



Health and Safety Policy

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CONSULTATION AND RATIFICATION SCHEDULE

Name of Consultative Body	Date of Approval
Senior Management Team	March 2018

CROSS REFERENCE TO OTHER POLICIES/STRATEGIES

This policy should be read in conjunction with:	Detail
All SA health and safety associated policies	Available on the health and safety page of SOURCE
Risk Assessment Policy and Procedures	Corporate Risk Strategy
Health and Safety Training Statement	SA statement on health and safety training for employees
Management of Health and Safety at Work Regulations 1999	HSE regulations and guidelines re risk assessments
Health and Safety at Work Act 1974	HSE regulations on health and safety

Key words: Health and safety, Plan, Do, Check, Act, risk assessments, health and safety Regulations

CONTENTS

1. INTRODUCTION	1
2. HEALTH, SAFETY AND WELL-BEING, STATEMENT OF INTENT	2
3. ORGANISATION – DUTIES, ROLES AND RESPONSIBILITIES.....	3
3.1 CHIEF EXECUTIVE	3
3.2 DIRECTORS	3
3.3 REGIONAL/ DEPARTMENTAL MANAGERS/ NEW STRUAN SCHOOL HEAD TEACHER	3
3.4 LINE MANAGERS.....	4
3.5 DUTIES OF EMPLOYEES/VOLUNTEERS.....	5
3.6 COMPETENT HEALTH AND SAFETY PERSON	5
3.7 HEALTH AND SAFETY COMMITTEE	6
3.8 HEALTH AND SAFETY REPRESENTATIVES	6
4. ARRANGEMENTS AND PROCEDURES.....	7
4.1 RISK ASSESSMENTS	7
4.2 SPECIFIC OPERATIONAL POLICIES AND PROCEDURES	7
4.3 VISITORS TO COMPANY PREMISES	8
4.4 CONTRACTORS/SUBCONTRACTORS.....	8
4.5 REPORTING AND INVESTIGATING OF ACCIDENTS AND DANGEROUS OCCURRENCES (RIDDOR).....	9
4.6 TRAINING	9
4.7.CONSULTATION	9
5. REVIEW	10

1. INTRODUCTION

Primecare Health LTD is committed to delivering high quality experiences and levels of support to individuals with ASD. These principles are underpinned with equally high standards in Health, Safety and Well-being provision to protect staff, service users, contractors and visitors from workplace injuries and ill-health.

This document sets out the commitment of the Primecare Health LTD to Health, Safety and Well-being and provides a framework for an effective health and safety management system and to create a proactive approach to developing and maintaining a safe and healthy culture across the organisation. It is also required to have in place measures to mitigate, as far as reasonably practicable, factors that could harm employees' physical and mental well-being. Primecare Health LTD acknowledges the potential impact that work has on an individual's physical and mental health, and that there is a moral and legal duty for taking steps to promote employee well-being.

Health, Safety and Well-being is everyone's responsibility and members of staff, contractors and visitors have a legal and moral obligation to assist the Senior Management Team to achieve its aims to ensure, as far as is reasonably practicable, the health, safety and well-being of our employees whilst at work and others who may be affected by our operations under the responsibilities of the Health and Safety at Work Act 1974.

Primecare Health LTD's approach to Health and Safety is now based on the Health and Safety Executive's revised Plan, Do, Check and Act approach to health and safety management (HSG65)

PLAN

Set the organisation's health and safety objectives for the year in line with its business plan which complies to recognised legislation, standards and governance.

Develop plans, based on identified risks in line with the Health, Safety and Well-Being strategy of Primecare Health LTD

DO

Implement health, safety and well-being plans

Identify, control, record and review risks at corporate and individual levels

Improve the health and safety culture of the organisation at collective and individual level through the support and leadership of the Senior Management Team and the effective engagement of the workforce

Ensure a safe place of work

CHECK

Through regular monitoring and inspection

Regular reporting of key performance indicators

Validate compliance with health and safety legislation, standards, implementation of action plans and tracking of remedial actions

Audit local and corporate management control systems

ACT

Robust governance

Investigation and reporting of accidents and incidents at management level

Communicate key findings from accident or incident investigations across the organisation to share learning

Analysis of accidents and incidents identifies areas for strategic development

Review risk profiles

Primecare Health LTD has also implemented the Scottish Government's Healthy Working Lives initiative across all services to raise awareness of and to develop and maintain the health, safety and well-being of both staff and service users throughout the organisation.

