



Health and Safety Policy 2018 – 2023

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The provisions of this policy, which was developed by a partnership group on behalf of Grampian Area Partnership Forum, apply equally to all employees of NHS Grampian except where specific exclusions have been identified.

NHS Grampian
Health and Safety Policy

This document is also available in large print and other formats and languages, upon request. Please call NHS Grampian Corporate Communications on Aberdeen (01224) 551116 or (01224) 552245.

This Policy has undergone Equality and Diversity Impact Assessment.

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NHS Grampian Health and Safety Policy

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NHS Grampian Health and Safety Policy

Statement of Intent

Safety Is Everybody's Responsibility

The core values of NHS Grampian are Caring, Listening, Improving.

Embedding these values in everything that we do is an important part of our vision to improve health and reduce inequalities; deliver high quality care in the right place; involve our patients, public, staff and partners; and develop and empower our staff.

We recognise that to deliver these aims, and to provide effective services, we must ensure that risks to health, safety and welfare, for all patients, clients, staff, visitors, volunteers, contractors and others who are affected by or involved in our activities, are prevented, managed and controlled, as far as possible and that everyone is kept safe and free from harm.

The minimum acceptable standards of health and safety are those contained in legislation. It is our obligation to meet these legal standards and those set within the Staff Governance Standard, in order to create a positive employee experience which will facilitate high quality and safe patient or client care. The Board of NHS Grampian understands and accepts that for the organisation to be successful we must conduct our business and operations with certain commitments in mind at all times.

With respect to health, safety and well being, it is the policy of NHS Grampian Board, the Senior Leadership Team, Clinical Leaders, Managers, Staff and their representatives to:

- Lead by example, through our managers, in promoting a positive health and safety culture.
- Speak up if we see something unsafe.
- Act to ensure the health, safety and wellbeing of our employees, patients, clients, contractors, volunteers and members of the public.
- Clearly define responsibility and accountability from the Board to the frontline to create organisational alignment to keep people safe.
- Ensure that we have arrangements in place that comply with the law, professional and NHS standards that are relevant to the structure and operations of the Board and within service delivery.
- Reduce harm by preventing incidents, accidents and work related ill-health.

- Provide adequate control of risks arising from our work activities.
- Take account of health and safety in all change and service redesign programmes and projects.
- Ensure that our staff are competent by the provision of information, instruction, training and supervision.
- Ensure that arrangements are in place to engage with our staff and others in accordance with the principles of partnership working.
- Cooperate and coordinate with other employers/agencies where they share premises or workplaces.
- Ensure that arrangements are in place for the safe use of premises, plant, equipment, material and substances.

As Chief Executive, I have overall accountability for health and safety across NHS Grampian. The Board Directors, the Director of Acute Services, the Chief Officers of the Health and Social Care Partnerships and all General Managers are responsible for assuring that the Health and Safety Policy and its plans are implemented operationally. In addition, I have appointed the Director of Workforce as the Lead Executive Director for Health and Safety with the responsibility to oversee the implementation of this policy through the activities of the Board's Occupational Health and Safety Committee. Line Managers are directly accountable for ensuring this policy is implemented within their area of responsibility.

Everyone working within NHS Grampian is responsible for making safety at work a priority to protect themselves, their colleagues, patients, visitors and the interests of NHS Grampian. Effective control of health and safety can only be achieved through cooperative working at levels of the organisation and this Policy Statement reflects the importance which I attach to the health, safety and welfare for all our employees, patients, clients, contractors, volunteers and members of the public.



Amanda Croft
Acting Chief Executive
May 2018

NHS Grampian
Health and Safety Policy

1 Introduction

NHS Grampian is striving to create a positive and inclusive working environment and culture, providing the conditions for individuals and teams to thrive and achieve the highest standard of performance and service; by adhering to NHS Scotland's Staff Governance Standard where contributions are fully recognised and valued by all.

