



Cobalt

Medical Charity

Diagnosis • Research • Education

Registered Charity No: 1090790

Cobalt Health Health & Safety Policy

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CONTENTS

POLICY DETAILS	2
LEGAL FRAMEWORK / HEALTH & SAFETY POLICY STATEMENT.....	3/4
RESPONSIBILITIES.....	4
1. HEALTH & SAFETY RISKS ARISING FROM WORK ACTIVITIES	5
2. CONSULTATION WITH EMPLOYEES	5
3. MAINTENANCE & SAFETY OF EQUIPMENT	6
4. SAFE HANDLING & USE OF SUBSTANCES.....	6
5. INFORMATION, INSTRUCTION & TRAINING	7
6. COMPETENCY FOR TASKS & TRAINING.....	7
7. ACCIDENTS, SERIOUS UNTOWARD INCIDENTS, INFECTION CONTROL, FIRST AID & WORK-RELATED ILL-HEALTH	8
8. MONITORING	9
9. HEALTH & SAFETY OBJECTIVES	10
10. EMERGENCY PROCEDURES, FIRE & EVACUATION.....	10
11. EQUALITY IMPACT ASSESSMENT.....	11
12. APPENDIX 1.....	14

POLICY DETAILS

Version	Revision	Date	Approved By
V1-V7	Annual reviews	-	H&S Group
7.1	Annual review – a few name changes & roles at paragraph 3	April 2015	H&S Group
8.0	Complete review of the document	April 2016	H&S Group
9.0	Change to names (IT and First Aiders)	January 2017	H&S Group
10.0	Document review (change to H&S Officer and some staff)	December 2017	H&S Group
11.0	Removal of Fire Marshal and First Aider names	February 2018	H&S Group
12.0	Reviewed with minor updates including logo change	April 2019	H&S Group
13.0	Reviewed with minor updates including logo change	April 2022	H&S Group
14.0	Replacement of names with job titles and addition of appendix - names of those with responsibilities.	May 2022	H&S Group
14.1	Update to CEO reference and H&S Group Members and S-drive links to SharePoint and additions of objective details from OH&SMS Manual.	January 2024	NB
14.2	Addition of Claire Finan to the Health and Safety Group lists	January 2024	NB

LEGAL FRAMEWORK

The basis for health & safety law in Great Britain is the Health & Safety at Work etc Act 1974 (HSWA) which sets out, amongst other provisions, general duties for both employers and employees.

These are summarised below;

Employers must

- Provide and maintain safe systems of work (e.g., procedures & equipment)
- Plan the implementation of emergency procedures – evaluation in case of fire or other major incident.
- Ensure safe handling, storage, transport, and use of potentially hazardous substances.
- Provide information, instruction, training, and supervision to ensure the health and safety at work of all employees.
- Provide and maintain a safe working environment.
- Monitor, audit and regularly review this policy and measure safety performance to enable continual improvement.

Employees must

- Take care of their own health and safety and the health and safety of others who may be affected by their acts or omissions.
- Co-operate with their employer in health and safety matter.
- Not misuse or interfere with anything provided for health and safety purposes.

These duties are qualified by the term 'so far as is reasonably practicable'. 'Reasonably practicable' means the measures taken to avoid or control risks should be in proportion to that risk i.e. balancing the cost of steps taken to reduce a risk against the degree of risk presented. Cost should include the time, trouble and effort required, not just the financial cost.

Since the introduction of HSWA, numerous sets of regulations have been introduced, many aimed at hazards that can be encountered within the NHS, e.g. hazardous substances, work equipment, manual handling, working with computers. Many of these regulations outline absolute duties and do not allow for 'reasonably practicable'.

The Management of Health & Safety at Work Regulations 1999 (the Management Regulations)

introduced more explicit requirements of employers to effectively manage health & safety risks. Like HSWA, they apply to all work activity.

The Management Regulations require employers to:

- Make appropriate health and safety arrangements.
- Employ competent health and safety assistance.
- Lay down appropriate procedures for serious and imminent danger.
- Provide information for employees.
- Provide appropriate health surveillance where necessary.
- Provide for co-operation and co-ordination of health and safety arrangements for contractors and self-employed people working within his operation.
- Have due consideration for individual capabilities and training regarding health and safety.

The main requirement is the undertaking of risk assessment which must:

- a) Be systematic

- b) Identify hazards
- c) Evaluate the likelihood and severity of risks

The Workplace (Health, Safety and Welfare) Regulations 1992, as amended, expand on the duties placed on employers under HSWA to provide and maintain a safe working environment. Commonly known as the **Workplace Regulations**, they apply to all Cobalt premises and are intended to protect the health & safety of everyone in the workplace (not only employees) and ensure that adequate welfare facilities are provided for people at work.

