
POLICY TITLE: **Health & Safety Policy, Organisation and Arrangements**

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Responsible signatory: David Watts, Director of Risk Management

Outcome: This policy:

- Ensures clearly identified and allocated organisational responsibilities for health and safety.

Cross Reference: OP09 [Priory Group - Governance Framework](#)
[HR, People Team Policies](#)
[Purchasing Policies](#)

EQUALITY AND DIVERSITY STATEMENT

Priory Group is committed to the fair treatment of all in line with the Equality Act 2010. An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any protected characteristics and all will be treated with dignity and respect.

In order to ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, email LegalandComplianceHelpdesk@priorygroup.com

Health & Safety Policy Statement

It is the policy of Priory Group to ensure, so far as is reasonably practicable, the health, safety and welfare of the service users and colleagues who may be affected by our activities and services. In order to achieve this, it is our policy to provide a healthy and safe environment, with safe equipment, systems of work and adequate information, instruction, training and supervision, as required for this purpose. Priory Group is committed to providing adequate resources to ensure this policy is effectively implemented.

Priory Group consists of three divisions that deliver a comprehensive range of services under the Priory Group brands: Priory Adult Care, Priory Healthcare and Priory Education & Children's Services. We are committed to achieving high quality services using professional and dedicated colleagues who understand and comply with their health and safety responsibilities. We are also committed to ensuring our health and safety standards are appropriate to the particular needs and vulnerabilities of all our service users.

Where we engage third party service providers on our premises, we will make sufficient enquiries to establish the competence of the provider to undertake the work safely and without risks to health. The health and safety performance of such providers are kept under review in order to ensure adequate standards are maintained.

We consult with colleagues on health and safety matters using staff representatives and meetings with a view to actively involving our colleagues in the effective implementation of the health and safety policies.

Where temporary or contract colleagues or volunteers are working with us on our premises we provide, through our due diligence and induction systems, the same environmental health and safety standards for them as we do for our own employees. We also establish that those colleagues have adequate training and instruction, or are under appropriate supervision to ensure the health and safety, both of themselves and others.

Where we acquire new businesses, Priory Group undertake a due diligence review prior to the proposed acquisition to establish what action needs to be taken to meet our required standards of health and safety and fire safety management and put in place recommendations and an action plan for implementation of those recommendations.

Where we enter into partnership agreements with other organisations to deliver services, or to undertake projects, we establish that there is adequate co-ordination of health and safety arrangements between the organisations. We also make reasonable enquiries to establish the competence of any potential partnership organisation, in cases where the nature of the activities involved can impact on the health and safety of our service users, colleagues and others who may be affected by the partnership activity or service.

The health and safety performance of Priory Group and this policy is reviewed annually by the Executive Team and at any other time when there are significant changes in Priory Group, or its activities.

The organisation and responsibilities of the Chief Executive Officer and colleagues of Priory Group, for health and safety and the arrangements and standards to which Priory Group operates, are detailed in the Health & Safety Policy, Organisation and Arrangements.



Trevor Torrington, Group Chief Executive Officer

Date: 10/02/2020

HEALTH & SAFETY POLICY, ORGANISATION AND ARRANGEMENTS

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1 OPERATING BOARD RESPONSIBILITIES