2 Aim

The aim of this policy is to set in place a framework to enable NHS Grampian and all its employees to continually improve its health and safety arrangements by ensuring that health and safety is a core activity of NHS Grampian and Health and Social Care Partnerships.

We will encourage the workforce to improve performance by engaging in health and safety at all levels, recognising that this is a core activity of the way health and social care is enabled and by participating in committees, groups and other forums to drive and enable change.

3 Scope

This policy applies to all staff employed by NHS Grampian, either directly or indirectly, and to any other person or organisation which uses NHS Grampian services or premises for any purpose. It will also apply to bank workers, temporary staff, volunteers, young workers, staff working from home and contractors working on NHS Grampian business. The principles of this policy shall apply to all NHS Grampian work activities, regardless of who is supplying or providing them.

This policy will be the overarching control document for all relevant health and safety arrangements, strategy and supports the Risk Management Policy.

4 Objectives

In order to achieve compliance with this policy, NHS Grampian has set the following objectives:

- ensure that NHS Grampian has a proactive management system in place to enable it to comply with all relevant statutory health and safety legislation;
- set and maintain high standards for health and safety throughout NHS Grampian, in order to demonstrate NHS Grampian's commitment to reducing adverse events causing ill-health as well as other environmental hazards and risks in the workplace;
- identify hazards and risks and set in place programmes to either remove, control or reduce these risks;
- provision of adequate resources to enable NHS Grampian to properly implement this policy and monitor its effectiveness;
- monitor operations at all work areas for health and safety compliance;
- ensure that these objectives are communicated to all staff, patients, visitors, contractors, temporary workers and third parties, as appropriate;
- ensure that all staff are given the necessary information, instruction, training and supervision to enable them to work in a safe and healthy manner;
- set out the organisation's arrangements for health and safety in accordance with Plan - Do – Check – Act Methodology as contained within the HSE document, HSG65¹;
- inform managers and staff as to their roles and responsibilities with respect to these objectives.

5 Duties and Responsibilities for Managing Health and Safety

The responsibilities of staff, committees and groups are outlined in this document. Additional specific detail will be included within other health and safety related arrangements.

5.1 The Board of NHS Grampian

The Board of NHS Grampian is responsible for demonstrating strong and active leadership from the top; ensuring there is visible, active commitment from the Board and appropriate board-level review of health and safety.

The Board is ultimately responsible for the health, safety and wellbeing of all

¹ Managing for Health and Safety (HSG65)

employees and anyone that may be affected by their undertaking. The Board will ensure that these matters are integral to the way in which it manages its business. Health and safety will remain a board level topic.

The Board of NHS Grampian recognises their responsibility to provide leadership in relation to the provision of health and safety management for staff, patients and visitors.

The board will seek assurance that health and safety is being considered as an integral part of the work of the organisation. This will be assured, through the Staff Governance Committee, and by determining compliance with both the relevant legislation and the NHS Scotland Staff Governance Standard.

5.2 The Chief Executive

The Chief Executive is the officer ultimately responsible within NHS Grampian for maintaining and achieving the policy aims and is responsible for:

- delegating responsibility for health and safety to an Executive Director;
- ensuring health and safety arrangements are in place to meet legislative and policy requirements;
- supporting health and safety by ensuring that it is integrated into senior management decision making processes;
- providing appropriate resources for implementing and maintaining this policy;
- input into setting the performance standards of this policy (via the Occupational Health and Safety Committee);
- reviewing the effectiveness of this policy;
- communicating the decisions regarding escalated risks, through the appropriate management structures.

