

POLICY TITLE:	Health & Safety Policy, Organisation and Arrangements				
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Policy Owner:	Lyn Madgwick, Priory Health & Safety Manager				
Ratified by:	Colin Quick, Chief Quality Officer				
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 <u>Priory - Governance Framework</u> <u>HR, People Team Policies</u> <u>Purchasing Policies</u>				
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EQUALITY AND DIVERSITY STATEMENT

Priory is committed to the fair treatment of all in line with the <u>Equality Act 2010</u>. 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

Health & Safety Policy Statement

It is the policy of Priory to ensure, so far as is reasonably practicable, the health, safety and welfare of the service users, colleagues and visitors 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 is committed to providing adequate resources to ensure this policy is effectively implemented.

Priory consists of two divisions that deliver a comprehensive range of services under the Priory brands: Priory Adult Care and Priory Healthcare. 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 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 and this policy is reviewed regularly by the Executive Team and at any other time when there are significant changes in Priory, or its activities.

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

Robertula Crasswell

Rebekah Cresswell, Chief Executive Officer (on behalf of Priory)

Date: 11/08/2022

HEALTH & SAFETY POLICY, ORGANISATION AND ARRANGEMENTS

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1 SCOPE

- 1.1 This policy applies to all sites and services across England, Scotland, Northern Ireland and Wales. Where there are differences between nations, this will be clearly highlighted.
- 1.2 This policy applies to all types of services in Priory.

2 PRIORY UK BOARD RESPONSIBILITIES

- 2.1 The Priory UK Board is collectively responsible for:
 - (a) Adopting a general statement of Health & Safety Policy and the written organisation and arrangements for implementing the policy and monitoring its effectiveness
 - (b) Reviewing the health and safety performance of Priory by considering written reports from the Director of Risk Management and through the Health & Safety Divisional Meetings and reporting groups on risks and strategic changes
 - (c) Ensuring there are adequate resources allocated for effective management of health and safety and the implementation of this policy
 - (d) Ensuring that relevant Priory UK Board decisions are consistent with the objectives of the Health & Safety Policy.
- 2.2 **The Priory Chief Executive Officer -** The Priory Chief Executive Officer (CEO) has overall responsibility for health and safety matters within Priory. The Priory CEO is also responsible for the general oversight of Priory'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.
- 2.2.1 The Priory CEO is also responsible for ensuring:
 - (a) That adequate resources are available for meeting statutory requirements and Priory policy relating to health and safety
 - (b) 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
 - (c) 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.

3 THE QUALITY ASSURANCE COMMITTEE

3.1 The Quality Assurance Committee convene on a monthly basis and are chaired by the General Counsel & Company Secretary and attended by the Priory CEO, Director of Risk Management and senior colleagues from Healthcare and Adult Care. The meeting reviews the quality and safety 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, RIDDOR reportable incidents, fire related issues and relevant regulatory health and safety concerns.

4 HEALTH & SAFETY DIVISIONAL MEETINGS

- 4.1 Divisional Health & Safety Meetings are held quarterly to consider health and safety matters for Healthcare and Adult Care. These are attended by the Director of Risk Management and/or the Priory Health and Safety Manager to monitor and review the systems of risk management and to ensure the highest standards of service are delivered to all service users, colleagues and visitors.
- 4.2 Continued compliance with internal and external regulatory requirements and the continuous improvement of risk management and internal control procedures are discussed along with divisional and Priory safety strategies. The Director of Risk Management will report to the Priory UK Board on matters arising from these meetings.
- 4.3 In relation to health and safety, Divisional Meetings will:
 - (a) Assist the Priory UK Board to lead the overall health and safety strategy and the actions and resources needed to implement it.
 - (b) Review Priory Health & Safety Policy, as well as Priory and divisional Health & Safety plans,
 - (c) Alert the Priory UK 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) Enable thematic analysis on compliance with health and safety policy and procedure across Priory to identify potential risk to service users and the business of Priory.

