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## Health and Safety Policy

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## 1 Health & Safety Statement of Intent

### Introduction

- 1.1 It is the policy of the Public Services Ombudsman for Wales ('PSOW') to develop a positive health and safety culture throughout the organisation because we believe that high standards of health and safety demonstrate how seriously our organisation takes its health and safety responsibilities.
- 1.2 To achieve this, PSOW will continually strive to identify all workplace hazards and take appropriate measures to eliminate or control risks to staff and others affected by our operations, by applying positive control standards and by provision of information, training and supervision as needed. The PSOW and managers will work with staff and trade unions to this end.
- 1.3 In accordance with the Health and Safety at Work Act etc. 1974 and all relevant Regulations, PSOW will:
  - Provide adequate control of the health and safety risks arising from our work activities.
  - Consult with our staff on matters affecting their health and safety.
  - Provide safe equipment and maintain it.
  - Ensure safe handling and use of substances.
  - Provide information, instruction and supervision for staff.
  - Ensure all staff are competent to do their tasks, and to give them adequate training.
  - Strive to prevent accidents and cases of work-related ill health.
  - Maintain safe and healthy working conditions.
  - Review and revise this policy as necessary at regular intervals.
  - Ensure that the necessary resources are made available to address any health and safety issues.

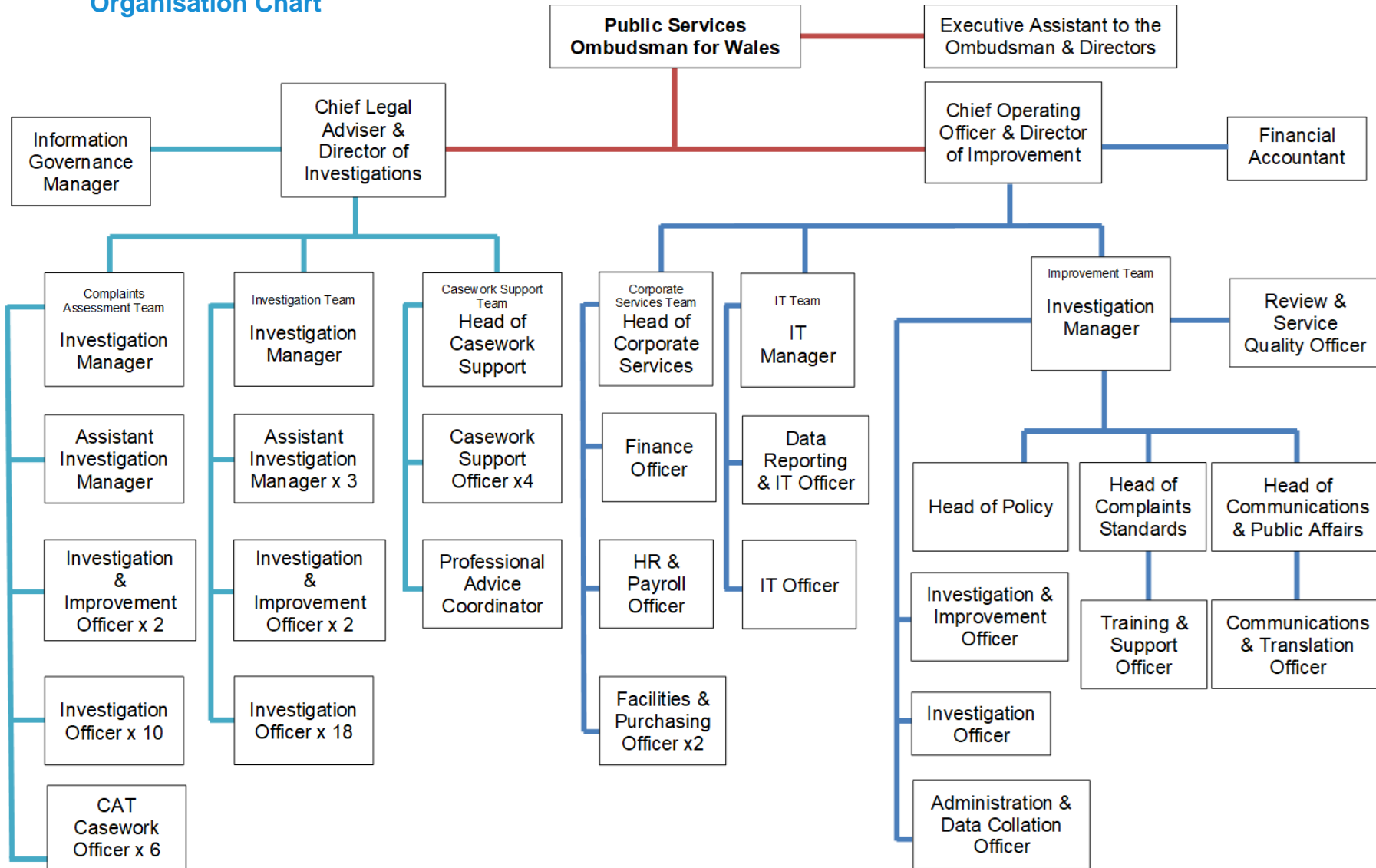
## Health and Safety Policy

- 1.4 The Ombudsman accepts overall responsibility for policy formulation and implementation. In turn, all levels of management are responsible for carrying out those health and safety duties placed upon them. The Ombudsman will ensure that the safety plan includes sufficient resources for the successful implementation of the Health and Safety Policy.
- 1.5 Development of the Health and Safety Management Policy will be conducted through normal business meetings where health and safety will be given equal standing to the other activities of the business.
- 1.6 PSOW will appoint a number of competent persons to assist the Ombudsman in implementing this policy. The Safety Adviser's role is to provide independent and authoritative advice to managers with individual responsibilities for health and safety.