The term workplace applies to common areas of shared buildings and includes private roads, paths and other outdoor areas under NHSGGC control.

What you are required to do with regards to the Workplace Regulations will be explained further in the Health & Safety handbook which can be found on the front page of the Health & Safety site on SharePoint.

HEALTH & SAFETY POLICY STATEMENT

Protecting our employees, patients, volunteers, contractors and the public are the highest priorities within Cobalt. This policy, promoting health and safety, will guide our daily operations and will not be compromised in our activities.

Our statement of general policy is to:-

- Comply with all health and safety laws and regulations and apply responsible standards.
- Continuously strive to provide an accident free workplace by anticipating, evaluating and managing risk through emphasis on prevention, preparedness, and response to potential hazards.
- Monitor, audit and regularly review this policy and measure safety performance to enable continual improvement.
- Ensure all employees are competent to do their tasks and to give them adequate training to enable them to perform their jobs in a safe and responsible manner.
- Provide information, instruction and supervision for employees.
- Consult with our employees on matters affecting their health and safety.
- Assign specific health and safety duties and responsibilities to the charities personnel and where necessary, engage the services of competent persons to provide specialist skills.
- Evaluate and manage all work activities, maintain safe plant and equipment to promote a safe workplace.
- Ensure safe handling and use of potentially hazardous substances.
- Assign responsibility and accountability to all employees for safety performance.
- Review and revise this policy annually or sooner if it is no longer a true representation of Cobalt.

Signed:



Malcolm MacKeith Chief Executive Officer

RESPONSIBILITIES

1. Overall and final responsibility for health and safety rests with:
The Chief Executive Officer
2. Day-to-day responsibility for ensuring this policy is put into practice is delegated to:
The Health and Safety Officer
3. To ensure health and safety standards are maintained/improved, a list of staff with defined responsibilities has been drawn up: - please see appendix 1, page 12.
4. All employees have a responsibility to:-
 - Co-operate with supervisors and line managers on health and safety matters;
 - Not interfere with anything provided to safeguard their health and safety;
 - Take reasonable care of their own health and safety; and
 - Report all health and safety concerns to an appropriate person (as detailed in this policy statement).

1. HEALTH & SAFETY RISKS ARISING FROM WORK ACTIVITIES

Risk assessment to be undertaken by:-

MRI	Head of MRI & MRI Superintendents
CIC Admin	Head of Business Administration
PET/CT	Head of PET/CT & CT
Radiation	RPS
Linton House	Health & Safety Officer / Deputy H&S Officer
ITM	ITM Manager / Superintendent
Other areas	Health & Safety Officer / Deputy H&S Officer

Staff who will be responsible for ensuring the action required is implemented:-

Chief Executive Officer
Head of Governance
Head of PET/CT & CT
Head of MRI

Staff who will check that the implemented actions have removed/reduced the risks:-

Chief Executive Officer
Head of Governance
Head of PET/CT & CT
Head of MRI
Head of Business Administration
Financial Director

Assessments will be reviewed annually or when the work activity changes, whichever is soonest.

2. CONSULTATION WITH EMPLOYEES

Employee representative(s) are:-

Health & Safety Officer
Heads of Department/Health & Safety Representatives/Group

Cobalt's Health & Safety Group meet quarterly and will:-

- Review Cobalt's Health and Safety Policy to ensure it reflects us and our management structure.
- Audit effectiveness of management structure and risk controls.
- Review Health & Safety Objectives and performance against targets.
- Include employees in risk management decisions and assessments.
- Agree procedures to implement new and changed legal requirements.

Consultation with employees is provided by the Health & Safety Group: - Please see Appendix 1, page 12.

3. MAINTENANCE & SAFETY OF EQUIPMENT

Responsibility for identifying all equipment needing maintenance and ensuring effective maintenance procedures are drawn up rests with:-

Estates Manager
Head of PET/CT & CT
Head of MRI
MRI / PET/CT & CT Superintendents

Any problems found with equipment should be reported to:-

CEO, Head of Department or Department Health & Safety Representative.

