

Health & Safety Policy – Trust wide

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Author/originator	Any Comments on this document should be addressed to the author		
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1 Introduction & Purpose

1.1 Introduction & Purpose

The purpose of this Policy is to document the Statement of Commitment to Health & Safety by the Trust Board, to identify the organisational responsibilities and describe general Health & Safety arrangements to comply with legislation and guidance.

1.2 Glossary/Definitions

The following terms and acronyms are used within the document:

COSHH	Control of Substances Hazardous to Health
CQC	Care Quality Commission
DH&SC	Department of Health & Social Care
DSE	Display Screen Equipment
EPF	Employee Partnership Forum
FM	Facilities Management
GWH	Great Western Hospital
H&S	Health & Safety
HSE	Health & Safety Executive
IP&C	Infection Prevention and Control
LSMS	Local Security Management Specialist
MSD	Musculoskeletal Disorders
NHS	National Health Service
NHSPS	NHS Property Services
PAT	Portable Appliance Testing
PFI	Private Finance Initiative
PPE	Personal Protective Equipment
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
SSOW	Safe System of Work
TNA	Training Needs Analysis
UK	United Kingdom

2 Main Policy Content Details

2.1 Objectives

Great Western Hospitals NHS Foundation Trust (the Trust) is committed to ensure, so far as is reasonably practicable, the health safety and welfare of all employees whilst at work and of others who may be affected by the work of the Trust including patients, visitors, contractors and others.

The Trust also gives a commitment to ensure compliance with the Health and Safety at Work etc. Act 1974 (Ref 1); the Management of Health & Safety at Work Regulations 1999 (Ref 2) and all other relevant legislation, Approved Codes of Practice and Department of Health standards as appropriate.

In order to deliver these statements of commitment, the Trust has set the following objectives:

- To set and maintain high standards for risk management, including health and safety, throughout the Trust (Ref 4 & 5).
- To identify hazards and their associated risks and set in place programmes to eliminate or manage those risks (Ref 5).

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- To ensure that these objectives are communicated to all employees.
- To ensure that all employees are given the necessary information, instruction and training to enable them to work in a safe manner (Ref 25).
- To ensure that dissemination and discussion of relevant information on health and safety issues takes place.
- To develop and encourage health and safety awareness of all employees, patients, visitors, contractors or others.
- To monitor all Trust activities for risk reduction potential and put in place corrective measures
- To work together with any partners or contractors to ensure that common risk management goals are achieved.

2.2 Standards for Health & Safety Risk Management

The Trust's standards and expectations for Health & Safety Risk Management are set and outlined in:

- The Health & Safety Executive (HSE) Document [HSG65] Managing for Health and Safety (Ref 27).
- This Health & Safety Policy
- Risk-specific policies and procedures (Ref 13-24). Departmental compliance with these Trust standards will be assessed through annual Health & Safety audit.
- The annual Health & Safety Business Plan and Objectives (Ref 12).

Continuous improvement is achieved by:-

- Departments improving on annual health and safety audit scores each year and also in year improvement by implementing the actions and recommendations identified through the audit process.
- Setting challenging operational business objectives. Progress against these objectives is reviewed quarterly through the Health & Safety Group. An Annual Report for the Board is published describing achievements against these objectives.

Trust standards and expectations will be continuously reviewed and will evolve to ensure that they meet best practice guidelines and changes to legislation.

2.3 Identifying Hazards

Foreseeable and significant risks including environmental hazards and those relating to activities of work.

The annual health & safety audit recognises the following significant organisational health & safety risks:-

- Clinical Waste
- Control of Substances Hazardous to Health
- Display Screen Equipment
- Driving at Work
- Fire
- First Aid
- Infection Prevention & Control
- Lone Working
- New & Expectant Mothers
- Manual Handling
- Patient Falls
- Patient Handling
- Personal Protective Equipment

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- Sharps
- Security
- Slips and Trips
- Ventilation
- Violence at Work
- Work Equipment
- Work Related Skin Disease
- Young Persons at Work

Identification of significant health & safety risks happens at organisational, divisional, departmental and individual levels.

Managers and their employees are responsible for identifying, assessing and managing the risks in their work areas and those risks arising from their work activities (Ref 5).

The identification of health & safety risks is a continuous process supported by incident reporting processes; feedback from teams and patients; audit and inspections and guidance from external agencies including the Health & Safety Executive (HSE), Care Quality Commission (CQC) and the Department of Health & Social Care (DH&SC).

Where risks have increased or new significant risks have been identified risks will be managed as described in the Risk Management Strategy (Ref 4) and How to Assess Risk Policy and Procedure (Ref 5).

2.4 Risk Management

Where risks are significant, they will be managed through risk assessment. The procedures for risk assessment are described in the How to Assess Risk Policy and Procedure (Ref 5). Suitable and sufficient risk assessment of significant risks will take place at all levels of the organisation and will describe agreed arrangements for safe working.

Risks are managed as described in the Risk Management Strategy (Ref 4).

All significant risks must be identified, and risk assessed (Ref 5). Risks scored at 8+ through risk assessment are documented on the Divisional Risk Registers and risks scoring 15+ through risk assessment are documented on the organisational risk register for action and monitoring.