- 1.1 The Operating Board is collectively responsible for:
- Adopting a general statement of Health & Safety Policy and the written organisation and arrangements for implementing the policy and monitoring its effectiveness
 - Reviewing the health and safety performance of Priory Group by considering written reports from the Director of Risk Management and through the Health & Safety Forum on risks and strategic changes
 - Ensuring there are adequate resources allocated for effective management of health and safety and the implementation of this policy
 - Ensuring that relevant Operating Board decisions are consistent with the objectives of the Health & Safety Policy.
- 1.2 **The Chief Executive Officer** - The Chief Executive Officer has overall responsibility for health and safety matters within Priory Group. The Chief Executive Officer is also responsible for the general oversight of Priory Group's management of health and safety and, in consultation with the General Counsel & Company Secretary and Director of Risk Management, for monitoring its effective implementation.
- 1.2.1 The Chief Executive Officer is also responsible for ensuring:
- That adequate resources are available for meeting statutory requirements and Priory Group policy relating to health and safety
 - Where it is intended to undertake a new type of business, or to acquire a new company business or premises, an assessment is made of any necessary health and safety requirements relating to the new business and arrangements are made to implement any necessary actions as part of the overall business plan
 - In relation to any planned organisational change, an adequate assessment is made of the change to establish that health and safety can be effectively managed before, during and after the change and that changed responsibilities are clearly defined.

2 THE HEALTH & SAFETY FORUM

- 2.1 The Health & Safety Forum, chaired by Priory Group Director of Risk Management, meets quarterly and considers health and safety matters at each meeting by way of receiving upwards reports from the three divisions within the Priory Group. The forum monitors and reviews the establishment and operation of an effective system of risk management and audit to ensure the highest standards of service are delivered to all service users; continued compliance with internal

and external regulatory requirements and the continuous improvement of risk management and internal control procedures. In relation to health and safety, the forum is responsible for:

- (a) Advising the Operating Board on the overall health and safety strategy and the actions and resources needed to implement it
- (b) Annually reviewing Priory Group Health & Safety Policy, divisional Health & Safety plans, and recommending it to the Operating Board for approval
- (c) Alerting the Operating Board to any changes of legal requirements, or health and safety practice which need to be taken into account in the business planning process
- (d) To receive thematic analysis on compliance with health and safety policy and procedure across the Group to identify potential risk to service users and the business of the Group.

3 THE DIVISIONAL QUALITY REVIEW MEETINGS

- 3.1 The Quality Review Meetings convene on a monthly basis and are chaired by the General Counsel & Company Secretary and attended by the Group Chief Executive Officer (Group CEO), the Group Director of Compliance, Director of Risk Management, the relevant divisional Chief Operating Officer (Divisional COO) and divisional Director of Quality. The meeting reviews the quality performance of each division which, relevant to this policy, considers the performance in the previous month in respect of the outcome of health and safety audits, RIDDORs, fire related issues and relevant regulatory health and safety concerns.

4 RESPONSIBILITIES

- 4.1 The following senior executives and managers have specific health and safety responsibilities.
- 4.2 **General Counsel & Company Secretary** - The General Counsel & Company Secretary has responsibility for ensuring that the Operating Board process fulfils statutory health and safety requirements. The General Counsel & Company Secretary is therefore responsible for ensuring:
 - (a) The Operating Board annually considers and accepts reviews to this policy from the Health and Safety Forum
 - (b) That appropriate legal advice is provided to Priory Group
 - (c) Insurance arrangements, meeting the requirements of the Employers' Liability (Compulsory Insurance) Regulations, are maintained and arrangements are in place for the electronic display of the current certificate.
- 4.3 **Director of Risk Management** - The Director of Risk Management reports to the General Counsel & Company Secretary and has line management responsibility for the Health & Safety Manager. The Director of Risk Management is therefore responsible for:
 - (a) Updating the General Counsel & Company Secretary on any serious issues relating to health and safety and action which should be taken as a result
 - (b) Supporting the divisions in ensuring that health and safety is reviewed within divisional business meetings, regional meetings and site meetings
 - (c) Liaising with other central Group functions, in particular the Compliance teams, Estates teams, Policy co-ordination teams and the People Development team to ensure that business planning processes consider health and safety issues
 - (d) Ensuring through risk management that the incident reporting system is fully implemented and accurate and helping the individual sites/services to develop control measures and risk assessments to prevent an incident from reoccurring, with serious incidents being notified to the Chief Executive Officer, and investigations undertaken and learning points communicated across Priory Group as deemed appropriate to promote an opportunity for shared learning
 - (e) Highlighting risk areas across Priory Group and communicating as deemed appropriate to promote an opportunity for shared learning
 - (f) Overseeing the management of complaints in accordance with Priory Group policy
 - (g) Overseeing the fire risk assessment programme to ensure that fire risk is effectively managed
 - (h) Overseeing the planned and coordinated health and safety compliance auditing programme for all locations and advising the General Counsel & Company Secretary of any significant findings