5 PREMISES SAFETY GROUP FORUM

- 5.1 The Premises Safety Group Forum meet quarterly to enable effective oversight and consultation on safety matters in relation to the premises under the control of Priory services. It is chaired by Head of Maintenance and attended by Head of Estates, Health & Safety Manager and Divisional Property Managers, along with wider member of the Estates and Central H&S Teams as required.
- 5.2 The group have responsibility to:
 - (a) Ensure that suitable systems and processes are in place to monitor and manage premises safety across the business and ensure that premises undergo the required local and contractor safety checks and monitoring to manage fire, water, electrical, asbestos and others as required under UK legislation and guidelines
 - (b) Maintain a strategic overview of any property/premises health and safety risks identified by the Central Estates Team and/or Central H&S Team, including legionella, asbestos and those arising from Fire Risk Assessments and the wider Compliance function.
 - (c) To discuss any relevant Enforcement Authority interest, interventions and actions to enable organisation learning, and inform future policy or procedure
 - (d) To ensure systems and processes in place are in line with UK legislation or guidance
 - (e) To ensure relevant policies are in line with UK legislation and guidelines where these are applicable to premises
 - (f) Maintain and update a Premises Risk Register and Report to Director of Risk Management as necessary

6 RESPONSIBILITIES

6.1 The following senior executives and managers have specific health and safety responsibilities.

- 6.2 **General Counsel & Company Secretary -** The General Counsel & Company Secretary has responsibility for ensuring that the Priory UK Board process fulfils statutory health and safety requirements. The General Counsel & Company Secretary is therefore responsible for ensuring:
 - (a) The Priory UK Board annually considers and accepts reviews to this policy from the Health and Safety Forum
 - (b) That appropriate legal advice is provided to Priory
 - (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.
- 6.3 **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 Priory functions, in particular the Compliance teams, Estates teams, Policy co-ordination teams and the Learning & 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 Priory CEO, and investigations undertaken and learning points communicated across Priory as deemed appropriate to promote an opportunity for shared learning
 - (e) Highlighting risk areas across Priory and communicating as deemed appropriate to promote an opportunity for shared learning
 - (f) Overseeing the management of complaints in accordance with Priory 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'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
 - (I) In consultation with the Director of Learning & Development, ensuring that standards of minimum health and safety training for key groups of colleagues are developed and incorporated into Priory'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 and 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.
- 6.4 **The Chief People Officer** The Chief People Officer (CPO) has an overall responsibility to ensure human resources practices incorporate up to date standards of health and safety. The CPO also has line management responsibility for the Learning & Development Team. The CPO therefore has responsibility for:
 - (a) Ensuring Human Resources management standards adequately reflect legal requirements for health and safety and are consistent with Priory health and safety standards and procedures and Human Resources policies

- (b) In consultation with the Director of Risk Management and the Director of Learning & 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.
- 6.5 **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 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
- (d) Reporting any shortfalls in safety standards to the Priory CEO, within Business Review Meetings and to the Divisional Health & Safety Meetings, 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.
- 6.6 **Priory Health & Safety Manager -** The Priory Health & Safety Manager is responsible for the day-to-day coordination of Priory's programme for managing health and safety. The manager also has line management responsibility for the Health & Safety Advisors. They are therefore responsible for:
 - (a) Co-ordinating Priory'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
 - (i) Assisting with identifying the health and safety training requirements across Priory and monitoring compliance with mandatory health and safety training.
- 6.7 **Regional Health & Safety Advisors -** The Regional Health & Safety Advisors are part of the Legal & Compliance Team and provide central advice and coordination of health, safety and hospitality matters across Priory 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 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 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 activities are managed by providing advice, change of policy and/or advising changes to working practice are escalated through Priory in accordance with the procedures
- (e) Notifying any changes required to health and safety and hospitality policies and ensuring Priory 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
- (d) Ensuring food preparation and catering arrangements meet food hygiene standards, Priory 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.

6.8 **General Responsibilities of all Priory Managers -** All Priory 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 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, the required action taken 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) RIDDORs are reported effectively (in liaison with the Health and Safety Advisor) and advice is sought in the event of Health & Safety Executive (or equivalent) contact.
- (h) 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.

6.9 **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 premises
- (b) To comply with Priory 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'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
- (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
- (i) To ensure all vehicles owned or operated by Priory 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 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.

