, utilising vital lifesaving skills.

First aid is defined as treatment:

- for the purpose of preserving life and minimising the consequences of injury and illness until help, from a medical practitioner or nurse, is obtained; or

¹ First Aider

A person who has attended, and passed either of the following 2 courses approved by the HSE:

1. First Aid at Work (**FAW**) a course over 18 (contact) hours. In order to retain this qualification they must attend a 12 (contact) hours refresher course, prior to the expiry of their existing certificate, which qualifies them for a further 3 years.

2. Emergency First Aid at Work (**EFAW**), a course over 6 (contact) hours

In order to retain this qualification they must attend another EFAW course, prior to the expiry of their existing certificate, which qualifies them for a further 3 years.

Appointed Person

A person who has been nominated to take charge of the first-aid equipment and facilities, and to call the emergency services etc. in cases where a first-aider is not required.

- of minor injuries which would otherwise receive no treatment or which do not need treatment by a medical practitioner or nurse.

Minimum First Aid Cover

In terms of numbers of First Aiders it is our Health and Safety Policy to adhere to the Guidance to the First Aid at Work Regulations and have regard to the following factors:

- the number of employees expected to be present at any one time.
- the hazards and risks involved in the work.
- the distance from outside facilities/treatment.
- the maintenance of First Aid cover as far as possible when staff are absent e.g. due to holidays.

In terms of risk, our offices currently only have low risk areas with few visitors to the premises.

Every floor will have available least one 'Emergency First Aid at Work' (EFAW) trained person as a minimum. Any fully trained 'First Aiders' are seen as both advantageous and supplementary to this minimum. Where necessary, to ensure full cover in areas that we share with the Commissioning Support Unit (CSU) we will liaise with them in order to make efficient use of such resources.

This decision will be held under review should our risk-profile, staff numbers, or availability of additional help change in the future. Our First Aiders will be chosen on the basis of willingness and ability to carry out the duties and their availability during our normal working hours.

Training will be undertaken by training organisations approved by the Health and Safety Executive. The First Aiders will also be sent on 'refresher' courses at 3 year intervals to ensure their skills are practised and kept up-to-date.

Responsibilities

The main responsibilities of a First Aider are to:

- Maintain the designated First Aid box(es) and ensure that first aid materials are re-stocked.
- Respond promptly to all calls for first aid assistance.
- Assess the situation quickly and take any steps necessary to prevent further injuries (e.g. isolation of electrical equipment).
- Summon additional help, via others if appropriate.
- Identify as far as possible, the injury or nature of the illness affecting the casualty.
- Provide first aid treatment to Group employees, or visitors in accordance with their training.
- Remain with the affected person(s) until recovery or transfer to an appropriate person e.g. the emergency services, doctor etc.
- Complete an Incident Report Form.

It is the responsibility of each First Aider/Appointed Person to notify their Manager of any changes to their circumstances that will affect their ability to deliver first aid e.g. if they are moving location, leaving the CCG or become unavailable for extended periods (e.g. due to sickness, extended leave etc.).

First Aid Information to Employees and Others

The CCG is under a duty to inform all employees of first-aid arrangements including the location of equipment facilities, and the identity of trained persons. This is done initially at induction and where necessary supplemented by signs.

First Aid Supplies

First Aid Kit(s) will be provided in the kitchen areas for the First Aider to look after and request the Business Management team to replenish stocks as necessary (lists of permissible items should be kept with each kit e.g. no aspirins, creams or sprays).

The first aid kits should be readily visible and identifiable (a white cross on a green background) to meet the Health and Safety (Safety Signs and Signals) Regulations 1996.

Records

Our online Datix Incident Report Form (the electronic DIF1 form) should be completed for all instances where first aid is given and submitted on Datix. This should be done as soon as possible, and within 2 working days, by the affected staff member or their nominee.

2.9 Hazardous Substances ('COSHH')

All Locations

Policy

West Hampshire CCG recognises its duties under the Control of Substances Hazardous to Health Regulations 2002 ('COSHH') to employees and any others at work, who may be faced with risks to health from exposure to hazardous substances.

The COSHH regulations stipulate that assessments should be carried out where there are risks from exposure to hazardous substances so that appropriate prevention and control measures can be formulated - including where necessary the provision of information, instruction and training for persons who may be exposed.

In general terms, our work does not include foreseeable use or exposure to hazardous substances. We also do not generate any hazardous substances e.g. chemicals, dusts etc. as a normal part of our work.

Therefore, the degree of management input required is limited to ensuring that:

- staff are aware of the need to take normal precautions with the few low-hazard substances used, and where necessary the simple precautions to be adopted are explained on induction.
- managers ensure that the use of substances with hazard warning labels is kept to the absolute minimum and wherever possible less hazardous substances are purchased.
- staff report through any additional hazardous substances encountered.
- others who may be exposed are considered where appropriate e.g. cleaners, maintenance staff, visitors, members of the public etc. where the hazardous substance is controlled by us.

The CCG will make best endeavours to ensure that up-to-date information on the potential hazards of all substances used within its premises is available.

All staff are required by the CCG to play their part in limiting exposure to any hazardous substances that may be encountered during the course of their work. Particular care must be taken with the introduction of new substances (e.g. the purchase of industrial-strength cleaning products not normally encountered in everyday life).

COSHH Assessments

Due to the low level of risk outlined above, the CCG does not anticipate the need for any detailed risk assessments - if this situation changes, then assessment forms are available from the Programme and Delivery Manager.

Control will be principally exercised by precisely following instructions given on any packaging where a hazard indication is given, and by limiting the number of substances available for use to the absolute minimum.

Where additional information is needed then the suppliers/manufacturers are by law obliged to give to the purchaser information relating to the hazards and handling in the form of a 'Data Sheet' (material safety data sheet (MSDS)).

If we become aware of any risks associated with any hazardous substance used that could affect other building users then we undertake to make this information available to them and to notify our landlords, NHS Property Services Ltd.

Legionella

As we operate within leased office accommodation it is the responsibility of our landlords, NHS Property Services Ltd to ensure that a suitable and sufficient risk assessment is carried out for the risk of exposure to legionella bacteria. They will also have a duty to carry out any necessary remedial works to our hot and cold water systems and ensure they are maintained and monitored in accordance with best practice.

West Hampshire CCG will assist in the risk assessment when requested and ensure all outlets are flushed through to an agreed frequency and any other user control requirements outlined in the risk assessment are undertaken. We will also inform our landlords, NHS Property Services Ltd if any of our leased areas are likely to be left unused for long periods of time so that the necessary adjustments can be made to the control regime.

The exception is the CHC office in Fareham Council Offices, which is the responsibility of the landlords, Fareham Borough Council and therefore CCG staff will have to comply with their policy and procedures.

Asbestos

As we operate within leased office accommodation it is the primary responsibility of our landlords, NHS Property Services Ltd, to carry out a risk assessment in accordance with the Control of Asbestos at Work Regulations. Following this, they will also prepare and maintain an Asbestos Management Plan and ensure any remedial works are carried out in accordance with the risk assessment and best practice.

West Hampshire CCG undertakes not to carry out any works on the building fabric without consulting our landlords, NHS Property Services first. Where we have been given responsibilities as tenants as a result of the asbestos survey, risk assessment and Management Plan we will ensure that our staff and anyone who we engage to do work for us are informed of the necessary preventive and protection arrangements.