2.5 Communication

The Trust ensures relevant Health & Safety information is shared with employees by:-

- Using Employee Communication arrangements to share information (e.g. weekly update).
- Maintaining a Health & Safety Intranet webpage on the intranet (Ref 28).
- Requiring employees to have access to a Department Health & Safety Notice board in their place of work.
- Publishing minutes from all Health & Safety Group Meetings.
- Having Department Health & Safety Representatives and other Health & Safety Link roles in each Department (e.g. Fire Wardens, Control of Substances Hazardous to Health (COSHH) Co-ordinator, Manual Handling Link Co-ordinator).
- Expecting Health & Safety to be a standing agenda item on all Department and Team Meetings.
- Providing forums for Health & Safety concerns to be discussed and information shared (e.g. working groups).

2.6 Information, Instruction, Supervision and Training

The Trust ensures all employees know what they need to for safety by:-

- Providing a Corporate Induction programme.
- Delivering a Departmental Induction for all new and temporary employees new to a Department to the Trust Health and Safety Induction (Minimum Requirements) (Appendix C)
- Requiring individuals to complete refresher training.
- Developing programmes of learning to meet identified learning needs.
- Ensuring Managers understand their responsibilities through training.
- Documenting risk assessments and safe systems of work (SSOW).

2.7 Consultation

The Trust ensures employees are informed and consulted on health & safety matters that affect them. Consultation is supported by: -

- Having formal consultation agreements in place including the Health & Safety Group and Employee Partnership Forum.
- The network of Department Health & Safety Representatives.
- Developing forums for individuals and teams to bring health & safety issues and concerns.
- An expectation that health & safety will be a standing agenda item at team meetings at all levels of the organisation.

2.8 Safety Culture

The Trust will promote a positive safety culture for employees, visitors, patients, contractors and others by:-

- Demonstrating a commitment at all levels of management to creating a safe working environment for all and providing leadership and resources for the management of health & safety at all levels of the organisation.
- Acting quickly as an organisation when new significant health & safety risks are identified.
- Listening to health & safety concerns and issues raised and acting to address them.
- Identifying and supporting new initiatives to manage risk.
- Continuously improving performance against key health & safety performance indicators.

2.9 Incident Reporting

The Incident Management Policy (Ref 3) describes arrangements for the management of incidents in the Trust.

All health and safety incidents, accidents and near misses must be reported by completing an Incident Notification form.

All Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) incidents must be reported to the Health & Safety Department as described in the RIDDOR (The Reporting of Injuries, Diseases, and Dangerous Occurrences Regulation) Reporting Procedure (Ref 6).

Managers are responsible for ensuring an incident investigation is completed on all incidents, accidents and near misses reported in their work areas and by their employees.

Health & Safety incidents are reviewed and monitored by the Health & Safety Department and analysis is presented at the monthly GWH Health & Safety Group and annual data on incidents is incorporated into the Annual Report for the Executive Committee and Finance, Infrastructure & Digital Committee.

2.10 Monitoring Risk

The Trust will monitor health & safety risks by:-

- Ensuring all incidents, accidents and near misses are reported using the Trust's Incident Reporting process (Ref 3).
- Using incident data to identify overall trends.
- Publishing information gathered from incident data.
- Providing incident data to Divisions and Departments to inform their work on managing risks
- Gathering information on all incidents reportable to external agencies including RIDDOR (Ref 6).
- Reviewing Department Risk Assessments through the annual audit process.
- Reviewing Trust Health & Safety Risk Assessments at least annually.

2.11 Co-operation & Co-ordination

Where health & safety risks are shared with other organisations the Trust will work in partnership with them to ensure those health & safety risks are managed for the benefit of all those affected by them.

2.12 Working in Shared Business Premises

The Trust has a responsibility to all employees wherever they work but also to anyone else who might be affected by the activities and work of those employees.

In addition, all other employers working in shared premises will have the same legal requirement to take care not only of their own employees but anyone else affected by the activities and work of those employees.

Where employees work in shared business premises all employers will take all reasonable steps to minimise risk to all employees through co-operation and co-ordinated effort. Safety information will be shared and safe ways of working agreed by all affected.

2.13 Working in Premises not owned by Trust

For employees working on premises not owned by the Trust arrangements for Health & Safety of the site must be available to all. This includes Fire Safety arrangements, electrical safety, security, pre-planned maintenance and corrective maintenance, asbestos management and legionella prevention.

Information about whom to contact about site management risks must be available to all employees and included on the Health & Safety Notice board.

2.14 Management of Specific Health & Safety Risks

The arrangements for monitoring compliance are outlined in the table below: -

The Trust will ensure that everyone understands their responsibilities for Health & Safety by writing risk specific Health & Safety policies (Ref 13-24) for the Trust's most significant and complex health & safety

risks. Trust measures, standards and expectations are described within those risk-specific policy & procedure documents (available to all employees on the intranet).

The measures, standards and expectations of other health & safety risks are described in the following sections:-

2.14.1 Premises & Buildings

Arrangements for Estates management will be site-specific. However regardless of the local arrangements there will be: -

- Co-ordinated arrangements for Fire Safety on site and these arrangements will be clear and shared with all users of the premises.
- Arrangements for pre-planned maintenance to ensure safe environment.
- Reporting processes for any site health & safety issues.
- Arrangements to provide maintenance for site/estates issues.
- Safe maintenance of site health & safety risks such as asbestos, heating & water systems, air quality systems.

2.14.2 Noise and Vibration

The Trust will: -

- Identify individuals exposed to noise and vibration risks.
- Ensure legal limits on noise and vibration exposures are not exceeded.
- Take action to eliminate or reduce exposure by considering new or alternative working methods and/or personal protection.
- Provide health surveillance to those individuals exposed to noise and/or vibration risks.

