



The Police Treatment Centres

Health & Safety Policy

Policy Number:		Responsible Manager:	CEO & Centre Operations Managers (Safety Officer)
Date of issue:	APPROVED: FPSC 10 July 2009. Board of Trustees 18 July 2009. REVISED: FPSC 19 January 2010 FPSC 20 January 2011 FPSC 26 January 2012 BoT 08 May 2014 FPSC 23 April 2015 BoT 12 May 2016 BoT 11 May 2017	Policy Review:	Annually, OR, where legislative or other issues prompt an earlier review

The Police Treatment Centres Health and Safety Policy is presented in two parts for ease of reference and reading;

Part 1

- Statement of intent.
- Duties on Employers, Employees and the Self Employed under The Health and Safety at Work etc. Act 1974.
- Managing Health and Safety.

Part 2

- Specific activity arrangements for Health and Safety.

Appendices

- A. St Andrews Pool Safe Operating Procedures.
- B. Castlebrae Pool Safe Operating Procedures.
- C. Legal Compliance Register.

Policy Statement

The Police Treatment Centres (PTC & 'the Charity') will ensure that any Health and Safety matter will be handled promptly and consistently and in accordance with relevant legislation, Health & Safety Executive (HSE) Codes of Practice; advice and best practice.

It is the Charity's policy to promote standards of health and safety at work which are aimed at the avoidance and reduction of hazards and the risk of those hazards to which the Charity's employees and others, may be exposed; to achieve this the Charity requires the full co-operation and support of its employees, any contractors employed by the Charity and any other relevant person who may be affected by the Charity's activities.

Given the importance of health and safety this policy will be **reviewed annually** to ensure legal compliance.

Purpose

The purpose of this policy is as far as is reasonably practicable;

- To ensure that any health & safety matter will be handled promptly, consistently and in accordance with relevant legislation;
- To ensure that employees understand and achieve expected health & safety standards;
- To provide a fair and consistent framework so that the Charity can ensure employees understand the procedures where health & safety issues are raised and appropriate action has to be considered or instituted;
- To provide and maintain equipment and systems of work that are safe and which avoid or reduce hazards and risks to health and safety;
- To ensure that the use, handling, storage and transport of articles and substances are safe and avoids or reduces risks to people's health and safety;
- To provide information, instruction, training and resources including continued supervision as may be necessary to ensure that the Charity's employees can carry out their jobs in a safe manner;
- To ensure that the Charity's premises are a safe and healthy environment in which to work, by providing safe means of access and egress, high standards of housekeeping, safe storage of goods and any waste materials;
- To provide adequate welfare facilities for the Charity's employees;

Legal Safeguard

The policy forms part of the Contract of Employment. Whilst the policy may be applied in a health & safety situation the Charity reserves the right to amend all or part of the policy at its discretion.

Nothing in the procedure shall reduce the entitlements of employees or the obligations of the Charity under the provisions of the relevant legislation.

Application of the policy

The responsibility for the application of the policy is that of the Chief Executive Officer (CEO) who should act in accord with the policy and who should, in accordance and with the delegated authority, refer appropriate matters to Trustees of the Finance and Human Resources Committee or the Board of Trustees. However, all PTC employees are reminded that Health and Safety and the application of the policy pertaining to the PTC, is also a personal responsibility, and as well as being directed to comply with all aspects of policy direction, they are reminded that should they see any Health and Safety infringements that might impact on other employees, patients and visitors, they should draw this to the attention of their Line Manager as soon as practicable.

PART ONE (1)

1. Health and Safety Policy Statement of Intent

The Charity's policy on health, safety and welfare, applies to everyone employed by the Charity. This includes permanent employees, temporary employees, self-employed, bank/casual employee's medical consultants and any contractors required to carry out work on site.

The policy sets out the Charity's aims and objectives for ensuring, so far as is reasonably practicable, the health, safety and welfare of all of its employees, and any other person who may be affected by the Charity's undertaking. The policy serves to ensure the health, safety and welfare of not just those employed by the Charity, but also patients, visitors and any other individual lawfully resorting to the Charity's premises.

The Health and Safety Policy forms a set of standards, instructions and guidelines for all employees and contractors required to work at or within the Charity. It sets out the basic standards of safety required, to ensure a safe working and general environment for all associated with the Charity.

Each individual person will be made aware of his or her respective health and safety responsibilities at their induction into the organisation, which may be in the form of verbal or written instruction. A full copy of the Charity's policy on health safety and welfare has been placed on the Charity's website and S Drive hard copies are available and in particular are located within the Operations Manager's office at Castlebrae and St Andrews.

The Charity's Health and Safety Policy 'Statement of Intent' will be ratified and signed by the Charity's Chief Executive Officer (CEO). This signifies the Charity's commitment to ensuring that the successful management of Health and Safety is of paramount importance within the organisation.

A copy of this Health and Safety Policy 'Statement of Intent' will be signed by the Chief Executive Officer and displayed within the reception area at each Treatment Centre.

