

HEALTH & SAFETY POLICY

Section 2 – Statement of Intent and H&S Responsibilities

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Version History:

VERSION	DATE AMENDED	ISSUED TO	BRIEF SUMMARY OF CHANGES
1.1	2010		Title changes only
2.0	Nov 2020		Split into 3 sections. Statement of Intent added. Organisation and Contacts added. General review
2.1	Feb 2021	Tony Saunders	Reviewed
2.2	July 2021	Peter Hartland	Reviewed Structure Chart amended Addition of Clinical Involvement/Boundaries
2.3	Nov 2021	Peter Hartland	Amendments made in response to review and re-issued for approval
2.4	Jan 2022	Tony Saunders	For ratification
2.5	March 2023	Peter Hartland	Review of revised Statement of intent

Please note that the intranet version of this document is the only version that is maintained. Any printed copies should be viewed as “uncontrolled” and as such may not necessarily contain the latest updates and amendments.

Health and Safety Policy Statement of Intent

It is the policy of St Luke's Hospice Sheffield (hereafter referred to as St Luke's) to comply with the Health and Safety at Work Act (1974) and all associated UK Health and Safety (H&S) regulations and legislation, and to provide and maintain a safe environment for patients, employees, volunteers and visitors.

This policy reflects our commitment to ensuring that H&S at work is paramount to the organisation, and that effective monitoring, management and promotion of H&S actively contributes to the safety and wellbeing of our patients, our staff, our volunteers and our culture and maintains a positive reputation for the organisation.

Our objective is to demonstrate this ongoing and determined commitment to improving H&S at work throughout our organisation. Through the ways in which we work and behave, we will minimise the risk of occupational injury or ill health to all our employees and stakeholders and this includes all environments on St Luke's premises and includes anyone working on behalf of St Luke's out in the community.

This policy sets out the various responsibilities of St Luke's, its employees and stakeholders, and forms the basis of the H&S Management System.

Whilst the Executive at St Luke's will do all within its powers to ensure the H&S of its employees, it is recognised that H&S is the responsibility of every individual associated with St Luke's. It is the duty of each employee to take reasonable care of their own and other people's welfare and to report any situation, which may pose a risk or threat to the well-being of any other person.

St Luke's undertakes to:

- promote and support a positive H&S culture within the working environment, minimising the number of instances of accidents and illnesses and aiming to achieve an incident-free workplace
- monitor, manage and report on H&S effectively and respond appropriately following any accident, incident or near miss, adjusting this policy and/or working practices as required
- make available reasonable finances and resources to implement this policy
- protect the H&S of all visitors to its premises, including patients, clients, contractors, volunteers and temporary workers as well as any members of the public who might be affected by our operations
- provide all necessary equipment, training, information and supervision to employees and stakeholders
- be prepared to invoke disciplinary procedures in case of any deliberate disregard for the H&S Policy

Management and Employee Responsibility:

- stay familiar with the H&S Policy (a copy of the policy is held on St Luke's Intranet)
- co-operate with St Luke's and with their colleagues in implementing the policy, and ensuring that their own work is without risks to themselves and others as far as reasonably practicable
- support safe working practices within St Luke's and report any accidents/incidents or near misses immediately
- be proactive on H&S issues as part of the continued development of the H&S culture of the organisation

St Luke's H&S Policy has immediate effect and replaces all previous versions. The Policy will be regularly monitored, reviewed and updated, as necessary, and at least every 24 months.