5.3 Director of Workforce

The Director of Workforce has delegated executive responsibility for health and safety, in particular for:

- informing the Board on all relevant health and safety management issues, including alerting the Board to the requirements of this policy and any actual or potential breaches of Health and Safety Legislation;
- ensuring clear lines of accountability throughout the organisation for the management of health and safety and that all staff groups are represented;
- putting arrangements in place to get competent people to help them satisfy health and safety legislative requirements;

- ensuring co-ordination and co-operation on health and safety matters between NHS Grampian, its neighbours, contractors and any other relevant stakeholder;
- ensuring that suitable plans are in place to manage health and safety;
- ensuring that adverse health and safety consequences of introducing new technology, equipment or procedures and ways of working are mitigated so far as is reasonably practicable;
- ensuring the Board's Occupational Health and Safety Committee is in place;
- co-chairing the Board's Occupational Health and Safety Committee, with the Employee Director to ensure that it is effective.

5.4 **Executive Directors**

All Executive Directors have delegated corporate responsibility to ensure provision of a safe working environment. Within their respective areas of responsibility they shall ensure adequate arrangements and resources are provided to implement the requirements of this policy.

They will ensure that health and safety arrangements are adequately resourced, competent advice is obtained and reports, performance and action plans are reviewed to ensure compliance.

5.5 **General Managers/Chief Officers**

General Managers/Chief Officers are responsible for ensuring all of their staff are **aware** of this Policy and comply with the relevant health and safety legislation and all NHS Grampian, health and safety arrangements, including ensuring

- putting into practice all arrangements, procedures and safe systems of work which are designed to reduce health and safety risks associated with NHS Grampian's work;
- all staff and workers engaged in healthcare provision and support have adequate information, training, instruction and supervision. This includes refreshing staff knowledge and skills at regular intervals;
- monitoring the effectiveness of arrangements and safe systems of work, including annual review of adverse events recording, review and management inspections;
- any necessary local policies and procedures are developed and maintained;
- staff receive suitable and effective support following any adverse event relating to health and safety;
- arrangements are put in place for constituted health and safety

committees/groups at the appropriate level(s) at which operational areas are able to develop and maintain health and safety management arrangements to co-ordinate and monitor progress and performance;

- sufficient investigation of adverse events is completed within the NHS Grampian timeframes, and controls are implemented to reduce the likelihood of reoccurrence so far as is reasonably practicable. Ensuring all investigations are reviewed by appropriate management teams and/or health and safety committees;
- suitable and sufficient risk assessments are carried out by competent staff and that the findings are implemented or escalated and reviewed, as appropriate and in compliance with the NHS Grampian Risk Assessment Policy;
- involvement in workplace inspections and incident investigations;
- Health and Safety Representatives involvement in issues related to health and safety.

Additionally, and where applicable, the above have responsibility for:

Establishing that all equipment, plant and substances used are suitable for the task and are kept and stored in good working condition. This must include the regular maintenance and servicing of equipment as required by relevant legislation. Ensuring that safe access/egress to and from the workplace is maintained, as far as is reasonable, at all times.

5.6 **Head of the Occupational Health and Safety**

The Head of Occupational Health and Safety is responsible for the overall health and safety service. Specifically within occupational health they are responsible for ensuring fit for purpose arrangements for the assessment of fitness for work, for advising about control of health risks in the workplace, and for leading staff health and wellbeing. The Head of Occupational Health and Safety is accountable for planning, developing and managing the delivery of proactive strategically focused Occupational Health and Safety services in accordance with the needs of users, health and safety legislation and local and national initiatives.

The Head of Occupational Health is responsible for the coordination of:

- pre-employment screening;
- management and self referral service;
- immunisations against infectious diseases and follow up post exposure;
- health surveillance;
- staff support and counselling;

- advice about adjustments to work on health grounds;
- rehabilitation back to work after illness;
- special advice to managers on generic risk assessments;
- advice to managers on individual risk assessments (taking account of individual susceptibility due to pregnancy or health problems);
- health promotion and wellbeing advice;
- regular feedback to the Board on work-related ill health.