- (i) Ensuring, with the assistance where necessary of relevant specialist functions and advisers, that company policies and procedures relating to health and safety are developed and periodically reviewed, revised and reissued as necessary
- (j) Liaison with Estates to ensure there are adequate arrangements for the maintenance of Priory Group's facilities and buildings in a safe condition and, where relevant, that there is a programme of planned preventative maintenance
- (k) Ensuring a prompt and appropriate response where necessary to enforcement authorities such as HSE
- (l) In consultation with the Head of People Development, ensuring that standards of minimum health and safety training for key groups of colleagues are developed and incorporated into Priory Group's health and safety training strategy and where relevant and appropriate, central programmes of health and safety training courses are provided for colleagues with common health and safety training needs
- (m) Ensuring that Central Alerting System (CAS) alerts and other relevant alerts are circulated and acted upon by the services to whom they are relevant
- (n) Advising all Service Managers on ensuring that for each Healthcare, Education & Children's Services, Adult Care unit, there is an adequately resourced and trained individual to provide assistance on the implementation of local health and safety procedures and practices
- (o) Ensuring that any training sessions and materials are made available to colleagues at site level.

4.4 **The Group Human Resources Director** - The Group Human Resources Director has an overall responsibility to ensure human resources practices incorporate up to date standards of health and safety. The Group Human Resources Director also has line management responsibility for the People Development Team. The Group Human Resources Director therefore has responsibility for:

- (a) Ensuring Human Resources management standards adequately reflect legal requirements for health and safety and are consistent with Priory Group health and safety standards and procedures and Human Resources policies
- (b) In consultation with the Director of Risk Management and the Head of People Development there are adequate arrangements for the health and safety training of colleagues, both at induction and in relation to specific job or work needs and that there are adequate arrangements for keeping health and safety training records within the business
- (c) Ensuring the effective provision of occupational health services for colleagues and, in particular, ensuring that there are suitable pre-employment medical assessment procedures, provision of statutory health surveillance and colleague health records and arrangements for undertaking specific risk assessments on the work of colleagues who have notified the organisation of pregnancy.

4.5 **Divisional Chief Operating Officers** - Divisional Chief Operating Officers have overall responsibility for ensuring the sites/services within their Division are provided with the necessary resources and management support to fulfil their health and safety responsibilities effectively. The Divisional Chief Operating Officers have a particular health and safety responsibility to ensure that:

- (a) Priory Group procedures relating to health and safety management are applied to the services within their Division and that Site/Service Managers receive appropriate information, instruction and training to enable them to direct and manage their businesses safely
- (b) Health and safety standards within their businesses are monitored within divisional business review meetings, regional meetings and site meetings on an ongoing basis as well as through Business Review Meetings and where deficiencies are identified they are promptly rectified
- (c) Adequate allowance for meeting health and safety obligations is incorporated into any business plan developed
- (d) Ensuring that when serious incidents are reported, investigations are undertaken by the most appropriate person and evidence is collated and assistance and support is provided where necessary.

4.6 **Managing Directors and Operations Directors** - The Managing Directors and the Operations Directors are responsible for ongoing monitoring of the health and safety performance of their respective site/service managers and/or group of sites/services and taking action to rectify any shortfalls in performance.