Name:	Nick Bennett	
Position:	Ombudsman	
Signature:		
Date:	15 September 2020	Next Review: September 2022

## 2 Organisation

### Organisation Chart



## Roles and Responsibilities

### Ombudsman

- Overall and final responsibility for health and safety.
- Ensures that the necessary appointments are made in the organisation to fulfil the requirements of the Health and Safety Policy and management systems.
- Provides adequate resources to meet the requirements of the Health and Safety Policy.
- Sets a personal example.

### Chief Operating Officer (COO)

- Day to day responsibility for managing health and safety in the organisation and for implementing the Health and Safety Policy.
- Ensures that the Policy is updated, as required.
- Ensures that staff are made aware of the contents of the Policy.
- Ensures that the Health and Safety Policy requirements are adequately monitored, and effective action taken to address non-conformity and opportunities for improvement.
- Maintains safe and healthy working conditions, provides and maintains appropriate equipment, and ensures safe storage and use of any substances.
- Ensures that adequate health and safety training is provided to ensures that staff conform to health and safety arrangements.
- Ensures that relevant risk assessments are completed and that any actions arising out of the risk assessments are addressed.
- Sets a personal example
- Support the Health and Safety Co-Ordinator and other personnel in fulfilling their health and safety duties.

### Health and Safety Co-Ordinator (Head of Corporate Services)

- Day to day responsibility for the effective implementation of the Health and Safety Policy and arrangements.
- Identifies training requirements for health and safety and arrange training as necessary.
- Co-ordinates emergency response plans.
- Co-ordinates completion and review of risk assessments.
- Retains accident records and co-ordinates accident investigation identifying appropriate recommendations to prevent recurrence.
- Ensures that relevant injuries, diseases and dangerous occurrences are reported to HSE under RIDDOR.
- Reports to the COO on health and safety performance and issues.
- Ensures injuries and dangerous occurrences are reported to the HSE and investigated to identify appropriate recommendations to prevent recurrence.
- Acts as the first point of contact for staff with health and safety queries, issues or concerns.
- Maintains Health and Safety signage and noticeboards.
- Carries out regular workplace health and safety inspections.
- Co-ordinates inspection and maintenance of equipment and facilities and liaises with the landlord.
- Co-ordinates work carried out by contractors.
- Sets a personal example.

### Safety Adviser (HR Business Partner)

- Monitor legislation, codes of practice, guidance notes and safe working practices relevant to the organisation and advise on measures needed to achieve compliance.
- Liaise with the Health and Safety Executive and other regulatory bodies, where necessary.
- Supports the identification of health and safety training needs.

- Supports the risk assessment programme.
- Supports incident investigation where appropriate.
- Carries out inspections and audits where appropriate.
- Provides ad hoc advice and support on request.

### Managers

- Ensure that all staff are familiar with Health and Safety Policy, risk assessments and other documents relevant to their work.
- Ensures that health and safety arrangements and precautions are followed.
- Liaises with the Health and Safety Co-Ordinator to address issues raised by staff.
- Promotes an awareness of health and safety in the workplace and supports a positive health and safety culture.
- Encourages the reporting of accidents, incidents, near-misses and hazardous conditions.
- Ensures that high standards of housekeeping are maintained.
- Makes staff available for training and other health and safety activities, including input to risk assessments.
- Sets a personal example.

### Staff

- Familiarise themselves with the Health and Safety Policy, risk assessments and other relevant documents, and comply with them at all times.
- In particular, be familiar with emergency procedures and the identity of fire marshal(s) and first aider(s).
- Report any observed accidents, incidents, near misses, hazardous conditions or damage to property or equipment, irrespective of whether persons are injured or not, to the Health and Safety Co-Ordinator immediately.



- Ensure accidents are recorded in the accident book.
- Never interfere with or attempt to use equipment for which they have not been duly trained or authorised.
- To take reasonable care for their own health and safety at work and of those who may be affected by their actions, or by their omissions.
- Stop any work, which, in their opinion, involves risk or injury.
- Co-operate with other duty holders to ensure that any duty, or requirement, for health and safety imposed upon their employer by law is performed or complied with.
- Not to intentionally, or recklessly, interfere with or misuse anything provided in the interests of health, safety or welfare.

### 3 Arrangements

#### Health and Safety overall objectives

3.1 The overall Health and Safety aims and objectives of the PSOW are to:

- Actively involve staff at all levels in ensuring a competent workforce that continuously operates safe and efficient working methods. This will reduce lost time from accidents, sickness and absence with the consequent benefits of high morale and increased productivity. It will also help demonstrate that PSOW is a well-run, professional, safe and trusted organisation.
- Set standards that will at least meet the relevant statutory requirements for health and safety and environmental matters as these may affect our staff, customers, contractors and their employees and the public at large.
- Review and, where appropriate, develop these standards in the light of changes in technology, industry practices and legislation.
- Co-operate, where applicable, with the appropriate authorities and technical organisations on the formulation of standards and means of compliance.
- Ensure that the potential health and safety factors and environmental effects are assessed for all new activities and acquisitions.