2.14.3 Personal Protective Equipment (PPE)

Where a Risk Assessment identifies a need for personal protective equipment for safety The Trust will:-

- Provide adequate personal protective equipment for those needing it.
- Ensure the personal protective equipment protects against the identified risk.
- Meet individual needs (where there may be one) and ensure equipment 'fits' the individual.
- Provide suitable storage for equipment.
- Ensure personal protective equipment is maintained as necessary.
- Ensure employees are aware of the need for personal protective equipment and provide training in its use where appropriate.

2.14.4 Radiation & Laser

The Trust will: -

- Identify individuals exposed to laser and radiation risks.
- Control access to areas of radiation and laser risks.
- Appoint a Radiation Protection Advisor and Laser Protection Advisor.
- Ensure individuals exposure to radiation and laser risks do not exceed recommended doses.
- Inspect equipment at recommended intervals.
- Monitor exposure through Health Surveillance.

2.14.5 Slips, Trips & Falls

Slips, trips and falls are a common hazard in healthcare environments for both healthcare workers and members of the public.

The Trust will pro-actively identify slip and trip risks in the work place and eliminate those risks where possible.

Where risks cannot be eliminated The Trust will manage slip and trip risks by:-

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- Ensuring Departments complete the Monthly Health & Safety/Fire Safety Checklist.
- Requiring all Departments to complete a Slips and Trips Risk Assessment.
- Investigating incidents of slips and trips in the Trust and acting on the findings of the investigation to minimise the likelihood of further slips and trips.
- Providing information on the Health & Safety Intranet (Ref 28) on managing the risks associated with slips, trips and falls via links to the HSE Website (Ref 26).
- Presenting accident /Incident statistics and monitor trends for review and action at the GWH Health & Safety Group.

2.14.6 Work Environment

The Trust will meet its responsibilities for safe and comfortable work environment by ensuring:-

- All premises meet the basic welfare requirements of employees.
- Information for reporting issues with work environment are clear and available on all sites occupied by Trust employees.
- Action is taken to address safety issues with work environment at the earliest opportunity.
- The Monthly Health & Safety Checklist is completed in every Department and actions taken to address issues identified.
- There are arrangements for pre-planned and unplanned maintenance in place at all sites occupied by Trust employees

2.14.7 Work Equipment

The Trust will meet its responsibilities for the provision and use of work equipment by:-

- Ensuring work equipment is suitable and fit for purpose.
- Ensuring equipment is maintained at intervals advised by the manufacturer.
- Maintaining electrical equipment through Portable Appliance Testing (PAT) regularly.
- Ensuring any employee using work equipment has been shown how to use it safely.
- Identifying any work equipment that creates significant risks to user or others and completing a risk assessment to outline specific risks and describe agreed safe ways of working.

2.14.8 Temporary Workers

The Trust will meet its responsibilities for the safety of temporary workers (including Agency) by:-

- Ensuring all temporary workers are told what they need to know for the safety of themselves and others as part of a Departmental Induction. Department Induction must take place before they start work, must be documented and must meet the Trust Health and Safety Induction (Minimum Requirements) (Appendix C).

2.14.9 New & Expectant Mothers

The Trust will meet its responsibilities for the safety of new and expectant mothers at work by:-

- Completing a new & expectant mothers risk assessment once notified of pregnancy (Ref 10).
- Outlining any specific risks identified and describing agreed adjustments to work, workload or working practice in the Risk Assessment.
- Seeking advice from Occupational Health for any pregnancy related medical conditions or existing health conditions that may be affected by the pregnancy.
- Reviewing the New & Expectant Mothers Risk Assessment at least every three months and on return to work.
- Providing appropriate facilities for breastfeeding at work for new mothers.

3 Monitoring Compliance and Effectiveness of Implementation

The arrangements for monitoring compliance are outlined in the table below: -

Measurable policy objectives	Monitoring / audit method	Monitoring responsibility (individual / group / committee)	Frequency of monitoring	Reporting arrangements (committee / group to which monitoring results are presented)	What action will be taken if gaps are identified?
Compliance with this and other Trust Safety and Risk Management Policies	Annual Health & Safety Audit	Health & Safety Team	Annually	Results shared at Health & Safety Group	Health & Safety Audit Department Report Audit Action Plan developed by Health & Safety Team
Training Compliance	Academy training compliance data	The Academy	Monthly	Please refer to Mandatory Training and TNA	Please refer to Mandatory Training and TNA
Effectiveness of Health & Safety Management	Incident Report Data	Health & Safety Team	Monthly	Health & Safety Group	Action Plan for any significant trends or issues identified
Effectiveness of Health & Safety Management	RIDDOR Reports	Health & Safety Team	Monthly	Health & Safety Group	Action Plan for any significant trends or issues
Effectiveness of Health & Safety Management	Business Plan Objectives	Health & Safety Team	Quarterly	Health & Safety Group	Action Plan for any areas of non-compliance with business plan

4 Duties and Responsibilities of Individuals and Groups

4.1 The Chief Executive

The Chief Executive is ultimately responsible for the implementation of this document.

The Chief Executive shall assume overall responsibility for:

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- The health, safety and welfare of all employees, patients, visitors and others within the Trust
- Ensuring the Trust has a clear and up to date H&S policy, explaining how it intends to deliver its H&S objectives.
- Appointing one Board member to champion H&S issues.
- Ensuring that individual members of the Board recognise their personal liabilities and responsibilities under H&S law.
- Making sure that Board decisions reflect the organisation's H&S policy particularly when making investment decisions and by only doing business with companies who themselves have sound H&S policies and practices.