They are therefore responsible for:

- (a) Providing resources and monitoring the site/service compliance with legislation and Priory Group health and safety standards, procedures and policies
- (b) Ensuring that health and safety is reviewed within regional meetings and site meetings
- (c) Sharing best practice amongst their group of sites/services to ensure exemplary standards of health and safety across Priory Group
- (d) Reporting any shortfalls in safety standards to the Chief Operating Officer of the respective Division, within Business Review Meetings and to the Health & Safety Forum, as requested
- (e) Supporting and assisting the site/service managers in achieving compliance with health, safety and quality standards and raising any concerns through the appropriate escalation route to ensure action is taken
- (f) Ensuring any health and safety issues which cannot be promptly corrected are reported to the Legal & Compliance Team for advice and guidance on appropriate action
- (g) Ensuring that for each Unit there is an appropriate local structure in place to ensure the implementation of local health and safety procedures and practices
- (h) Communicating with the Health & Safety Manager and Health & Safety Advisors where necessary.

4.7 **Group Health & Safety Manager** - The Group Health & Safety Manager is responsible for the day to day coordination of Priory Group's programme for managing health and safety. The manager also has line management responsibility for the Health & Safety Advisors and Health & Safety Officers. They are therefore responsible for:

- (a) Co-ordinating Priory Group's relationship with the Health & Safety Executive (or equivalent in all countries of the UK), Local Authorities and Fire Authorities
- (b) Ensuring that, through general and line managers and with the assistance of the internal specialists and relevant external consultancies, the corporate programme of undertaking and updating risk assessments for all Company activities is implemented effectively
- (c) Coordinating the health and safety and fire risk compliance audit programme and ensuring that the results are reviewed by the Director of Risk Management
- (d) Assisting with identifying the health and safety training requirements across the Group and monitoring compliance with mandatory health and safety training.

4.8 **Regional Health & Safety Advisors** - The Regional Health & Safety Advisors are part of the Risk & Audit Team and provide central advice and coordination of health, safety and hospitality matters across Priory Group by developing and monitoring the systems and processes that manage, and improve the quality of health and safety, fire safety and hospitality compliance. The Health & Safety Advisors also have specific responsibilities for:

- (a) Providing technical advice, guidance and training on health, safety, fire safety and hospitality matters in relation to both Priory Group strategy and operations utilising external specialist advice and guidance as necessary
- (b) Maintaining an up to date knowledge of current and proposed legislation, relating to health, safety, fire safety and hospitality issues and providing interpretation of the implications of such legislation on Priory Group activities
- (c) Championing, monitoring and assisting senior managers in determining safe working practices through robust risk assessment and local procedures
- (d) Trying to ensure that any conflict between health and safety legislation and Priory Group activities are managed by providing advice, change of policy and/or advising changes to working practice are escalated through Priory Group in accordance with the procedures
- (e) Notifying any changes required to health and safety and hospitality policies and ensuring Priory Group Manuals are kept current to comply with health and safety legislation and disseminating information as appropriate
- (f) Ensuring that communications are made about changes to health, safety and hospitality standards and that they are acted upon in the individual site/service
- (g) Ensuring food preparation and catering arrangements meet food hygiene standards, Priory Group policies and procedures and that there are adequate standards for the selection and training of those involved in the storage, preparation, or serving of food.

4.9 **Regional Health & Safety Officers** are responsible for assisting the Regional H&S Advisors with the provision of information, guidance and assistance to sites and individual colleagues as

detailed in 4.8 (a)-(g) and completing site audit and support visits as requested by the Health and Safety Manager.