Health and Safety Policy Statement of Intent

The Police Treatment Centres will, so far as is reasonably practicable;

1. Provide and maintain equipment and systems of work that are safe and which avoid or reduce hazards and risks to health and safety.
2. Ensure that the use, handling, storage and transport of articles and substances are safe and avoids or reduces risks to people's health and safety.
3. Provide information, instruction, training and resources, including continued supervision, as may be necessary to ensure that its employees can carry out their jobs in a safe manner.
4. Ensure that Charity premises are a safe and healthy environment in which to work, by providing safe means of access and egress, high standards of housekeeping, safe storage of goods and any waste materials.
5. Provide adequate welfare facilities for its employees.

The overall responsibility for the health, safety and wellbeing of employees, and others who may be affected by our activities, lies with the Chief Executive Officer, however all PTC employees are directed to know their own responsibilities, and to take an active role in ensuring that all Health and Safety policy directives are followed in the best interest of all. The Charity does engage the services of external health and safety Auditing companies to assist the Charity in effectively discharging its duties as required by UK health and safety legislation.

In order for the Charity to ensure that its legal and moral obligations to its employees and others are being met the Charity requires that all employees, at all levels within the organisation, provide their full co-operation and support in achieving a safe working environment at all times.

A copy of this statement will be made available to all employees and will be prominently displayed within Charity premises. It will be reviewed on an annual basis or as dictated by any change in legislation or working practices.

As Chief Executive Officer of the Charity, I require you to take all matters of health and safety seriously at all times, and should you have any questions or concerns about any health and safety matters, to bring these to the attention of your Line Manager or the Centre/Deputy Centre Manager immediately. Active engagement by all employees on this issue will ensure the successful management of health and safety at the Charity and the successful implementation of this policy to make this a safe working environment.

Signed: Date:

Colonel Patrick Cairns MA, BA (Hons), CMgr FCMI
Chief Executive Officer
The Police Treatment Centres

PART TWO (2)

3. Duties on Employers, Employees and the Self Employed under The Health and Safety at Work etc Act 1974

The Health and Safety at Work etc Act 1974 (HASAWA), places 'General Duties' upon employers, employees and the self-employed in order to ensure so far as is reasonably practicable, their health, safety and welfare whilst they are at work. Set out below are some of the duties which are most pertinent to The Police Treatment Centres.

4. General duties placed upon Employers

4.1 HASAWA Section 2 (1)

"It shall be the duty of every employer to ensure, so far as reasonably practicable, the health, safety and welfare at work of all his employees".

4.2 HASAWA Section 2 (2)

It shall be every employer's duty to ensure:

The provision and maintenance of plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health;

(b) arrangements for ensuring, so far as is reasonably practicable, safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substance;

(c) 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 his employees;

(d) so far as is reasonably practicable as regards any place of work under the employer's control, the maintenance of it in a condition that is safe and without risks to health and the provision and maintenance of means of access and egress from it that are safe and without risks;

(e) the provision and maintenance of a working environment for his employees that is, so far as is reasonably practicable, safe, without risks to health and adequate as regards facilities and arrangements for their welfare at work.

4.3 HASAWA Section 3 (1)

"It shall be the duty of every employer to conduct their undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in their employment who may be affected thereby are not thereby exposed to risks to their health or safety" .

4.4 HASAWA Section 9

"No employer shall levy or permit to be levied on any employee of his charge in respect of anything done or provided in pursuance of any specific requirement of the relevant

statutory provisions". (This means that employees should not be charged for anything provided under health and safety legislation e.g., PPE)

5. General duties placed upon Employees

5.1 HASAWA Section 7

"It shall be the duty of every employee while at work –

to take reasonable care for the health and safety of themselves and of other persons who may be affected by his/hers acts or omissions at work; and, as regards any duty or requirement imposed on his/hers employer or any other person by or under any of the relevant statutory provisions, to co-operate with him/her so far as is necessary to enable that duty or requirement to be performed or complied with".

5.2 HASAWA Section 8

"No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare in pursuance of any of the relevant statutory provisions".