4.2 Health and Safety Lead Director

The nominated Director and Board Member with special responsibility for occupational health and safety and Fire Safety shall ensure the effective management of Health & Safety risks and for the management of H&S improvement programmes. This shall be achieved by:

- Ensuring adequate resources are allocated to meet Health & Safety organisational objectives, to comply with all legislative requirements and to achieve reduction in risk, so far as is reasonably practicable.
- Ensuring the Chief Executive is informed, as soon as possible, of any significant Health & Safety Risks to the Trust.
- Presenting an annual report to the Board to confirm the status of legislative compliance and other matters of H&S
- Monitoring all significant Health & Safety issues affecting the organisation and its performance.
- Monitoring any health and safety risks on the Trusts Risk Register.
- Enabling employee consultation through the Employee Partnership Forum on all Health & Safety issues and by chairing the H&S Group Meetings.
- To ensure the independence and status of all risk management professionals providing advice to the Trust is maintained, and that their advice is sought and taken into account by all levels of management during the decision making process.
- Developing strategic plans to include:
 - Reduction in the total number of accidents/incidents.
 - Provision of adequate training for those with responsibility for H&S matters.
 - Systematic identification of hazards, assessment of risk and implementation of effective control measures.
 - Development of appropriate performance standards with regular monitoring including annual audits

4.3 Divisional Directors

Divisional Directors shall be accountable to the Chief Executive and shall assume overall responsibility for:-

- The implementation of this and all Health and Safety Policies in their Division.
- The management of significant health & safety risks in their Division.
- Monitoring the effectiveness of risk controls for the health, safety and welfare of employees, patients, visitors and others within their area of responsibility.
- Ensuring that adequate time and resources are allocated for H&S matters within their Division.
- Monitoring of the Divisional Risk Register and escalating risks onto the Trust Risk Register where appropriate.

4.4 Senior Managers

Senior Managers shall be accountable to Divisional Directors and shall assume responsibility for the effective implementation of this and all Safety Policies including:

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- Identifying, assessing and managing health & safety risks in their Department work spaces and those created by the work of their Department.
- Ensuring Department compliance with Trust Health & Safety standards and expectations
- Ensuring the availability of resources, training and time for post holders to attend to H&S matters including the Health & Safety Group.
- Identifying the training needs of their managers and taking appropriate steps to ensure that these needs are satisfied.
- Escalating risks onto the Divisional Risk Register where appropriate.

4.5 Department Managers

Department Managers shall be accountable to Senior Managers and Directors and shall assume responsibility for the following:

- Appointing a Health & Safety Representative in their Department to support them in carrying out their duties.
- Management of all significant Health & Safety risks within their department and places of work. This may include managing significant health & safety risks in patients' own homes, GP surgeries, schools, children's centres or premises leased from other organisations.
- Implementing Trust safety policies and procedures in the department.
- Ensuring that they understand their roles and responsibilities under Trust Health and Safety (Ref 13-24), Trust Risk Management Policies (Ref 3-5) and Procedures and for implementing those policies and procedures in their department.
- Ensuring that monthly H&S inspections are carried out and documented in their work areas.
- The monitoring and upkeep of all Health & Safety training records for departmental employees, including any temporary workers.
- Ensuring that risk assessments have been carried out on all areas of significant risk within the department or workplace.
- Overseeing the implementation of any control measures that may be required.
- Ensuring departmental policies, procedures, protocols and safe systems of work are agreed and documented.
- Carrying out periodic annual reviews of risks and risk control measures in their Department
- Ensuring employees within their Department are represented at the Trust Health & Safety Group and that information from the Trust H&S Group is shared with employees.
- Escalating health and safety concerns to the Senior Manager where appropriate.

4.6 Line Managers and Supervisors or equivalent

Line Managers and Supervisors (or equivalent) shall be accountable to Department Managers and shall assume responsibility for the day-to-day management of H&S within their department including:

- Ensuring that the operations under their control are, as far as reasonably practicable, conducted without detriment to the health and safety of patients, employees, visitors or others.
- Ensuring hazards are identified, risk assessed and that the findings are recorded and the appropriate preventative and protective measures are implemented, monitored, reviewed and updated as required.
- Establishing safe systems of work and safe working practices.
- Ensuring that all incidents, accidents and near misses are reported on the incident reporting system.
- Investigating all accidents and incidents which have given rise to, or could give rise to, injury, loss or damage, taking appropriate remedial action and reporting the findings to the Trust's H&S Department.

- Ensuring employees are provided with such time, resources, information, instruction, training and supervision required to undertake their work activities and responsibilities safely and that this is adequately documented.
- Ensuring that their department's Health & Safety representatives attend the Health & Safety Group meetings on a monthly basis. For wards/departments that have several Health & Safety representatives to rota attendance at the Group meetings.
- Ensuring that sufficient "competent persons" (H&S delegates) are nominated within their departments and that they have sufficient time and resources allocated to enable them to fulfil their H&S responsibilities.
- Providing opportunities for employees to discuss significant health & safety issues and address those issues with the support of specialists (e.g. Health & Safety, Occupational Health). Where it is not possible to manage risks adequately at Departmental level those risks should be escalated through the Risk Register to Divisional Level and brought to the attention of the Health & Safety Department.
- Escalating risks to the Department Manager where appropriate

4.7 Employee Responsibilities

All employees have a responsibility to act in a way that does not put at risk the H&S of themselves, those with whom they work and those having justified reason to be in the premises.