- Inform staff of their health and safety responsibilities and provide sufficient information, instruction and training to enable them to be aware of and avoid the hazards to which they may be exposed.
- Ensure that contractors working under the control of PSOW are informed of its standards, and that appropriate procedures exist for monitoring compliance, without detracting from the legal responsibilities of the contractors.
- Ensure that PSOW's established protocols are used for staff consultation and participation on matters affecting health and safety at work.
- Ensure, as far as reasonably practicable, that equipment and systems of work are safe and to eliminate any foreseeable hazard which may result in injury, occupational health illness, property damage/loss, fires, security loss and environmental damage.
- Ensure that these objectives are being fulfilled through auditing PSOW's activities.

### Health and Safety Assistance

3.2 As required under The Management of Health and Safety At Work Regulations 1999, the following have been appointed as 'competent persons' in respect of health and safety:

<b>PSOW Safety Adviser</b>	HR Business Partner
<b>PSOW HR Manager</b>	HR Business Partner

### Consultation with Staff

3.3 PSOW will ensure that procedures are in place to consult with staff and provide information on matters of health and safety.

### Guidelines for Raising Matters Regarding Health and Safety

- 3.4 The procedures to be applied in dealing with health and safety matters locally are:
1. Individual members of staff are to raise matters of safety that they consider relevant to themselves with their immediate Line Manager who will quickly settle such matters as far as they are able to within the scope of their authority.
  2. Individuals not satisfied with the action taken under (1) are to refer the matter to the COO who will take the matter up in consultation with the Safety Adviser, if applicable.
  3. Notwithstanding the above procedure, which is to be followed wherever possible, matters serious enough to require immediate attention of the COO may be raised by a member of staff at any time and dealt with as appropriate. It is to be remembered, however, that line management must be given reasonable opportunity to deal with health and safety problems.
  4. Where the Safety Adviser wishes to carry out workplace inspections, they are to arrange the timing of these with the COO. On completion of an inspection, the COO shall agree any actions necessary to improve health and safety and produce a written record to this effect. Managers should then report back to the staff in their teams and, if necessary, report to the next team meetings, staff meeting or Representative Council meeting.
- 3.5 The Ombudsman or COO and the Safety Adviser are to speak at 6 monthly intervals regarding any general safety topics within PSOW. These contacts may be conducted on an informal basis but one of the parties involved shall take written notes of what was discussed, and any action agreed. Health and Safety matters requiring immediate action are dealt with as above.
- 3.6 The Safety Adviser will provide written hazard reports on all cases where they consider there is a need for remedial action by PSOW. Managers are to record the action taken (or to be taken) prior to returning the report to the Safety Adviser for recording in the Health & Safety Hazard Report File.

## Health and Safety Essentials

- 3.7 In the design and selection of equipment, storage facilities and anything else used in work activities, the suitability of such equipment for safe operation and use is of prime consideration.
- 3.8 Design, operating and general behavioural rules are set out in operating instructions, safe works procedures manuals or posted on notice boards as appropriate. These rules cover statutory, PSOW and local requirements and will take into account industry best practice.
- 3.9 It is essential that all staff are aware of the general and specific rules that apply to their job. By the issue and up-dating of such rules, together with training and practice in the requirements, PSOW aims to ensure that no failure in compliance will occur through lack of knowledge. The specific rules which refer to work activities are contained in the following documents:
- Relevant legislation and statutory instruments (available through Safety Adviser).
  - Codes of practice/regulations and HSE guidance (available through Safety Adviser).
  - Manufacturers' instructional manuals.
  - Risk Assessments.

## Staff involvement

- 3.10 The Health & Safety at Work Etc Act 1974 states that every member of staff has a general statutory duty to take reasonable care for the safety and health of themselves and others who may be affected by their acts or omissions, and to co-operate with their employer, so far as is necessary, to enable the latter to fulfil its statutory obligations.
- 3.11 The successful implementation of the Health and Safety Management Policy depends on the active support and co-operation of all staff to an extent that goes beyond the statutory requirement. Arrangements to create a climate that ensures the continuing involvement and co-operation of all staff are detailed later throughout this document. It is essential that all staff perform their work diligently and well, and that in doing so they: comply with the

issued rules and work permits; use and do not misuse anything provided in the interests of safety and health; and report to the appropriate manager any occurrence or defect which appears to present a risk to safety or health.

- 3.12 Members of staff are reminded that contravention of health and safety legislation is a criminal offence that could result in prosecution of individual members of staff as well as, or instead of, PSOW.

### Health and Safety – Good Practice

- 3.13 No item of equipment is to be operated by any person unless the person has been trained and authorised to do so.

- All equipment guarding is to be in place and correctly adjusted prior to use (e.g. Guillotine).
- Only competent and authorised personnel may carry out repairs, maintenance or adjustments to equipment.
- All defects, malfunction or damage to machinery, plant or equipment must be reported immediately.
- Substances are to be used, stored and transported in accordance with written instructions on the container and/or set out in PSOW COSHH information file.
- All hazard notices, warning signs and general information notices are to be read, and the information displayed complied with.
- Safety equipment, clothing and facilities (where applicable) provided are to be used in accordance with instructions and not willfully misused or damaged.
- Site housekeeping is to be of the highest standard at all times and waste is disposed of promptly and appropriately.
- Any spillage of materials or substances, etc. is to be cleared up immediately.
- All emergency procedures relevant to the work area are to be obeyed and emergency routes, exits and equipment are to be kept free from obstruction.
- Use of or damage to fire-fighting equipment is to be reported immediately.