5.7 Head of Health and Safety

The Head of Health and Safety has responsibility for promoting understanding and compliance with this Health and Safety Policy and will:

- act as the nominated 'competent person' for NHS Grampian as required in Regulation 7 of the Management of Health and Safety at Work Regulations 1999;
- provide support in the implementation of an Organisational Health and Safety Management Framework using HSG 65;
- keep the Board informed of changes in the relevant statutory provisions and assess the implications of such changes with regard to their area of responsibility;
- liaise effectively with the Health & Safety Executive (HSE), and other safety related external agencies, on behalf of NHS Grampian;
- regularly monitor and review all existing NHS Grampian health and safety policies, arrangements and guidance; ensure that these are readily available to all staff, that changes are effectively communicated and that they are implemented;
- ensure that arrangements are in place to ensure staff are provided with information on the likely risks and dangers arising from NHS Grampian work or activity; introduce measures to reduce or eliminate these risks; and inform staff as to what they need to do if they have to deal with a risk or danger;
- provide Health and Safety Reports to the Board, Staff Governance Committee, Occupational Health and Safety Committee and others, as required;
- assist and provide support with the formulation, development and the delivery of health and safety training;
- analyse health and safety related NHS Grampian wide adverse events, ensuring appropriate review(s), the analysis of health and safety data, production of detailed reports, and reporting as appropriate.

5.8 Health and Safety Representatives

Health and Safety Representatives are appointed by recognised Trade Unions/ Professional Associations, or are elected under the Consultation with Employees Regulations² to represent employees on health and safety matters.

The role of the Health and Safety Representative is independent of management. Representatives are there to represent the interests and concerns of their co-workers and respond on their behalf. They provide valuable insight, skills and resources that help employers and their co-workers.

The law sets out what functions Health and Safety Representatives have including the right to:

- represent employees about matters or changes that could affect the health, safety and wellbeing of the employees;
- represent employees with Health and Safety Inspectors from the HSE or local authorities;
- review accidents, near misses, and other potential hazards and adverse events in the workplace;
- review complaints made by an employee they represent about their health, safety or wellbeing in the workplace;
- present the findings of reviews to relevant stakeholders;
- inspect the workplace;
- with at least one other appointed representative, request in writing to set up a health and safety committee;
- attend health and safety committee meetings as a representative of employees;
- support the risk assessment process and be made aware of outcomes;
- attend training courses;
- support managers with health and safety audits in partnership.

NHS Grampian equally supports Health and Safety Representative both Union Accredited or elected by employees. Further information is available in the Safety Representatives Protocol.

5.9 All NHS Grampian Staff

All staff who are engaged in healthcare provision and support services, within NHS Grampian, are responsible for:

- taking precautions and reasonable care with regard to their own safety and

² Consultation with Employees Regulations

health, and that of any other persons who may be adversely affected by their actions and omissions;

- complying with all relevant policies, arrangements and safe systems of work that are in place to minimise and / or manage any health and safety risk to all persons, including themselves and patients;
- reporting of all adverse events, including near misses;
- attending the appropriate training and instruction, ensuring practical skills are regularly refreshed; and ensuring that they alert their manager to their training needs in line with their personal development plan;
- assisting managers with the identification and management of all health and safety risks arising from their day to day activities.

5.10 Head of Radiation Protection Service

The Head of the Radiation Protection Service will normally be an appointed Radiation Protection Adviser (RPA) and a Radioactive Waste Adviser (RWA) to provide advice on the storage and disposal of radioactive waste.

The Head of the Service is responsible for:

- providing guidance and advice to the Medical Director and Radiation Safety Committee on all matters relating to Radiation Protection and legal compliance issues (see section 6.10);
- providing guidance and advice to departmental managers and departmental responsible persons for IR(ME)R³ on all matters relating to radiation protection, legal compliance issues and the interpretation of NHS Grampian radiation safety policy documents;
- advising whether a radiation incident involving an employee or patient receiving an exposure greater than intended, or that adversely impacts on the environment, should be reported to the relevant regulatory authority following a radiation incident;
- advising on and providing training and instruction to employees on radiation safety as required;
- taking a lead role in providing NHS Grampian's emergency response to major radiation incidents and maintaining emergency response plans;
- assisting departmental managers in auditing and other duties relating to specific regulatory requirements.