The Scottish Governments “Fairwork Convention” is now also applicable. There are five basic values for all workforces within Scotland. These are Security, Opportunity, Fulfilment, Effective Voice and Respect. Respect ensures the health, safety and well-being of others.

2. HEALTH, SAFETY AND WELL-BEING, STATEMENT OF INTENT

It is the policy of the Primecare Health LTD to develop and ensure a safe, healthy and supportive environment for all employees, service users, contractors and visitors under the responsibilities of the Health and Safety etc. at Work Act 1974.

Primecare Health LTD is committed to achieving a measurable, progressive improvement in health and safety performance, with legal requirements establishing a minimum acceptable level. The Health, Safety and Well-being Policy will also support the organisation’s Strategic and Business Plan and ensure that it complies with its legal duty of care throughout all levels of the organisation

The objectives of the Health, Safety and Wellbeing Policy are to:

- a) *Ensure Primecare Health LTD implements and maintains an effective and properly resourced health and safety management system as per HSG65.*
- b) *Create and maintain a positive health and safety culture which secures the commitment and participation of all employees through regular health and safety communications.*
- c) *Define the health, safety and well-being responsibilities for staff, service users and visitors*
- d) *Ensure effective communication and consultation with staff and others who can be affected by the activities of Primecare Health LTD.*
- e) *The provision and maintenance of a place of work, means of access and egress to the work place, equipment and systems of work that are so far as is reasonably practicable, safe and without risks to health and are adequate as regards facilities and arrangements for welfare at work for the health and well-being of employees, service users and visitors.*
- f) *Arrangements for ensuring, so far as is reasonably practicable, safety and absence of risks to health and well-being in connection with the use, handling, storage and transport of articles and substances.*
- g) *The provision of such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of its employees/volunteers.*
- h) *Identifying and addressing the risks associated with all activities of the organisation with the aim of eliminating, controlling or mitigating the risks, so far as is reasonably practicable.*
- i) *Allocating resources to undertake appropriate preventative/protective measures that meet the requirements of the organisation’s Health, Safety and Well-being Policy.*
- j) *Planning for health, safety and well-being including the setting of realistic short and long term objectives through the development of corporate and local health and safety action plans*
- k) *Monitoring and reviewing performance on a regular basis to ensure that high standards are maintained to ensure the health and well-being of employees, service users and visitors.*
- l) *Appointing competent personnel to secure compliance with our statutory duties and developing a system of joint consultation with health and safety representatives and to provide them with assistance to enable them to carry out their functions.*
- m) *Ensuring that a sufficient number of qualified First Aiders and items of first aid equipment are available at all times.*
- n) *Ensuring that all accidents, incidents and near misses are reported and documented, and where necessary, investigated, as part of the health and safety monitoring process.*

This policy shall be made available to all interested parties and be accessible to all employees via Source.

Martin Williamson
Chief Executive

Date:

3. ORGANISATION – DUTIES, ROLES AND RESPONSIBILITIES

Individualised responsibilities for health and safety are allocated by management position and by designated posts within the corporate structure of the organisation.

3.1 CHIEF EXECUTIVE

Shall, so far as is reasonably practicable, be ultimately responsible for ensuring the health, safety and wellbeing at work of all Primecare Health LTD employees, service users and visitors. This includes ensuring the organisation fulfils its legal responsibilities, that policy objectives are achieved and that effective machinery is in place for the achievement of the policies concerned with health, safety, wellbeing and environmental protection.

Shall also ensure that the organisation's policies are reviewed to maintain compliance with existing policies, current legislation and any changes in the law. This will involve ensuring the allocation of adequate resources to maintain sound and efficient health and safety arrangements.

