

HEALTH AND SAFETY POLICY

The aim of this policy is to (a) comply with the requirements of the Health & Safety at Work etc. Act 1974 and other relevant statutory provisions; (b) to act as a pivotal document in implementing Cygnnet's safety management system (SMS), following the HSE's HSG65 'Managing for H&S' and (c) to ensure, so far as is reasonably practicable, a healthy and safe environment for all people who work, use or visit Cygnnet's premises.

- It is the personal responsibility of every individual referring to this policy to ensure that they are viewing the latest version; this will always be published on Cygnnet's SharePoint.

Table 1 Linked Policies

Related Policies
HEALTH & SAFETY MANUAL
ESTATES MANUAL
INFECTION CONTROL MANUAL
CLINICAL POLICY MANUAL

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Appendix 1 Cygnnet Health & Safety Management System (HSG 65 Model)

CYGNET HEALTH CARE HEALTH AND SAFETY POLICY

CYGNET HEALTH CARE HEALTH AND SAFETY POLICY

1. HEALTH AND SAFETY POLICY STATEMENT

Cygnnet Health Care accepts in full its responsibilities under the Health and Safety at Work etc. Act 1974 and will act positively to minimise the incidence of all workplace risks via our commitment to taking all reasonably practicable steps to protect the health, safety and welfare of our workforce, service users and others who may be affected by our activities.

We also recognise that the effective management of health and safety is an integral part of our overall business performance and should be an integral everyday part of our employees' activities. We expect therefore, that those employees and others who may visit or work on our premises, to share this commitment, by the exercise of personal responsibility in complying with company policies and procedures and to understand that they too, have legal and moral obligations to themselves and to one another.

The Company is committed to:

- Providing a safe working and living environment for all employees, service users and others who have access to our sites.
- Providing safe access and egress to all workplaces.
- The provision and maintenance of safe plant and safe systems of work.
- Providing adequate health and safety instruction, supervision and information for employees whilst at work.
- Ensuring that all employees are competent to do their tasks and to provide them with adequate training to ensure their health and safety.
- Consulting with our employees on matters affecting their health & safety.
- Preventing incidents / accidents and cases of work related injuries, ill-health and disease.

The allocation of duties regarding safety matters and the particular arrangements that we have made to implement the policy are set out in the procedural documents contained within Cygnnet Health Care's Health and Safety, Estates and Infection Control Manuals.

To ensure that this policy reflects current business activity and any legislative changes, the policy and its implementation will be reviewed, as necessary, at regular intervals.

I and my fellow members of the Cygnnet Board are committed to this policy and to the implementation and maintenance of the highest standards of health and safety across the company. We expect every member of the Company to share this commitment and to work together to achieve it.

Signed



Date 12 FEBRUARY 2016.