6. General duties placed upon the Self Employed

6.1 HASAWA Section 3 (2)

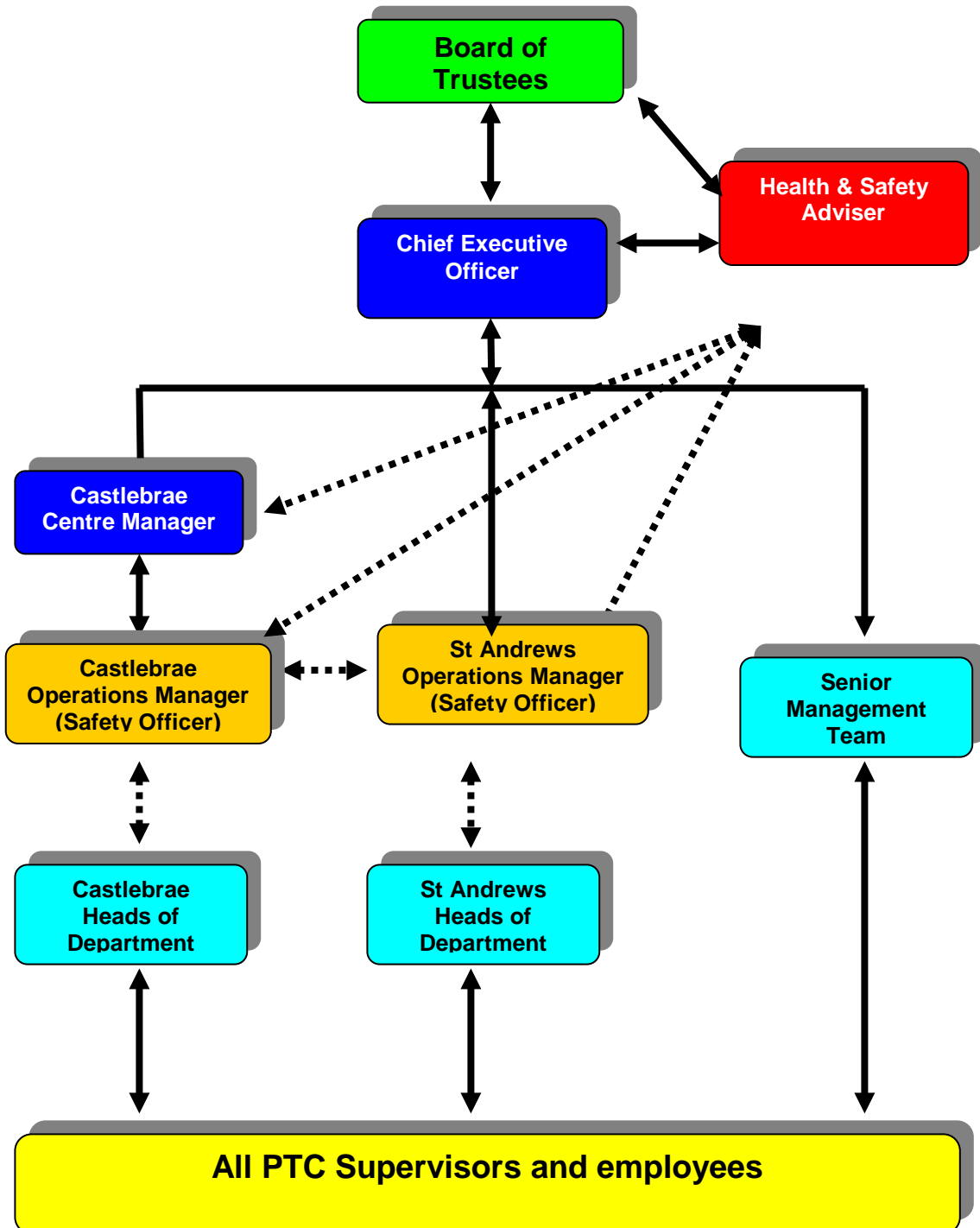
"It shall be the duty of every self employed person to conduct his/her undertaking in such a way to ensure, so far as is reasonably practicable, that he/she and other persons (not being his/her employees) who may be affected thereby are not thereby exposed to risks to their health and safety".

Note: *The above sections of legislation are just a small but significant part of the body of law covering health and safety. As these sections are set out in an Act of Parliament, it means that they are classed as State Law, a breach of which is a criminal offence and can be punished in a court of law*

Individual Health & Safety roles and responsibilities

The Police Treatment Centres

Organisation Structure of functional Health & Safety roles



7.1 The Board of Trustees

The organisational structure for the management of Health and Safety is shown at **Appendix B**. The following sections outline the responsibilities of functional posts within that structure.

The Charity's Board of Trustees recognise the importance of effective corporate governance. Managing corporate risk is a key issue for the Chief Executive Officer and all senior managers. One key risk area is the health and safety of the Charity's employees and of others, including members of the public, who may be affected by the Charity's activities or omissions.

The Trustees recognise that effective health and safety management will help;

- Maximise the well-being and productivity of all people working for the Charity;
- Prevent employees from being injured, ill or killed through work related activities;
- Improve the Charity's reputation in the eyes of service users, stakeholders and the wider community;
- Encourage better relationships with contractors;
- Avoid damaging effects on the Charity's name and reputation;
- Minimise the likelihood of prosecution and consequent penalties.

Based on guidance issued by the Health and Safety Executive;

The Board of Trustees of the Charity formally and publicly accepts its collective role in providing health and safety leadership in the Charity.

Ultimately the Trustees are accountable for health and safety and are responsible for providing health and safety leadership within the Charity. Trustees will continuously strive towards, and are committed to, continuous improvement in order to ensure so far as is reasonably practicable, the health, safety and welfare of the Charity's employees and others who may be affected by its activities. In providing health and safety leadership Trustees expect the full co-operation of the Charity's employees and any contractors or visitors, with regard to the safe observation and implementation of the Charity's Health and Safety Policy and procedures.