4.10 General Responsibilities of all Priory Group Managers - All Priory Group managers have a legal responsibility for:

- (a) Ensuring that activities under their control are managed in a way that ensures health and safety statutory requirements are fully adhered to through compliance with all Priory Group policies and procedures relating to health and safety
- (b) Ensuring that all colleagues and temporary colleagues receive appropriate information, instruction, training and supervision to enable them to work safely, and visitors and contractors are made aware of all safety systems in place as appropriate
- (c) Ensuring that Central Alerting System (CAS) alerts and other relevant safety alert information is circulated to colleagues, discussed at Governance meetings and processes are amended accordingly
- (d) Ensuring that health and safety standards are monitored in a systematic way and where deficiencies are identified they are promptly rectified
- (e) Incorporating into any business plan developed, adequate allowance for meeting health and safety obligations
- (f) Reporting through escalation procedures any health and safety problems, which cannot be promptly corrected, and taking action to ensure the problem is resolved
- (g) Ensuring that colleagues including temporary colleagues are regularly consulted in health and safety matters through appropriate forums such as staff meetings, individual meetings and staff notice boards and information sharing facilities.

4.11 General Responsibilities of Colleagues - All colleagues have the following responsibilities:

- (a) To act with due regard to the health and safety of themselves and others who may be affected by what they do, or fail to do, whilst they are at work, or on Priory Group premises
- (b) To comply with Priory Group instructions and procedures relating to health and safety and making full and proper use of any protective or safety equipment provided
- (c) To report to their manager any serious danger to health or safety, defects in structures or equipment, or safety procedures that come to their notice and which they cannot immediately rectify
- (d) To report to their manager any incidents which have led, or might have led to injury or damage, in addition to following the required incident reporting or recording procedure
- (e) To follow at all times Priory Group's written Health & Safety policies and procedures for the work being undertaken
- (f) To report to their supervisor or manager any loss or damage to personal protective equipment, such as gloves, eye protection, hard hats, etc., so it can be promptly replaced by Priory Group
- (g) Not to interfere with or misuse anything provided to safeguard their health and safety
- (h) To only use plant, vehicles, equipment or substances in accordance with information, instruction and training provided by Priory Group
- (i) To ensure all vehicles owned or operated by Priory Group are maintained in a safe condition and that regular inspections of the condition of the vehicles are undertaken and recorded
- (j) No manager or employee of Priory Group is authorised to initiate, or continue, any process or activity that places colleagues, or others, in danger, or is in breach of statutory obligations with respect to health and safety.

5 STANDARDS AND GUIDANCE

5.1 Mandatory common standards and guidance are issued periodically as Health & Safety policies to form the Priory Group Health & Safety Policy Manual. Policies are issued by e-mail from the Policy team (part of the wider Legal & Compliance team) to the site/service managers and are available to all colleagues on the Priory Group Intranet.

5.2 Priory Group policies cover a range of subject specific areas such as manual handling, work with display screen equipment, control of hazardous materials, general risk assessment, first aid etc. These standards are very comprehensive. However, where internal guidance does not cover a specific issue, Priory Group will adopt the practices or standards recommended in Health & Safety Executive publications, relevant British or European Standards and local guidance.

6 PRIORY GROUP HEALTH & SAFETY EVIDENCE FILES

- 6.1 Within all the sites/services operating under the Priory Group, there is a system of filing and evidencing health and safety documentation, including statutory checks, health and safety risk assessments and safety checks carried out locally either to ensure adherence to statutory requirements, or compliance with Priory Group policies and procedures.
- 6.2 All managers and colleagues with specific responsibilities for maintaining this documentation, mostly kept within 'Health & Safety Evidence Files' are required to do so within the timescales specified i.e. daily, weekly, monthly, quarterly.
- 6.3 All Health & Safety Evidence Files must be made available for colleagues to access freely, and be available for auditing and compliance purposes. Therefore no personal confidential information should be contained within these Evidence Files.
- 6.4 Some clinical safety checks will be maintained within other documentation and filing systems as appropriate.

7 COMPETENT PROFESSIONAL HEALTH & SAFETY SUPPORT AND ASSISTANCE

- 7.1 Priory Group can, when necessary, enlist specialist occupational health and safety consultants in support of in-house colleagues to support and advise the group, thus ensuring an adequate provision of competent person support as required by health, safety and fire safety legislation. Such consultants may also provide periodic health and safety audits and advise on changes to health and safety legal requirements and the action to be taken. Priory Group also appoints a range of specialist advisers to provide specialist fire risk assessment, medical, clinical and education advice.