The work of the Head of Radiation Protection is supported by the Radiation Protection Service in the Department of Medical Physics.

³ The Ionising Radiation (Medical Exposure) Regulations 2017

5.11 **Nominated Officer Fire**

The Nominated Officer Fire is responsible for:

- ensuring that suitable and efficient fire risk assessments are undertaken, findings are appropriately acted upon and ensuring such fire risk assessments are regularly reviewed;
- monitoring all fire safety provisions including the provision and review of local fire evacuation plans, staff training at all levels, the keeping of records in relation to the testing and maintenance of systems, staff training and fire drills;
- ensuring that regular reports regarding the fire safety performance of the organisation are provided to the Fire Safety Management Group and to the Occupational Health and Safety Committee;
- receiving reports of fire and unwanted fire signals and shall review and monitor actions to mitigate the potential for their reoccurrence;
- liaison with the Fire Safety Advisers in regards to the points above and other relevant matters.

The Nominated Officer Fire will be supported by the Health and Safety Specialist (Fire Safety) to ensure the above responsibilities are delivered.

5.12 **Health and Safety Specialist (Manual Handling)**

The Health and Safety Specialist (Manual Handling) is responsible for leading and professionally managing an effective Manual Handling Service and Violence and Aggression Service, within allocated resources and support. This includes the following:

- advising on strategic developments necessary to reduce musculoskeletal disorders to meet statutory and best practice compliance, equipment procurement principles and new projects;
- provision of professional advice and recommendations to staff at all levels of the organisation to aim to reduce adverse events and improve working practice;
- liaison with service providers and be involved in discussions regarding service level agreements;
- development of systems to audit the effectiveness of procedures across NHS Grampian and reporting to the Grampian Area Partnership Forum (GAPF) and the Occupational Health and Safety Committee on developments, priorities and risks;
- reviewing procedures, risk control procedures and performance through audit and incident data analysis;

- ensuring systems are in place to monitor the competence of all staff with a role in manual handling as per the Scottish Manual Handling Passport Scheme;
- supporting the implementation of the Manual Handling Education Programme and the Management of Violence and Aggression programmes ensuring that a record of all employees is maintained.

5.13 **Waste Manager**

The Waste Manager is responsible for:

- identification of Waste and Materials safety risks and ensuring compliance;
- provision of secure storage, uplift, recycling and disposal arrangements (including take back schemes from NHS patients), adequate facilities, resources and competency training to support, implement and maintain all of the aspects of the Waste Management Policy;
- provision of management and annual performance reports to Chief Executive, Management Teams, Infection Prevention and Control, Occupational Health & Safety and Risk Management;
- providing and leading the Waste Management Group to provide appropriate cross sector expertise, to support, to co-ordinate and to review operational management and controls in accordance with statutory and mandatory requirements.

The Waste Manager will report to the Head of Sustainability, Compliance and Risk.

5.14 **Contractors Employed by NHS Grampian**

The term contractors covers a wide range of disciplines, from Estates and IT related matters, external companies providing Healthcare, through to private general practitioners working for NHS Grampian.

In essence, this will mean all contractors (including sub-contractors) and private or independent service providers who provide care, staff, equipment, buildings or other services or facilities for the direct care of patients or clients.