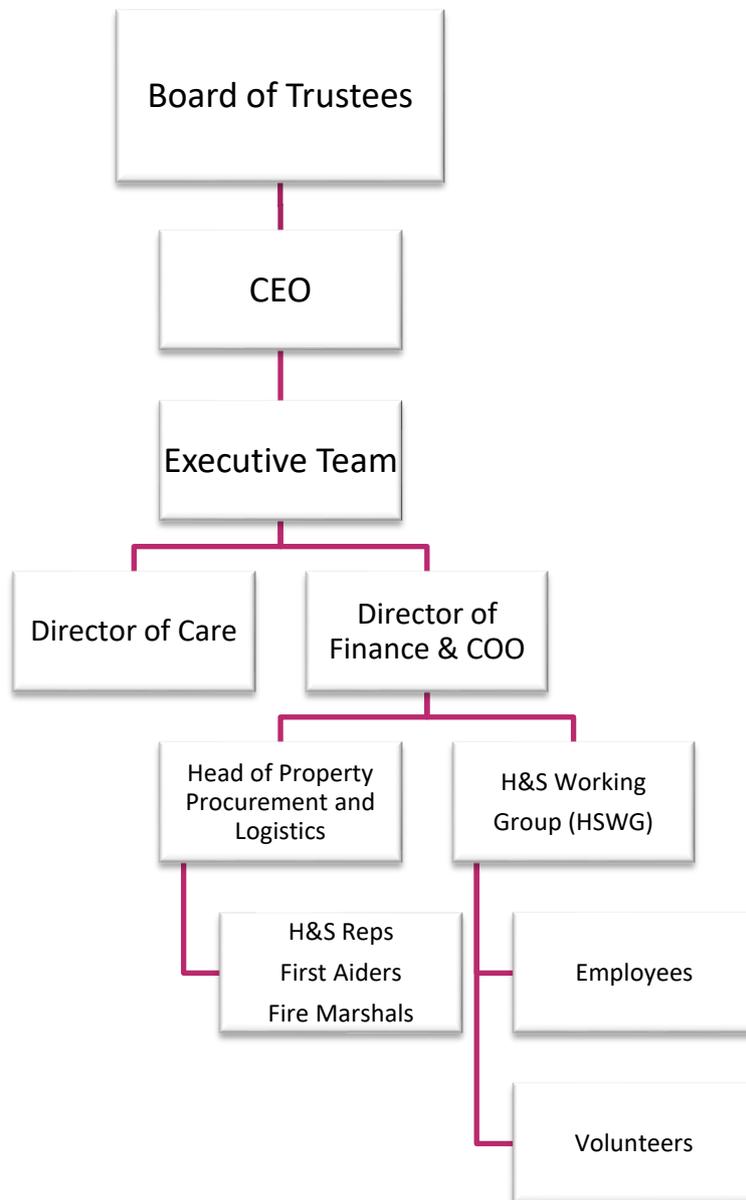
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Section 2 – Statement of Intent and H&S Responsibilities