8 REFERENCES

- 8.1 Health and Safety at Work etc. Act 1974
Management of Health & Safety at Work Regulations 1999, Regulation 5
Regulatory Reform (Fire Safety) Order 2005, Article 11
Fire (Scotland) Act 2005
Fire Safety (Scotland) Regulations 2006
Health & Safety at Work (Northern Ireland) Order 1978
Fire and Rescue Services (Northern Ireland) Order 2006
Fire Safety Regulations (Northern Ireland) 2010

Appendix 1 - Specific Duties relating to Health & Safety

Appendix 2 - Management of an MDA/CAS Alert

Associated Documents:

[Health & Safety Policy Statement](#) – to be displayed in all Site Reception areas

[Health & Safety Policy Statement](#) – Easyread (with pictures)

[Health & Safety Policy Statement](#) – Easyread (without pictures)

APPENDIX 1

Specific Duties relating to Health & Safety

1 SITE/SERVICE MANAGERS

- 1.1 Each site/service manager has overall responsibility for health and safety within their unit. In this role, they have the support and assistance of, and advice of their locally appointed person responsible for health and safety, the Director of Risk Management and his team, Regional Managers, Operational Directors, Managing Directors and the Operating Board.
- 1.2 Each site/service manager also has specific responsibilities for ensuring that:
- (a) Management standards adequately reflect legal requirements for health and safety and are consistent with Priory Group health and safety standards and procedures and People Team (HR) policies
 - (b) At larger sites there is a locally appointed individual to coordinate health and safety for the unit
 - (c) Where health and safety deficiencies are identified, a plan is produced which identifies clear responsibilities, timescales and resources to enable these to be rectified.
 - (d) The site has a meeting in place which makes particular reference to health and safety and consists of management representatives, the local individual responsible for health and safety, and representatives of employee safety
 - (e) Where any organisational changes are planned, adequate arrangements are put in place to ensure that health and safety is maintained and managed during, and after, the change
 - (f) The Director of Risk Management is informed promptly of any potential RIDDOR reportable incidents and visits of, and recommendations made by, enforcing authority inspectors so that a coordinated response to any issues raised can be made throughout Priory Group. The Legal & Compliance Helpdesk is used to assist with this process of notification (LegalandComplianceHelpdesk@priorygroup.com)
 - (g) Time and resources are allocated to the appropriate level of investigation when incidents and accidents occur that affect the safety of colleagues, service users or visitors to the premises to identify root causes and prevent re-occurrence as far as possible.

2 HEALTH & SAFETY LEADS AT REGIONAL AND SITE LEVEL

- 2.1 In particular regions and at particular sites there are colleagues identified with a role to re-inforce appropriate health and safety practice and activity. These colleagues will have relevant training and experience to enable them to undertake this role and will be responsible for:
- (a) Liaising with the allocated Health & Safety Advisor/Officer as and when required
 - (b) Overseeing the day-to-day activity of the site in conjunction with his/her manager
 - (c) Acting as a local resource to colleagues when queries are raised
 - (d) Communication with and where necessary oversight of contractors to ensure best and safe practice
 - (e) Assisting with the implementation of the Health & Safety Evidence Folders, and working with management and organisational Health & Safety colleagues to monitor accidents and incidents at site, reporting concerns upwards in the organisation as required
 - (f) Compiling any data from the site/region as requested for meetings at site and regional level.
 - (g) Assisting other sites to manage health and safety as required.
- 2.2 Health & Safety Leads at regional and site level will have a baseline knowledge of health and safety legislation and requirements, and will also have experience in the implementation and management of the Priory Group health and safety systems. Further advice should always be sought via the Central Health & Safety Team where specific information and expertise is required.

APPENDIX 2

Management of an MDA/CAS Alert