The exception is the CHC office in Fareham Council Offices, which is the responsibility of the landlords, Fareham Borough Council and therefore CCG staff will have to comply with their policy and procedures.

2.10 Information, Instruction and Training

All Locations

Policy

It is the policy of West Hampshire CCG to ensure that employees are given adequate instruction, information and training to carry out their jobs safely and without risks to health,

in accordance with our legal obligations under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999.

The following types of training are also dealt with specifically where necessary under the relevant sections of the Policy: Fire Precautions; First Aid; Manual Handling; Hazardous Substances, and Display Screen Equipment.

Responsibility for Training

All Managers have the overall responsibility for ensuring that they and their employees are adequately trained in health and safety, commensurate with job requirements.

The CCG will maintain records of all staff training, including that for Health and Safety reasons on personnel files.

Employees have a duty to attend relevant health and safety training courses where this has been deemed to be a necessary part of our health and safety arrangements, and to complete mandatory e-learning training programmes when these are specified.

New Employees

Every new employee of the CCG will be made aware of this policy.

Employees are also advised of various health and safety issues, including their duties in law by being taken through an induction checklist and given a comprehensive 'Induction Programme' pack.

Records of all induction/training carried out will be kept in personnel files.

2.11 Manual Handling

All Locations

Policy

West Hampshire CCG recognise its duties towards employees for manual handling operations that involve a risk of injury (Manual Handling Operations Regulations 1992).

It is the CCG's policy to comply with the Regulations by avoiding the need for manual handling operations involving risk wherever it is reasonably practicable to do so. Where there are no reasonable alternatives then we will aim to control the risk to employees who carry out manual handling operations.

Where risks can be foreseen, control should be informed by the carrying out of assessments for those groups of employees or operations identified as being at potential risk. This may include training in Manual Handling hazards and techniques where necessary to control the risks.

Duties

Managers' duties include:

- Identification of areas of potential risks involving manual handling. This will initially be achieved through the general risk assessment carried out as a requirement of the Management of Health and Safety at Work Regulations 1999.
- Determining whether it is reasonably practicable to eliminate manual handling tasks or automate/mechanise the operations.
- Ensuring specific manual handling risk assessments are conducted on activities which still present a potential risk of injury.
- Deciding on the implementation of the recommendations resulting from the risk assessments.

- Communicating the results of the risk assessments to all affected staff.
- Monitoring the on-going effectiveness of the control measures.
- Ensuring that where risk assessments have been carried out, they are reviewed as necessary (e.g. work practices modified or staff changes).

A meaningful assessment can only be based on a thorough practical understanding of the type of manual handling tasks to be performed, the loads to be handled, the capabilities of the individual/s and the working environment in which the tasks will be carried out. The aim of such assessments is to determine the measures required to reduce the risk of injury to the lowest level that is reasonably practicable.

Employees have a specific duty under the Regulations to use proper systems of work that have been introduced to lessen injuries caused by manual handling operations.

Records will be kept of any assessments carried out if/when significant risks have been identified. These records will be kept by the Programme and Delivery Manager but will be freely available for staff to view.

2.12 Security

All Locations

Policy

The CCG is committed to promoting and improving security for all of its staff, and visitors. The CCG aims to provide and maintain a calm, pleasant and secure working environment, where staff and visitors are confident of their personal safety and the security of property, buildings and equipment are safeguarded.

All CCG employees have a responsibility to ensure that security measures and procedures are observed at all times. Managers of the CCG should take a leading role in promoting and developing a security conscious culture.

Objectives

The objectives of the Security Policy are to:

- ensure, as far as is reasonably practicable, the security of WHCCG staff;
- ensure as far as is reasonably practicable, the security of other persons for example contractors, visitors, and the general public who may be affected by WHCCG's activities including travelling on WHCCG business and at non NHS sites;
- satisfy the requirements of the relevant regulations as they apply, and any other associated, relevant regulations; and
- supplement and enhance associated, and appropriate internal policies.

Scope

Security management is creating a WHCCG environment where the risks to people and property are minimised from any actions that may lead to personal injury, threat to life or the disruption of the business activity of the CCG. Effective security management is linked to other policy areas, including Health and Safety and lone working. THE CCG Security Policy supports the Policy and work of NHS Protect.

Security Management Director (SMD)

The Chief Finance Officer is the WHCCG designated Security Management Director. The SMD has overall responsibility for all aspects of Local Security Management matters, with priority for dealing with matters of violence against staff, ensuring measures to address the following areas are implemented:

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- Lone worker safety
- Prevention and management of violence and aggression against staff
- Protection of assets, including data and hazardous materials

Deputy Directors/Heads of Department

It is the responsibility of all Deputy Directors/Heads of Department to:

- Communicate the content and requirements of the Security Policy within the area of their responsibility
- Ensure the implementation of the Security Policy within the area of their responsibility by providing support and advice to their managers.
- Co-ordinate security issues with other employers who share the worksite with the CCG

Hampshire and Isle of Wight Fraud and Security Management (HloWF&SMS)

The Security Management Service sits within the above team hosted by North Hampshire CCG. It supplies the Local Security Management Specialist, and as such this organisation provides services to the CCG.

Local Security Management Specialist (LSMS)

The nominated Local Security Management Specialists (LSMS) are to provide professional skills and expertise to tackle security management issues across a range of proactive and reactive action. The overall objective of the LSMS will be to work on behalf of WHCCG to deliver an environment that is safe and secure.

The LSMS will:

- Have passed the accredited training from the NHS security management service.
- Be responsible for the management of security of all the locations within the CCG:
- Carry out inspections, write reports and advise the CCG on all matters of security.
- Be responsible for the design and installation of CCTV and security systems.
- Respond to NHS initiatives and security alerts.
- Provide advice to managers at all levels on security measures and dealing with violence.
- Provide assistance to managers implementing risk reduction measures and post incident management.
- Monitor the effectiveness of implementation of the security policy by means of Security Surveys.
- Report the results of Security Surveys undertaken to the Risk Department.
- Ensure there is a prompt review of any significant violent, criminal or security incident and that it is used to evaluate policy guidelines and recommend security measures to avoid further incidents i.e. Access Control, Panic Alarms and CCTV.
- Work with the Service Managers to improve all aspects of Security within the CCG
- Provide assistance to managers undertaking security risk assessments.
- Refer staff (through their managers), as necessary, to the CCG Counselling Service or to Occupational Health.

Programme and Delivery Manager

The Programme and Delivery Manager is responsible completing the Security Risk Assessment for WHCCG and for ensuring that all security related Datix Incident Reports are notified within 24hrs of receipt (Mon – Fri) to the LSMS, and for working with the LSMS to ensure that Health and Safety aspects of security incidents are dealt with in the appropriate manner.

Manager's Duties

All managers in the CCG are responsible for security within their work area. Managers are required to assess security risks as part of the general assessments for their service, develop action plans and implement security measures as appropriate.