- All accidents/incidents that cause damage or injury are to be reported. First aid or medical assistance should be sought where necessary.
- Workstations provided are to be designed so as not to put at risk the health or safety of staff or others.
- Any plant, equipment and machinery subject to statutory inspections is to be inspected/examined at the relevant intervals.

### Work at Other Organisations' Premises

3.14 Members of staff who are required to work at the premises of other organisations are to be made fully conversant with the safety rules applicable to the relevant premises. (If, exceptionally, specialist training is necessary prior to working at different premises, the member of staff will attend training and be assessed as competent before working at the premises concerned.)

### First Aid Facilities, Kit Contents and Checklist

3.15 PSOW will provide first aid facilities and equipment at least to the standard laid down in the Approved Code of Practice L74.

3.16 PSOW standard is to provide first aid boxes at PSOW's principal workplace.

3.17 Sufficient numbers of qualified first aiders shall be appointed at the principal workplace. Safety information notices are posted at PSOW's premises informing staff of appointed first aiders' names and locations. In the event of an injury necessitating treatment, members of staff are to contact a first aider so that treatment may be administered.

3.18 First aid kit checks are necessary to ensure availability of the equipment for emergencies. The Health and Safety Co-Ordinator will ensure that first aid boxes and kits are regularly checked (minimum 3 monthly) and the contents replenished and updated. The checks are to be carried out using the form included in the box or kit.

3.19 The duties of the first aider are to:

- Administer first aid treatment as required.
- Notify the Health and Safety Co-Ordinator of any first aid supplies that have been finished.
- Ensure accidents are recorded in the Accident Report Book.
- Inform the Health and Safety Co-Ordinator, and where appropriate the relevant manager, promptly of all treatment.

### Manual Handling Operations

3.20 Some work activities include the need for manual handling of materials, etc. PSOW will provide training on manual handling and, where requested by managers, carry out on-site assessment of risks to staff from specific operations. Expectant mothers and members of staff who suffer from health problems that may affect their capability to undertake manual handling tasks are required to report to their managers how these may limit their capability to lift. Managers shall confirm if staff have problems affecting their lifting capability and take this information into account during the preparation of any assessment involving the member of staff.

### Emergency Plans

3.21 PSOW has prepared an emergency plan document and all relevant staff should familiarise themselves with any requirements they need to meet under the plan. Incident rehearsals/practice of procedures will take place from time to time. Up-dating of the emergency plan will be co-ordinated by the Safety Adviser.

### Provision and Use of Work Equipment

3.22 'Work Equipment' is broadly defined to include everything from a hand tool to larger equipment.

3.23 Only authorised personnel to maintain copiers/printers.

3.24 Contact Corporate Services in the event of a breakdown.

### Workplace Health, Safety and Welfare

3.25 PSOW will take such steps as are necessary to meet current legislation. Due account will also be taken of lighting, ventilation and other facilities to ensure a safe and healthy environment.

### Substances/Materials Hazardous to Health (COSHH)

3.26 PSOW is aware that certain substances/materials may cause bodily harm by inhalation, ingestion, skin contact or absorption through the skin. Suppliers' Health Hazard Data sheets or Material Safety Data Sheets (MSDS) are to be acquired for all relevant items purchased. Prior to putting into use a substance/material an assessment of the MSDS shall be carried out to determine any health risks and whether control measures are necessary to guard staff against harm from the substance or material. Further information on COSHH is contained in the COSHH Policy.

### Fire Prevention and Action on Serious Imminent Danger

3.27 PSOW will comply with The Regulatory Reform (Fire Safety) Order 2005.

3.28 Those members of staff delegated responsibility for managing premises shall ensure that fire precautions as listed below are implemented either by themselves, the Landlord or a Third Party taking into account the size, layout and use of the premises:

- Undertake a fire safety assessment and identify the control measures necessary.
- Identify and provide an adequate means of fire detection and of warning people in the premises.
- Implement a visitor/contractor register and accompaniment procedure where required during their time in the premises.
- Provide and maintain (by regular inspection and servicing) adequate firefighting equipment.
- Draw up and post fire emergency instructions and ensure those using the premises understand how to carry them out.



- Clearly sign all escape routes, fire equipment and alarm points throughout the premises.

3.29 Refer to Fire Policy for further information.

### Specific Duties

3.30 Corporate Services will ensure that the precautions listed are below are implemented either by themselves, the Landlord or a Third party:

- Fire drills are carried out twice yearly and records kept.
- Fire alarms are tested weekly and records kept.
- Emergency lighting is tested monthly and records kept.
- Training of staff is carried out yearly and records kept.
- Fire extinguishers are in position and safety pins/devices are in position. Extinguishers are inspected/serviced by contractors yearly. Checks to be carried out quarterly.
- Fire escape routes checked regularly for any obstructions.

### Fire Prevention

3.31 Fire prevention is the responsibility of all staff and precautions taken by staff are as below:

- Keep heat sources (such as electric fires) and combustible materials separate.
- Do not overload electrical circuits or use non-approved fitments (multi-socket adapter plugs) or obvious defective electrical appliances.
- **Report all defects.**
- Switch off electrical appliances at the end of the working day.
- Ensure good housekeeping and do not allow accumulation of combustible materials.
- Strictly control the use of any flammable substances and always follow the manufacturer's instructions for use.

- Hot work carried out by craftsmen/contractors must be carried out under Permit to Work conditions.
- Use and storage of highly flammable liquids and gases must comply with the relevant regulations.