Therefore, each employee must:

- Take reasonable care for their own health & safety.
- Consider the safety of other persons who may be affected by their acts or omissions.
- Refrain from intentionally misusing or recklessly interfering with any work equipment or anything that has been provided for health & safety purposes.
- Work in accordance with information and training and not to undertake tasks for which authorisation and/or training has not been provided.
- Make use of any protective clothing or equipment provided by the Trust and presenting themselves for medical examination (if under Health Surveillance).
- Act to address or immediately report to their line manager anything they believe may compromise the health or safety of themselves or others.
- Co-operate and comply with safety policies and procedures; risk assessments and safe systems of work.
- Bring to the attention of their managers significant health & safety issues and/or the Department Health & Safety Representative.

4.8 Specialist Support Roles

4.8.1 Head Of Health and Safety

The Head of Health, Safety, Fire & Security, shall be professionally accountable to the Chief Executive, through the nominated executive director, and shall have the following responsibilities:

- Ensuring that the Chief Executive, through the nominated executive lead, is informed of any non-compliance with statutory requirements, Department of Health or Trust policies and the possible implications.
- Providing information and advice to the Trust on the implications of changes to H&S Legislation, Directives, Approved Codes of Practice or Official (including NHS) Guidance.
- Assisting in the development of policies, procedures, Safe Systems of Work and protocols as a result of these changes.
- Receiving and the investigation of incident reports where a significant risk has been identified and ensuring that the appropriate Divisional management teams are informed of any remedial actions required as a result of the investigations.

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- Production of an annual report to the Executives and Trust Board informing them of the current status of H&S within the Trust.
- Provision of H&S advice to all Trust employees.
- Provision of specific training for all H&S post holders to ensure competency.
- Providing assistance and training to those responsible for carrying out risk assessments and to ensure the effectiveness of the identified control measures.
- Monitoring and auditing of the overall H&S management structure and within each Division.
- Maintaining relevant records associated with any of the above responsibilities.

4.8.2 Health & Safety Department

The Health & Safety Department is responsible for:-

- Collating information about incidents, accidents and near misses.
- Gathering information for RIDDOR reporting from managers and individuals.
- Providing data to Divisions and Departments to inform health & safety management.
- Offering advice to managers and individuals.
- Establishing trends.
- Offering support to the running of the Health & Safety Group.
- Developing Trust standards and expectations for health & safety.
- Leading on health & safety policies.
- Bringing significant health & safety risks to the attention of the Health & Safety Group.

4.8.3 GWH Health & Safety Group

The GWH Health & Safety Group will: -

- Act as a focus for full employee participation in the management of health and safety within the Trust.
- Monitor health and safety policy and plans, including accident/incident investigation, reporting and analysis.
- Monitor the levels of compliance with all statutory requirements, identify any weaknesses and recommend any remedial action required.
- Monitor the adequacy and effectiveness of health and safety management communications and publicity
- Promote a positive Health & Safety Culture and a proactive approach to the principle of identifying hazards and the elimination or minimisation of potential risk through the risk assessment and risk management process
- Receive and consider reports and factual information from enforcing authorities and professional advisors and decide on the appropriate action
- Act as a decision-making and ratification forum for the development and review of health & safety policies and procedures
- Consider significant health & safety risks brought to its attention.

The full Terms of Reference for the Health and Safety Group are available (Ref 11).

4.8.3a H&S Representatives

Every Department should appoint a Health & Safety Representative.

Health & Safety Representatives may be Union or employees appointed and are to consult with the line manager regarding departmental health & safety issues.

Health & Safety Representatives must complete suitably trained for their role.

Health & Safety Representatives may: -

- Assist their managers or the Health & Safety Department with the investigation of accidents, incidents or near misses in their area.
- Bring safety concerns to the attention of the departmental manager and the Health and Safety Department.
- Conduct and review local risk assessments and identify appropriate control measures in conjunction with departmental manager.
- Ensure the availability risk assessments and safe systems of work in their department.
- Ensure the workplace is inspected regularly (according to risks but not less than monthly) to ensure that any health and safety/fire safety faults/breaches are documented and actioned.
- Work in partnership with other health & safety leads in their department to manage significant health & safety risks. Other health & safety leads could be the COSHH Co-ordinator, Fire Safety Warden, Manual Handling Link Co-ordinator and Infection Control Link.

4.8.3 Occupational Health

Occupational Health undertakes relevant health surveillance when potential or specific health hazards are identified via managers' COSHH risk assessments and/or Health and Safety's monitoring systems.

Health surveillance is a system of regular health checks which may be required by law for employees who are exposed to substances hazardous to health such as biological or chemical agents, noise or vibration, ionising radiation, solvents, fumes, dusts or compressed air.

Occupational Health will support Health and Safety when unexpected exposures occur and will provide on-going surveillance if required, in addition to reporting outcomes to Trust management and advise on future management.

The Occupational Health Service also offers specialist advice and support to managers and individuals when:

- An employee is experiencing ill health or has an existing health condition that needs to be managed at work.
- An employee is absent from work due to an ill health or injury.
- An employee is returning to work following an absence.

4.8.6 Estates & Facilities

Arrangements for the management of estates and facilities vary across the Trust with responsibilities on some Trust sites managed through partnership arrangements.

Some specific Estates risks are managed directly by the Facilities Management (FM) Provider for Private Finance Initiative (PFI) premises and also National Health Service Property Services (NHSPS) for other NHS sites. These include risks from activities such as water management & building related H&S and Fire safety systems maintenance checks and testing.

