

Health and Safety Management Framework

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1. Introduction and Purpose

The CCG will endeavour, as far as reasonably practicable¹, to ensure that the workplace and work environment is free of health and safety hazards, and where elimination cannot be achieved, to minimise the risks associated with health and safety hazards to as low as reasonably practicable.

It will do this by following a systematic integrated approach, as set out in this framework for health and safety management. The framework is based on the Health and Safety Executive's guidance 'Managing for Health and Safety' (HSG65 Third Edition 2013) 'Plan, Do, Check, Act' approach.

2. Scope

This document applies to all employees who work for the CCG whether on a permanent or temporary basis, Governing Body members, contractors, agency staff, visitors and any other parties who have a business relationship with the CCG.

3. Definitions

HSE – Health and Safety Executive

HSWA1974 – Health and Safety at Work Act 1974

RIDDOR – Reporting of Injuries, Diseases and Dangerous Occurrences Regulations

4. System for Health and Safety Management

This system is based on the HSE's 'Plan, Do, Check, Act' approach detailed in health and safety management system guidance HSG65 (Third Edition 2013).

4.1	PLAN	Do	Check	Act
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Effective planning is essential for the implementation of a health and safety management system. The CCG has a systematic approach in place to effectively manage health and safety which includes this framework document, and in addition:

4.1.1 Policies

The CCG has the following policies in place:

- Health and Safety Policy
- Health and Safety Handbook

¹ 'So far as is reasonably practicable' can be defined as balancing the level of risk against the measures needed to control the real risk in terms of money, time or trouble. It is not necessary to take action if it would be grossly disproportionate to the level of risk.

- Lone Working Policy.

The purpose of these policies is to clearly describe how the CCG will manage health and safety so that everyone, from staff to stakeholders, understands their commitment to providing a safe working environment and how the CCG will meet the requirements of Health and Safety legislation.

4.1.2 Planning

Planning is essential for the implementation of health and safety policies. Adequate control of risk can only be achieved through co-ordinated action by all members of the organisation. An effective system for health and safety management requires organisations to plan to:

- Control risks;
- React to changing demands;
- Sustain positive health and safety attitudes and behaviours.

Planning should also include steps to ensure legal compliance and procedures for dealing with emergency situations. It should involve people throughout the organisation.

4.2	Plan	DO	Check	Act
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To deliver an effective health and safety management system the organisation must implement processes for managing and controlling health and safety related risks. This is delivered through:

4.2.1 Risk profiling and control

The process of assessing health and safety-related risks for staff and others includes:

- Identifying what could cause harm in the workplace, who could be harmed, and how
- Identifying existing control measures, or if further action is needed
- Deciding what the priorities are for action and how risks will be managed
- All managers assessing and managing health and safety risks ensuring implementation of effective controls locally and maintaining and updating risk assessment records.

4.2.2 Organising health and safety

This is a collective label given to activities that promote positive health and safety outcomes. These are:

Co-operation/employee involvement – it is a legal requirement for all employees to be consulted about health and safety issues in the workplace that affect them. The CCG encourages and supports employee consultation and acknowledges the importance of employee involvement in promoting a positive safety culture. This is currently achieved through: Staff Council, fire wardens, first aiders.

Responsibilities – key roles and responsibilities for health and safety management are detailed in section 5 of this document.

Competency and training – The CCG acknowledges that effective health and safety management requires adequate resources and competency across all levels of the organisation to ensure that responsibilities are understood. The CCG must ensure all employees are competent, and have the relevant experience, skills and knowledge to carry out their work safely and without risk to their health.

All staff are required to undertake health and safety related training. The training includes:

- Induction training for new staff
- Mandatory training provided as e-learning via the Electronic Staff Record (ESR) system covering:
 - Moving and Handling every 3 years
 - Health, Safety and Welfare every 3 years
 - Fire Safety awareness annually
 - Display Screen Equipment Information and Training annually.

The CCG will follow HSE guidance to determine the recommended number of fire wardens and first aiders required in each workplace. Based on this assessment, fire wardens and first aiders will be nominated and trained.

In addition to the above, organisations must appoint one or more competent people to help carry out the measures needed to comply with the law. As the CCG falls into the category of a low hazard environment, this role will be carried out by the Health and Safety Lead.

The CCG will also engage the services of a Health and Safety Adviser, to review and give guidance on policy content and ensure the CCG remains compliant with the most up-to-date legislation, regulations and best practice.

Communication – Health and Safety issues are communicated to employees through Staff Council, the weekly newsletter, posters and leaflets, team meetings.

4.2.3 Implementing plans

Having identified the health and safety-related risks applicable to the organisation, it is then necessary to put in place appropriate preventive and protective measures, to provide the right tools and equipment for the work being carried out and to keep them maintained. The CCG achieves this through:

Safe working practices – The control of relatively minor risks affecting all employees, such as ensuring passages and gangways remain free from obstruction, can be dealt with by a number of simply stated general rules, as detailed in the CCG’s Health and Safety Policy and Health and Safety Handbook.

Occupational health - The CCG is committed to the health, safety and welfare of employees. It commissions an occupational health service which delivers a range of benefits to the wellbeing of the organisation and its employees and provides a programme that equips managers with the tools and skills needed in order to manage the health of all employees. An occupational health assessment is required for all employees prior to them commencing a role within the CCG to determine fitness for the role and if any adjustments are required.

