## Health & Safety Policy

Kingston GP Chambers (KGPC) is committed to ensuring the health, safety and welfare of its employees, patients and visitors, and it will, so far as reasonably practicable, establish procedures and systems necessary to implement this commitment and comply with its statutory obligations on health and safety. It is the responsibility of each employee to familiarise themselves and comply with KGPC's procedures and systems on health and safety.

The KGPC management team will take all reasonable steps to ensure the health and safety of its employees; however, it should be noted that health and safety at work is the responsibility of each and every employee. This includes employees taking reasonable care of their own and other people's health, safety and welfare and being responsible for reporting any situation which may pose a serious or imminent threat to wellbeing of themselves or any other person.

Disciplinary procedures may be taken against any employee who violates KGPC's health and safety rules and protocols, or who fails to perform their duties under health and safety legislation. Depending on the seriousness of the offence, it could potentially amount to gross misconduct, rendering the employee liable to summary dismissal.

With regard to health and safety, the KGPC will pay particular attention to:

- Maintaining the workplace in a safe condition and providing adequate facilities and arrangements for welfare at work

- Providing a safe means of access to, and egress from the workplace

- The provision and maintenance of equipment and systems of work that are safe

- Arrangements for ensuring the safety of employees in connection with the use, handling, storage and transport of items and substances

- The provision of such information, instructions, training and supervision to employees as is necessary for them to perform their duties correctly, adequately and paying due regard to their safety and the safety of other persons.

## KGPC's responsibilities

The Board has overall responsibility for health and safety. The nominated Health and Safety Officer is the General Manager. The Health and Safety Officer has responsibility for overseeing, implementing and monitoring health and safety procedures in the organisation and for reporting back to the Board on relevant health and safety matters.

Additionally, the Health and Safety Officer also has responsibility for ensuring that the required health and safety inspections and actions are carried-out by the organisations which host KGPC's services, including maintaining safety records and investigating and reporting on any accidents occurring in the workplace.

## Risk assessment

A health and safety risk assessment will be carried-out, in line with the Management of Health and Safety at Work Regulations 1999. The Health and Safety Officer will be responsible for monitoring the risk assessment and ensuring that all identified mitigating actions are carried-out. The risk assessment will be updated contemporaneously to reflect any changes, and will also be routinely reviewed every 6 months. See Appendix A for risk assessment checklist.

## General Safety Rules

- All employees, temporary workers and contractors should be aware of, and adhere to KGPC's rules and procedures on health and safety.
- Any identified unsafe working practices or conditions must be immediately reported to the Health and Safety Officer or to a manager. Activities which could potentially jeopardise the health and safety of any person are forbidden.
- Any person who cannot perform their duties due to ill-health or fatigue will not be allowed to work if this might jeopardise the health and safety of any person.
- Employees must not adjust, move or otherwise tamper with any electrical equipment or machinery in a manner not within the scope of their job duties.
- All waste materials must be disposed-of carefully in the receptacles provided and in such a way that they do not constitute a hazard to other workers.
- No employee should undertake a job which appears to be unsafe. They must report their concerns and reasons to a manager as soon as possible.
- No employee should undertake a job until they have received adequate safety instructions and they are authorised to carry out the task.
- All injuries must be reported to the employee's line manager or to the Health and Safety Officer.
- All materials must be properly and safely used and when not in use, properly and safely secured.
- Good safety practices for specific tasks should be well planned and instructions documented to avoid injuries in the handling of heavy materials and while using equipment.
- Employees should take care to ensure that all protective guards and other safety devices are properly fitted and in good working order and must immediately report any defects to their line manager or to the Health and Safety Officer.
- Suitable clothing and footwear must be worn at all times. Personal Protective Equipment must be worn where appropriate.
- Work stations and work areas must be kept clean, tidy and all spillages cleaned up immediately.

## Employees:

### Staff Training

Health and safety training is an integral part of KGPC's operations. It is essential that every employee is trained to perform their job comprehensively and safely. Each

employee is trained in safe working practices and procedures relevant to their role. Training includes full instruction on the safe use of any necessary equipment provided.