Trust FM governance arrangements should also include processes to confirm that PFI FM Provider and NHSPS are completing their obligations to the required standard and how assurance is fed back, monitored and reported to the Trust Board

In general, however, the provider of estates and facilities services will:-

- Be responsible for managing the health and safety within premises and buildings.
- Provide pre-planned maintenance services.
- Provide maintenance of premises and buildings for safety.

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- Manage premises and buildings risks including asbestos, water systems, boiler systems, electrical systems.
- Provide information to those working and using the building to ensure Fire Safety and safe evacuation in an emergency.
- Provide supervision of contractors carrying out work on Trust sites on behalf of Estates and Facilities ensuring safe systems of work are used.

4.8.7 Equipment Manager and Procurement Manager

The Equipment Manager and Procurement Manager shall ensure that all equipment and supplies brought into the Trust meet the requirements of United Kingdom (UK) and European legislation, as well as any requirements laid down by the DH&SC. They must also ensure that:

- Any equipment supplied includes adequate provision for maintenance, calibration or inspection required by the manufacturer or the DH&SC.
- All employees are informed and trained in the use of the equipment **before** it is brought in to use.
- Any manual, instruction, Manufacturer's Safety Data Sheet etc. is available and brought to the attention of the user(s) **before** it is brought in to use.
- The Health & Safety Department is consulted during the procurement process to ensure that the requirements of law are being met and that any risk assessment, SSOW etc. is completed.

4.8.8 The Academy

The Academy is to be responsible for:-

- Development of the organisational Mandatory Training Needs Analysis Policy in partnership with subject leads.
- Management of Corporate Induction programme.
- Design, development and management of the e-learning system.
- Delivery of face-to-face Mandatory Training.
- Providing data to managers and individuals on compliance with the Mandatory Training Needs Analysis Policy (Ref 25).

4.9 Document Author and Document implementation Lead

The document Author and the document Implementation Lead are responsible for identifying the need for a change in this document as a result of becoming aware of changes in practice, changes to statutory requirements, revised professional or clinical standards and local/national directives, and resubmitting the document for approval and republication if changes are required.

4.10 Target Audience – As indicated on the Cover Page of this Document

The target audience has the responsibility to ensure their compliance with this document by:

- Ensuring any training required is attended and kept up to date.
- Ensuring any competencies required are maintained.
- Co-operating with the development and implementation of policies as part of their normal duties and responsibilities.

5 Further Reading, Consultation and Glossary

5.1 References, Further Reading and Links to Other Policies.

The following is a list of other policies, procedural documents or guidance documents (internal or external) which employees should refer to for further details:

Ref. No.	Document Title	Document Location
1	The Health & Safety at Work etc. Act 1974	www.legislation.gov.uk
2	The Management of Health & Safety at Work Regulations 1999	www.legislation.gov.uk
3	Incident Management Policy	T:\Trust-wide Documents
4	Risk Management Strategy	T:\Trust-wide Documents
5	How to Assess Risk Policy & Procedure	T:\Trust-wide Documents
6	RIDDOR (The Reporting of Injuries, Diseases, and Dangerous Occurrences Regulation) Reporting Procedure	T:\Trust-wide Documents
7	Slips & Trips Trust Risk Assessment	T:\Trust-wide Documents
8	Monthly Health & Safety/Fire Safety Checklist	T:\Trust-wide Documents
9	Departmental Induction Checklist	T:\Trust-wide Documents
10	New & Expectant Mothers Risk Assessment	T:\Trust-wide Documents
11	Health & Safety Group Terms of Reference	T:\Trust-wide Documents
12	Occupational Health & Safety Business Plan and Objectives	T:\Trust-wide Documents
13	Control of Substances Hazardous to Health (COSHH) Policy	T:\Trust-wide Documents
14	Fire Safety Policy	T:\Trust-wide Documents
15	Manual Handling Policy	T:\Trust-wide Documents
16	Display Screen Equipment Policy	T:\Trust-wide Documents
17	Young Persons Health and Safety at Work Policy	T:\Trust-wide Documents
18	Minimising Violence & Aggression Policy	T:\Trust-wide Documents
19	Lone Worker Policy	T:\Trust-wide Documents
20	First Aid at Work Policy	T:\Trust-wide Documents
21	Driving at Work Policy	T:\Trust-wide Documents
22	Laser & Optical Radiation Policy	T:\Trust-wide Documents
23	Security Policy	T:\Trust-wide Documents
24	Fire Safety Protocol	T:\Trust-wide Documents
25	Mandatory Training Needs Analysis Policy	T:\Trust-wide Documents
26	Health & Safety Executive	www.hse.gov.uk
27	HSG65 Managing for Health and Safety	www.hse.gov.uk
28	Health & Safety Intranet Page	http://intranet/

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5.2 Consultation Process

The following is a list of consultees in formulating this document and the date that they approved the document:

Job Title / Department	Date Consultee Agreed Document Contents
Head of Health, Safety, Fire & Security	20/01/2023
Occupational Health Manager	22/12/2022
Director of Estates & Facilities	20/01/2023

Equality Impact Assessment

An Equality Impact Assessment (EIA) has been completed for this document and can be found at Appendix A.