David Cole
Chief Executive

Issued: 02/16
Review: 02/19
Ref: HS 01 MP/VJM
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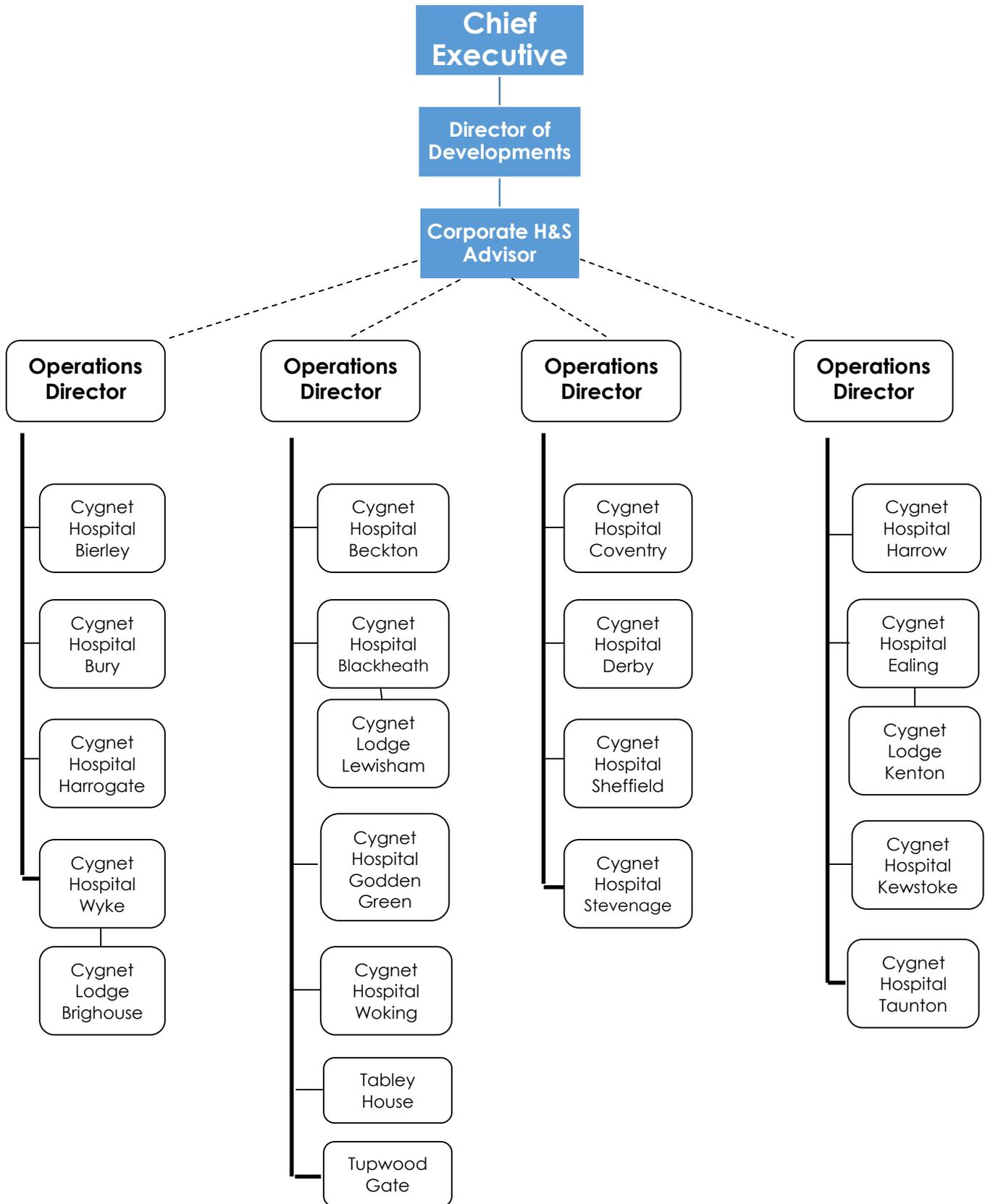
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**CYGNET HEALTH CARE
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2. ORGANISATION FOR HEALTH AND SAFETY

2.1 Health and safety organogram



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2.2 Responsibilities for health and safety

2.2.1 The Chief Executive

Is ultimately responsible for:

- Compliance with the Health and Safety at Work etc. Act 1974 and other relevant statutory provisions.
- Ensuring that an up to date health and safety policy statement is prepared and brought to the attention of all staff.
- Ensuring the effective implementation and maintenance of this policy across the Company.
- Nominating an Executive Director to be responsible for health and safety throughout the Company.

2.2.2 Director of Developments (DD)

Is responsible for:

- As the nominated Director with responsibility for H&S, the DD is responsible for ensuring that suitable and effective health and safety arrangements are in place across the Company.
- The DD will ensure that the health and safety management arrangements reflect best practice and will receive periodic reports from the Corporate H&S Advisor on H&S activity across the Company.
- Reporting on matters relating to the management of health and safety to the Chief Executive and briefing the Board as appropriate.

2.2.3 Operations Directors

Are responsible for:

- Ensuring that their health and safety risks are managed effectively by their senior managers.
- Ensuring that health and safety issues are considered an integral part of business operations and that adequate resource is available to ensure their achievement.
- Ensuring that effective communication exists between all sections of their business operations with regard to health and safety.
- Periodically reviewing the health and safety performance of their services.