7 STANDARDS AND GUIDANCE

- 7.1 Mandatory common standards and guidance are issued periodically as Health & Safety policies to form Priory Health & Safety Policies. Policies are issued by e-mail from the Legal & Compliance team to the site/service managers and are available to all colleagues on the Priory Intranet.
- 7.2 Priory 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 will adopt the practices or standards recommended in Health & Safety Executive publications, relevant National Standards and local guidance.
- 7.3 Mandatory standards and quidance will additionally be supported by ad-hoc Safety Bulletins, safety guidelines and presentations issued through the Legal and Compliance Helpdesk and available on the Priory Intranet.

PRIORY HEALTH & SAFETY EVIDENCE FILES 8

- 8.1 Within all the sites/services operating under the Priory, 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 or by external contractors to ensure adherence to statutory requirements, or compliance with Priory policies and procedures.
- 8.2 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.
- 8.3 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.
- 8.4 Some clinical safety checks will be maintained within other documentation and filing systems as appropriate.

9 COMPETENT PROFESSIONAL HEALTH & SAFETY SUPPORT AND ASSISTANCE

- When necessary, Priory can enlist specialist occupational health and safety consultants in support 9.1 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 also appoints a range of specialist advisers to provide specialist fire risk assessment, medical, clinical and education advice.
- 9.2 Priory will provide information and evidence to an external provider at least annually to ensure that the health and safety management system in place is suitable, appropriate and open to scrutiny. Currently this review is completed through CHAS (Contractors Health & Safety Assessment Scheme) with annual accreditation in place for the organisation.

10 NATIONAL CONDITIONS INCLUDING PANDEMIC AND/OR MANAGING TEMPORARY LEGAL RESTRICTIONS AND RELATED ACTIONS AFFECTING COLLEAGUES, SERVICE **USERS AND VISITORS**

10.1 Priory will ensure all sites operate within national and local guidance to keep service users and colleagues safe where additional and/or specified controls, organisational guidance and monitoring of standards are required. This includes pandemic or other significant national event affecting all services.

10.2 Priory will also provide colleagues with suitable information and guidance and the required personal protective equipment and have in place a monitoring and audit system to ensure suitable controls are in place.

11 REFERENCES

11.1 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

12 ASSOCIATED FORMS

12.1 <u>Health & Safety Policy Statement</u> – to be displayed in all Site Reception areas

Health & Safety Policy Statement – Easyread (with pictures)

<u>Health & Safety Policy Statement</u> – Easyread (without pictures)

13 EQUALITY IMPACT ASSESSMENT

13.1	How is the policy likely to affect the promotion of equality and the elimination						
	discrimination in each o						
	Protected	Impact	Reason/ Evidence	Actions Taken (if			
	Characteristic	Positive/ Negative/	of Impact	impact assessed as			
	(Equality Act 2021)	None		Negative)			
	Age	None					
	Disability	None					
	Gender re-assignment	None					
	Marriage or civil	None					
	partnership						
	Pregnancy or maternity	None					
	Race	None					
	Religion or beliefs	None					
	Sex	None					
	Sexual orientation	None					
	Other, please state:	N/A					
	EIA completed by:						
	Name:	Lyn Madgwick Health & Safety Manager					
	Role/Job Title:						
	Date completed:	19 July 2022					

14 APPENDICES

14.1 **Appendix 1 -** Specific Duties relating to Health & Safety

Appendix 2 - Management of an MDA/CAS Alert

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 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 produces 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. 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 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 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

Alert received by Director of Risk Management and Legal & Compliance Helpdesk via email alerting systems – i.e. MDA/CAS

Director of Risk Management reviews alert and makes decision on distribution

Legal & Compliance Helpdesk circulate alert to all site/service managers within agreed division/s

Site/service manager cascades relevant information to colleagues, discusses at Governance meetings and alters processes accordingly.

Receipt and any necessary action in response to the alerts is checked as part of the internal compliance inspections and Health and Safety audits procedure

Details of all circulated MDA/CAS alerts can be found on the Intranet under Central Services / Legal and Compliance / Risk Management / Safety Bulletins and Lessons Learnt / Safety Alerts – details and links

A fortnightly list of all circulated MDA/CAS alerts appears in the Weekly Brief