Each of the Trustees accepts their individual role in providing health and safety leadership for the Charity.

There are varying levels of health and safety roles and responsibilities for Trustees. Each Trustee accepts their overall health and safety responsibilities as well as any individual responsibilities placed upon them via this policy.

The Trustees will ensure that all board decisions reflect its health and safety intentions, as articulated in the Health & Safety Policy Statement of Intent.

The Trustees realise that some of their decisions will have health and safety implications. When considering any such decisions at board level, the Trustees will ensure that the possible health and safety implications are taken into account and carefully considered, before any final decision is reached. The Trustees fully realise that although health and

safety responsibilities and functions can be delegated, the overall legal accountability and responsibility for health and safety remains with the Trustees of the Charity.

The Trustees recognise their role in engaging the active participation of employees in improving health and safety.

The Trustees fully realise the necessity of ensuring that employees are engaged and consulted when making health and safety related decisions; or at any time where the Charity seeks to improve the Charity's overall health and safety performance. The Trustees recognise that there are legal requirements with regard to the consultation of employees via employee staff representatives as appropriate at the staff reps meeting. Health and Safety is an agenda item on Departmental meetings, HOD meetings, Trustee meetings and the Staff reps meeting. All employees are involved in the annual review of the Health and Safety policy and risk assessments. All Departments have a Health and Safety folder containing relevant information and risk assessments relevant to their roles.

The Trustees will ensure that all employees are consulted, in good time, on any matter which may affect their health and safety. The Trustees will take into consideration, any ideas or concerns with regard to health and safety, which may be expressed by employees. In order to achieve this, they will rely on the full co-operation and active involvement of employees in ensuring that the arrangements within this policy and any other safety related procedures are observed at all times.

The Trustees need to ensure that they are kept informed of, and alerted to, relevant health and safety risk management issues. The Health & Safety Executive recommends that the Trustees appoint one of their number to be the 'health and safety Trustee'.

The Board of Trustees will therefore appoint one of their number to be the nominated health & safety Trustee.

The above sections of legislation are just a small but significant part of the body of law covering health and safety. As these sections are set out in an Act of Parliament, it means that they are classed as Statutory Law, a breach of which is a criminal offence and can be punished in a court of law.

7.2 All Charity Employees

All the Charity's employees have a legal duty under Section 7 of the Health and Safety at Work etc 1974 (HASAWA) to take reasonable care of themselves and any other person who may be affected by their acts or omissions. In order to ensure that this legal duty is complied with, employees at all levels must, and will, be expected to adhere to the Charity's policy on health, safety and welfare at all times.

All employees at all levels within the Charity, are required to, and will be expected to, provide their full co-operation in ensuring that the Charity meets the legislative requirements placed upon it under Health and Safety Law.

It is important to understand that a breach of this policy may actually constitute a breach of the law. If this is the case and an accident occurs, as well as the Charity facing possible legal action from the enforcement authorities, it is possible that the employee could also be prosecuted if it was found that the employee was in some way responsible or at fault for an accident. Therefore it is vitally important that health and safety rules, procedures, roles and responsibilities are adhered to at all times whilst employees are at work.

- Employees must, at all times, conduct themselves in a manner which is safe and refrain from any behaviour which could lead to an increased risk of an accident, injury or loss, within the workplace.
- Section 8 of the Health and Safety at Work etc 1974 requires that employees do not intentionally or recklessly interfere with or misuse anything provided in the interests of health and safety.
- This policy requires employees all to be involved in assisting the Charity in discharging its legal duty by reporting defects, accidents, raising safety concerns, keeping work areas clean and tidy, using equipment correctly, wearing PPE where appropriate and assisting with risk assessments as required. This list is neither prescriptive nor exhaustive.
- By co-operating with their respective Head of Department employees will be assisting the Charity in fulfilling its legal obligations.
- If employees have any concerns whatsoever regarding the health, safety and welfare of themselves or any other employees they should inform their Head of Department as soon as possible so that any concerns can be dealt with as speedily as possible.
- Employees must familiarise themselves with the Charity's emergency arrangements associated with fire safety; pool safety; Bomb threats, Fire Arms attack, suspect parcels, dealing with accidents and accident reporting. If an employee does not understand the procedures they are to make this known to their Head of Department so that the procedures can be further explained.

7.3 Chief Executive Officer (CEO)

Based on guidance issued by the Health & Safety Executive the Trustees have appointed the Chief Executive Officer to take responsibility for health and safety.

The CEO carries overall responsibility for health and safety within the Charity and will ensure that adequate resources are available for the implementation of the Charity's policy on health, safety and welfare.