Department Managers, Department Health and Safety Representatives, the CEO or the Manufactures Health & Safety Advisors **will check that new equipment meets health and safety standards before it is purchased and for clinical equipment a risk assessment for its use completed.**

4. SAFE HANDLING & USE OF POTENTIALLY HAZARDOUS SUBSTANCES

Responsibility for identifying substances which need a COSHH assessment, undertaking COSHH risk assessments and ensuring that all actions identified in the assessments are implemented rest with:-

PET/CT Health and Safety Representative
MRI Health and Safety Representative
Health and Safety Officer
Deputy Health and Safety Officer
Infection Prevention and Control Lead
Estates Manager

Health & Safety Group and Heads of Departments **will be responsible for ensuring that all relevant employees are informed about the COSHH assessments.**

Heads of Department and Departments Health & Safety Representatives **will check that new substances can be used safely before they are purchased.**

Procurement of substances used in infection prevention and control procedures must be approved by the Infection Prevention and Control Committee prior to their introduction.

Assessments will be reviewed annually or when work activity changes, whichever is soonest.

5. INFORMATION, INSTRUCTION & TRAINING

The Health & Safety Law poster is displayed in:-

- The staff kitchen/rest room first floor of CIC
- The staff kitchen/rest room first floor Linton House
- The staff kitchen/rest room basement Linton House
- The staff kitchen/rest room Linton Cottage

Health & Safety advice is available from:-

Health & Safety Officer
Deputy Health & Safety Officer/Trainer
Head of PET/CT & CT
Head of MRI
Estates Manager
Health & Safety Group Representative

or you can visit:-

www.hse.gov.uk

www.iosh.co.uk (Institution of Occupational Safety & Health (IOSH))

Supervision of young workers/trainees will be arranged/ undertaken/monitored by:-

Head of PET/CT & CT
Head of MRI
Head of Business Administration
Head of HR

or another appointed responsible person

The Head of MRI and Head of PET/CT & CT, or an appointed responsible person, **is responsible for ensuring that our employees working at locations under the control of other employers are given relevant health and safety information.**

6. COMPETENCY FOR TASKS & TRAINING

H&S Induction training will be arranged for all employees by:-

Health & Safety Officer
Deputy Health & Safety Officer/Trainer
Heads of Department or appointed competent person/s
Head of HR

Specific training will be provided by:-

Heads of Department
Line Manager or appointed competent person/s
Health & Safety Officer
Deputy Health & Safety Officer / Trainer
External Trainer (e.g. St Johns Ambulance)

Specific jobs requiring special training are:-

Working in controlled or restricted areas
Working with radiation
Working with strong magnetic fields
Working with patients
Working at height
Working with heavy loads
Working with machinery

Fire Marshal
First Aider

Training records, where applicable, are kept in the Education & Training site on SharePoint.

Training will be identified, arranged and monitored by:-

Heads of Department
Line Managers
Health & Safety Group
Health & Safety Officer
Health & Safety Trainer

7. ACCIDENTS, SERIOUS UNTOWARD INCIDENTS, INFECTION CONTROL, FIRST AID & WORK-RELATED ILL-HEALTH

Health surveillance is required for employees doing the following jobs:-

Radiation dose monitoring:-

CEO
Medical Director
MRI – All radiographers working within x-ray
PET/CT – All PET/CT staff

Radiation dose monitoring will be arranged by:-

Radiation Dosage Monitoring PET/CT, CT & X-ray: RPS
Monitored by RRPPS Approved Dosimetry Systems, Kings Norton, Birmingham
Radiation Dosage Monitoring MRI - All radiographers who use the x-ray equipment use a monitoring dose pen that measures dosage and is monitored within the Department.
The X-ray RPS will arrange calibration of the dose pen when required and TLD radiation dose monitoring for an agreed period annually for staff who are identified as working in X-Ray most frequently.

Radiation dosage monitoring records will be kept by:-

RPS
Head of PET/CT & CT / Superintendent Radiographer - PET/CT
Head of MRI
Deputy RPS – X-ray

The first aid boxes are kept in the locations listed below:-

Cobalt Imaging Centre:-

MRI	Crash Room
PET/CT	Lab
Ground Floor	CIC Reception
First Floor	Kitchen/Rest Room

Linton House

Basement	Estates Corridor (by eye station) Basement Back Door
Ground Floor	Kitchen
First Floor	Kitchen Fundraising

Linton Cottage

Ground Floor	Kitchen
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Qualified First Aiders are listed on the Training Spreadsheet (SharePoint - Education and Training site) and an updated list is displayed in every rest room / Kitchen.

Recording & Reporting of Incidents

(Please also see – Incident and Serious Incidents Policy)

Cobalt is committed to investigating and learning from all incidents in order to prevent a recurrence of a similar incident and to ensure that, where required, changes are identified and become embedded in practice.

All serious untoward incidents, both clinical and non-clinical, are to be recorded following Cobalt's incident reporting procedure.

Full details, and forms, on how and where to record details of accidents, incidents and Near Misses can be found on the *Health & Safety site on SharePoint*.