Appendix A - STAGE 1: Initial Screening for Equality Impact Assessment

At this stage, the following questions need to be considered:			
1	What is the name of the policy, strategy or project? Health & Safety Policy		
2.	Briefly describe the aim of the policy, strategy, and project. What needs or duty is it designed to meet? The purpose of this Policy is to document the Statement of Commitment to Health & Safety by the Trust Board, to identify the organisational responsibilities and describe general Health & Safety arrangements to comply with legislation and guidance.		
3.	Is there any evidence or reason to believe that the policy, strategy or project could have an adverse or negative impact on any of the nine protected characteristics (as per Appendix A)?		No
4.	Is there evidence or other reason to believe that anyone with one or more of the nine protected characteristics have different needs and experiences that this policy is likely to assist i.e. there might be a <i>relative</i> adverse effect on other groups?		No
5.	Has prior consultation taken place with organisations or groups of persons with one or more of the nine protected characteristics of which has indicated a pre-existing problem which this policy, strategy, service redesign or project is likely to address?		No

Signed by the manager undertaking the assessment	Barry Slade
Date completed	20/01/2023
Job Title	Head of H&S, Fire and Security

On completion of Stage 1 required if you have answered YES to one or more of questions 3, 4 and 5 above you need to complete a [STAGE 2 - Full Equality Impact Assessment](#)

Equality Impact Assessment

Are we Treating Everyone Equally?

Define the document. What is the document about? What outcomes are expected?

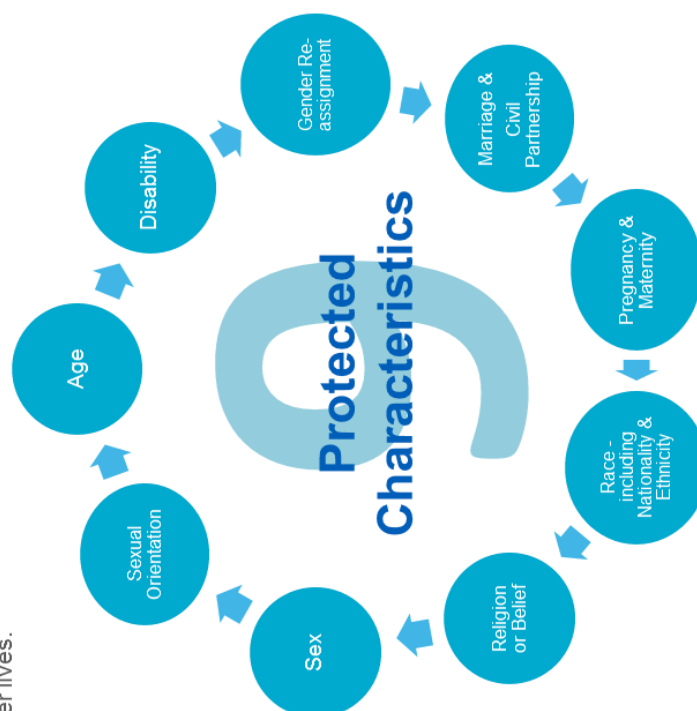
Consider if your document/proposal affects any persons (Patients, Employees, Carers, Visitors, Volunteers and Members) with protected characteristics? Back up your considerations by local or national data, service information, audits, complaints and compliments, Friends & Family Test results, Staff Survey, etc.

If an adverse impact is identified what can be done to change this? Are there any barriers? Focus on outcomes and improvements. Plan and create actions that will mitigate against any identified inequalities.

If the document upon assessment is identified as having a positive impact, how can this be shared to maximise the benefits universally?

Our Vision

Working together with our partners in health and social care, we will deliver accessible, personalised and integrated services for local people whether at home, in the community or in hospital empowering people to lead independent and healthier lives.



Trust Equality and Diversity Objectives

Better health outcomes for all

Improved patient access & experience

Empowered engaged & included staff

Inclusive leadership at all levels

Appendix B - Statement of Commitment



Health & Safety Policy Statement of Commitment

The health, safety and security of everyone who may be affected by the Great Western Hospitals NHS Foundation Trust's activities including staff, patients, visitors and carers is of paramount importance to us all.

The Chief Executive and Board are committed to providing and maintaining a safe and healthy working environment providing and maintaining safe plant and equipment and ensuring safe manual handling practices as well as safe use of hazardous substances so far as is reasonably practicable.

The Trust will strive for continual improvement in all aspects of risk management and aim to prevent accidents and cases of work-related ill health whilst recognising its requirements to comply with all relevant health and safety legislation as a minimum requirement. In pursuing these aims, Trust employees are empowered to take all reasonable steps to ensure the highest standards of health, safety and welfare for staff, patients, visitors and any other persons that may be affected by the Trust's activities.

The Trust will provide adequate control of the occupational health and safety risks arising from our work activities and will provide the necessary information, instruction, training and supervision for our staff in order to ensure they are competent to conduct their tasks.

The Trust recognises that good risk management awareness and use of risk assessment practice at all levels is a critical success factor for our organisation.

Policies will be reviewed regularly in line with changes in legislation, approved codes of practice or official guidance as recommended by recognised national bodies as advised by the Health and Safety Department.

The Trust encourages staff at all levels of the organisation to give consideration to and take a responsible approach to the assessment and management of all risks when planning and organising work activities or changes to the workplace. In order to promote active participation and consultation at all levels within the organisation, the Trust encourages staff to take on health and safety responsibilities particularly as accredited Safety Representatives.

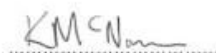
Full co-operation on the part of staff is vital to the successful delivery of this Policy and in achieving the safety aims of the Trust. The Trust expects all staff to fully comply with all matters of health and safety and in return offers full commitment to the well-being of employees. Each employee shall recognise their personal involvement and responsibility for observing all Trust policies and procedures.

Liam Coleman
Chairman



Date 14/11/22

Kevin McNamara
Chief Executive



Date 14/11/22

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Appendix C – Health and Safety Induction (Minimum Requirements)

COSHH

All employees know that Substances Hazardous to Health in use in the Department are listed on the Department COSHH Inventory List.