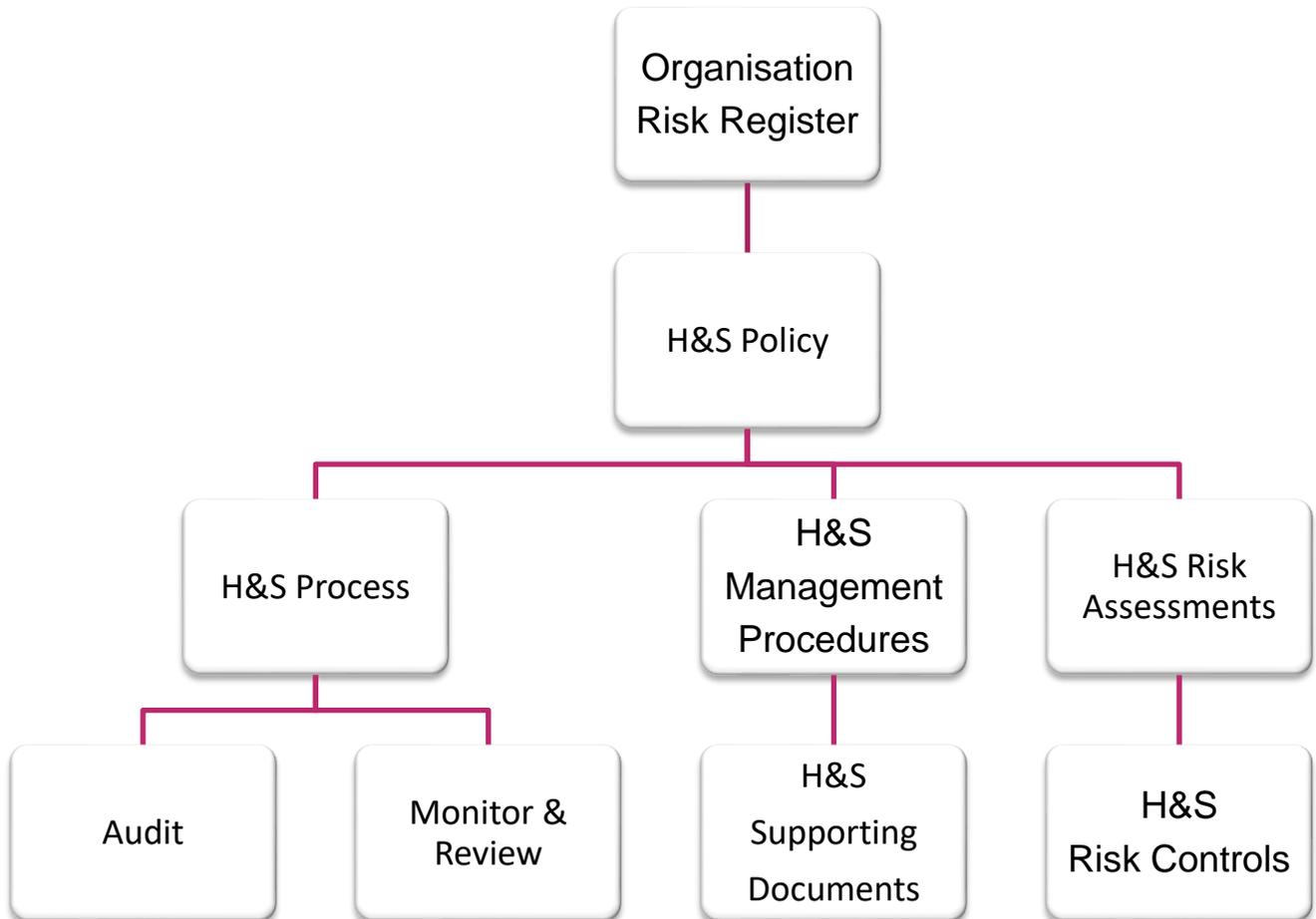
St Luke's H & S Management System - Responsibilities

This policy covers all St Luke's workplaces, premises and all employees, voluntary workers and contractors employed by or working for St Luke's. It will form the framework of all H&S activities.

H&S Organisational Structure



H&S Management System structure



This H&S policy is linked to various sub-policies listed in Section 3

All H&S Risks are reviewed annually as part of the organisation wide Risk Management approach.

There is an organisation wide Incident Management policy which includes Incident and Near Miss systems, procedures and responses and contains full details of all reporting and frequencies.

All Incidents and Near Misses are reviewed and investigated by an appropriate investigating manager and also a clinical or non-clinical lead to ensure appropriate action and follow-up. Urgent items are escalated to the appropriate Head of Dept and/or Executive Lead as soon as possible after they are reported.

Incidents and Near Miss data is reviewed on a quarterly basis by the the H&S Working Group.

Reports on both Risk and also Incidents and Near Misses are presented to both the Executive and the Audit and Risk Committee on a regular basis and the details also form part of an annual board paper.



St Luke's H & S Management System - Responsibilities

Board of Trustees

- The Board of Trustees is collectively responsible for ensuring that health and safety remains a high profile aspect of its discussions and will seek suitable assurances that acceptable safety standards are being achieved and maintained under all applicable legal, clinical and government frameworks

Chief Executive Officer (CEO)

- The CEO is accountable for compliance with H&S legislation and is responsible to the Board of Trustees. On a day to day basis, the CEO delegates management and oversight to the Director of Finance and Chief Operating Officer. The CEO signs the statement of Intent on behalf of the organisation.