3.2 DIRECTORS

Shall ensure that the arrangements for the health, safety and wellbeing of the staff employed within their remit, are made known to all employees/volunteers and are maintained and reviewed in accordance to agreed policies and procedures.

Shall also demonstrate their commitment to achieving a high standard of health and safety performance within their Departments/Services and develop a positive attitude to health, safety and wellbeing amongst employees.

Shall implement Health and Safety Management Systems within Departments/Services which will ensure the assessment of risk and the effective planning, organisation, control, monitoring and review of the preventative and protective measures necessary to eliminate, control or mitigate risks.

Encourage initiatives and events across the organisation that promote health and well-being in line with the Healthy Working Lives award.

3.3 REGIONAL/ DEPARTMENTAL MANAGERS/ NEW STRUAN SCHOOL HEAD TEACHER

Shall be accountable to their respective Director to organise within their Areas/Department/Service how the organisational health, safety and wellbeing policy will be implemented and by encouraging and assisting in developing safety procedures and in ensuring that established rules and safe working practices are followed and adhered to.

Shall be responsible for the health, safety and wellbeing of all employees for whom they have an operational responsibility.

They shall ensure that the following shall be implemented as part of the health, safety and wellbeing policy:

- a) Safe methods of work are in place
- b) A localised health and safety action plan is developed, monitored and reviewed for their area of management which is communicated to all employees within their remit.
- c) Induction training is given to all employees/volunteers, and shall include health and safety matters
- d) Review accident investigation reports and where necessary, be satisfied that the correct action is being taken, and recommend a means of preventing recurrence, then report to their appropriate Senior Manager
- e) Ensure that Line Managers have precise instructions on their health and safety responsibilities.

- f) Regularly inspect and monitor standards and carry out workplace inspections, and where necessary, advise as to where and when to improve methods of working
- g) Check that all machinery and plant, including power and hand tools, are maintained in good condition and staff using them are suitably trained
- h) Have in place a system that will ensure that suitable Personal Protective Equipment is available where appropriate, and that it is used
- i) Ensure that sufficient, qualified First Aiders and items of First Aid equipment are available with ease of access and that their locations are known to employees
- j) Release employees for Health and Safety meetings and training
- k) Ensure that health and safety is itemised on all team meeting agendas
- l) Within the Act, allow the Health and Safety Representatives of the organisation to carry out their functions
- m) Ensure that all contractors working in their Areas/Departments/Services are instructed to comply with all legal requirements relating to Health and Safety prior to any work starting and can provide Method Statements on Safe Systems of Work and Risk Assessments

3.4 LINE MANAGERS

Are responsible for the health and safety of all employees under their direct line management. They shall implement the organisation's Health, safety and wellbeing policy within their respective Department/Service and be specifically responsible for:

- a) Ensuring that persons in their Department/Service are given adequate training, induction, information, instruction and supervision regarding work processes/environments and are competent to undertake the work allocated to them and know their own and others responsibility for implementing this health, safety and wellbeing policy and how to access this policy.
- b) Devising a specific health and safety plan for their area of line management, and that it is communicated to all staff, monitored and reviewed, as required.
- c) Ensuring that any activities carried out by employees/volunteers, visitors or contractors will not create a risk or hazard to other employees/volunteers, visitors, contractors or properties, especially if it involves any aspect of lone working.
- d) Must ensure that all employees in their Department/Service and visitors know what actions to implement in an emergency and who the First Aiders or Fire Marshals are and the location of first aid or fire fighting equipment.
- e) Must ensure that an adequate risk assessment and supervision is available at all times, with particular regards given to lone workers, young, or inexperienced workers and expectant mothers
- f) Must ensure that all appropriate recording systems to document accidents and injuries are fully completed and reported to the appropriate person within the organisation.
- g) Must report all accidents promptly to discover the cause and eliminate recurrence. They should request the support of the local Health and Safety Representative to aid in any investigation in the first instance. Failing that the support of the Health and Safety Business Partner.
- h) Ensuring that all statutory records are regularly maintained, inspected and actioned.
- i) Must consider any representation about Health and Safety from employees
- j) Ensure that safe systems of work are implemented and adhered to, plus continually review and develop safe practices in their Department/Service to ensure maximum safety for all
- k) Ensure that all team meeting agendas itemise health and safety
- l) Ensure that there is good communication within their team members and there are opportunities for individuals to raise concerns about their work, seeking advice from either Human Resources or Health and Safety Business Partners at an early stage where concerns are raised.
- m) Encourage staff to participate in events and initiatives to promote well-being and more effective working