Members of NHS Grampian who have responsibility for the management and / or oversight of contractors, private and independent service providers, are responsible for bringing to their notice the contents of this policy and in particular their specific responsibilities, which are that, all contractors (including sub-contractors) and private or independent service providers, ensure that they:

- undertake their work in a safe manner in accordance with statutory safety requirements and NHS Grampian arrangements;
- fully co-operate with the guidance set out in contract documents issued prior to the commencement of any contract;
- and other self-employed persons (engaged on NHS Grampian business) assess and document the risks of their work and undertakings and make provision to protect themselves and others in respect of their own work activities;
- are competent and authorised to carry out the required work and they have the supporting documentation to evidence this through risk assessments, safety plans and/or method statements, permits to work, etc;
- and all their employees (including sub-contractors) are appropriately informed, instructed and trained in health, safety and wellbeing related matters pertaining to their own and NHS Grampian work activities;
- take reasonable steps to ensure co-operation and communication between all contractors and NHS Grampian staff and other relevant persons;
- report adverse events or near misses that occur when undertaking their work to NHS Grampian; including incidents that fall within the Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR), 2013⁴ which occur as a result of the contractor's undertakings.

5.15 **Volunteers and Charitable Organisations**

Even though charity and voluntary workers generously give their time, work and expertise to NHS Grampian, these people are regarded as honorary employees in the eyes of the law and as such are bound by the same health and safety conditions as all other staff. Charity or voluntary workers or any NHS Grampian manager or representative responsible for them must ensure that risk assessments of their activities are undertaken and the identified risks are managed.

6 **Committees and Management Groups with Responsibility for Health and Safety**

6.1 **Staff Governance Committee**

The Staff Governance Committee is responsible for the governance arrangements of health and safety related matters. This committee is required to review and challenge processes set in place for the management of health and safety and to

⁴ Reporting of Injuries, Diseases, and Dangerous Occurrence Regulations: 2013.

receive regular reports from the Occupational Health and Safety Committee which is a sub-committee of Staff Governance Committee.

6.2 Audit Committee

The Audit Committee is responsible for providing independent assurance on the adequacy of the system of health and safety to the Board and for authorising and reviewing internal audit reports on the systems in place.

6.3 Senior Leadership Team

The Senior Leadership Team is responsible for identifying the key health and safety risks to achieve NHS Grampian's Strategic Objectives and ensuring that these are effectively managed.

6.4 Grampian Area Partnership Forum

The Grampian Area Partnership Forum is responsible for developing and maintaining good employee relations within the Board and having an oversight of all matters that relate to staff, working in partnership with management to ensure an effective working environment, highlighting issues, including matters relating to health, safety and wellbeing. Grampian Area Partnership Forum is also responsible for developing networks and effective working relationships with other bodies e.g. Board, Staff Governance Committee, Local Authorities, and other groups established to take forward major initiatives.

GAPF through its sub-group structure will enable a process for reviewing Health and Safety policies.

6.5 Occupational Health and Safety Committee

The Occupational Health and Safety Committee is a fully constituted committee, directly reporting to the Staff Governance Committee. The Occupational Health and Safety Committee is responsible for the oversight of health and safety arrangements within NHS Grampian.

The committee will consider, discuss, and make recommendations on, significant and/or operational matters relating to occupational health, safety and wellbeing e within NHS Grampian.

The committee will send regular reports to the Staff Governance Committee as to the management of Health and Safety within NHS Grampian.

6.6 Health and Safety Expert Group

The Health and Safety Expert Group is responsible for the provision of expert support and guidance to NHS Grampian on all matters relating to occupational health and safety and support delivery of a compliant system.

6.7 Fire Safety Management Group

The Fire Safety Management Group is responsible for coordinating arrangements to oversee the management of all fire risks (including risks to the staff and service users of partner organisations in their use of NHS premises, leased or such like premises and third party owned premises) within NHS Grampian sphere of operations.

The Fire Safety Management Group will provide leadership and set priorities for, fire risk management within NHS Grampian, in accordance with legislation and relevant NHS Grampian policies.

The Fire Safety Management Group will be a sub-group of the Occupational Health and Safety Committee and will report directly on a regular basis.