Director of Finance and Chief Operating Officer (DoFCOO)

Day to day management and oversight of St Luke's H&S Policy, procedures and compliance is delegated to the DoFCOO who is accountable to the CEO. In particular, the DoFCOO needs to

- ensure that adequate resources are available to implement the H&S policy
- ensure H&S performance is regularly reviewed at Executive level
- monitor the effectiveness of the H&S policy
- ensure that the policy is reviewed annually and approves the statement of Intent to confirm the above
- discuss and propose targets with Executive colleagues as part of personal objectives and monitoring achievements as part of the personal review process
- Include a section within St Luke's Annual Report which outlines St Luke's health and safety plan and performance
- Ensure that the CEO and the Board of Trustees are informed as required on health and safety matters affecting staff, volunteers or the public
- Support the training and development of staff
- Formulate and oversee the development of policies that identify key health and safety objectives and review progress towards their achievement
- Plan, measure, review and audit health and safety activities to ensure that legal requirements are being met and that all risks eliminated or minimised to an acceptable level
- Ensure that statistical information is available on health and safety performance throughout St Luke's and interpret such information in order to evolve action plans to improve or maintain standard.
- Ensure that health and safety responsibilities are adequately reflected in the current job descriptions, training programmes and induction procedures
- Ensure that health and safety information is disseminated throughout St Luke's
- Support quality initiatives to improve safety standards.

Executive Members

The Executive Team has executive responsibility for the development of the strategic direction in relation to health and safety. Each Director is responsible for the effective management of H&S within their own area or function. This includes:

- promoting the implementation of the St Luke's H&S policy and management system
- understanding and review of St Luke's H&S plans including highlighting priorities
- ensuring that discussion of both clinical and non-clinical H&S matters is included in Board meetings and team meetings
- ensuring that employees are aware of their responsibilities and they have received adequate training including and in particular during their induction
- reviewing any H&S reporting including both clinical and non-clinical incidents and near misses
- reviewing any H&S issue highlighted by employees
- participating in risk assessment programmes
- ensuring that safe systems of work are implemented
- enforcing personal protective equipment requirements as appropriate
- setting a good example on H&S matters

Audit and Risk Committee

- To provide organisation wide assurance to the Trustees and Exec across all aspects of governance and internal controls;
- To provide a consistent framework for governance activity across the organisation
- To provide oversight and ownership of central, group wide governance policy
- To review and respond to regular assurance reporting at regional level
- To provide direction on priorities for governance/internal audit activity in line with strategic direction
- To provide oversight of governance improvement programmes

Clinical Quality and Risk Lead (currently the Clinical Governance Manager during maternity leave)

- advising the Director of Care and Lead for Healthcare Partnerships on all pertinent matters of clinical governance, quality and risk including any matters relating to the following bullets as relevant to this policy:
- responsible for managing all elements of clinical governance including CQUINs, complaints, incidents and Serious Incidents
- ensuring that proper records are maintained and training needs identified and escalated
- responsible for preparing and submitting reports on clinical quality and associated risk(s) to Healthcare Governance Committee and other Committees as required
- providing Serious Incident updates to ARC
- managing the Central Alerting System process for the organisation
- coordinating clinical policy review and refresh activities as the programme of updates requires
- linking with the Head of Property, Procurement and Logistics to ensure all clinical H&S issues are included in the H&S Management system

Head of Property, Procurement & Logistics (Organisational lead for H&S)

- advising the DoFCOO on all pertinent matters of H&S including any matters relating to the following bullets
- responsible for managing any non-clinical H&S contracts in place and identifying any requirements for these
- ensuring that proper records of non-clinical accidents, incidents and near-misses are maintained, and that any significant training needs are identified and escalated
- responsible for preparing and submitting reports on non-clinical H&S measures including annual reviews
- providing quarterly reports with H&S measures to ARC and an annual Board Paper.
- reviewing the H&S Policy annually
- co-ordinating the H&S annual inspection and risk assessment programmes
- review the sub-policy wordings and arrangements and agree these across the organisation e.g.: lone workers, home workers
- Linking with the Clinical Quality and Risk Lead to ensure all clinical H&S issues are included in the H&S Management system
- liaising with the H&S bodies and St Luke's insurers on H&S matters

Health & Safety Working Group (HSWG)

The H&S Working Groups will convene four times per year. They offer an opportunity for employees to raise and review H&S issues and a conduit for the organisation to disseminate H&S initiatives, policies and directives out to employees. The Executive Team receives minutes and reports from the HSWG. The DoFCOO is ultimately responsible for the HSWG.