### Fire Emergency Action

3.32 Fire drills are a necessity to ensure that all staff are aware of what action is expected of them if there is a fire and evacuation of the premises is necessary. Members of staff are to ensure that all visitors to the premises are escorted to safety. Notices are posted throughout the premises showing the relevant assembly point. Briefly the fire instructions require action as below.

- Raise the alarm.
- Call the Fire Service.
- Prevent the spread of fire (close doors and windows.)
- Leave all personal belonging behind (possible trip hazards).
- Evacuate the building and move to the designated assembly point.
- Do not leave the assembly point and remain there until 'All Clear' is given.

3.33 Managers with health and safety responsibilities must be aware of their duties in the event of a fire and ensure that all other staff know the location of the assembly point.

3.34 Staff/visitors/contractors will not be permitted back into the building until instructed to do so by the Fire Service or the senior manager present on site, who will have first ensured the premises are safe to enter.

### Risk Assessment

3.35 PSOW is committed to achieving and maintaining high standards of health and safety for all staff, visitors, the public and contractors. To do this, PSOW will identify hazards associated with their operations which threaten

health and safety, evaluate the risks which arise from those hazards and put into place sensible, practical precautions which will protect against them. This process is termed **risk assessment**.

- 3.36 Risk assessments will be carried out periodically as a check on our performance against statutory standards and relate to the buildings we occupy, the equipment we use and the methods of work we employ.
- 3.37 We will implement all control measures identified by existing generic assessments which relate to the tasks to be undertaken.
- 3.38 We will introduce measures to control all other hazards evident on site and relating to the existing conditions and tasks to be undertaken and which are not covered by existing generic assessments.
- 3.39 **All risk assessments are to be recorded and the staff affected informed** of the assessment content and requirements.
- 3.40 Basic steps in risk assessment:
- Classify all activities: prepare a list of work activities covering premises, equipment, people and procedures, and gather information about them.
  - Identify hazards: identify all significant hazards relating to each work activity.
- 3.41 Consider **who** might be harmed and **how**:
- Determine risk: make a subjective estimate of risk associated with each hazard, assuming that planned or existing controls are in place. Assessors should also consider the effectiveness of controls and the consequences of their failure.
  - Decide if the risk is tolerable: judge whether planned or existing precautions (if any) are sufficient to keep the hazard under control and meet statutory requirements.
  - Prepare a risk control action plan (if necessary) to deal with any issues found by the assessment to require attention. Ensure that new and existing controls are implemented and are effective.

- Review the adequacy of the action plan, re-assess the risks on the basis of the updated controls and check that the risks are tolerable.
- Review assessments periodically and/or on significant change of circumstances affecting how the activity is done.

3.42 A number of regulations direct that risk assessments be carried out, those relevant to operations are listed below:

- Management of Health and Safety Regulations (General Activity Risk Assessments)
- Manual Handling Operations Regulations.
- Display Screen Equipment at Work Regulations
- Control of Substances Hazardous to Health Regulations
- Protective Clothing and Equipment Regulations
- Fire Precautions (Workplace) Regulations

### Display Screen Equipment (DSE)

3.43 To secure the health and safety of staff so far as is reasonably practicable, PSOW will, in consultation with staff and their representatives:

- Carry out an assessment of each workstation, taking into account the display screen equipment, the furniture, the working environment and the member of staff.
- Take all necessary measures to remedy any risks found as a result of the assessment.
- Take steps to incorporate changes into the work schedule of the member of staff throughout the working day to prevent intensive periods of on-screen activity.
- Review software to ensure that it is suitable for the task.
- Arrange or meet/reimburse the costs of eye tests for DSE users (as defined under the Display Screen Regulations 1992) on request.

- Arrange for or meet/reimburse the costs of basic frames and lenses (or equivalent corrective appliances) where the appropriate optician confirms that they are required specifically for working with display screen equipment.
- Arrange or meet/reimburse the costs of further eye test(s) where a member of staff reports a visual problem when using VDU equipment on request and by prior agreement.
- Advise staff, and agency staff required to use display screen equipment, of the risks to health and how these are avoided.

### Breaks

- 3.44 Users of display screen equipment are encouraged, and will be expected, to take the opportunity of breaks from work with the equipment so as to prevent the onset of fatigue.

### Radiation and Pregnancy

- 3.45 Scientific research has concluded that no health risk exists from radiation to a pregnant person, or person seeking to become pregnant, when using VDU equipment. Consequently, there is no need for them to avoid working with VDUs.

### Safety Management Communication

- 3.46 Within PSOW, communication is essential both to keep staff informed of the business' safety performance and to build a shared understanding of safety priorities and needs. Managers shall be encouraged to maintain regular and frequent personal contact with staff to give relevant advice and agree risk controls.
- 3.47 Effective communication of health and safety information is vital to all levels of staff. Managers are encouraged to hold short meetings such as briefings whereby staff are updated on new information or existing work methods. These meetings will, through time, achieve a positive safety

culture within PSOW and ensure that the safety message is communicated to all staff. A number of situations when safety should be discussed are:

- Team meetings
- Monthly management meeting
- Intranet announcements
- Representative Council meetings

3.48 PSOW recognises that consultation with its staff on health and safety is of high importance and encourages staff to become involved in the improvement of health and safety management and standards.

- Reviewing the existing arrangements for safety.
- Proposing suggestions and actions for health and safety improvements.
- Monitoring new equipment, processes and changes which may significantly affect staff's health and safety.
- Examining safety audit reports.
- Monitoring safety training plans and implementation.
- Keeping up to date and ensuring that new information is available to those affected.
- Advising managers on any defects in PSOW health and safety arrangements and assisting with implementing remedial action.