6.8 Water Safety Group

The Water Safety Group is responsible for ensuring that there is an appropriate risk management infrastructure and controls in place to minimise the risk of harm and infection from water used by patients, residents, staff and visitors.

The Water Safety Group will provide clear guidance on how to maintain safe water within NHS Grampian premises and the processes to be adopted and monitored in line with statutory requirements.

6.9 Staff-Side Safety Representative Group

The Staff-Side Safety Representative Group are responsible for facilitating cooperation between management and staff in instigating, developing and carrying out measures designed to ensure the health and safety of staff throughout NHS Grampian by discussing unresolved local or broader issues being experienced and bringing the items raised to the Occupational Health and Safety Committee.

6.10 Radiation Safety Committee

The Radiation Safety Committee is responsible for advising NHS Grampian through the Medical Director on:

- the content and maintenance of the NHS Grampian Radiation Safety Policy;
- any current issues relating to the implementation of the provisions of any policy, procedures or protocols;
- the need to review the radiation protection arrangements within NHS Grampian;
- promoting a culture of radiation safety within NHS Grampian;
- any radiation safety issues arising from the purchasing, use, maintenance and disposal of equipment;
- any externally reportable adverse events; and
- any issues relating to the legal obligations of to the safe use of radiations.

The Radiation Safety Committee reports to the Medical Director. The committee shall make regular reports to the Occupational Health and Safety Committee on matters relating to the health and safety of employees and members of the public.

In addition the committee will report at least once per year to the Chief Executive via the Clinical Governance Committee and regularly via the Staff Governance Committee on matters relating to the IR (ME) regulations⁵.

6.11 Infection Prevention and Control Team

The Infection Prevention and Control Team aims to promote as safe as possible an environment for patients, staff and visitors so that the risks of cross-infection or contamination are kept to a minimum.

The Infection Prevention and Control Team is responsible for:

- surveillance, monitoring and control of infection within NHS Grampian;
- provision of patient management advice to clinical teams;
- education and audit support for operational management teams;
- review of guidelines, literature, national policy;
- introduction of national and local initiatives;
- weekly review of surveillance data;
- identification of infection risks on the risk register.

The Infection Prevention and Control Team will report to the Director of Nursing, Midwifery and AHPs and through that Director to the Clinical Governance Committee and provide assurance to the Occupational Health and Safety Committee.

⁵ The Ionising Radiation (Medical Exposure) Regulations 2017

6.12 Waste Management Group

The Waste Management Group is responsible for:

- ensuring that staff are made aware of any change in waste related regulations, which can relate to best practice for disposal and handling of different waste streams;
- providing support on all waste related questions which are complex to advise on best practice for disposal and handling;
- discussing solutions to ensure both clinical and non-clinical waste streams are managed appropriately, for both the person(s) who are disposing of the waste and for the benefit of the site in question.

The Waste Management Group reports to the Office of Waste Management and provides assurance to the Occupational Health and Safety Committee.

7 Process for Health and Safety Management

To achieve a culture of continuous improvement, NHS Grampian has adopted the Health and Safety Executive (HSE) Health and Safety Management System guidance HSG65.

This sets out a 'Plan; Do; Check; Act' approach which achieves a balance between the systems and behavioural aspects of management. It also treats health and safety management as an integral part of good management, rather than as a stand-alone system.

Further details on this system are contained within the Health and Safety Strategy

7.1 Managing Health and Safety Risk

Where significant health and safety risk cannot be reasonably eliminated, it must be effectively assessed and managed, in order to reduce it to the lowest level that is reasonably practicable. The cooperation of all staff is expected in terms of raising potential or active risks with their manager, or the appropriate person for a particular work area and ensuring that suitable and sufficient measures are in place to manage the risk are followed.

7.2 **Assessment of Risks to Health and Safety**

Risk assessment is a major cornerstone of health and safety management. There is a statutory requirement for 'suitable and sufficient' risk assessments to be undertaken for tasks, environments and/or situations identified as presenting a **significant** risk of injury either to staff, visitors or patients.