3.5 DUTIES of EMPLOYEES/VOLUNTEERS

- a) To make themselves familiar with, and conform to the Health, safety and wellbeing policy, the Health and Safety Action Plan and associated health and safety policies
- b) To co-operate with the organisation in meeting its statutory duties
- c) To take reasonable care of themselves and others who may be affected by their acts or omissions
- d) Not to intentionally or recklessly interfere with or misuse anything provided in the interest of health and safety
- e) To report all accidents, dangerous occurrences and near misses immediately to the relevant line manager
- f) To be fully conversant with all fire safety procedures applicable to their workplace
- g) That any equipment provided for personal safety is used and maintained in a condition fit for that use, and any defects are immediately reported to the relevant manager
- h) To report any concerns over health and safety to their line manager and the local health and safety representative
- i) Raise relevant health and safety topics for discussion at team meetings under the health and safety agenda heading
- j) Raise concerns with their line manager if they feel there are work issues that are having a negative impact on their health or well-being.
- k) Take responsibility for their own health and well-being by adopting healthy lifestyles.

3.6 COMPETENT HEALTH AND SAFETY PERSON

A person will be deemed competent when they have sufficient training and experience or knowledge and other qualities to enable them to properly assist in undertaking health and safety measures on behalf of the organisation. The identified person competent in health and safety will advise management, health and safety representatives and employees/volunteers over relevant health and safety issues and updates on legislation changes and practical developments.

Shall be involved in the monitoring of the health, safety and wellbeing policy and the Health and Safety Action Plan and in their practical implementation and in the review of Performance Standards and audits. They will also monitor levels of staff absence with the Human Resources Department to report any patterns of absence/illness to the SMT on a quarterly basis. They will also have an overview of the Healthy Working Lives programme across the organisation.

Shall receive copies of all health and safety or fire safety inspection reports and be informed of any accidents which involve being reported under The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 which are immediately reported to the CEO, SMT and the organisation's insurers.

Shall be involved in any Health and Safety tours/inspections as required and be involved in the monitoring of accident or incident investigations, analysis and reports.

Shall be involved in establishing organisational arrangements, systems and risk control standards, relevant to the specific work roles, and service requirements within the organisation at all levels.

Shall have the authority to stop any work which contravenes agreed health and safety standards and places people at risk and shall assist in the maintenance of professional standards throughout the organisation. They shall also immediately inform the relevant Director/Line Manager of any dangerous work practices or actions which they have advised be stopped and the reason for that action.

Shall have the responsibility to co-ordinate all Health and Safety Representatives and Healthy Working Lives Representatives within the organisation.

3.7 HEALTH AND SAFETY COMMITTEE

The organisation shall have a Health and Safety Committee whose purpose shall be to:-

- Ensure that all aspects of the Health, safety and wellbeing policy are operational and being applied throughout the organisation
- Be aware of any legislation/insurance amendments that need to be communicated and applied throughout the organisation
- Forecast and plan for improvements/recommendations in the working environment/practices or conditions
- Review and analyse Health and Safety reports/audits/inspections/accident reports/near misses or concerns which are communicated through the reporting structure
- Make recommendations on risk assessment and accident prevention
- Develop and monitor the effectiveness of the Health and Safety Action Plan
- Monitor the effectiveness of health and safety training
- Ensure all aspects of the Health, safety and wellbeing policy are adhered to through the effective organisation, planning, implementation, monitoring, review and auditing of health and safety across the organisation.