2.2.4 Unit Managers

Are responsible for:

- Assisting their Operations Directors in meeting their health and safety responsibilities.
- Implementing the health and safety policy within their units and for all other matters relating to health, safety and welfare within these areas.
- Ensuring that periodic workplace inspections are carried out and any unsafe conditions found are subsequently removed or adequately controlled.
- Ensuring that staff (and others where appropriate) receive the training necessary for safe working.
- Ensuring suitable and sufficient risk assessments have been carried out and appropriate control measures are in place and are maintained.

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- Ensuring that accidents / incidents and near misses are properly reported (especially those under the umbrella of RIDDOR) and recorded and appropriate investigations and reviews are undertaken and acted upon.
- Ensuring that any areas of concern noted above are identified, monitored and managed via their Risk Register and OLAP.
- Establishing effective arrangements for staff consultation vis-a-vis the management of health and safety within their unit.
- Creating an open environment which encourages staff to raise and discuss health and safety issues within their respective work areas.

2.2.5 The Corporate Health & Safety Advisor

Is responsible for:

- Being the Company's 'competent person', as required under Regulation 7 of the Management of Health and Safety at Work Regulations 1999.
- Providing the Company with advice and assistance on the measures it needs to take to comply with its statutory health and safety obligations.
- Advising the Director of Developments & others regarding improvements to the Company's health and safety management arrangements.
- Reporting periodically to the Director of Developments on the Company's health and safety performance.
- Maintaining the Company Health and Safety Policy (and any other supporting corporate documents such as the Health and Safety Manual).
- Periodically monitoring, reviewing or auditing by sampling the Company's health and safety management arrangements, ensuring those arrangements are effective at and appropriate for controlling risks.
- Annually reporting the findings of monitoring etc. to the Director of Developments.
- Liaising with each unit's Health and Safety Leads (e.g. by setting up and managing a periodic health and safety workshop) to ensure a consistent approach is taken across the Company to the management of health and safety.
- The provision of training and / or advice to staff and / or other training providers.
- Heightening health and safety and risk management awareness in all staff groups in all locations across the Company.

2.2.6 The Health and Safety Leads

Are responsible for:

- Providing advice to staff and service users to maintain a safe place of work and a safe environment.
- Providing advice, support and guidance to facilitate the development of health and safety and to promote a risk aware culture.
- Assisting in identifying realistic solutions to health and safety problems.
- Facilitating regular health and safety risk assessments and safety audits within their area of responsibility.
- Taking part in the educational and training requirements for health and safety related subjects.
- Ensuring incidents and near misses are reported via the appropriate reporting routes.

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2.2.7 All employees

Will:

- Take reasonable care for the health and safety of themselves and of others who may be affected by their acts or omissions at work.
- Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare.
- Co-operate with any relevant person and comply with all relevant health and safety policies and procedures and risk control measures.
- Use any equipment, machinery, hazardous substance, transport equipment, safety device, or system of work in accordance with any training or instruction provided to ensure safe use.
- Wear the appropriate safety equipment and use appropriate safety devices where applicable.
- Report to their manager and / or health and safety lead, all hazards which they believe the manager is currently unaware of.
- Report immediately to their manager and / or health and safety lead, any accidents, incidents, near misses or dangerous occurrences in which they are involved, regardless of whether persons are injured or not.

2.2.8 Contractors

Will:

- Act in accordance with Company guidance on contractors with respect to the management of their health and safety.

3. ARRANGEMENTS FOR THE MANAGEMENT OF HEALTH & SAFETY

3.1 Training

Health and safety training will be provided for all staff, (including Bank Workers), as part of their induction and subsequently, repeated periodically as part of their mandatory training, in accordance with the company Training Policy CH 15.

Other specialist training necessary for staff with specific health and safety responsibilities in each workplace is signposted within the health and safety manual or will be identified through the risk assessment process and staff appraisals. This includes e.g. Fire Warden, First Aider, Legionella and Asbestos Awareness.

Details of the H&S training appropriate for each group of staff and each managerial level can be found in the Company's corporate Training Needs Analysis.

Training records will be kept and maintained on eSMART by each Unit Manager.

3.2 Risk assessment

Risk assessment is the key to effective and sensible health and safety management. The findings from risk assessments will be used to identify prioritise and control risks at all levels in the company.

Unit Managers will ensure that:

- All significant hazards in their workplace / work activities under their control have been suitably risk assessed and that any subsequent risks are adequately controlled.