## At Risk Employees

KGPC recognises that certain employees may, from time-to-time, be at increased risk of injury or ill-health resulting from work activities. To ensure the risk of these groups is minimised as much as possible, KGPC requires employees to advise their line manager if they become aware of any change(s) in their personal circumstances which could result in them being at increased risk.

Examples of such changes could be certain medical conditions, permanent or temporary disability, taking medication or becoming pregnant. If any employee is in doubt whether a change arising in their personal circumstances could increase their exposure to risk, they should consult with their line manager as soon as they become aware of the change.

## First Aid and Reporting Accidents at Work

First aid equipment is provided at each site used by KGPC. All employees will be shown the location of the first aid equipment as part of their induction. Any injury sustained by a person at work, however small, must immediately be reported to their line manager or the Health and Safety Officer and recorded the location accident book.

## Manual Handling

KGPC is committed to educating staff on the prevention of long term muscular-skeletal health problems by promoting an "each-and-every-time" protocol for safe lifting.

In line with Manual Handling Operations Regulations 1992 (amended 2002), KGPC adheres to the following:

- **Avoid** the need for hazardous manual handling, so far as reasonably practicable

- **Assess** the risk of injury from any hazardous manual handling that can't be avoided

- **Reduce** the risk of injury from hazardous manual handling, as far as reasonable practicable

In adhering to the above, KGPC staff must follow the protocol below:

- The load to be lifted or moved to be inspected for sharp edges and wet patches

- The route over which the load is to be lifted should be inspected to ensure it is free of any obstructions

- Employees should not attempt to lift or move a load which is too heavy to manage comfortably. Employees should ask for assistance if there is any danger of strain

- When lifting an object off the ground, employees should assume a squatting position, keeping the back straight. The load should be lifted by straightening the knees, and not the back

- Employees should not attempt to obtain items from shelves which are beyond their reach. A ladder or stepping stool must be used. Employees should not use chairs or any makeshift device for climbing and should never climb up the shelves themselves

## Premises:

All specific risks relating to premises used by KGPC will be outlined in the Health and Safety Risk Assessment. Below is an outline of the action KGPC will take to identify and monitor these risks.

### Fire Safety

KGPC operates solely from premises owned and operated by host organisations, all of which have their own fire safety arrangements. KGPC ensures that each site has adequate fire safety arrangements in place; this is checked by KGPC as part of the assurance process prior to the start of a new tenancy. It is a contractual requirement that all host organisations have ongoing arrangements relating to the identification and mitigation of fire risks and maintenance of fire safety equipment; KGPC check compliance with this requirement annually. In addition, all host organisations are contractually obliged to notify KGPC of any fire safety risks which occur between annual checks, which may impact KGPC's ability to safely offer a service.

All staff will be made aware of the fire safety arrangements at the site(s) they are working from as part of their induction, including the location of fire exits, alarms and fire fighting equipment. All staff will be made aware of the process for reporting concerns about fire safety.

### Amenities (including electrical, gas and water safety)
KGPC operates solely from premises owned and operated by host organisations, all of which have their own electrical, gas and water safety arrangements (including both installed electrics and portable appliances). KGPC ensures that each site has risk assessed their electric, gas and water safety arrangements, and that adequate mitigation plans are in place; this is checked by KGPC as part of the assurance process prior to the start of a new tenancy, and annually as part of the contract renewal process.

In addition, all host organisations are contractually obliged to notify KGPC of any electrical, gas or water safety risks which occur between annual checks, which may impact KGPC's ability to safely offer a service.  All staff will be made aware of the process for reporting concerns about electrical, gas or water safety.

### Waste Disposal

Waste produced at each KGPC site will be disposed of by the host organisations in line with the host's own waste disposal policy. KGPC ensures that each site has adequate waste disposal arrangements; this is checked by KGPC as part of the

assurance process prior to the start of a new tenancy. It is a contractual requirement that all host organisations have ongoing arrangements relating to the categorisation and safe disposal of waste; KGPC check compliance with this requirement annually.