The Committee shall consist of members of the Senior Management Team, with the Chief Executive Officer as Chair. Other members shall include:-

- Health and Safety Business Partner
- Chair of the Health and Safety Representatives Committee
- Quality Assurance/Risk Manager
- Senior Learning and Development Partner
- Property Business Partner

The committee shall meet quarterly with copies of minutes being available to all staff.

3.8 HEALTH AND SAFETY REPRESENTATIVES

In order to fulfil these functions, as referred to in the Health and Safety (Consultation with Employees) Regulations 1996, employers are required to ensure that employees or their representative are consulted on health and safety matters/issues.

Each Health and Safety Representative shall have the following functions:-

- a) To investigate potential hazards and dangerous occurrences in the work place and to examine the causes of accidents in the work place
- b) To investigate complaints by any employee they represent relating to that employees, health, safety or welfare at work
- c) Make representation to the employer and between employees, by promoting and developing essential measures to ensure the Health and Safety of employees and in checking the effectiveness of these measures
- d) Encourage co-operation between the employer and employees by promoting and developing measures to ensure the Health and Safety of employees/volunteers and in checking the effectiveness of these measures
- e) Bring to the employers notice in writing, any unsafe or unhealthy conditions, or working practices or unsatisfactory arrangements which could prove hazardous on coming to their attention. Whether on an inspection or day to day observation by them or the people they

represent. Making a written report does not preclude the bringing of such matters to the attention of Line Managers by direct oral approach, particularly in situations where speedy remedial action is necessary and minor matters can be dealt with immediately without the need for formal discussion

- f) Carry out inspections once every three months or more frequently as circumstances dictate (e.g. changes in working methods, new equipment)
- g) Ensure regular and minuted local health and safety meetings take place within their area of service to raise and address any workplace health and safety issues that staff identify.
- h) To raise any local health and safety concerns or suggestions at the agreed quarterly Health and Safety Representatives meetings where any items that can have a corporate identity are recorded and forwarded to the Health and Safety Committee proper for discussion and action

4. ARRANGEMENTS AND PROCEDURES

The following arrangements and procedures shall be put in place to ensure the health and safety of all employees and others, whilst at work and as affected by the associated work activities of the organisation.

4.1 Risk Assessments

All premises and activities subject to risk assessments must be assessed in accordance with the relevant legislation using the standard risk assessment documentation of the organisation.

Assessments shall be reviewed and updated whenever any of the following factors occur:-

- Changes in legislation
- Change in control measures
- Changes in the work environment
- Changes in the work force
- Changes in the actual work/tasks carried out
- Transfer of new technology
- Where an accident has occurred
- The original assessment is no longer valid

Assessments must be recorded and signed by staff with records maintained by local line managers in the first instance. Results of all assessments must be communicated to and be available to all employees and interested parties (unless they are of a private and confidential nature).

The assessments must identify any protective and preventive control measures necessary.

The organisation shall make, as far as is reasonable practicable, appropriate arrangements for the effective planning, implementation, monitoring and review of the control measures identified as a result of risk assessments based on a 6 monthly review cycle.

4.2 Specific Operational Policies and Procedures

All associated health and safety policies issued by the organisation shall be regarded as supplementary to this policy. These include those pertaining to statutory legislation, approved codes of practice and guidance, including:-

The Health and Safety at Work Act 1974
Health and Safety (First Aid) Regulations 1981

Health and Safety Information for Employees Regulations 1989
Electricity at Work Regulations 1989
The Manual Handling Operations Regulations 1992 (amended 2002)
The Personal Protective Equipment at Work Regulations 1992 (amended 2002)
The Provision and Use of Work Equipment Regulations 1992
The Workplace (Health, Safety and Welfare) Regulations 1992
The Health and Safety (Display Screen) Regulations 1992
The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
Health and Safety (Consultation with Employees) Regulations 1996
Employers Liability (Compulsory Insurance) Regulations 1998
Working Time Directive and Working Time Regulations 1998
The Management of Health and Safety at Work Regulations 1999
The Control of Substances Hazardous to Health Regulations 2002
Fire (Scotland) Act 2005
Fire Safety (Scotland) Regulations 2006
Working at Heights Regulations 2005
The Control of Asbestos at Work Regulations 2012