In particular, all managers and supervisory staff shall ensure:

- Arrangements are in place to ensure the security of premises and assets and the safety of staff, patients and visitors taking all preventative measures to safeguard people and property.
- That risk assessments are in place and where significant security risks exist local procedures are in place to minimise or reduce the impact.
- That staff are aware of local and CCG security procedures and the results of risk assessments by effective training and communication.
- Security arrangements are reviewed following incidents and ensure necessary changes in procedures are implemented.
- If appropriate, disciplinary procedures are initiated for staff who breach security arrangements.
- That all criminal activities are reported to the Police and that all security incidents are reported and safeguard reports are completed.
- That all staff are briefed with regard to their own personal security and local procedures, and if appropriate, are supported to attend security training.
- That all staff are issued with staff identification badges (ID badges).
- That work areas under their control are operated in accordance with this policy and any associated procedures.
- That all breaches of security arrangements are investigated and reported immediately in accordance with laid down incident reporting procedures.
- That all staff on leaving the CCG return their ID badges, uniforms, keys and electronic passes to the Business Support team, either through a Directorate PA or direct to the administration assistants. For staff based at Fareham Council Offices their ID badges, uniforms, keys and electronic passes are returned to their line manager and then the admin manager.
- That rules with regard to confidential paperwork are adhered to.
- That official visitors/ contractors are issued with the relevant visitor badge via reception and this is monitored to ensure they are carried at all times when on CCG premises.
- That all security incidents are recorded using the CCG's Datix incident reporting system.
- That any suspicion of fraud is reported to the local counter fraud service.
- That a response is made at the earliest opportunity to any request from employees for advice on security concerns.
- That appropriate support is given to staff involved in any security related incident.

Responsibilities of All Staff

All CCG employees, whether permanent, temporary or working through an agency or other third party, are responsible for acquainting themselves with this policy, following the guidance contained in it and complying with all security measures in their department.

All employees have a duty to co-operate with the implementation of this policy. In particular they should ensure:

- They are vigilant and responsible in the workplace, bringing to the attention of their immediate manager, as appropriate, any suspicious activity they observe on CCG premises.
- They attend appropriate security training or education.
- They co-operate with managers to achieve the objectives of the security policy, highlighting any identified risks.
- They report all security related incidents on the Datix Incident Reporting System.
- They wear their staff identification badges at all times.
- They report immediately to their departmental manager any loss of or malicious damage.
- They attend training / awareness sessions when provided.

CCG Premises

NHS Property Services, our landlords, are responsible for risk assessing and developing any local procedures required to ensure security of premises, for example explicit arrangements for the items listed below. This list is not exhaustive and managers may identify other issues.

- Access to CCG premises including key codes;
- Security of CCG and staff property, providing appropriate secure storage facilities e.g. lockers;
- Relevant arrangements for contractors to access premises as required.

The exception is the CHC office in Fareham Council Offices, which is the responsibility of the landlords, Fareham Borough Council and therefore CCG staff will have to additionally also comply with their security policy and procedures.

Access fobs

Where used, access fobs will be issued to staff when joining the CCG by the Business Management team, and will be returned to the Business Management team when staff leave CCG employment.

Fobs should not be swapped or given to unauthorised personnel at any time. Lost or missing fobs should be reported to the Business Management team immediately. Fobs can be temporarily issued by the Business Management team to trusted visitors on request.

Identification Badges

ID Badges are issued by the Business Management team office to all staff on commencement of employment. ID badges must be worn at all times whilst on CCG premises or business. Persons not wearing an ID badge should be challenged and asked to identify themselves.

When staff leave CCG employment, all ID badges should be returned to the Business Support team, either through a Directorate PA or direct to the administration assistants and destroyed. For staff based at Fareham Council Office, ID badges should be returned to their line manager and then the admin manager.

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If an ID is lost or stolen this must be reported to the Business Management team and a Datix online incident form completed.

Visitors/ Contractors

All visitors/contractors should report to reception where they are to be signed in and out of CCG premises and issued with a visitor pass, which must be displayed at all times whilst on CCG premises. For security reasons, visitors must be escorted to and from their destination as appropriate within CCG buildings.

CCG Property and Assets

Managers are responsible for undertaking risk assessments regarding the security of assets held within their departments and this should be included in the service/departmental general risk assessment. Where appropriate, items should be placed on the IG asset register. The Business Manager should review CCG property details held by their team on a regular basis to ensure that all items are securely managed.

All managers and staff should take all reasonable steps to safeguard CCG property whilst it is in their care.

Personal Property

Staff should be aware that the CCG cannot accept liability for loss or damage to staff property brought onto its premises.

Staff are advised to take adequate precautions to ensure the safety of their possessions. Where storage has been provided for personal use, the individual to whom it is allocated will be responsible for ensuring it is locked.

Staff must report any loss of or damage to their belongings and co-operate in any consequent enquiry into the loss or damage. If private property has been stolen then it is the owner's and not the CCG's responsibility to report the matter to the Police. This should be after notifying a line manager and reporting the incident on the Datix online incident form. Any investigation reference number assigned should also be recorded on the incident log.

The LSMS will if requested, advise staff on the security of their property. Any loss of private property must be reported without delay.

Security of Information - Confidentiality

All safeguards should be taken by staff that handle, receive and use confidential patient/personal information. It is essential that all staff taking up employment with the CCG understand and follow the appropriate CCG information governance policies.

Security of Motor Vehicles

The CCG cannot accept liability for any private motor vehicle or its contents when they are parked on a CCG site or when the car is in being used by an employee on CCG business. See WHCCG Travel Policy.

Prevention of Violence to Staff

The CCG has a duty to provide a safe and secure environment for all employees and visitors and has a zero tolerance approach to violence or abusive behaviour. The CCG takes a very serious view of violence, abuse and aggression at work and recognises its responsibility to protect employees and others who may be subjected to any acts of violence, abuse or aggression whether or not the act results in physical or non-physical assault and whether carried out by members of the public, patients, relatives or by members of staff. Violent or

abusive behaviour will not be tolerated and decisive action will be taken by the CCG to protect staff, patients and visitors.

Please refer to the WHCCG Lone Working Policy for further details of appropriate lone working precautions.

Bomb Threats

Any member of staff receiving such a call should immediately report it to the police and inform the most senior manager available. Making such malicious calls is an offence contrary to *Section 51 of the Criminal Law Act 1977* and should always be reported to the police.

Reporting of Security Incidents

All staff have a responsibility to report all crimes and breaches of security and should refer to the relevant Incident Reporting and Management Policy.

Reporting security incidents falls into the following categories:

Assault or Abuse of a Staff Member, Patient or Visitor

All incidents of assault or abuse must be reported through the Datix online incident form and should be reported as soon as practicable after the incident. Staff incidents should be dealt with in line with NHS protocols regarding violence and aggression against staff. Staff should inform their Line Manager of all physical assaults. Visitors and staff should always be asked if they wish the police to be involved. The Programme and Delivery Manager will inform the Local Security Management Specialist as soon as is reasonably practicable.

A Security Incident or Crime Is In Progress

This should be reported immediately to the Police and the senior manager on site. A Datix online incident form must be completed as soon as possible after the incident and passed on as per the CCG incident reporting policy. The Programme and Delivery Manager will inform the Local Security Management Specialist as soon as is reasonably practicable.

An Incident Is Discovered after the Fact and the Time of the Offence is Not Known

The Datix online incident form must be completed as soon as the crime is discovered and then passed on as per reporting policy. The manager should assess the need to involve the police, e.g. it may be necessary to obtain a police reference number for insurance purposes. The Programme and Delivery Manager will inform the Local Security Management Specialist as soon as is reasonably practicable.

Theft of Information

Where a security incident involved the **theft of patient identifiable information** this must immediately be reported in accordance with the CCG's Information Incident Handling and Reporting Procedures.