The CEO is also responsible for:

- Ensuring that the Charity's policy on health, safety and welfare is implemented and applied across the Charity's operations and that appropriate reports are submitted to the Trustees.
- Ensuring that the Charity's work related activities are subject to risk assessment and that appropriate precautions and risk controls are introduced.
- Ensuring that health and safety responsibilities and duties are delegated to Heads of Departments, senior managers and officers of the Charity.
- Ensuring that any persons delegated with the aforementioned responsibilities and duties are competent to carry out their designated role.
- Ensuring the effective monitoring of the Charity's overall health and safety management system.

- Ensuring that the Charity makes suitable arrangements for the provision of relevant health and safety training and for consulting with employees on matters relating to their health and safety.
- Ensuring that this policy and its contents are made available to all employees employed by the Charity, in order to ensure that the overall aim of avoiding and reducing risks to health and safety can be achieved.
- Ensuring that the Charity's overall safety management systems and risk assessments are subject to periodic review.
- Liaising with all senior managers, the Charity's safety adviser and other external organisations, in order to ensure that the CEO is informed of any changes in health and safety legislation which may affect the Charity and its current or future operations.
- Ensuring that any deliberate breaches of health and safety law, deliberate breaches of the Charity's health and policy, or any non-compliance with any of the Charity's health and safety instructions, are dealt with immediately and that where necessary, disciplinary action is taken.
- Maintain the Charity Risk Register.

7.4 Castlebrae Manager (Deputy Chief Executive Officer)

The Castlebrae Manager, who is also the Charity's Deputy Chief Executive Officer, will at all times set a personal example to employees with respect to the observation and implementation of the Charity's health and safety rules and procedures. In the event of the CEO being absent from the Charity the Castlebrae Manager will assume overall responsibility for health and safety within the Charity. At all other times the Castlebrae Manager will have delegated authority from the Chief Executive as follows;

- Responsible for overseeing the implementation of the Charity's health and safety management system at the Charity's Castlebrae Treatment Centre.
- Responsible for reporting to CEO on any health and safety matters relating to the Charity's operations as a whole and in particular, those concerning Castlebrae Treatment Centre.
- Understand the requirements of the Health and Safety at Work etc Act 1974 (General Duties for Employers and Employees) and aware of other legislation relevant to the Charity's business.
- Ensure that suitable channels of communication are set up between senior managers and employees, in order to facilitate the conveying of health and safety information and reporting. This is to ensure that he is made aware of any potential health and safety related issues either before or as they arise.
- Delegate health and safety duties and responsibilities to various persons within the Castlebrae Treatment Centre. Where such duties are assigned ensure that those who are assigned are competent to carry out their role and that any necessary training has or will be provided.
- Liaise with all Castlebrae employees over the full range of their duties and responsibilities that may have been placed upon them by the Charity's health and safety policy.

- Ensure that there are adequate means in place for the dissemination of any health and safety information provided to the Charity via the Health and Safety Executive (HSE), Local Environmental Officers or Local Authority, Trade Associations and the Charity's Health and Safety Adviser.
- Ensure that any individual at Castlebrae Treatment Centre who is required to use any work equipment is competent to do so. Where individuals are not competent to use work equipment, they will be prohibited from carrying out such tasks until such a time as they have received suitable training and instruction, and are deemed as being competent to use the equipment safely.
- Responsible for ensuring that all work equipment within the centre is suitable for use. Where necessary ensure that work equipment is tested and inspected in accordance with legislative requirements or manufacturer's specifications. Where any doubt exists over the frequency of equipment testing, this should be raised with the CEO, the Castlebrae Manager, or the Charity's external Safety Adviser.
- Attend meetings with the Charity's external Safety Adviser in order to ensure that;
 - legislative requirements are being met
 - to review various risk assessments and procedures as necessary
 - discuss any potential risks or problems that may arise
 - to review and analyse any information regarding accidents with a view to establishing further preventative measures
 - Discuss any relevant health and safety matters.

7.5 Deputy Centre Managers at St Andrews and Castlebrae

The Deputy Centre Manager at each Treatment Centre is the respective Operations Manager who has a primary responsibility as a Head of Department. As the nominated Deputy Centre Manager they are responsible for ensuring that they are aware of their own personal health and safety role and responsibilities under this policy. They will set a personal example to employees with respect to health and safety at all times. They should also ensure that they are aware of the health and safety roles and responsibilities which may be placed upon employees under their control.

The Deputy Centre Manager will;

- In conjunction with the CEO & Castlebrae Manager overseeing the implementation of the Charity's health and safety policy they will make the necessary arrangements to ensure that work activities under their sphere of control, are subject to risk assessment and that adequate controls or methods of risk reduction are implemented where necessary.
- Assume responsibility for health and safety matters in the event of either the CEO or Castlebrae Manager not being available within the Charity at any particular time.
- Ensure that all work equipment within the centre is suitable (i.e. designed for the purpose for which it is to be used). They will ensure that that no work equipment has been subjected to any local adaptations or improvisations and that no item of work equipment is being used for tasks other than it's dedicated purpose.
- Ensure that in areas under their control, where Personal Protective Equipment (PPE) is to be worn, that any PPE issued for use at work is used and is worn correctly. Where training in the use of PPE is required, they will ensure that such

training is provided. Where the use of PPE has been stipulated via the Charity's safety rules and procedures, and it is found that it is not being worn, the Deputy Centre Manager will take appropriate action. This may include disciplinary action.