### Sources of Health and Safety Information

3.49 Further communication of health and safety information throughout PSOW will be disseminated as necessary by circulation:

- Intranet
- Notice Boards
- External Health & Safety Consultants assisting PSOW
- Health and Safety Policy

- Risk Assessments and Health and Safety Audit reports
- HSE (Health and Safety Executive) reports and notices and other publications
- Environmental Health Department reports and notices and other publications
- Minutes of meetings covering Health and Safety matters
- Health and Safety training events
- PSOW staff handbooks or booklets

### Staff Competence

3.50 It is the policy of PSOW to recruit and retain competent staff. Effective job performance can only be achieved by good selection and development of staff. Managers in their business planning shall implement systems that allow a combination of education, skills training, information provision and specialist advice to assist staff in carrying out their duties effectively and safely at all times. The extent to which any of these factors is required will depend upon the individual's specific health and safety responsibilities and nature of their work.

### Health and Safety Training

3.51 PSOW shall provide staff with the necessary skills and information to carry out their jobs in accordance with recognised best practice and statutory standards necessary for efficient production, quality and safety. To achieve this, teams are to identify and meet their own training needs and quality requirements by:

- Identifying the training needs for statutory compliance and staff competence relating to each post.
- Formulating training plans and programs to meet the requirements above.
- Measuring the effectiveness of the training and adjusting the content or means of delivery where necessary.

## Training needs identification

3.52 Responsibility for ensuring that each member of staff receives the necessary health and safety training rests with the manager of the member of staff. Managers will identify training requirements on a basis of those groups below:

- Specified individuals with crucial health and safety responsibilities
- Directors and Managers
- All other staff

## Training Requirements

3.53 Training is an important means of achieving competence and helps convert information into safe work practices. Situations where all staff must be trained or retrained are listed below:

- A statutory requirement.
- Induction into PSOW and job.
- Emergency procedures (regular practice in the drill).
- A change of work equipment, system of work or technology.
- A change of responsibility or work activity.
- As necessary for on-going professional development.
- Where a member of staff takes on extra responsibilities (e.g. first aider).
- Where a risk assessment identifies a need.

## On-going Training

3.54 Effective job performance depends on good selection, training and development of staff.



3.55 PSOW is responsible for the actions of staff and, due to the far-reaching implications of this responsibility, must trained to:

- Apply the relevant health and safety legal requirements and PSOW policy.
- Formulate and implement safe systems of work.
- Apply effective supervision of staff and working activities.
- Identify any areas of weakness in PSOW health and safety arrangements.
- Apply the procedures of discipline related to failures in health and safety compliance.
- Recognise their own limitations in experience and knowledge and where/from whom to get assistance.
- Communicate with all levels of staff/management within PSOW on matters relating to health and safety.

3.56 **All staff** need to fully understand the requirements and the arrangements for ensuring their health and safety. They need to know how to discharge their responsibility to work safely without creating risks to themselves or others. They also need to know how to report deficiencies in PSOW health and safety arrangements. Their training will cover:

- What their duties are under health and safety law.
- What the in-house safety arrangements are, including PSOW policy and any emergency evacuation rules.
- Safe working practices relating to their job.
- Hazard identification and avoidance.
- Specialist training (if required)
- How to report health and safety problems.

### Means of Training

- External courses at venues/premises organised by recognised training organisations.

- In-house training carried out by visiting trainers from recognised organisations and/or carried out by competent PSOW trainers.
- On the job training.
- Manufacturers' training courses and briefings.
- Online / Distance learning courses.

### Reactive Monitoring of Safety Performance by Accident / Incident Report and Investigation Reporting

3.57 All injuries, dangerous occurrences or cases of industrial disease are to be reported to management under The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) in order that the circumstances surrounding the event can be investigated and corrective action applied to prevent recurrence. Reporting duties are as follows:

#### All Staff

- Each member of staff is responsible for reporting without delay any injury or ill health condition sustained at work, or arising during the working period.
- Each member of staff is responsible for reporting to his/her manager, any accident, incident or potential source of hazard of which he is aware. A hazard/potential hazard report form is provided for use on such occasions. A sample of the report is shown in the section of this policy dealing with Guidelines for Raising Health and Safety Matters.

#### Managers

- Managers are responsible for ensuring that all accidents are reported to the Health and Safety Co-Ordinator so that, where necessary, an investigation of the circumstances can be carried out.
- The accident reporting system that complies with The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) is set out later in this section and is to be followed by managers and other staff.

## Analysis of Accidents and Incidents

3.58 A record of injuries, diseases and dangerous occurrences shall be kept and that these records shall be analysed to determine trends and/or failures in work practices or systems. Where such deficiencies are identified they shall be corrected through updating work practices/procedures, substituting materials or equipment and, where necessary, improved training to update staff competence.