Suspected Fraud or Corruption

All cases of **suspected fraud or corruption** should be notified immediately to the Chief Finance Officer who will then give advice or arrange investigation of the incident, in accordance with the appropriate CCG policy.

Support to Staff Following an Incident

The CCG will fully support staff who report an incident. When an offence is committed against persons or property within WHCCG and the culprit is detected or detained, it is the policy of WHCCG to report the matter to the police and seek redress where appropriate. An online Datix Incident must be completed for all security incidents.

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In the event of an incident staff must report it to their appropriate manager/ supervisor immediately before referral to other agencies, e.g. Occupational Health, Human Resources, etc. (incidents requiring an immediate Police presence or response excepted).

Right Management is contracted by WHCCG to provide access to a free and confidential employee assistance programme.

Following an incident, managers should ensure that staff members are given the opportunity to discuss the incident and receive assistance in the preparation of reports on the incident. Staff should be given the opportunity to contact supportive agencies. The Occupational Health Department can provide support directly, or arrange referral to external agencies if necessary.

Managers should arrange for staff to have time off to attend supportive agencies. Staff may wish to consult with their professional staff organisation or trade union or Local Security Management Specialist to obtain further advice and assistance.

2.13 Monitoring and Reviewing of Health and Safety

All Locations

Policy

Monitoring and reviewing of our health and safety practices is an important part of West Hampshire CCG's risk management system. The aim is to assess how effective our Health and Safety Policy and risk control systems are, and make timely adjustments where necessary. In addition, there are legal imperatives in regulation 5 of the Management of Health and Safety at Work Regulations 1999, and the relevant section of the Approved Code of Practice.

Monitoring of Health and Safety

Monitoring on a day-to-day basis

Each Manager and Supervisor must monitor what they are doing to implement the Health and Safety Policy to assess how effectively they are controlling risks. The scale of monitoring needed, and any associated procedures, will depend on the type of risks and the control measures that have been set up following risk assessment (see 'Risk Assessment' Policy Arrangement) - particularly when they are critical to ensure safety. All Managers and Supervisors should note that it is important to give good feedback when sound health and safety performance is noted, and to involve workers in monitoring whenever possible.

Proactive Monitoring

Examples of this type of monitoring activities include:

- Inspections and checks to ensure that general arrangements described in the Health and Safety Policy are being adhered to and are effective.
- Monitoring against set performance targets e.g. completion of specific risk assessments, staff training initiatives, monitoring the implementation of improvements set by Director-level decisions etc.
- Inspections and checks to ensure that control measures described in risk assessments and safe working procedures/method statements are being followed and are proving effective, and contractors are being monitored where necessary.

Reactive Monitoring

Examples of this type of monitoring activities include:

- Investigating the immediate and underlying causes of incidents and accidents and sickness absence rates.

- Responding to the introduction of new standards e.g. in the form of legislation, new processes or products.
- Acting in response to complaints, enforcement visits etc.

In both types of monitoring it may be appropriate to record the results of the activity in a brief report and to be on the lookout for underlying themes or trends which may not be apparent from looking at events in isolation. This should include trends associated with factors such as the age, gender and any disability of employees, contractors or visitors involved in health and safety incidents or raising concerns.

Reviewing of Health and Safety

Internal Review

The Programme and Delivery Manager (Manager responsible for Health and Safety) will monitor progress over the year and where necessary request information from other managers or supervisors and through consulting with our employees (see 'Consultation and Communication' Policy Arrangement).

Where necessary, extra 'on-site' inspections can be set in order to gather information for a formal review, or direct that more attention is given to particular proactive or reactive monitoring.

All health and safety risks are reviewed on a monthly basis as part of the CCG's risk review process.

Reference to improvements needed to our Health and Safety Policy should be made as necessary.

Independent Review

If appropriate, the CCG's independent auditor may include how we manage and implement our Health and Safety Policy and procedures in their audit programme.

2.14 Occupational Health

All Locations

Policy

West Hampshire CCG acknowledges its duties towards its employees in maintaining good health and putting in place adequate controls to prevent the work we do from harming the health of our workforce.

Many of the other 'Arrangements' sections of this Policy have an Occupational Health dimension (e.g. the use of Display Screen Equipment, the prevention of harm whilst Manual Handling etc.) and should be referred to for more information where necessary.

Where other occupational health matters come to light we will investigate these as necessary and consult with external Occupational Health specialists if required.

For example, advice and assistance will be sought where a medical opinion is required on medical issues arising from pre-employment health questionnaires, long-term absence through injury or illness, making reasonable adjustments for persons with a disability, ill-health retirement, etc.

Duties of Employees

Employees must make proper use of the arrangements listed above and remember they are under a legal duty to inform their managers about any shortcomings they perceive in our health and safety arrangements. Where these are directly related to an occupational-health condition, the initial report should be made using the DIF1 Incident Report Form on Datix.

Health Surveillance

The Management of Health and Safety at Work Regulations 1999 requires us to provide appropriate health surveillance where identified as being necessary by relevant risk assessments.

There are currently no known operations or processes identified within the CCG that require detailed on-going health surveillance (e.g. as might occur when handling very hazardous substances close to the Workplace Exposure Limits).

2.15 Potentially Vulnerable Groups

All Locations

General Policy

It is the general policy of West Hampshire CCG to ensure that all employees and others who may be potentially vulnerable (e.g. due to their age, disability or condition) are given an appropriate level of support so that they are not harmed by being in our working environment. See separate West Hampshire CCG policies, e.g. on Lone Working, maternity, etc.

Children on West Hampshire CCG Premises

The presence of children or young persons within our premises could, in some cases, mean that normal controls over hazards are inadequate for them for a range of reasons e.g. purely because of their size, inquisitiveness or immaturity.

Note: in this Section, the term 'child' includes young persons i.e. 16 - 18 year olds as well as those under the age of 16 – see section 'Young Persons' for arrangements specifically for 16- 18 year olds.

Employees are discouraged from bringing their children onto our premises except for organised/brief visits (e.g. with new-born babies etc.).

All staff are cautioned that if, against policy, they bring a child on site they are exposing the child to an environment not designed for children and must accept responsibility for the child's own safety (and possibly for any damage done by the child to others).

In general, parents may not bring a child to work and care for the child whilst at the same time undertaking their work as an employee.

However, the CCG recognises that, exceptionally, employees and visitors may find it necessary to have a child or children with them.

Anyone wishing to bring children onto our premises must seek permission beforehand from their manager so that appropriate controls can be discussed. The request and subsequent approval should be in writing whenever possible to ensure that both sides are aware of the conditions of the agreement.

Controls:

The following is a list of some of the factors to be taken into account:

- The safety of the work area in terms of hazards, access/egress etc.
- The effect of having children present on people working in that area (e.g. introducing distractions).
- The potential for damage to property.
- The numbers and ages of any children.
- The frequency and duration of their visits.

In reaching this decision permission is at the discretion of the Programme and Delivery Manager.

Parents or guardians are required to ensure that there is adequate supervision of children at all times whilst they are on West Hampshire CCG premises. This is the sole responsibility of the parent or guardian and cannot be delegated to another person.

Young Persons

Regulation 19 of the Management of Health and Safety at Work Regulations 1999 state that: 'Every employer shall ensure that young persons employed are protected at work from any risks to their health or safety which are a consequence of their lack of experience or absence of awareness of existing or potential risks or the fact that young persons have not yet fully matured'.