- Ensure that any accidents, equipment defects or any other safety related issues are reported to the CEO and/or Castlebrae Centre Manager and will be responsible for conveying relevant safety information between employees and senior management.
- Ensure that all relevant safety signage is in place within the departments or areas under their control. They will ensure that any such signage is updated, amended or replaced as necessary.
- Ensure that all employees under their direct control are aware of the Charity's health and safety policy and their duties under that policy.
- Ensure that employees are made aware of the emergency arrangements that are in place at the Charity and of the procedure for raising any health and safety issues that they may have.

7.6 Heads of Departments (HOD's)

Head of Departments (HoD's) are responsible for ensuring that they are aware of their own personal health and safety role and responsibilities under this policy, as well as those roles and responsibilities which may be placed upon employees under their control. HOD's main health and safety role is one of supervision and co-ordination and they must ensure that their departmental employees are also fully aware of the procedures in place. HOD's will set a personal example to employees with respect to health and safety at all times.

HOD's will;

- Report to CEO/Castlebrae Manager and the Operations Managers (Safety Officer) on any matter regarding health and safety. HOD's will be the main link in the supply of information between employees and senior management and Operations Managers (Safety Officer) within the Charity.
- Be responsible for overseeing the implementation of the Charity's Health and safety policy within their respective departments. They will make the necessary arrangements to ensure that work activities under their control are subject to risk assessment and that adequate control or methods of risk reduction are implemented where necessary.
- Be responsible for ensuring that any equipment subject to statutory test or inspection, held within their respective department, is subject to such a test or inspection in accordance with the current relevant health and safety legislation in force.
- Ensure that any personal protective equipment (PPE) issued for use at work is used and is worn correctly within their departments. Where training in the use of PPE is required HOD's will ensure that the necessary training is provided. Where applicable HOD's will carry out this training provided that they are competent to do so. Where the use of PPE has been stipulated via the Charity's safety rules and procedures and it is found that it is not being worn, the respective HOD will take appropriate action to ensure that this practice ceases. If the practice of not wearing the correct PPE persists, the respective HOD will report this to the CEO/Castlebrae Manager so that corrective action can be taken.

- Be responsible for ensuring that daily and weekly checks are carried out upon their own department's equipment, where required, and for reporting any defects if detected.
- Where any defective equipment or systems are identified. HOD's will report the defect to the Operations Manager as soon as possible.
- Be responsible for ensuring that high housekeeping standards are maintained within their respective departments.
- Be responsible for ensuring that people do not interfere with, misuse or bypass anything provided in the interests of health and safety within their departments. Where such an instance occurs, they are to report it immediately to CEO/Castlebrae Manager so that appropriate action can be taken.
- Ensure that all members of the Charity's employees adhere to safe working practices at all times whilst working within or visiting their respective departments.
- Ensure that they and the employees under their control are all fully aware of any actions to be taken in the event of an emergency.
- familiarise themselves with and understand, the Charity's procedures for reporting and investigating accidents or suspected instances of work related ill health to the CEO/Castlebrae Manager.

7.7 Operations Managers

The Charity's Operations Managers are also the Safety Officer for each of the Charity's Treatment Centres and are the focal point for health and safety matters and associated health and safety responsibilities. This includes health and safety responsibilities relating towards the Charity's premises, facilities and equipment.

The Operations Manager's will;

- Ensure that all appropriate building maintenance and inspection arrangements are implemented throughout the Charity's premises.
- Will make arrangements for any necessary building or equipment repairs to be carried out, they will ensure that any health and safety issues are taken into account and addressed, before any such work is carried out.
- Will co-ordinate the activities of contractors whilst they are working within or on the Charity's premises.
- Will make recommendations to the CEO or Castlebrae Manager for the purchasing of both general and safety related work equipment.
- Will report directly to the CEO or Castlebrae Manager on health and safety related issues and resolve any minor safety issues that may occur.
- Will be responsible for collating all defect reports and co-ordinating any corrective actions to be carried out.
- Will undertake accident investigations, including where the possible cause of the accident is building/premises related.

- Will make arrangements for the provision of personal protective equipment (PPE) as requested by HOD's.

7.8 Senior Management Team

Senior Management Team e.g. CEO, Deputy CEO, Chief Financial Manager, HR Manager and Head of Clinical Services are responsible for ensuring that they are aware of their own personal health and safety role and responsibilities under this policy, as well as those roles and responsibilities which may be placed upon employees under their control. Senior Management Team will set a personal example to all employees with respect to health and safety at all times.

Where the Senior Management Team feel that a level of health and safety expertise is required, which is beyond their current health and safety capabilities, they must report this to the CEO and/or Castlebrae Manager so that appropriate arrangements can be made for dealing with any issues that may arise.