Driving Safely
Gas and Gas Appliances
Inclement Weather Conditions
Infection Control
Legionella – now contained within the 2017 Water Management Policy
Lone Workers
Stress in the Workplace

4.3 Visitors to Company Premises

Visitors to any premises or location may not be aware of the risks associated with the location, therefore all visitors must:

- Sign in on arrival
- Be accompanied by the person they are visiting, who in turn, will be responsible for the visitor's safety and ensuring that visitors are aware of any hazardous processes or situation they may be exposed to and for their safe evacuation in the event of an emergency
- Sign out when leaving

4.4 Contractors/subcontractors

Contractors, similar to visitors, may not be aware of the risks associated with the location. Therefore there is a duty to ensure that there is co-operation and co-ordination at all times between employers, employees and the contractors/subcontractors. In particular, contractors/subcontractors must be provided with;

- information, instruction and training on anything that may affect their health and safety and that of others
- information on local health and safety procedures and policies
- management and supervision to ensure the safety of contractors/subcontractors, especially if contractors/subcontractors are lone working

Further information is available via the Use of Contractors policy

4.5 Reporting and Investigating of Accidents and Dangerous Occurrences (RIDDOR)

All accidents, no matter how minor, must be recorded and reported using the Accident Book with copies forwarded to the relevant manager. Near Miss events are recorded on the incident report form.

All records shall be treated confidentially and retained for a minimum of 3 years before archiving.

All accidents and near misses shall be investigated within 24 hours by the relevant manager, who may request advice from other specific personnel (i.e. Health and Safety Representative, CALM Instructor, Health and Safety Business Partner)

A copy of all reportable accidents and near miss events involving an individual with ASD, which have required hospitalisation, or fulfil the 7 day return to work rule under RIDDOR, shall be forwarded to the Health and Safety Partner for information.

Over periodic intervals, the competent person for health and safety shall undertake inspection visits or request data to analyse accident statistics and issue a report to all relevant managers and the health and safety committee identifying trends and common causations

Where the accident or near miss has involved an employee of the organisation whilst not at their place of work, (e.g. local authority or private premises, leisure centre, college, shop) a copy of the accident report shall be requested from the manager of the premises.

Where the accident or near miss has involved the employee of another organisation, a copy of the accident report shall be forwarded to their employer.

4.6 Training

To comply with the general duty to provide such information, instruction, training and supervision as is necessary to ensure, so far as is reasonable practicable, the health, safety and welfare of staff, the following levels of health and safety training shall be provided:

- At inductions
- Refresher training at regular intervals
- On transfer or promotion to new duties/locations
- On the introduction of new technology
- On changes in systems of work
- When risk assessments identify specific training needs
- To develop Health and Safety Representatives

Further information on related health and safety training is available in the Health and Safety Training Statement.

4.7. Consultation

Consultation shall take place via the Health and Safety Committee to discuss matters of health and safety.

Employees shall be involved in the consultation process via local, named Health and Safety Representatives and through the Staff Forum.

The policy shall also be placed before the Policy sub-Group of the organisation for comment and ratification before progressing to the Health and Safety Committee, Senior Management Team (SMT) and Board for final approval.

Any employee with a concern over health and safety must inform their line manager initially. If, after investigation, the problem is not corrected in a reasonable time, or the line manager decides no action is required and the employee is not satisfied with the explanation, the employee may then refer the matter to their local health and safety representative who may make representation to the line manager concerned. Should that approach be unsuccessful, then the matter can be raised with the person competent in health and safety, then failing that, in writing, at the health and safety committee.

5. REVIEW

This policy shall be reviewed on a 3 yearly basis, or sooner to comply with legislative changes, by the organisation's Policy sub Group who are charged with the development, implementation and review of all organisational and operational policies and related documents. The Policy sub Group's purpose is to ensure that the organisation's policies are established, applied, monitored and reviewed consistently and appropriately across the organisation.