Staff who witness an incident must inform their line manager as soon as reasonably practicable. The Head of Department or appointed responsible person must record the incident on the incident matrix and complete all details and action taken on an incident form and inform the Health and Safety Officer.

All accidents and cases of work-related ill health are either to be recorded electronically or in hard copy in the accident book if unable to complete electronic copy. Hard copy Accident books are held at:-

- CIC Reception
- Linton House First Floor on kitchen wall
- One on each of the MRI Mobile Scanners

Where appropriate, staff members are referred to Working Well (staff health and wellbeing) Occupational Health Services for assessment.

Infection Prevention & Control

Infection control incidents must be reported to the Lead of Infection Prevention and Control and follow the clinical incident or near miss reporting procedure.

Any change in policy or procedure, recommended by the infection control team, should be documented and actioned by Heads of Department or the appointed responsible person.

All incidents are reported and minuted by the H&S Group and in the event of an infection control incident the infection prevention and control committee. Incidents are also reported within departmental meetings and escalated to the clinical governance committee for review

8. MONITORING

To check our working conditions, and ensure our safe working practices are being followed, we will:-

- Report accidents, monitor incidents and sickness rates.
- Change work procedures or products if there is a serious health and safety risk.
- Record actions of the Health and Safety Group and report back to all staff.
- Update and amend procedures to implement new and changed legal requirements.
- Audit effectiveness of management structure and risk controls.

Responsibility for investigating accidents & work-related sickness and associated prevention methods rests with:-

- **Investigating accidents:** Head of Departments, Health & Safety Officer / Deputy H&S Officer, and/or the Health and Safety Representative.
- **Investigating work-related causes of sickness absences:** Head of HR, Health & Safety Officer, Head of Departments or Health and Safety Representative.

- **Investigation findings to prevent a recurrence:** Head of Departments, Health and Safety Group.

9. HEALTH & SAFETY OBJECTIVES

Senior management ensures that the Cobalt Imaging Centre's objectives are established during the planning process, and at relevant functions and levels within Cobalt.

Cobalt will, where legislative and operational procedures allow, establish Health & Safety objectives. For the Health & Safety objectives to be achieved, it is important that an action plan is put in place to manage the objectives. Cobalt's action plan to achieve its Health & Safety objectives (chosen for the 2023-24 financial year) is summarised in table 2 below:

Table 2

What will be done?	What resources will be required?	Who will be responsible?	When will it be completed?	How will the results be evaluated?
Ensure all employees are aware of the Health & Safety procedures	H&S Team time Heads of Department time	H&S Officer Dep H&S Officer Heads of Department	To be reviewed at Staff survey (~ June) 2024	Staff survey results
Decrease the number of incidents in 2024 by 10% of the figures reported in 2023	H&S Team time Heads of Department time	H&S Officer Dep H&S Officer Heads of Department	December 2024	Analysis of the incident register
Investigate reducing any high-risk scores (over 10) on the risk registers	SMT members time	CEO, Finance Director and SMT	December 2024	Analysis of Corporate and Committee risk registers

Health & Safety objectives are reviewed bi-annually as part of the management review process and revised and updated as necessary.

Health & Safety objectives are documented as part of the Health & Safety Management and audit function, which incorporates the Management Review Meetings.

10. EMERGENCY PROCEDURES, FIRE & EVACUATION

Malcolm MacKeith is responsible for ensuring the fire risk assessments are undertaken and implemented.

Escape routes are checked by:-

Estates Manager / Estates Team..... (Checked Daily)

Fire extinguishers are maintained and checked by:-

Estates Manager / Estates Team (Checked Weekly)

A&E Fire Equipment Ltd (Tested Annually)

Emergency lighting will be tested by the Estates Team as follows:-

- Emergency lighting function test (flick test) Monthly
 - Emergency lighting 1 hour test Twice a year
 - Emergency lighting 3 hour test Annually
- Any faults arising from these checks will be reported to a professional contractor.

Alarms are tested by:-

- Estates Manager / Estates Team (Tested Weekly)
- A&E Fire Equipment Ltd (Tested Quarterly)

The Emergency Fire Evacuation will be tested every:-

Six months at different times (am/pm) to cover part-time staff/volunteers.

The Major Incident Plan will be tested every 3 years.

Full fire and evacuation details can be found in the Cobalt Fire and Emergency Plan in the Policies and Procedures site on Share Point.