Senior Management Team employees will;

- Be responsible for overseeing the implementation of the Charity's health and safety policy, in conjunction with the CEO / Castlebrae Manager at an operational level within the Charity. They will make the necessary arrangements to ensure that work activities within their respective area of work are subject to risk assessment and that adequate control or methods of risk reduction are implemented where necessary.
- Be responsible for reporting directly to the CEO and/or Castlebrae Manager with regard to any health and safety related issues.
- Assist in the preparation of policies, procedures and guidance on health and safety matters for approval and adoption throughout the Charity and will review and monitor these documents in order to meet the existing and emerging business needs of the Charity.
- Where applicable will be responsible for co-ordinating and assisting in the process of compiling the Charity's overall risk assessment programme.
- Ensure that all items of equipment within their departments are suitable for use and that they are in good condition and subject to regular inspection, cleaning and maintenance. Where any defective equipment or system is identified they should report the defect to the appropriate Operations Manager.
- Be responsible for ensuring that high standards of housekeeping are maintained within the areas under their control
- Be responsible for assisting the CEO and/or Castlebrae Manager in the dissemination of health and safety information and instructions within their respective departments and throughout the Charity as a whole.
- Be responsible for ensuring that any employees, under their direct supervision, adhere to safe working practices at all times and do not take unnecessary risks.
- Must ensure that they and any employees under their control are all fully aware of any actions to be taken in the event of an emergency.

- Must familiarise themselves with and understand the Charity's procedures for reporting accidents or suspected instances of work related ill health to the CEO and/or Castlebrae Manager.

7.9 Charity Health and Safety Officer(s)

The Operations Managers at each of the Charity's Treatment Centres is also the appointed Safety Officer for their respective locations. The St Andrews Operations Manager (Safety Officer) also has responsibility for supporting and assisting the CEO in the development and co-ordination of Health and Safety strategy, policy and processes and in this regard will liaise closely with their counterpart.

The Operations Manager (Safety Officer) will;

- Report directly to the CEO/DCEO and Castlebrae Manager, as appropriate, with regards to any legitimate health and safety related matter.
- Make recommendations to the CEO on any health and safety matter where it is considered that there may be a potential health and safety issue or risk.
- Will assist with overseeing the implementation of the Charity's policy on health, safety and welfare.
- Provide advice or make recommendations on the need for any health & safety related training to be provided for the Charity's employees.
- Liaise with all HOD's to ensure that the requirements of the Charity's policy on health, safety and welfare are met.
- Attend appropriate meetings e.g. HOD's meetings, in order to advise and inform on or of any health and safety issues that may or could potentially exist.
- Monitor the Charity's risk assessment strategy and ensure that risk assessments are carried out by department and that those assessments are subject to regular review.
- Carry out accident investigations and maintain data on any accidents, instances of ill health and any RIDDOR reportable incidents.
- Advise and answer questions on the induction of new employees who are to be employed at the Treatment Centres.
- Be responsible for ensuring that any contractor employed by the Charity has provided the Charity with adequate health and safety information regarding the work that they are intending to carry out.
- Be responsible for ensuring, where contractors are employed at the Charity's premises, they are provided with adequate information regarding the Charity's health and safety arrangements as well as any specific risks that the contractor may need to be made aware of.
- Carry out informal inspections of workspaces, be on hand to offer advice and guidance where necessary, report health and safety issues, and ensure that any such issues are raised with HOD's and/or management

7.10 External Safety Advisor

The Charity contracts the services of an external Safety Advisor in accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999 (MHSWR 99) – (which refers to Health and Safety Assistance). The Safety Advisor's role is to assist the Charity in ensuring so far as is reasonably practicable, the health, safety and welfare of its employees and those who may be affected by the Charity's activities.

The primary responsibility of the Safety Advisor will be to offer advice and, where necessary, make recommendations to the CEO in order to ensure the Charity's ongoing compliance with UK health and safety legislation.

The external Safety Advisor will;

- Report directly to the CEO and/or the Castlebrae Manager either verbally and /or in writing on any matter or recommendation regarding health and safety and the Charity's safety management system.
- Assist in monitoring the Charity's overall health and safety management system. This will be achieved by carrying out one (1) health and safety monitoring visit annually.
- Act as a source of guidance and information for the Charity's Operations Managers (Safety Officer) and HOD's when required.
- Where requested, assist and monitor The Senior Management Team and HOD's during the compilation of Risk Assessments, Accident Investigations, Safe Working Procedures etc. and will provide advice and recommendations with regard to any training that the Charity should be providing for it's employees in order to meet its statutory obligations.
- Rely heavily on the co-operation and support of the Charity's employees, who will in return receive the necessary support, guidance and advice that will enable them to carry out their health and safety duties and ensure that the overall management of health and safety within the Charity is not compromised.
- Assist the Charity in any dealings with the Local Area Enforcement Authority (LAEA) as necessary.