All employees know that there is a Material Safety Data Sheet providing safety information on using the Hazardous Substances available for each hazardous substance in use.

All employees know there is a written Safe System of Work (COSHH Assessment) written for all but very low risk substances. The Safe Systems of Work must be understood and followed.

All employees know where to find the Department COSHH Folder.

Driving at Work

All employees must be aware of the requirement to notify their Manager of any health condition, medications or anything else that could impact on safety when driving for work.

All employees must be aware that mobile phones must not be used whilst driving for work.

All employees must have completed the Personal Details Form and that information will be made available to colleagues in their Department in an emergency.

Fire Safety

All employees must have read and understood the Department Fire Emergency Action Plan for their location of work.

All employees must undertake a tour of the Department and have knowledge of the emergency exits, alarms, fire call points and emergency numbers.

No member of staff is permitted to work in a Department without this knowledge and information.

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All employees must be aware that smoking is not permitted on site by staff or visitors.

All employees must follow the Trust **Toaster and Microwave Protocol:-**

Toasters must never be left unattended when in use. If the person watching the toast has to leave due to an operational emergency, then the toast must be raised and toaster turned off.

Microwaves should never be left unattended when in use.

First Aid

All employees must know how to access First Aid Provision in the Department (a First Aid poster should be on display).

All employees are aware that they must declare to their Manager any health conditions that may require specialist first aid.

Health & Safety Arrangements

All employees are shown the location of the Department Health & Safety Noticeboard.

All employees are shown the location of any other Department Safety documentation.

All employees are aware that the Health & Safety Policies are available on the intranet (Policies and Procedures link on home page).

All employees are aware that health & Safety resources including risk assessment examples and key safety documents are available on the Health & Safety intranet (Ref 28).

Incident Reporting

All employees are aware that all accidents, incidents and near misses must be reported on an Incident Reporting Form (IR1).

All employees know how to access the Incident Reporting System online (if access to IT arranged) AND/OR employees know where to find the IR1 paper book in the Department.

Lone Working

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All employees have read the Department Lone Worker Protocol.

All employees know how to raise the alarm when working alone.

All employees are aware of the importance of ensuring a colleague knows when they are lone working.

Manual Handling and Display Screen Equipment (both acute and Swindon community)

All employees must have read, understood and follow Department Safe Systems of Work for specific manual handling activities and tasks,

All employees must be aware of the importance of not carrying out any manual handling activity if there is any uncertainty about safety or there remain significant risks

All employees must be aware of the need to inform the Manager of the Department if they have any health condition that may have an impact on their ability to carry out work activities

All employees who use computers for 2.5 hours or more per shift are required to complete a DSE Workstation Assessment at least every 3 years (Ref 28).

Patient Handling (i.e. assisting, supporting and moving patients)

All employees must have completed [practical] manual handling training in the last 3 years and understand the principles of safe handling;

All employees must only use manual handling equipment if they are competent to use it safely;

All employees must request suitable training and/or work with a colleague competent in safe use if they are unfamiliar with equipment;

All employees must ensure the safe working load of equipment is not exceeded

All employees must refer to the Patients Manual Handling Risk Assessment and Patient Mobility Care Plan to ensure they know how to work with a patient safely;

All employees must discuss individual patient handling needs with Department colleagues to ensure they understand any recent changes to ability/mobility;

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All employees must be aware of the importance of not carrying out any manual handling activity if there is any uncertainty about safety or there remain significant risks to the patient or employee

Personal Protective Equipment (PPE)

All employees must know when PPE is needed and how to access it.

All employees must be advised that where PPE is provided it must be worn.

All employees must be shown how to fit PPE for comfort if appropriate.

Security

All employees have a responsibility to challenge individuals in staff areas who are not wearing Trust Identification.

All employees have a responsibility to be vigilant for the security of Trust building, property and people.

Sharps

All employees must be told what action to take on discovery of a sharp

All employees must be aware of the action to take following a sharps injury (Contamination Hotline).

Slips, Trips and Falls

All employees have a duty to act to prevent slips, trips and falls by identifying, removing or reporting hazards in their work area.

All employees must be told of the importance of wearing suitable footwear at work.

Violence at Work

All employees must be aware that verbal abuse, threatening behaviour and/or physical assault are not acceptable behaviours from visitors or patients and must be reported on an via the Incident Management System.

All employees should be told what to do if they experience violence at work including how to raise the alarm:

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Security can be called at GWH on extension 4601.

The Police should be called on Community Sites (9 -999) where assistance is required.

All employees should be aware that the Trust has a Security Management Specialist (SMS) who can offer support and advice to individuals and Departments following any security or personal safety incident. All such incidents must be reported via the Incident Management System.

All employees should be reminded of the importance of referring to patient records to identify where violence and aggression risks are increased.

All employees must be told of the location of the Department 'safe place(s)' for employees (behind a lockable door and with a means of raising the alarm).

Work-Related Skin Disease

All employees must be shown where barrier cream for hands is available for use in the Department

All employees should be encouraged to carry out hand checks regularly

All employees should be advised to report any issues or concerns with skin to their Manager and/or Occupational Health

Work Equipment

All employees must be made aware of any equipment in use with the potential to cause harm

All employees must be shown how to use equipment safely and know where to access Safe Systems of Work and/or the User Guide

All employees must report any equipment considered to be faulty and remove it from use

All employees must be told not to carry out any equipment activity if there is any uncertainty about safety or if there remain significant risks to the patient or employee

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