## Infection prevention and control (IPC)

KGPC will ensure that all staff have the necessary knowledge, skills and equipment to manage the risk of infection. This includes providing all staff with IPC training relative to their role, providing suitable protective equipment, and ensuring that host organisations have in place processes to limit the risk of infection, such as effective waste disposal systems.

KGPC ensures that all host organisations to have in place a programme of regular IPC audit; this is checked by KGPC as part of the assurance process prior to the start of a new tenancy. It is a contractual requirement that all host organisations have ongoing arrangements relating to the identification and mitigation of IPC risks; KGPC check compliance with this requirement annually. In addition, all host organisations are contractually obliged to notify KGPC of any IPC risks which occur between annual checks, which may impact KGPC's ability to safely offer a service.

## Harmful substances

KGPC will ensure that all host sites have risk assessed the use of any potentially harmful substances, and that appropriate documentation is kept relating to any substances being used; this is checked by KGPC as part of the assurance process prior to the start of a new tenancy, and annually as part of the contract renewal process.

In addition, all host organisations are contractually obliged to notify KGPC of any incidents or risks relating to harmful substances which occur between annual checks, which may impact KGPC's ability to safely offer a service.  All staff will be made aware of the process for reporting concerns about harmful substances.

## Equipment Safety

KGPC takes appropriate steps to ensure the safety of all employees working on/with equipment and the safety of others who may be affected by the use of equipment. KGPC will:
- Ensure the suitability of work equipment for the task
- Ensure that measures are taken to prevent access to, or stop the movement of any dangerous part of equipment before any person enters a danger zone
- Ensure the correct guarding of the equipment and all dangerous parts and correct continual use of the guards
- Ensure that equipment is safely and securely positioned;
- Ensure that work equipment is maintained in an efficient state, in efficient working order, in good repair and inspected and tested where necessary
- Ensure that all machinery has suitable controls which are marked and clearly identifiable
- Ensure that where appropriate, any work equipment incorporates warnings and warning devices
- Ensure that where possible, all equipment is appropriately isolated

- Ensure that all persons who use machinery and all persons who supervise or manage the use of machinery are trained and have adequate health and safety information
- Provide Personal Protective Equipment where necessary

## Recording and reporting of incidents:

Accident records are crucial to the effective monitoring of health and safety procedures and must therefore be accurate and comprehensive. All accidents, incidents and near misses must be reported to the General Manager. These are recorded as significant incidents using the significant event process.

The Health and Safety Officer will inspect the accident book on a regular basis and all accidents will be investigated and a report prepared, with any necessary action being taken to prevent a repetition of the accident.

### Notifying the Health and Safety Executive (RIDDOR)
By law, under the duty of RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) all organisations must report certain workplace injuries, near-misses and cases of work-related disease to the Health and Safety Executive (HSE). These include:

- The death of an individual caused by a work-related incident

- Specified injuries to workers (including fractures, amputations, injury leading to permanent loss of sight, any crush injury, serious burns or scalds, scalping, loss of consciousness caused by asphyxia, any other injury arising from working in an enclosed space)

- Over seven day incapacitation of a worker

- Occupational diseases

Further information about the specific criteria for reporting an incident under RIDDOR and details of the process for reporting can be found in HSE's website.

### Notifying CQC of the death or serious injury of a person who uses the service

In addition to the internal reporting arrangements and RIDDOR requirements above, some incidents carry a mandatory reporting requirement to CQC; these include incidents of death or serious injury to a service user, or where an incident results in KGPC's service being disturbed.

Anthony Hughes is the CQC Registered Manager, and is responsible for notifying the CQC immediately upon the death or serious injury of a person who uses KGPC's service.

Deaths would only require reporting if they met the following criteria:
a) The death or serious injury occurred whilst a regulated activity was actually being carried out, e.g. whilst the patient was attending one of KGPC's sites for a consultation.

b) The death occurred as a result of a regulated activity being carried out, AND
   The patient had seen their GP within the last two weeks before the death,

AND
The death was avoidable / related to inappropriate care and treatment.