Managing Health and Safety

8 Consultation with Employees

The Charity has a legal duty to consult with its employees on any matter, which may affect their health and safety at work.

Health and safety issues affect everyone who works within the Charity and it is therefore the policy of the Charity to consult with its employees on these matters. This enables everyone within the Charity to have the opportunity to voice their opinion, views or concerns with regard to any health and safety arrangements already in place, or those that are to be implemented.

There are a number of ways that consultation can be achieved and these will be employed according to situation and circumstances. Methods that will be continuously employed are

the HOD meetings and the Staff Representatives meetings and the Minutes of these meetings will be OPEN Minutes in respect of health and safety matters and will be communicated to employees following each meeting. Where construction work or change to working practices is envisaged employees will have the opportunity to be briefed on the proposals, examine available plans and raise any issue, particularly those of concern.

If an employee feels that their concerns are not being properly considered, or that they have not been consulted on a particular matter which may affect their health and safety, they should raise this immediately with their HOD. If they feel that they are unable to do so, they should then raise the issue with the Charity's Operations Managers (Safety Officer), or an alternative HOD. If an adequate response is not received, a meeting should be sought with the CEO or Castlebrae Manager if appropriate, in order to ensure that any concerns are heard at the highest level within the Charity. This course of action should only be taken once all other avenues of consultation have been explored and exhausted. The Charity's Disclosure (Whistleblower) Policy sets out a process to raise legitimate and honestly held concerns.

9 Monitoring

The responsibility of monitoring the Charity's health and safety arrangements and overall health and safety performance will initially rest with HOD's, even though accountability remains, and escalates through, Operations Managers (Safety Officer), the CEO and ultimately Trustees. HOD's will ensure that the Charity's Health & Safety Policy is being implemented within their areas of responsibility and will either take corrective action, or report any areas of concern that they may have, to the Charity's Health and Operations Managers (Safety Officer).

9.1 Monthly

Monthly Health & Safety Report - The Operations Managers (Safety Officer) will submit a monthly Health & Safety Report to the CEO, in the case of the Castlebrae Operations Manager (Safety Officer) this will be simultaneously submitted to the Castlebrae Manager. The matters reported upon will be:

- Accident and Near Misses.
- Fire Safety.
- Pool Safety.
- Monthly Health & Safety 'walkabout' findings.
- Quarterly Health & Safety Advisor Reports (where applicable).
- Health & Safety Training.
- Any other Health & Safety matters.
- Construction projects (if being undertaken).

The respective monthly reports will be exchanged between Operation Managers (Safety Officer) for information and comparison purposes. They will also be on the agenda and discussed at the respective HOD meetings.

Health & Safety 'walkabouts' - The Treatment Centres have been divided into distinct sections in order to accomplish a monthly health and safety 'walkabout' of a single section each month, the programme will be repeated in sequence with each section being visited twice annually at six monthly intervals. This is to enhance the current level of monitoring by ensuring that an impartial opinion can be gained over a department's health and safety performance and general condition.

These 'walkabouts' will be conducted by the Operations Managers (Safety Officer) accompanied by a HOD not responsible for the area being inspected, an employee from

another department and also a patient in residence. It would be an advantage for the patient to be either disabled or experiencing mobility problems so that their perspective on relevant matters can be gained.

Monthly 'walkabout' reports will be considered in regard to any remedial health and safety, or maintenance, action requiring attention and the appropriate action implemented.

9.2 Quarterly Reports

Quarterly Health & Safety Report - The CEO will submit four (4) Quarterly yearly Health & Safety Report to the Trustees Finance and Human Resources Committee (FHRC) covering the same items as the monthly report. This will be presented and considered at the next FHRC meeting following the quarter end.

The Charity's external Safety Advisor will carry out one health and safety monitoring visit annually. These will normally half yearly at each of the Charity's Treatment Centres in order to ensure that safety standards and safe systems of work are being maintained.

These half yearly visits will be utilised to meet with the Operations Manager (Safety Officer) and HOD's to discuss any issues or concerns that they may have with regards to health and safety. It is also an opportunity to monitor the Charity's overall health and safety performance, with a view to offering advice and guidance on any examples of good practice, or improvement which may be required in order to comply with UK health and safety legislation.

The resulting half yearly visit report will be submitted to the CEO, Castlebrae Manager and the Operations Managers (Safety Officer) and the report will be exchanged between the parties for information and comparison purposes. The reports will also be on the HOD agenda and discussed at the respective HOD meetings.

9.3 Annually

Risk assessments will normally be conducted on an annual basis, normally in March unless there is reason why this should be undertaken more frequently or for a special circumstance that has arisen.

10. Procurement in accord with health safety legislation and good practice

Procurement of good, supplies and services should always have regard to health and safety and where equipment in particular is being procured there should be cognisance of the requirements of "The Provision and Use of Work Equipment Regulations 1998" (Puer).

----- oo00oo -----