Maintenance and repair programmes – the type, frequency and depth of maintenance activities reflect the extent and nature of the hazards and risks identified through the risk assessment process. In conjunction with its facilities maintenance providers, the CCG has in place a programme of planned repair/replacement of components, elements or systems, a programme for servicing of equipment and a programme of routine inspections to ensure the CCG provides and maintains a safe and healthy workplace.

4.3	Plan	Do	CHECK	Act
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Measuring performance is essential to maintain an effective health and safety management system and improve health and safety performance. There are two forms of performance monitoring, active and reactive.

4.3.1 Active Performance Monitoring

This type of monitoring provides the organisation with feedback on its performance **before** an accident or incident of ill health occurs. The CCG undertakes the following active performance monitoring measures:

- Regular health and safety inspections;
- Review of policies – each health and safety related policy and procedure has a review date. The content and effectiveness of each of these policies is reviewed when it becomes due or sooner;

- Review of risk register – the CCG’s significant risks are reviewed bi-monthly by the Audit Committee, along with planned actions to reduce these risks;
- Planned preventive maintenance (PPM) – this forms part of the premises and equipment maintenance programmes outlined above;
- Training compliance – a review of compliance with health and safety related training is part of the Electronic Staff Record (ESR) system and compliance levels reported to line managers;
- NHS Staff Survey – the CCG participates in the NHS Staff Survey which includes questions on health and safety related issues. The results of the staff surveys are disseminated throughout the organisation.

4.3.2 Reactive Performance Monitoring

This type of monitoring provides the organisation with feedback on performance following an incident or untoward event. The following reactive monitoring takes place:

Incident and work-related absence data – the following key performance indicators will be monitored:

- The number of staff harm incidents;
- The number of RIDDOR reportable incidents to staff and others;
- The number of lost time/days due to work related incidents.

4.3.3 Incident reporting and investigation

Health and safety investigations form an essential part of the monitoring process. Findings from incident investigations can help identify why existing risk control measures failed, form the basis of action to prevent an incident from happening again, and improve overall risk management.

The CCG’s Health and Safety Handbook outlines the arrangements for identifying, managing, investigating and reporting accidents, incidents and near misses. This includes the requirement to report certain work-related injuries, cases of ill health and dangerous occurrences under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

The Joint Commissioning Committee will receive regular reports on incidents, investigations and action plans/lessons learned.

4.4	Plan	Do	Check	ACT
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4.4.1 Reviewing performance

Auditing and reviewing performance is essential to learn from experience, and to improve the health and safety management system through the development of policies, procedures and techniques.

Review of documentation and procedures - the health and safety audit and reviews carried out will include as a minimum:

- Review of Health and Safety Policy and Health and Safety Handbook every 3 years
- Review of Lone Working Policy every 3 years
- Annual review of performance measurements and risk assessments.

Earlier reviews may be necessary to reflect changes to legislation, technology or good practice, or as a consequence of any serious incidents.

4.4.2 Learning lessons

The key purpose of collecting information from incidents or near misses is to learn from them and act upon them. Where appropriate, incident outcomes will be shared with CCG staff through team meetings, staff briefings and via the Staff Council. Learning from incidents will be shared at an organisational level through regular reports to the Joint Commissioning Committee.

5. Duties and Responsibilities

This section provides a brief summary of the health and safety duties of key roles within the CCG.

5.1 Accountable Officer

The Accountable Officer has overall responsibility for ensuring

- a safe and healthy workplace and environment, so far as is reasonably practicable;
- the provision of sufficient resources to implement health and safety policies and procedures;
- that the CCG complies with all the requirements of Health and Safety legislation.

5.2 Associate Director of Corporate Services

Responsibility for the implementation of health and safety policies and procedures has been delegated to the Associate Director of Corporate Services. They will oversee compliance with these policies and procedures and will provide regular

progress reports to the Joint Commissioning Committee. They will also ensure that the Governing Body, Management team and staff are kept fully informed on major developments in Health and Safety legislation.

5.3 Health and Safety Lead

The Health and Safety Lead is responsible for developing and maintaining the CCG's health and safety policies and procedures, seeking advice from the CCG's health and safety adviser as required, and ensuring appropriate consultation is carried out. The Health and Safety Lead will also monitor the implementation of scheduled maintenance programmes and ensure that reactive maintenance is carried out as required.

5.4 Staff Council

The Staff Council provides the CCG with a forum where managers and staff can consult about health and safety issues. It allows staff representatives to raise health and safety issues that may be of concern and cannot be resolved at a local level.

5.5 Senior managers

Senior managers will ensure that all members of staff within their area of responsibility receive sufficient information, instruction, training and supervision with regard to their health and safety and welfare at work.

5.6 Line managers

Line managers will familiarise themselves with the CCG's health and safety policies and procedures and ensure that staff reporting to them are adequately trained and that safe practices and systems of work are followed in their areas of responsibility. They should also ensure that all incidents or near misses are reported in line with the CCG's incident reporting procedures.

5.7 Employees

Employees of the CCG have a legal duty to ensure that they take care of themselves and others, to co-operate with their employer and the local arrangements in order to achieve high standards in health and safety. The CCG expects all employees to be aware of their responsibilities and the health and safety arrangements in place. All employees are expected to contribute to improvements in health and safety wherever possible and must undertake mandatory health and safety training.

5.8 Health and safety adviser

The CCG's health and safety adviser will assist with the review of the CCG's health and safety policies and procedures, giving guidance on content and ensuring the CCG is able to fulfil its statutory duties as set out in health and safety legislation and regulations.