The Risk Assessment Protocol outlines the risk assessment framework which is available on the Corporate Health & Safety webpage.

7.3 **Training**

It is recognised that regular (particularly Statutory and Mandatory) training leads to increased competence levels and capabilities amongst employees.

The appropriate level of training to staff will be provided based on the needs identified through risk assessment conducted at local level..

7.4 **Education and Support Plan**

The Board is required to provide suitable and appropriate education, training and support. Details of training course dates and registration information, Statutory and Mandatory Training, Corporate Induction and refresher training are advertised on the Learning Zone section of the intranet.

A programme of Corporate Induction is set in place to ensure new staff joining NHS Grampian have an introductory level of health and safety information from day one.

Specific training including local induction related to the particular work activity must be provided by managers. Where the use of specialist equipment or work practices is required, suitable training will be arranged by the relevant manager.

8 **Adverse Event Reporting**

All persons working for NHS Grampian have a duty to report all adverse events relating to health and safety, including near misses. Local Managers should be informed of adverse events, with the relevant reports being made on the Datix system.

Managers and supervisors that are designated approvers for Datix, must ensure

that an appropriate level of review is recorded on Datix, as set out within the Management of and Learning from Adverse Events and Feedback Policy. This will assist, where an adverse event is of a reportable nature, in ensuring compliance with the Reporting of Injuries, Diseases, and Dangerous Occurrence Regulations: 2013 (RIDDOR).

It is necessary to record all adverse events to ensure accurate health and safety information, which will enable intelligent trend analysis, and will help with future planning for incident reduction target initiatives and improving safe systems of work.

9 Monitoring Arrangements

Management structures, including sector, divisional, and local Health and Safety Committees, play key roles in monitoring the effective implementation of this policy at all levels within NHS Grampian.

Monitoring includes ensuring that a programme of workplace inspections is put in place to verify that hazards and risks are being adequately recognised and managed.

Monitoring will be achieved through active measures: inspections, audits and training compliance, risk assessment completion; and proactive and reactive measures: by reviewing adverse event statistics, review reports, ill health checks, etc.

Additional monitoring will be achieved through various programmes set in place by the Health and Safety Expert Group.

Managers are required to monitor compliance with this policy and any appropriate arrangements for Health and Safety. Reporting arrangements should include regular reporting to sector, divisional, and local health and safety committees and to the Occupational Health and Safety Committee.

The Head of Health and Safety will provide an Annual Report, to the Chief Executive and to the Occupational Health and Safety Committee, regarding key health and safety activity across NHS Grampian, including any relevant performance data.

10 Review and Audit

The Occupational Health and Safety Committee will review this policy, and associated documents, as appropriate. This policy will, at a minimum be reviewed every five years.

The Occupational Health & Safety Committee will receive the annual reports from the Head of Health and Safety and the Chair of the Staff-Side Safety Representative Group, and any reports from officers of the Board relating to health and safety issues or performance and ensure that necessary actions are put in place to address identified risks.

Sector, Partnership and Directorate Health and Safety arrangements will be reviewed and reported on by the local Health and Safety Committees.

The Audit Committee will request the internal auditors to provide independent assurance on the adequacy of the system of Health and Safety and for authorising and reviewing internal audit reports on the systems in place.

11 Arrangements to deliver this policy

This policy will be delivered by:

- The development of procedures, protocols and guidance that meet the requirements of health and safety law as applicable to NHS Grampian which will be made available via the staff intranet and paper systems for staff who do not have access to the NHS intranet.
- Ensuring management conduct suitable and sufficient risk assessments and controls for their areas of responsibility.
- The provision of appropriate health and safety training.
- The promotion of health, safety and wellbeing of all colleagues through campaigns communications, seminars and training.
- Engaging our Staff in effective consultation and actively supporting partnership working with Safety Representatives in the fulfilment of their role.