Serious injuries would only require reporting if they met the following criteria:

**Injuries that lead to or are likely to lead to permanent damage, or damage that lasts or is likely to last more than 28 days to:**

- A person's sight, hearing, touch, smell or taste

- Any major organ of the body (including the brain and skin)

- Bones

- Muscles, tendons, joints or vessels

- Intellectual functions, such as

    o Intelligence

    o Speech

    o Thinking

    o Remembering

    o Making judgements

    o Solving problems

**Injuries or events leading to psychological harm, including:**

- Post-traumatic stress disorder

- Other stress that requires clinical treatment or support

- Psychosis

- Clinical depression

- Clinical anxiety

- The development after admission of a pressure sore of grade 3 or above that develops after a person has started using the service (European Pressure Ulcer Advisory Panel Grading)

- Any injury or other event that causes a person pain lasting or likely to last for more than 28 days

- Any injury that requires treatment by a healthcare professional in order to prevent:

    o Death

    o Permanent injury

    o Any of the outcomes, harms or pain described above

Where the Registered Manager is unavailable for any reason, the General Manager will be responsible for reporting the incident to CQC.
Notification forms for reporting these incidents can be found on CQC's website.

**Notifying CQC of incidents that stop or may stop the registered person from**

**running the service safely and properly**

Anthony Hughes is the Registered Manager responsible for notifying CQC without delay about events that stop or may stop the service running safely and properly, including:

- A level of staff absence or vacancy, or damage to the service's premises that mean that people's assessed needs cannot be met.

- The failure of a utility for more than 24 hours.

- The failure of fire alarms, call systems or other safety-related equipment for more than 24 hours.

- Any other circumstances or events that mean the service cannot, or may not be able to, meet people's assessed needs safely.

Where the Registered Person is unavailable for any reason, the General Manager will be responsible for reporting the incident to CQC.
Notification forms for reporting these incidents can be found on CQC's website.

# Appendix A

**Premises Risk Assessment Checklist**

| Site: | | | |
|---|---|---|---|
| **Check needed** | **Evidence seen (including date)** | **Outstanding issues/areas for follow-up** | **Date of next check** |
| **Health & Safety** | | | |
| Risk assessment | | | |
| H&S poster displayed | | | |
| **Infection control** | | | |
| IPC audit | | | |
| Waste management policy | | | |
| Waste management arrangements (e.g. evidence of contract with waste disposal company) | | | |
| Cleaning arrangements – incl cleaning schedules/records | | | |
| Arrangements for ad-hoc cleaning (e.g. spill kits) | | | |
| **Electrical safety** | | | |
| PAT testing for site owned items | | | |
| PAT testing for KGPC owned items | | | |
| 5 yearly electrical safety inspection | | | |
| **Clinical equipment/resources** | | | |
| Equipment calibration | | | |

| | | | |
|---|---|---|---|
| Privacy curtains in date | | | |
| Defib operational checks and checks that pads are in date | | | |
| Oxygen evidence of servicing | | | |
| **Legionella** | | | |
| Risk assessment | | | |
| Checks advised by risk assessment (including frequency): | | | |
| Checks carried out in line with those advised in risk assessment | | | |
| **Fire** | | | |
| Policy | | | |
| Risk assessment | | | |
| Alarm service (at frequency advised by risk assessment) | | | |
| Extinguisher service (at frequency advised by supplier) | | | |
| Alarm/emergency lighting test (at frequency advised by risk assessment) | | | |
| Fire drills (at frequency advised by risk assessment) | | | |
| **Meds fridge (where used – only SHC for Vasectomy?** | | | |
| Cold chain policy | | | |
| Evidence of fridge checks | | | |
| **COSHH** | | | |
| COSHH sheets available for all substances used/stored | | | |

| Staffing (where staff are provided by site) | | | |
| --- | --- | --- | --- |
| Recruitment policy seen – do requirements for pre-employment checks mirror those for KGPC? | | | |
| Staffing policy seen – do requirements for ongoing suitability checks mirror those for KGPC? | | | |
| Check of a sample of staff files for assurance that policies are followed. | | | |
| Check that mandatory training is up to date for all staff | | | |