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- That these assessments are reviewed annually.

Risk assessments will also be reviewed should there be:

- Any changes in legislation which effects the assessment.
- Any changes to working practices or environmental conditions that could affect employee safety.
- An accident, near-miss or Serious Incident.
- An indication that the assessment is no longer valid.

The relevant risk assessment procedures and associated documentation are contained within the company Health & Safety Manual.

3.3 Risk Register

Where units identify hazards / risk exposures that are not currently being, or may cease to be, effectively managed, they must ensure that a relevant entry is made in their Unit Risk Register. If a risk has been identified as being high or may have a major impact and/or be detrimental to service users, staff and the organisation, the Corporate Risk Manager (CRM) must be informed. All high risks that have been placed on the Unit Registers will be monitored and reviewed regularly by the CRM as appropriate, to ensure that progress is being made to reduce or eliminate the risk. All other health and safety risks that are on the local risk register should be reviewed regularly until resolved.

3.4 Accident / incident reporting and investigation

All accidents / incidents and 'near-misses' should be recorded, reported and investigated in accordance with the company's Incident Reporting Policy.

Each employee is responsible for reporting accidents / incidents to which they are party / witness and should liaise with their Line Manager in this regard. The Line Manager should ensure that the company accident / incident reporting form is completed in each instance.

Managers will review all reported incidents/accidents which occur in their workplace and investigate certain incidents further, e.g. those which are actually or potentially more serious or those which are frequent. The main purpose of the investigation is a 'lessons-learnt' approach – wherever possible, to reduce the likelihood of repeat events occurring.

Having made an initial investigation of the accident/incident and reviewed / revised any risk assessment and informed representatives of any changes, the Unit Manager should ensure that ePRIME and any allied data-base is updated accordingly.

All RIDDOR reportable incidents should be investigated and the outcomes discussed at an appropriate forum (e.g. H&S Meeting or Heads of Department) to ensure that timely feedback is provided to all involved.

The Unit Manager is responsible for reporting incidents:

- To the Chief Operating Officer if there is likely to be an insurance claim resulting.

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- To the Health & Safety Executive re: RIDDOR (see RIDDOR guidance in Incident Reporting Policy).
- To the Care Quality Commission.
- To the Corporate Health and Safety Advisor (RIDDOR incidents only) with a copy of the incident / accident report.

3.5 First Aid at work

Cygnnet will ensure that adequate provision is made, via the risk assessment process, to enable:

- Immediate assistance to be given to employees suffering from potential injuries or illness associated with our undertakings.
- Rapid summoning of an ambulance or medical assistance.

The level of provision provided will be appropriate to the risks identified in each workplace risk assessment.

All First Aiders will be competent in either (FAW/EFAW) and hold a valid certificate of training and their names and locations will be prominently displayed in each workplace.

More specific details are contained in policy HS 09 First Aid at Work

3.6 Supporting documentation

Cygnnet has a number of supporting documents which provide employees with more detailed practical arrangements regarding health and safety issues. These are available in the Health & Safety Manual, Estates Manual and Company Handbook – some examples are listed below.

Asbestos policy and procedures	HS31	Management of Contractors policy	HS04
Business Continuity Plan	CH47	New and Expectant Mothers	HS17
COSHH	HS26	Promoting Safe & Therapeutic Services: & the Prevention & Management of Violence & Aggression	HS27
Driving for Work policy	HS30	Policy for Patient Safety, Incident Reporting & Management	CPF 4.0
Electricity at Work	EM23	Safer Moving and Handling policy	HS16
Fire Safety policy	HS08	Safe Use of Display Screen Equipment policy	HS07
First Aid at Work policy	HS09	Training Policy	CH15
Food Hygiene Policy	HS03	Working at Height	HS32
Ligature Audit Tool	CPF 1.13	Estates Manual	
Lone Working policy	HS05	Infection Control Manual	
Management & Control of Legionella	HS13		

It is essential that all employees familiarise themselves with the content of these documents to ensure that they have a good understanding of all health and safety measures.

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3.7 Local health and safety procedures

On occasion, units may need to 'localise' their procedures for certain high risk activities and any local procedures must be consistent with the company Health and Safety policy and the company Health and Safety Manual and / or Estates Manual.