The HSWG are responsible for:

- Designing and operationalising the H&S Policy and H&S Management system
- regular reviewing of accidents or near misses and ensuring appropriate follow-up is undertaken
- providing a forum for raising H&S issues from staff, management, HR, H&S Reps & The Executive
- reviewing the implications and impact of changes in H&S Legislation and taking appropriate action in response on behalf of St Luke's
- identify and recommend changes in working practices, if required
- identify training requirements for employees and sourcing H&S training
- communication of H&S Strategy from The Executive Team to the H&S Representatives and employees;
- sourcing additional specialist H&S assistance when necessary

Human Resources

Human Resources will:

- Assist in the facilitation of significant training in response to escalated needs
- maintain records of employee training, induction sheets and – if appropriate - accident records where they need to be recorded on the HR system under the advice of DoFCOO, Director of Care and/or HOPPL
- review the sub-policy wordings and arrangements for HR related policies
- communicate HR related Policies to all concerned as appropriate
- coordinate certain risk assessments and associated procedures eg maternity adaptations, working from home etc



H&S Representatives

The H&S Representatives are generally based in each different location across the organisation and there should be two representatives for each location. They are responsible for:

- liaising between employees and management on H&S issues
- carrying out and recording fire alarms, fire evacuations according to local regulations
- carrying out and recording regular H&S inspections and complete monthly audit report
- providing H&S induction training to new employees based at their location
- identifying H&S training needs at their offices.
- ensuring the site has adequate fire marshals; First Aiders and someone trained in manual handling;
- ensuring H&S Notice board is up to date with appropriate policy, insurance, fire safety and contact information
- ensuring workstation assessments are completed for new employees(or after office moves) as appropriate
- supporting employees to resolve any actions arising from workstation assessments
- ensuring that any actions arising from the annual H&S audits are addressed
- recording hazardous substances and materials where necessary
- assisting St Luke's with the introduction of H&S initiatives

H&S Noticeboard

There is a H&S Noticeboard at each St Luke's location of work must display the following information:

- H&S Legal Poster
- Signed "Statement of Intent" from the H&S Policy
- St Luke's certificate of Employer's Liability insurance
- A list of Fire Marshals and First Aiders
- Notification of who the H&S Representative for the site is
- The Employee Assistance Helpline details
- Fire Evacuation Assembly Points



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Fire Marshals

Fire Marshals will:

- participate in all required fire marshal training
- be aware of and communicate emergency procedures in their area
- ensure that all employees in their area are familiar with their assembly points, and nearest escape routes;
- be involved in 6 monthly fire evacuation tests
- ensure assembly points and fire routes are accessible and clear and are communicate on the H&S noticeboard
- ensure there are sufficient and appropriate fire extinguishers on their site

First Aiders

All First Aiders must have the necessary training and qualifications, as evidenced by a current First Aid certificate issued under an approved training course. There are no trained First Aiders at Little Common Lane or Clifford House because these properties are covered by clinical representatives present 24/7/365.

First Aiders will:

- be available to attend or respond to a First Aid incident when they are in the office
- understand the importance and process of reporting incidents and near misses
- ensure all incidents and near misses are reported and if required with any statutory authority including making a record of all treatments for which they are responsible i.e.: RIDDOR reporting
- be involved in any follow-ups with the person involved after an incident as appropriate

Employees

Employees have responsibilities in respect of H&S. In particular, they must:

- co-operate with management in the implementation of and adherence to H&S policy and procedures;
- take reasonable care for their own safety and for the safety of others who may foreseeably be affected by their actions at work
- not intentionally or recklessly interfere with or misuse anything provided for H&S at work
- use all safety equipment and PPE provided
- report all H&S concerns to their H&S Representative or the HR team
- complete workstation assessments and other H&S training as required
- ensure all accidents, incidents and near misses are reported to their H&S Representative
- complete appropriate risk assessments where required i.e.: workstation assessments



Heads of Department and Line Managers

Heads of Departments have responsibilities in respect of H&S. In particular, they must:

- have an awareness of the H&S Policy and the H&S issues affecting their teams and areas of responsibility
- ensure that all members of their team are aware of their responsibilities and have received appropriate training
- co-operate with management in the implementation of and adherence to H&S policy and procedures
- ensure that there are appropriate documented structures for the discussion of H&S matters with their teams, e.g. team meetings, etc.
- co-operate with the H&S Representative to investigate and follow up on any incidents or near misses that occur in their areas of responsibility

Health & Safety Consultancy- as required

H&S Consultants can provide:

- competent person
- updates on changes to legislation and regulations (globally) and any actions St Luke's needs to undertake as a consequence
- support on St Luke's H&S Risk Register and H&S Management System
- consultancy on any H&S issue
- presence at HSWG

Safe Systems of Work

- Each Department is required to have operational health and safety procedures and protocols specific to that area. These form the basis of safe systems of work and are developed following detailed risk assessment
- These safe systems of work (procedures and protocols) must be strictly adhered to by all staff and volunteers
- They must be regularly reviewed and updated as necessary by the Executive Team, Heads of Departments and Departmental Managers to ensure their continuing effectiveness and following changes to legislation, identification of reasonably practicable good practice or the review of a risk assessment stimulated by a change in working practice or an incident or near miss.
- Disciplinary action under the terms of the St Luke's Disciplinary Procedure may be taken against any employee, regardless of status, who shows wilful disregard for the safe working practices. Where the total disregard for Safe Working Practices seriously affects the health and safety of themselves or that of any other employees, this may be viewed as gross misconduct and result in appropriate action. In addition, the employer and their employees may be subject to prosecution under the Health and Safety at Work Act 1974.



Training

- Health and safety training is a key element of St Luke's Induction and mandatory training programme
- Personal Development Plans will identify the need for further safety related training
- Training records will be maintained and kept on Cascade by Head of Department, Line Managers and HR

Incident Management

There is both a paper based system and an online system for recording any incidents and near misses. These are investigated, reviewed by senior management and any learnings implemented. Please see sub-policy – Incident Management

Monthly Reports

Monthly, incident and near miss reports will be provided to the Executive Team on a quarterly basis, or as requested. Summary reports will also be submitted to the Audit and Risk Committee with Executive commentary as necessary.

Monthly H&S Updates are to be introduced by end of March 2022 for occupied buildings (Shops, Clifford House, and DC) and provided to the Facilities Manager each month by the last day of each month. Any issues noted must be addressed by the local team by reasonable and practical action. Issues missed by the local team may then be picked up and acted upon at the HSWG or by the H&S team in conjunction with the local team. Any headlines or items of interest outside of incidents and near misses will be reported by the Head of Property to the Executive Team.

An annual paper will be produced for the financial year, summarising:

- incident trends and statistics (and follow-up actions)
- H&S risk assessments summaries
- new initiatives
- updates related to safety policies and projects
- legislative changes
- training updates
- strategy and objectives for the following 12 months

This paper will be submitted to the Executive Team in May for the financial year ending 31 March; and a summary report will subsequently be reported at Audit and Risk Committee, and to the Board.

Communication between Employees and HSWG

H&S Representatives can raise any H&S issues with any member of their HSWG or to the H&S mailbox any time on behalf of the site or on behalf of particular employees. These issues/items are added to the HSWG Agenda as appropriate.

Details of St Luke's H&S policy and H&S Management system are held on the Intranet. Redacted Minutes of meetings are available to all employees and a H&S Matters communication is issued at least twice a year.



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H&S Expertise

The Facilities Manager hold NEBOSH Diploma and H&S Officer holds a NEBOSH certificate.

Abi Metcalfe – a.metcalfe@hospicesheffield.co.uk

Mel Armstrong – s.hogg@hospicesheffield.co.uk

Annie Armitage, the Clinical Quality and Risk Lead holds IRISC

For further H&S expertise St Luke's have an ongoing commercial relationship with H&S specialist organisations including Redbox, i-Croner and Barbour EHS. I-Croner is an online H&S provider offering legal updates, advice, templates and training materials. Redbox offer H&S advice and consultancy on an "as needs" basis.