## Accident Reporting

3.59 PSOW procedures following any accident/incident are as follows:

<b>Incident</b>	<b>Inform</b>	<b>Other Action or Documentation</b>
Death	<ul style="list-style-type: none"> <li>• Chief Operating Officer (COO)</li> <li>• Manager</li> <li>• Health and Safety Co-Ordinator who will contact Safety Adviser &amp; Police</li> <li>• Health and Safety Co-Ordinator will call the HSE Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 08:30 to 17:00).</li> </ul>	<ul style="list-style-type: none"> <li>• Keep incident scene undisturbed and safe until accident has been investigated.</li> <li>• Assist HSE with investigation.</li> <li>• Log incident/accident in Accident Book.</li> <li>• Send completed PSOW Accident Report to Safety adviser (within 5 days).</li> </ul>
Major Injury	<ul style="list-style-type: none"> <li>• COO</li> <li>• Manager</li> <li>• Health and Safety Co-Ordinator who will contact Safety Adviser</li> <li>• Health and Safety Co-Ordinator will report online.</li> </ul>	<ul style="list-style-type: none"> <li>• Keep incident scene undisturbed and safe until accident has been investigated.</li> <li>• Assist HSE with investigation.</li> <li>• Log incident/accident in Accident Book.</li> </ul>

	<p>Go to <a href="http://www.hse.gov.uk/riddor">www.hse.gov.uk/riddor</a> and complete the appropriate online report form. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records.</p> <ul style="list-style-type: none"> <li>• Health and Safety Co-Ordinator may also report fatal and specified injuries by telephone. Call the HSE Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 8:30 to 17:00).</li> </ul>	<ul style="list-style-type: none"> <li>• Send completed PSOW Accident Report to Safety adviser (within 5 days).</li> </ul>
<p>Notifiable Dangerous Occurrence</p>	<ul style="list-style-type: none"> <li>• COO</li> <li>• Manager</li> <li>• Health and Safety Co-Ordinator who will contact Safety Adviser</li> <li>• Health and Safety Co-Ordinator will contact HSE by ringing the Incident Contact Centre on 0845 300 9923 or out of hours on 0151 922 9235</li> </ul>	<ul style="list-style-type: none"> <li>• Keep incident scene undisturbed and safe until accident has been investigated.</li> <li>• Assist HSE with investigation.</li> <li>• Log incident/accident in Accident Book.</li> <li>• Send completed PSOW Accident Report to Safety adviser (within 5 days).</li> </ul>
<p>Injury resulting in over 7 days off work or unable to carry out normal duties</p>	<ul style="list-style-type: none"> <li>• Manager</li> <li>• Health and Safety Co-Ordinator who will contact Safety Adviser</li> <li>• Health and Safety Co-Ordinator will report online at <a href="http://www.hse.gov.uk/riddor">www.hse.gov.uk/riddor</a> and</li> </ul>	<ul style="list-style-type: none"> <li>• Complete Documentation as above</li> </ul>

	complete the appropriate report form.	
Accident -- no time off	<ul style="list-style-type: none"> <li>• Manager</li> <li>• Safety Adviser</li> </ul>	<ul style="list-style-type: none"> <li>• Log in Accident Book</li> <li>• Forward completed PSOW Accident Report to Safety adviser</li> </ul>
Reportable Disease	<ul style="list-style-type: none"> <li>• Manager</li> <li>• HR Business Partner</li> <li>• Health and Safety Co-Ordinator who will contact Safety Adviser</li> </ul>	<ul style="list-style-type: none"> <li>• Report disease to HSE after doctor's written diagnosis/statutory sick form.</li> <li>• Complete all documents as for major injury etc.</li> </ul>

### Accident Investigation

3.60 PSOW policy concerning accident investigation is that all 'time off' accidents be investigated and their causes determined. The objectives of a PSOW investigation are:

- To ensure appropriate action is taken to prevent recurrence of similar incidents.
- To gather information for use in any criminal or civil proceedings.
- To confirm or refute industrial injury claims over the incident.
- To prepare notifications to be made to the HSE or other enforcing agency.
- Laying the blame is not an objective of the investigation and should be avoided. Where disciplinary action is necessary, management will need to follow employment policy procedures. Disciplinary action will probably be unnecessary on most occasions.

3.61 Accident investigations will be carried out by PSOW Safety Adviser. Managers and other staff will be expected to assist in any investigation and make available all information, witnesses, plant, materials, equipment and premises which have a bearing on the incident. Questions which will

need to be answered before any investigation can be considered complete are:

- What are the root causes of the accident?
- Who was involved?
- When did it occur?
- Where did it occur?
- Why did it occur?
- How could it have been prevented?
- How can a recurrence be prevented?

3.62 If all 7 questions cannot be answered, then it may be necessary to re-examine certain witnesses with a view to obtaining further information.

3.63 The incident investigation will, in all probability, reveal underlying causes. Dealing with the underlying causes will involve managers and PSOW Safety Adviser in reassessing existing practice and implementing change such as:

- Review of the risk assessment and controls relevant to the operation.
- Further formal procedures to be drawn up for certain work operations.
- Training programmes to be introduced or amended.

3.64 Guidelines prepared for operations which perhaps do not justify the preparation of formal procedures or training programmes.

- Instructions more clearly defining responsibility and accountability.
- The introduction of new methods or equipment.
- Improving or extending preventive maintenance.
- Introducing additional check procedures or special monitoring of certain operations.

### Accident Follow-Up Action

- 3.65 Should any change to existing practice be recommended as a result of an accident investigation, it is the responsibility of managers to monitor its effectiveness. Trade Union Representatives shall be given the opportunity to have input into any reviews carried out.
- 3.66 Any deficiency still apparent must be brought to the attention of PSOW Safety Adviser for further review and, where necessary, correction.

### Personal Protective Clothing & Equipment (PPE) and Safety Appliances

- 3.67 PSOW will provide personal protective equipment, where applicable, to reduce residual risks to a tolerable level where the risk is from a work activity cannot be adequately controlled by other means.