3.8 Communicating health and safety information

The company uses a variety of methods to ensure suitable and sufficient health and safety information is disseminated to all staff; these are:

- Health and safety law poster and local contact notices e.g. first aiders, fire marshals.
- The company Health & Safety, Estates and Infection Control Manuals.
- SharePoint.
- Team briefings which may contain occasional health and safety information.
- Consultation between management and employees is provided via regular meetings of the heads of department and the Staff Representative Committee. At these meetings, as well as at all other times, it is the responsibility of the heads of department to bring issues of health and safety to the attention of the Unit Manager.
- Health and safety articles featuring in MyCynet.
- Internal and external (e.g. DoH) Safety Alerts to share good practice and disseminate important safety information.
- Ad-hoc newsletters.
- Health, Safety and Well-being road-shows.

4. MONITORING

4.1 Pro-active monitoring: Workplace health and safety inspection

A workplace safety inspection is an effective way of identifying faults, hazards and unsafe working practices.

Unit Managers **must** ensure that their ward/departmental managers carry out a workplace inspection of the premises under their control using the most current Workplace Inspection template, incorporated within the company Health and Safety Manual. The frequency of inspection should be determined by the risk presented by individual workplaces, but as a minimum, it should be completed at least annually.

If any unsafe conditions are found, the responsible person for that area must take effective action to remove those conditions from the workplace. The Unit Manager is ultimately responsible for ensuring that all issues arising from inspections, wherever possible, are resolved to a satisfactory standard.

4.2 Re-active monitoring

The monitoring of injuries, ill-health, accidents and incidents complement active monitoring and can be used effectively to identify causation, lessons learning and positively, a reduction in future incidence.

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5. HEALTH & SAFETY AUDIT

The Corporate Health and Safety Advisor will audit and inspect sites across the company to determine both the level of compliance with the company Health and Safety policy and the degree to which risks are being adequately controlled.

The audit findings will be reported to each Unit Manager.

6. INSURANCE

The company's insurance issues are dealt with through the brokerage firm of Locktons. Notifications should be made as follows:

Incidents involving Injuries to Employees, Visitors or Third Parties or damage to their property and damage to Cygnet property:

Lockton Companies LLP, 45 Church Street, Birmingham B3 2RT
Switchboard: (0)121 232 4599
Fax: (0)121 232 4550

All Incidents involving Death, Illness or Injury to Patients or Service Users:

Argent Liability Adjusters, Peninsular House; 30-36 Monument Street, London EC3R
Tel: 020 7618 0724

Lockton Companies LLP, 45 Church Street, Birmingham B3 2RT
Switchboard: (0)121 232 4599
Fax: (0)121 232 4550

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Appendix 1

Cygnnet Health & Safety Management System – HSG 65

Plan (Policy & Planning):

- H&S Manual that undergoes regular consultation and review.
- Nominated Director for Health and Safety
- Commitment from Board to improve health and safety performance.
- Competent Health and Safety related advice actively improving safety and driving safety issues.
- H&S Committees / other relevant meetings support compliance and decision making and assurance.
- Health and Safety planning a requirement at Corporate and Local levels

Act (Learning Lessons & Reviewing Performance

- Regular review of health and safety related policies.
- Health and safety issues reported on corporate and local risk registers and reviewed at committees.
- Review of incidents and communication of findings.
- Learning lessons completed at a number of levels and through clinical governance for some incidents.

Do (Risk Profiling, Organising & Implementation):

- Resourcing to support health & safety arrangements.
- Competent health and safety advice
- Structure to support risk assessment at all levels.
- Employee representation at Health and Safety Committees / forums.
- Staff consultation where appropriate
- Health and safety designed into change wherever possible.
- Health and safety targets

Check (Measuring & Investigating):

- Reporting of safety related training uptake.
- Incident and near miss reporting and investigation
- Stress related absence data reviewed
- Health and Safety Inspection programme
- General and subject specific safety inspections and audits.
- Inclusion of significant issues on risk registers
- Review of RIDDOR data at corporate / local level
- Review of health and safety incidents.
- Annual report submitted to Board via AGR.