Young Persons are defined as persons who have not reached the age of 18. (A 'child' is defined as a person who is not over compulsory school-leaving age).

Persons between the age of 16 and 18 can still be employed for work where it is necessary for training, and if supervised by a competent person, and where the risks are reduced to the lowest level that is reasonably practicable.

Whenever we employ young persons we will undertake to review our procedures and risk assessments with the aim of determining the particular risks facing young persons in the light of their relative immaturity, lack of experience, and unfamiliarity with the workplace and comply with all the appropriate standards.

People with Disabilities

Under the Health and Safety at Work etc. Act 1974 there is an implied duty for an employer to pay particular attention to the needs of people with disabilities and, if appropriate, monitor at regular intervals their suitability for work on for which they are employed.

Other relevant legislation includes the Equality Act 2010 which requires employers to take steps to meet the needs of people with disabilities in all employment matters.

The CCG will therefore endeavour to make reasonable changes to the premises etc. to accommodate the needs of employees with disabilities where such changes do not contravene other health and safety laws.

As a 'public authority we will bear in mind the needs of the disabled when carrying out our functions e.g. inviting customers or clients who may have disabilities onto our premises. In the event of access to our premises being prohibitive, arrangements will be made for the activity to be delivered at a mutually acceptable venue e.g. clients home/office.

New or Expectant Mothers

West Hampshire CCG encourages female employees to notify their managers if they become new or expectant mothers, as the CCG has additional responsibilities towards them under the law and will carry out a review of their work and any risk assessments applicable to their work. Further information is available in the Maternity, Paternity and Adoption Leave Policy.

This 'person-specific' review will consider any potential risks to their health and safety on account of their working conditions, the type of work in which they are involved and any environmental conditions to which they are exposed e.g. noise, cold, heat, chemicals, etc.

Where this review reveals that there are significant hazard(s) which could present a risk to the employee then an assessment must be carried out and this must be recorded (see also 'Risk Assessment').

The carrying out of this review is the responsibility of managers within the work section.

Help and advice can be obtained where necessary from the Programme and Delivery Manager

Persons with Life Threatening Allergies

An estimated **1-2% of adults have a food allergy**, which equals around **2 million people**. It is not surprising that a number of people in the CCG have an allergy. It is therefore important that the CCG should minimise allergy risks and prioritise managing food allergies in the workplace to keep colleagues safe.

As each individual's allergy differs, it is important for managers to ask them directly about their needs. Being understanding and supportive helps people with allergies feel safe at work and allows everyone to enjoy their food free of risks. When people do suffer anaphylactic reactions prompt action is required and our First Aiders should know where to find and how to administer the person's epipen or auto injector. Ideally, even co-workers will know how to help in an emergency.

Where a life threatening allergy is made known then a risk assessment must be carried out by their line manager and sent to the Programme and Delivery Manager for recording on the Datix risk system (see also 'Risk Assessment').

Employee Stress

Policy Commitment

West Hampshire CCG acknowledges that it has a duty of care in organising working arrangements and facilities so as not to harm the physical and mental health of employees. We also understand that we must act reasonably to reduce any significant and foreseeable risks and in doing so will take into account all relevant Health and Safety Executive ('HSE') guidance. We are committed to promoting a healthy and supportive working environment which has been shown to have a buffering effect against the build-up of stress.

The aim is to continue to develop a culture of openness where stress is not seen as a personal weakness, and where employees under stress can access appropriate support. Where any employee of the CCG becomes disabled through a stress-related condition - (as statutorily defined) - appropriate adjustments (e.g. to workload, workplace arrangements etc.) will be made wherever reasonable and practicable.

Please refer to the CCG Managing Stress Policy for more information.

2.16 Records and Documents to be Kept Relating to Health and Safety Matters

All Locations

Policy

Managers within West Hampshire CCG must make themselves aware of the health and safety documents and records that they are required to keep (see below) and ensure that these documents and records are readily retrievable.

Risk Assessment records

Our Programme and Delivery Manager will keep records of 'general' risk assessments made under the Management of Health and Safety at Work Regulations 1999 on the CCG's Datix risk system. This law says that a record must be made of all 'significant findings' and of any group of employees deemed especially at risk. There is no statutory minimum length of time that these should be kept – it depends on how relevant they are to the work being carried out.

However, it is recommended that these records be kept for a minimum of 3 years and are archived when new assessments supersede them.

Under certain regulations requiring more specific assessments there are stipulations as to what records must be kept (e.g. Noise at Work Regulations 2005, Control of Asbestos at Work Regulations 2006, and Control of Substances Hazardous to Health Regulations 2002 (COSHH)). Advice is available from the Programme and Delivery Manager on keeping these records.

Where risk assessments relate to the employment of young persons or workplace reviews due to notification of new or expectant mothers then these records need to be kept in the same way as other risk assessments.

Incident Report Forms

Records of the accident and incident reports that they have made during the year will be stored electronically on the Datix system. This information should include records on steps taken after an incident has occurred, including details where applicable on accident investigations, risk assessment, subsequent decisions on amendments to procedure and, where necessary, related communications. It is also important to record the characteristics of employees, contractors and visitors involved in health and safety incidents so potential trends can be identified.

Competent Persons

If there are any additional health and safety 'Competent persons' appointed by the CCG under any health and safety statutory provisions then a record of this must be kept along with the justification for this e.g. by right of experience, knowledge and/or qualifications obtained e.g. Manual Handling-trained Assessors etc.

Health and Safety Monitoring

If any Manager undertakes any health and safety monitoring or auditing it will be necessary to formally document the results and keep records, including any associated discussions for audit purposes.

First Aid Records

First Aiders should record all first aid treatments they have administered: it is sufficient for the details to be provided on the electronic DIF1 Incident Report Form.

Personal Protective Equipment

If a Manager has cause to issue any individual personal protective equipment (PPE) e.g. safety shoes etc. then records should be kept of the date of issue and receipt.

Minutes to Meetings

Any minuted meetings which have a health and safety content should be kept as this provides valuable evidence on the reasons behind the decisions the CCG makes on health and safety issues.

Data Protection and Confidentiality

Employees should note that any/all of the above information collected may be passed onto the Health and Safety Enforcing Authority (where this is required by Statutory obligations); and to our Insurers (in order to advise on risks and claims matters).

Information may also be given to any West Hampshire CCG HR and Health and Safety Advisers (in order to ensure that employee records are accurate and to give supporting information e.g. in relation to sickness records or adaptation grant applications), and to our

Managers (in order to prompt change in the working environment or working arrangements). Wherever necessary, this information will be anonymised.

2.17 Risk Assessments

All Locations

Policy

West Hampshire CCG recognise its obligations under Regulation 3(1) of the Management of Health and Safety at Work Regulations 1999 to make a suitable and sufficient assessment of the risks to the health and safety at work of employees and others who may be affected by our activities.

These risk assessments must be recorded in writing and employees need to be notified of the significant findings.

It is the responsibility of Managers to ensure that risk assessments are conducted in respect of the activities carried out under their control and that action is then taken to eliminate any identified risks or to reduce them to an acceptable level.

Where there is the possibility that, despite this, residual risks remain unacceptably high, then a formal written safe system of work must be compiled in order to exercise a higher level of control over the risks presented by the activity.

Senior Management will ensure that where necessary, they and their staff undertake training in Risk Assessment so that staff throughout the organisation can make a valid contribution to our risk assessment process.