### Control of Contractors

- 3.68 PSOW will co-ordinate, control and monitor the activities of contractors so as to effectively minimise the risks presented to staff and other persons affected by contractors' works. PSOW will only use contractors who have proved able to discharge their primary responsibility to safeguard their staff and others who may be affected by their works. All contractors are assessed for their competency in Health & Safety.
- 3.69 PSOW will consult and involve the landlord as appropriate to identify and communicate with other tenants.

### Elements of Contractor Site Rules

- 3.70 PSOW/contractor pre-work agreements concerning site rules are to include the elements shown below:
- Site safety policy and activity risk assessments.
  - Procedures for high risk activities such as work in confined spaces, work at heights, electrical work, excavations, etc.
  - Method statements.

- Communication arrangements with the PSOW appointed person and where appropriate the landlord.
- Site access arrangements, vehicle restrictions and material storage areas.
- Local emergency procedures and instructions.
- Accident and dangerous occurrence reporting arrangements.
- Risks from plant, premises and personnel which may affect the contractor staff.
- The existing environment, e.g. services, existing structures, etc.

### Induction Training

3.71 PSOW will ensure that all new staff are given sufficient induction training to ensure they are conversant with the health and safety risks associated with the work on which they will be employed. The member of staff shall be briefed on risks specific to their employment as job training progresses. Any relevant written risk assessment shall be given to the member of staff at the initial briefing.

### Risk Reduction

3.72 Areas and/or activities to which new staff are not to be exposed until trained (unless undergoing recognised training with suitable competent supervision) are:

- equipment. (e.g. photocopiers, guillotine, ladders etc.)
- work involving possible exposure to vulnerabilities or danger

### Safe Systems of Work

3.73 All new staff shall be fully briefed (inducted) prior to any placement. The briefing shall be undertaken by PSOW staff and shall include:

- introduction to the manager responsible for the member of staff
- introduction to the Health and Safety Policy and safety rules
- issue of any relevant safety information



- any hazardous substances (warning labels, data sheets and signs)
- manual handling
- housekeeping
- electrical equipment hazards
- emergency procedures (fire alarm, emergency exits, evacuation)
- first aid and accident reporting (first aider location)
- hygiene
- how to obtain further information and advice.

### Lone Working

3.74 Whilst generally there is no legal prohibition on people working alone, it is not PSOW's intention to place any of its staff at risk, or allow any member of staff to place him/herself at risk, when working alone. PSOW is committed to ensuring the health, safety and welfare of all staff, including those who work alone.

3.75 The purpose of this section is to provide guidance that enables managers to develop and implement specific procedures for minimising risks in appropriate situations.

### Assessing the Risk

3.76 Managers are to ensure assessments are carried out on all work activities to determine which activities are being carried out under lone working conditions and as to check whether existing work methods are safe. Where people work alone, special considerations in assessing their activities include:

### The Task

3.77 Can the job be done safely by one person working alone; taking into account present safe systems of work, procedures and training the member of staff has been given?

- 3.78 Is the person medically suitable to work alone? Do you know which of your staff have health problems that could possibly place them at risk?

### The Area

- 3.79 Are there special problems associated with where the work is to be undertaken? (E.g. Remote location or away from communication systems, difficult access etc.)
- 3.80 Managers' risk assessments must identify communication arrangements and consider the need to provide any extra communication equipment so that staff can make contact in the event of emergencies and so that managers can monitor lone workers' progress throughout the day.

### Planning the Work

- 3.81 All work is to be properly planned and co-ordinated. This becomes especially important when staff are required to work alone.
- 3.82 Where practical the movements of staff should be recorded. A 'daily whereabouts record' would be a reasonable method by which such a record can be implemented, provided the member of staff keeps supervisors informed of any changes in the order or timing of attending sites from that initially recorded. There are other methods of recording staff whereabouts, such as a log sheet or diary into which the member of staff's location, start time, expected job duration and finish time are recorded and checked periodically throughout the day to confirm the member of staff's safety.
- 3.83 Managers must ensure that a system is in place to confirm that all lone workers are safe at the end of the normal working day. Managers must also ensure that a reporting system exists where lone workers are required to work beyond the end of the normal working day.

### Methods of Checking Staff Safety

- 3.84 Regular communication between various groups/individuals is a means by which lone workers' wellbeing and safety can be checked. Managers shall identify the method suitable to their operations, acquire the necessary resources and implement the system.

3.85 Some systems which may be implemented are:

- Twinning with a partner or partners who communicate and keep each other informed of the other's task location and expected duration of work. They would also contact each other on completion of work at a location. Any failure to communicate as planned would involve a physical check or other appropriate action by a manager or the nearest member of staff.
- Telephone communication with an office or a central point on an agreed pattern, especially at the end of each normal working day, shift or period of working late.
- There should be a method/system to monitor the activities of staff. If a member of staff fails to return or report in, there should be an established procedure to check the wellbeing and safety of the member of staff.

### Implementing Measures

3.86 Managers are responsible for designing and implementing procedures, suited to the operations, that will reduce risks to the lone worker to a tolerable level.

3.87 A review of any procedures in place shall be carried out by managers periodically (e.g. annually) or whenever there is a significant change in work practices.

## 4 Review and publication

4.1. This policy will be reviewed every 2 years and published internally and externally.

4.2. Any queries about this policy can be directed to [policycontrol@ombudsman.wales](mailto:policycontrol@ombudsman.wales)