11. EQUALITY IMPACT ASSESSMENT

Equality Impact Assessment Screening Form

Name of service / strategy /policy or project (hereafter referred to as policy) to be assessed:	Health and Safety Policy
Department:	Cobalt – all departments
Name of those completing EIA Screening:	Nigel Benatar Health and Safety Officer
Date:	January 2023
1. Policy Aim / Purpose:	To protect our employees, patients, volunteers, contractors and the public are the highest priorities within Cobalt. This policy, promoting health and safety, will guide our daily operations and will not be compromised in our activities.
2. Is this a new or existing policy:	Existing Policy.
3. How will you measure the outcome of the policy:	Regular auditing to ensure that policies are being implemented and that management controls are working. Achieving the standards and objectives and ensuring that these process are effective.
4. Who is intended to benefit from the policy:	Staff, patients, volunteers and visitors to Cobalt.

Use the table below to tick where you think the policy could have a positive impact on any of the equality groups or where you think the policy may have a negative impact on any of the equality groups. Please tick the ‘no impact’ box if you feel the policy has no impact on any of the equality groups. Please state your reason for your decision.


	Equality Group	Positive Impact	Negative Impact	No Impact	Reason For Decision
AGE	Older people(65+)	<input type="checkbox"/>			To provide a safe environment for anyone working or visiting Cobalt.
	Younger people and children (0 – 25)	<input type="checkbox"/>			
	Middle range	<input type="checkbox"/>			
	Disability	<input type="checkbox"/>			
	Faith and Belief			<input type="checkbox"/>	From a Health & Safety perspective there should not be any specific Faith and Belief issues which should be handled any differently.
	Older people(65+)	<input type="checkbox"/>			To provide a safe environment for anyone working or visiting Cobalt.
	Equality Group	Positive Impact	Negative Impact	No Impact	Reason For Decision
GENDER	Women	<input type="checkbox"/>			
	Men	<input type="checkbox"/>			
RACE	Asian or Asian British People			<input type="checkbox"/>	
	Black or Black British People			<input type="checkbox"/>	
	Chinese			<input type="checkbox"/>	
	European People			<input type="checkbox"/>	
	People of Mixed Race			<input type="checkbox"/>	
	White People			<input type="checkbox"/>	
SEXUAL ORIENTATION	Lesbian			<input type="checkbox"/>	
	Gay Men			<input type="checkbox"/>	
	Bisexuals			<input type="checkbox"/>	

	Equality Group	Positive Impact	Negative Impact	No Impact	Reason For Decision
	Trans Gender People			<input type="checkbox"/>	
	Carers	<input type="checkbox"/>			
	Part Time or Flexible Workers	<input type="checkbox"/>			

You will need to carry out a full equality impact assessment if you find a negative impact on any equality group.

Outcome (please tick one):

Policy promotes equality, equal opportunities and improved relations and will be reviewed in 3 year's time	<input type="checkbox"/>	Full Equality Impact Assessment to be carried out	NO
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Signed:  (Nigel Benatar) H&S Officer Dated: January 2023

Appendix 1

Named Individuals with H&S responsibilities

Name	Responsibility
Malcolm MacKeith	Chief Executive Officer/Finance Department/Health and Safety Group
Sue Wood	Admin/Health and Safety Group
Fiona Deane	Dep Health and Safety Officer/Health and Safety Group
Karen Hackling Searle	MRI Department/Health and Safety Group
Rachel Burke	Human Resources/ Health and Safety Group
Richard Wilkes	ITM/Health and Safety Group
Nigel Benatar	Health and Safety Officer/ Radiation Protection Supervisor
Darren Edwards	PET/CT & CT Departments / Health and Safety Group
Simon Whithouse	PET/CT & CT Departments / Health and Safety Group
Kerry Pawley	Radiation Protection (X-Ray) /Infection Prevention and Control Lead / Health and Safety Group
Claire Finan	Lung Health Check CT Department / Health and Safety Group
Jesse Smith	Estates/Health and Safety Group
Fire Marshals	Qualified Fire Marshals and their duties are listed in the Cobalt Fire & Emergency Plan, The Roles and Duties of a Cobalt Fire Marshal, and names are listed on the H&S Site https://cobalthc.co.uk/sharepoint.com/sites/HealthSafety An updated list is also displayed in every department.
First Aiders	Qualified First Aiders are listed on the H&S Site https://cobalthc.co.uk/sharepoint.com/sites/HealthSafety and an updated list is displayed in every department.

Health & Safety Group:-

Nigel Benatar
 Karen Hackling Searle
 Malcolm MacKeith
 Jesse Smith
 Kerry Pawley
 Sue Wood
 Fiona Deane
 Simon Whitehouse
 Darren Edwards
 Claire Finan
 Rachel Burke