'General' Risk Assessment

In July 2013 the CCG carried out an assessment in order to review current hazards and their management and to identify new hazards.

The General Risk Assessment was subjective (like everyone's perception of the strengths of particular hazards and the likelihood of risks occurring) and thus can never be scientific - but nevertheless provides a useful guide for us on how best to direct our efforts.

Employees are encouraged to give feedback to our Managers if they feel that there are other hazards/risks which are missing or more important, or if they disagree with the relative rating of the risks listed below.

The following items are extracted from this risk assessment and listed in order of importance:

1. Display Screen Equipment
2. Fire Hazards
3. Work-related Stress
4. Manual Handling
5. Slips, trips and 'same level' falls
6. Electrical – mains and portable appliances
7. Hazardous Substances
8. Work Equipment/machinery

The CCG will tackle the above risks in order of priority by carrying out protective and preventive measures and individual risk assessments and amend the 'General Risk Assessment' document to reflect this where appropriate. The General Risk Assessment is held by the Programme and Delivery Manager and will be made available on our computer system.

General Principles of Prevention

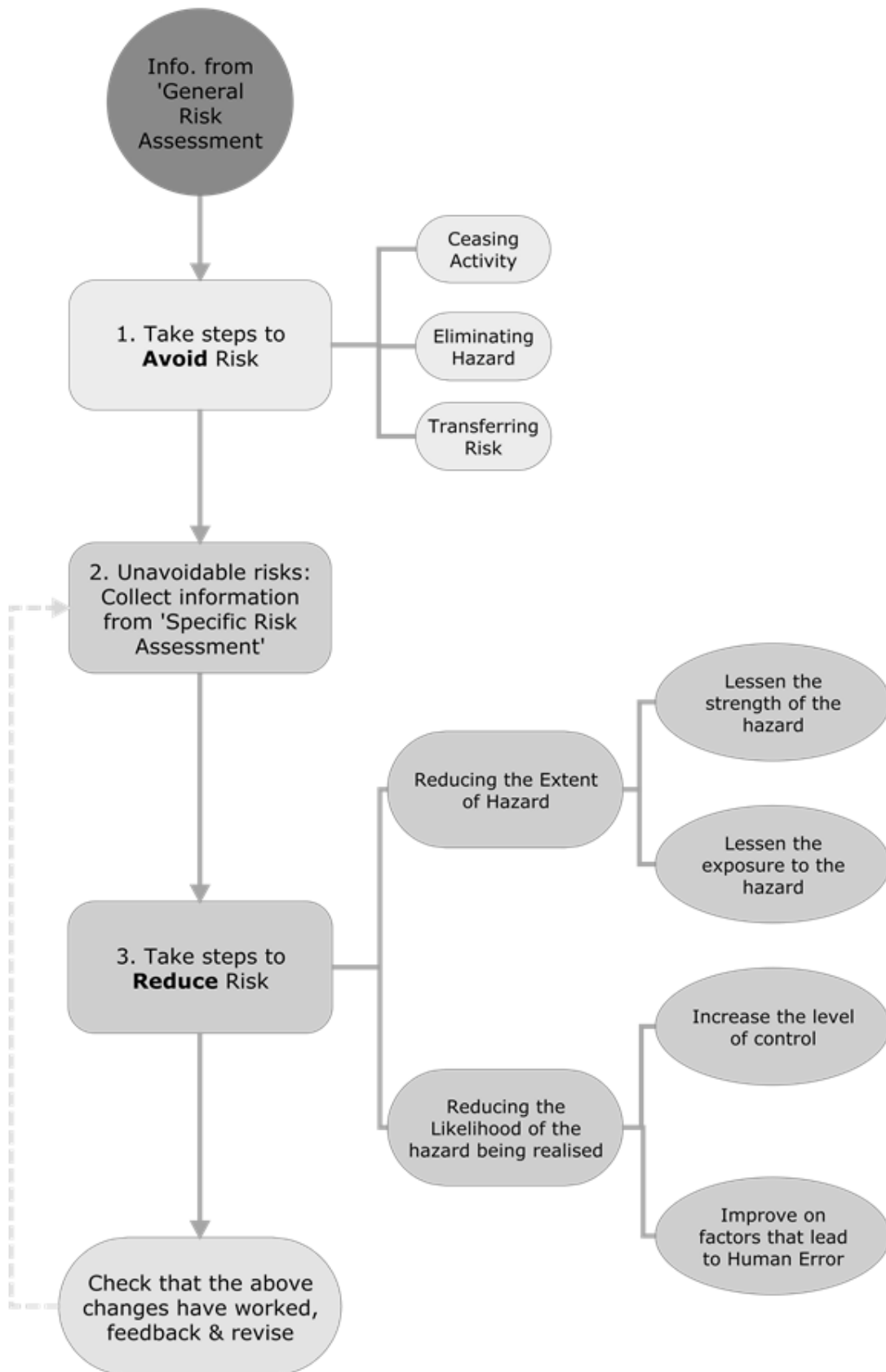
The Management of Health and Safety at Work Regulations 1999 state in Regulation 4 that: 'Where an employer implements any preventive and protective measures he shall do so on the basis of the principles specified in Schedule 1 to these Regulations' (as per Article 6(2) of Directive 89/391/EEC).

- Avoiding risks.
- Evaluating the risks which cannot be avoided.
- Combating the risks at source (e.g. physical methods rather than signs indicating danger).
- Adapting the work to the individual, especially as regards the design of workplaces, the choice of work equipment and methods.
- Adapting to technical progress.
- Replacing the dangerous by the non-dangerous or the less dangerous.
- Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment.
- Giving collective protective measures priority over individual protective measures.
- Giving appropriate instructions to employees.

We have made a commitment in its Health and Safety Policy Statement to work to comply with these principles wherever practicable.

In general terms, our Risk Prevention Strategy can be described by the diagram below.

Risk Prevention Strategy



Policy

West Hampshire CCG recognises its duties under the Provision and Use of Work Equipment Regulations 1998 ('PUWER').

The CCG will ensure, so far as is reasonably practicable, that all work equipment is suitable for its purpose and is maintained in an efficient state, in efficient safe working order and in good repair.

Work Equipment

PUWER covers the two essential features in relation to equipment safety:

Management issues including suitability, maintenance, information, instruction and training.

Physical factors such as machinery guarding and other specified hazards, controls, stability and safety systems required e.g. for isolation of machinery.

'Work equipment' means any machinery, appliance, apparatus or tool or any assembly of components which in order to achieve a common end are arranged and controlled so that they function as a whole.

This is clearly a very wide definition and includes office equipment, although the implications for compliance are obviously far less onerous than they would be for higher risk equipment such as drills, lathes etc.

Suitability

Managers should be generally aware of the need to ensure that work equipment is selected so as to be suitable for the purpose for which it is used or provided.

Work equipment must not be misused (e.g. used for unsuitable activities or under unsuitable conditions) such that it could be reasonably foreseen that it would affect the health or safety of any of our employees or contractors.

Maintenance

In order to comply with the maintenance requirements of the above legislation, Managers are reminded of the need to follow the maintenance schedules provided with equipment where this relates to the continued safe use of such equipment. Maintenance logs provided with work equipment must be kept up-to-date. In cases of doubt, then this must be decided by a competent person.

'Competent Persons' are not defined by the Regulations but they should be persons who 'have the necessary knowledge and experience' in the subject concerned to be able to make this judgement.

For routine maintenance checks of 'everyday' equipment employees are reminded of the need to visually check the condition of the equipment before use (no records are needed for this type of check).

Where maintenance work has to be undertaken on work equipment then appropriate measures must be taken to ensure that such work can be carried out safely.

If any Manager purchases or uses any CCG-owned equipment which incorporates a pressure vessel then they should check with the manufacturer/supplier whether there is the need to undergo regular safety inspections and if so make this known to the Programme and Delivery Manager

Risk Assessment

Whilst carrying out Risk Assessment is not a requirement of the above Regulations, it is a requirement of the Management of Health and Safety at Work Regulations 1999.

It is not expected (within normal CCG activities) that risk assessments should be needed, but Managers should be aware of the possible need to do so where work of a non-routine nature is carried out. In such instances, managers should seek the advice of our Programme and Delivery and Risk Manager

Risks should be eliminated wherever possible (e.g. by locking the equipment away and restricting its use to authorised users only). If this is not possible then physical measures should be used e.g. the provision of suitable guards. If this level of safety cannot be achieved then a risk assessment should be used to devise a safe system of work and persons at risk provided with information, instruction, training and where necessary supervision.

Authorised Users

Many accidents occur through the unauthorised use of equipment by an untrained person. Where the use of work equipment is likely to involve a specific risk to health or safety, the person in control of the activity must ensure that they also retain control over who uses that equipment.

In addition, they must ensure that all repairs, modifications, maintenance or servicing is restricted to those who have been specifically designated to perform these tasks.

Information, instruction and training

The CCG will ensure that suitable training, information and instructions are given to all persons who use work equipment.

2.18 Workplace (Health, Safety and Welfare) Provisions

All Locations

Policy

It is West Hampshire CCG's policy to comply so far as is reasonably practicable with the provisions of the Workplace (Health, Safety and Welfare) Regulations 1992 ('Workplace Regulations').

The following should satisfy the legal and moral obligations in respect of the welfare facilities required in our workplace.

As we operate within leased office accommodation many of these areas are the responsibility of our landlords, NHS Property Services Ltd. In certain cases our lease forbids the interference with the working environment without prior permission e.g. displaying of signs and notices. We will therefore liaise closely with their representatives to ensure the necessary permissions are sought and problems identified are resolved.

Ventilation

The CCG aims to ensure that adequate provision is made so that there is a suitable supply of fresh, or artificially purified air.

Fresh air introduced into the workplace will be free from any impurity that could cause ill health or be offensive as far as this is reasonably practicable to achieve.

Special attention must therefore be given to position air inlets carefully so that they do not draw in contaminated air (e.g. from a flue or extraction system).

Temperature

For most of the work carried out at the CCG, the following policy notes should be followed.

During normal working hours, the temperature inside our buildings should be maintained at a 'reasonable level'. This is undefined in law, but managers should follow the general guides given below.

Employees should be able to check the temperature by means of thermometer(s) provided by the CCG: these will be purchased and issued where concerns are raised so that temperatures can be monitored.

For most offices the temperature should be at least 16 degrees Centigrade. However, other factors, such as air movement and relative humidity, also have to be taken into consideration.

Where it is not practical to maintain these temperatures e.g. because the rooms are open to the outside, then temperatures should be maintained as close as possible to the advised level.

Where the temperature of an office is uncomfortably high, for example because of equipment or the building design, all reasonably practicable steps should be taken to achieve a comfortable temperature by, for example:-

- insulating the hot plant, or pipes.
- providing cooling equipment.
- shading windows, or
- re-siting the workplace away from the heat source, etc.

NB: There is no defined maximum temperature in either the Regulations or the Approved Code of Practice.

Where a reasonable temperature cannot be achieved throughout the workplace, local heating, or cooling, should be provided as appropriate.

Where persons are required to work in normally unoccupied rooms e.g. unheated storerooms other than for short periods, temporary heating should be provided. As portable heaters could present an extra fire risk we undertake not to purchase or use them without liaising with our landlords, NHS Property Services Ltd.

Lighting

A reasonable standard of illumination should be provided to every workstation staff use.

Wherever reasonably practicable, the lighting will be provided by natural light. Additional emergency lighting will be provided if this is needed in order to effect an escape route e.g. if there is a failure of the normal lighting.

Lighting should be sufficient to allow safe use of the area and to prevent persons experiencing eye strain. Localised lighting must be provided at workstations if necessary and in places of particular risk. Dazzling light and annoying glare and excessive heat from light fittings should be avoided.

Lights and light fittings must be designed, fitted and installed, so that they do not cause a hazard.

Although most employees are capable of replacing a desk lamp bulb, if in any doubt, and for all other maintenance and repair tasks a manager should be contacted to advise on what is permissible rather than risk injury.

Noise

West Hampshire CCG does not anticipate that any of our routine activities will be such that will generate any significant levels of noise. If any member of staff becomes aware of anyone being exposed to excessive noise (e.g. where continuous noise prevents conversation at a distance of 2 metres) then this should be reported through to their line manager who will seek guidance from the Programme and Delivery Manager if necessary.

Cleanliness and Waste

Although the standard of cleanliness required at any particular location depends on the use to which this workplace is to be put, the CCG aims overall to provide and maintain a clean and pleasant workplace.

Wherever possible, employees should help in this by ensuring that waste materials are not allowed to accumulate where they could cause danger e.g. fire risks, and that spillages are cleaned up promptly. In addition, staff should play their part by ensuring that waste is segregated and disposed of in accordance with any systems put in place by us or our landlords, and to cooperate with any audits carried out.

Working Space

The Workplace Regulations stipulate that 'every room where persons work shall have sufficient floor area, height and unoccupied space for purposes of health, safety and welfare'.

It should be emphasised that there are certain exemptions e.g. rooms being used for meetings etc., where it would be accepted that space per person is necessarily limited.

The Approved Code of Practice to the Regulations, together with Guidance to the Regulations, gives examples of sizes which can be applied in order to form a judgement.

Employees who are concerned as to the amount of space in their workplace are advised to seek guidance from their Manager who in turn can contact the CCG's Programme and Delivery Manager.

Workstations

Many of our workstations will be 'Display Screen Equipment' workstations which are covered in more detail by the separate DSE Policy.

For any other workstations, the CCG will comply with the provisions of these Regulations as far as is reasonably practicable to ensure that the workstations are suitable for those working at them.

Floors

The CCG aims to ensure that floors and corridors within the workplace are suitable and free from risks arising from obstructions, tripping or falling hazards.

Wherever employees become aware of specific dangers of these kinds they should inform their manager and report it as an incident or a "near miss" on the DIF1 incidents form on Datix.

Holes, bumps or uneven areas which may cause a person to trip or fall should be made good as soon as possible (and in the interim marked by barriers or signs). Account should always be taken of people who are sight impaired and who may be more vulnerable in such circumstances.

Lifts

The lifts to our buildings are serviced and maintained by our landlords, NHS Property Services Ltd.

CCG staff must ensure that they do not overload lifts and report through any defects they notice via their line manager.

Avoidance of Slips and Trips

West Hampshire CCG will take all reasonably practicable measure to avoid injury to its employees arising through 'slips and trips' in the workplace.

Employees should be aware that some of the floors can become slippery e.g. when wet/contaminated etc. and that they must clear up, cordon off if necessary, and report incidents and near misses on the DIF1 Incidents reporting form. Staff should also take advantage of team meetings in order to report such matters as:

- Whether they have slipped, tripped or fallen recently at work
- Whether areas do get contaminated or obstructed and this could lead to a problem
- Whether they feel that the right flooring types are being used within the workplace

Where necessary, the Programme and Delivery Manager will liaise with NHS Property Services Ltd managers in order to resolve any reported slip/trip hazards that are outside of the CCG's remit to solve.

Sufficient lighting should be provided internally and externally to ensure that working areas are safe to use/cross (depending on the nature of the area concerned).

The CCG's Policy is to keep well-ordered storage areas that are free from trip hazards and obstructions, and this is also necessary in order to facilitate fast evacuation in case of fire.

Employees are required by our Health and Safety Policy to report any known hazards to Management and this should include areas where there are obstructions e.g. goods have been delivered or stored in unsafe areas or where there is the potential for trip or slip accidents.

Where areas have become contaminated e.g. due to spillages, the CCG will use suitable equipment, materials and methods to clean the area and where necessary ensure that staff have been trained to apply these methods consistently and to good effect.

The relevant Line Manager is responsible for monitoring the above and taking action when conditions arise which could lead to an injury through slips or trips, as well as ensuring that contractors and other temporary workers are aware of the standards that operate in this respect.

Glass, windows, skylights and ventilators

West Hampshire CCG operates as a tenant and as such undertakes to report through to our landlords, NHS Property Services Ltd managers if any hazards are detected from any transparent (or translucent) doors, gates or walls.

Such measures may include, as appropriate, replacement by safety materials such as polycarbonate or safety glass, protection against breakage and the marking of such materials to make their presence apparent.

Similarly, our landlords are responsible for ensuring that, wherever reasonably practicable all the windows, skylights and ventilators are able to be opened and do not present any risks to safety when open or being opened e.g. project into an area where persons are likely to collide with them or fall through, over or under them.

Secure Environment

It is important that West Hampshire CCG staff feel that they are working in a safe and secure environment, as far as is reasonably practicable.

Staff will be informed at induction of all necessary building security arrangements including locking procedures for doors and windows, codes, alarms etc.

It is every member of staff's individual responsibility to ensure that they make themselves aware of any changes to such arrangements, normally by reading and following emailed information and notices issued by CCG Managers.

Staff must ensure that ID badges at all times within the building.

Food, Drink and Rest

Our landlords are responsible for providing an adequate 'readily accessible' supply of wholesome drinking water should be provided for all persons at work - normally through tap water or by delivery of bottled water.

For most office workers the provision of separate areas is not deemed necessary as rest and eating breaks can be taken at their desks without undue disturbance or contamination of food or workplace.

Eating facilities will include wherever possible a facility for preparing or obtaining hot drink such as a kettle or a vending machine and - where hot food cannot be obtained elsewhere - a microwave or other way of heating food.

Toilets and Washing facilities

Suitable and sufficient sanitary conveniences have been provided, in readily accessible places within NHS Property Services Ltd premises.

Washing facilities have also been provided in sufficient numbers and in readily accessible places and include an adequate supply of hot and cold running water, soap and a means of drying health and safety.

These facilities are the responsibility of our landlords and should be kept adequately ventilated, well lit and clean.

Equality impact assessment

Title of policy, project or proposal:

HEALTH AND SAFETY POLICY AND ARRANGEMENTS

Name of lead manager: Deputy Director of Performance and Planning

Directorate: Performance and Delivery

What are the intended outcomes of this policy, project or proposal?

The purpose of this policy is to ensure as far as is reasonably practicable, the health, safety and welfare of West Hampshire Clinical Commissioning Group staff and other persons.

Evidence

Who will be affected by the policy, project or proposal?

CCG staff and visitors.

Age

Younger people may be more vulnerable to H&S risks. This policy addresses this by highlighting the need to consider vulnerable groups.

Disability

Disabled people may be more vulnerable to H&S risks. This policy addresses this by highlighting the need to consider vulnerable groups.

Dementia

People with dementia may be more vulnerable to H&S risks. This policy addresses this by highlighting the need to consider vulnerable groups.

Gender reassignment (including transgender)

Not applicable.

Marriage and civil partnership

Not applicable.

Pregnancy and maternity

Pregnant staff may be more vulnerable to H&S risks. This policy addresses this by highlighting the need to consider vulnerable groups.

Race

Not applicable.

Religion or belief

Not applicable.

Sex (gender)

Women may be more vulnerable to specific hazards e.g. radiation. . This policy addresses this by highlighting the need to consider vulnerable groups.

Sexual orientation

Not applicable.

Carers

Not applicable.

Serving Armed Forces personnel, their families and veterans

Not applicable.

Other identified groups

Not applicable.

Involvement and consultation

For each engagement activity, briefly outline who was involved, how and when they were engaged, and the key outputs

How have you involved stakeholders with an interest in protected characteristics in gathering evidence or testing the evidence available?

Staff with life threatening allergies were consulted with during the review of the policy resulting in the subject being added as a specific hazard.

How have you involved/ will you involve stakeholders in testing the policy, project or proposals?

Not applicable.

Equality statement

Considering the evidence and engagement activity you listed above, please summarise the findings of the impact of your policy, project or proposal. Consider whether the evidence shows potential for differential impact, if so state whether adverse or positive and for which groups.

Impact summary (statutory considerations)

Age	Positive	Neutral	Negative
Disability	Positive	Neutral	Negative
Sexual orientation	Positive	Neutral	Negative
Race	Positive	Neutral	Negative
Religion or belief	Positive	Neutral	Negative
Gender reassignment	Positive	Neutral	Negative
Sex	Positive	Neutral	Negative
Marriage and civil partnership	Positive	Neutral	Negative
Pregnancy and maternity	Positive	Neutral	Negative

Other policy considerations

Poverty	Positive	Neutral	Negative
Place (Rural versus urban living)	Positive	Neutral	Negative
Serving Armed Forces/ veterans	Positive	Neutral	Negative
Other factors	Positive	Neutral	Negative

Have you identified any positive or negative impacts?

Yes No

If 'Yes' please provide details below

Younger people, disabled people, people with dementia and pregnant staff may be more vulnerable to H&S risks. Women may be more vulnerable to specific hazards e.g. radiation. This policy addresses this by highlighting the need to consider vulnerable groups.

Positive impacts

Where there is evidence, provide a summary of the positive impact the policy, project or proposal will have for each protected characteristic, and any other relevant group or policy consideration. This should include outlining how equal opportunities will be advanced and good relations fostered between different groups.

Negative impacts

Where there is evidence, provide a summary for each protected characteristic and any other relevant group or policy consideration. If the evidence shows that the policy, project or proposal will or may result in discrimination, harassment or victimisation this **must be** outlined.

Health inequalities

Please outline any health inequalities highlighted by the evidence (for example, differential access to services or worse health outcomes for particular groups or localities).

Action planning for improvement, and to address health inequalities and discrimination

Please give an outline of the key actions based on any gaps, challenges and opportunities you have identified. Include here any general action to address specific equality issues and data gaps that need to be addressed through consultation or further research.

Action	Person responsible	By date
No action required.		

For your records

Person who carried out this assessment: Programme and Delivery Manager

Date assessment completed: 26 April 2019

Date to review actions:

Responsible Director: Chief Finance Officer

Date assessment was approved: