

## Policy Arrangements for Health, Safety, and the Environment

---

<b>Version number</b>	2	<b>Type of document</b>	Policy
<b>Audience</b>	All staff, visitors and contractors who are involved in any way in duties for Millbrook Healthcare Ltd		
<b>Approved by</b>	Clinical & Governance Director	<b>Date Approved</b>	05/07/2024
<b>Policy Author</b>	Health Safety and Environment Manager		
<b>Review Period</b>	Annually	<b>Review Due Date</b>	05/07/2025
Forms / Further Information	Refer to supporting Health and Safety Policy Statement and Health and Safety Management System Policy		

### Organisation and Lines of Responsibility

Overall responsibility for the Health and Safety of all persons within the company, and the Environment, rests with the CEO of Millbrook Healthcare.

The CEO delegates this responsibility to the individual Service Centre and Operations Managers for the purposes of the day-to-day running of the operation.

Millbrook Healthcare has a nominated Health, Safety and Environment Manager who has overall group responsibility for reviewing and making recommendations on all matters relating to Health, Safety, and the Environment. The Health, Safety and Environment (HSE) Manager has overall responsibility for the day-to-day safety operations.

The HSE Manager will ensure through the management organisation that:

- All persons employed by the company receive adequate Health, Safety and Environment training. In addition, employees will receive adequate instruction and supervision to enable them to undertake their work in a safe manner.
- All plant and equipment are suitable for their intended purpose and that it is maintained in a safe condition always.
- All persons working on site, whether employees of the company, are adequately notified of all known hazards and protective measures.
- That the company risk assessments, along with all other safety documentation, are brought to the attention of all relevant parties.
- All employees are required to comply with their legal requirements under current national statutory provisions. All staff must co-operate with the management of the company to allow it to comply with the legal requirements for Health, Safety, and the Environment.

- Individual members of staff, who have any concern regarding their own safety, or that of a third party, are responsible for reporting the matter to their manager without delay

## Communication and consultation with employees

We consult with our employees or their representatives about the following:

- the introduction of any measure which may substantially affect their health and safety at work, e.g., the introduction of new equipment or new systems of work, such as the speed of a process line or shift work arrangements.
- arrangements for getting competent people to help them comply with health and safety laws (a competent person is someone who has the necessary knowledge, skills and experience to help an employer meet the requirements of health and safety law).
- the information we must give to our employees on the risks and dangers arising from their work, measures to reduce or get rid of these risks and what employees should do if they are exposed to a risk.
- the planning and organisation of health and safety training.
- and the health and safety consequences of introducing new technology.

Relevant H&S changes/arrangements will be devised from our bi-annual management review meeting and quarterly site based HSE meetings and follow an assessment period.

Throughout this period, relevant H&S information will be provided to the Millbrook Healthcare staff, feedback will be considered before making any health and safety decision.

Our staff's first line of communication is their immediate line manager on site; the information flows from Head Office to the Operations team and extends to our staff onsite. Aside from general updates provided by the Service Centre Manager or Operations Manager, we share group information with all our staff via emails, newsletters, safety bulletins, toolbox talks and within the Company's AssessNET portal.

## Monitoring, Audit and Review

Millbrook Healthcare are audited annually on the following standards: ISO 9001, ISO 14001, and ISO 45001. We work in close partnership with our external auditors who play a crucial role in helping to implement our management systems, providing audits and advice on:

Health & Safety  
Quality Management  
Energy & Environment  
Information Security  
Business Continuity

Our External Auditors, by necessity, pay attention to Millbrook Healthcare's Internal Audit Reports, Management Review Meeting Minutes, and Corrective Action processes. These three sources of information, when reviewed as an integrated set of processes, can help the Internal Auditor and the external Auditor identify and correct complacency in the overall Plan-Do-Check-Act process.

It's Millbrook Healthcare's responsibility to sample the processes and records of the organisation to ensure compliance, identify potential weaknesses in the system, and ensure the overall intent of driving customer satisfaction is met. We monitor our approach via internal audits based on a review of the processes (documented and not documented) providing evidence of compliance with ISO 9001, 14001 and 45001; conducting internal audits to the depth and breadth necessary to provide sufficient evidence of a review of the effectiveness of the entire management system. The Internal Audits ensure the Management System continues to meet the requirements of the standards:

- That Millbrook Healthcare continues to adhere to all processes, documented and undocumented.
- That the system ensures customer requirements are being met all the time.
- That all process descriptions remain current and accurate.
- That all records are maintained and are accurate.

Internal audits follow a yearly schedule, where all reams within Millbrook Healthcare's service provision are studied, and feedback provided to rectify minor/major non-conformances. Whenever there is room for improvement, internal auditors make recommendations for enhancing processes, policies, and procedures.

## **Risk Assessments**

We undertake risk assessments of all identified hazards related to work undertaken by our employees. We eliminate these risks wherever possible. Where we cannot achieve this, we implement suitable and sufficient control measures, based on these assessments, to reduce and manage, so far as is reasonably practicable, the risks to our workers and others.

We have listed the specific activities undertaken by our employees that are likely to carry significant risk. We have considered the risk from each of these activities and assessed whether the control measures are adequate or whether further action is necessary. The results of all significant and completed risk assessments have been made known to our employees and are available for their reference. Risk assessments are reviewed annually and updated as required. They are also reviewed whenever circumstances have changed and following the investigation of any accidents or incidents that may occur.

## **Dynamic Risk Assessments**

A Dynamic Risk Assessment is "the practice of mentally observing, assessing, and analysing an environment before and while at work, to identify and remove risk. The process allows individuals to identify a hazard on the spot and make quick but considered decisions with regards to their own safety."

Our employees are required to undertake Dynamic Risk Assessments before commencing work and as the work progresses. They should not assume risks have been encountered before and that previous control measures are necessarily appropriate. Our employees are trained to carry out a dynamic risk assessment before entering any new situation and continue to assess the risks and hazards in case there is a change in circumstances as the work proceeds. Where a new potential risk is identified, our employees may need to review the method of working and the appropriateness of the existing control measures before continuing. If uncertain, they should contact their Line Manager for further advice on how to proceed.

## Accidents, Accident Reporting and Investigation

Employees are instructed to report all accidents and near misses that happen in the course of their work however, minor, particularly where any form of personal injury or damage is involved. Employees are reminded that it is also their duty to report to their manager any safety hazards, such as defective equipment, and to warn others if necessary. Employees must not engage in any working practice they know to be unsafe.

All incidents are recorded and investigated using the Company's AssessNet portal, and where possible additional control measures or a safer system of work are implemented. We understand our duties to report incidents under statutory regulations within the appropriate timescales. Full details are set out in the company's accident reporting and investigation procedure.

## First Aid

We have taken action to provide suitable first aid arrangements for our employees whilst at work and third parties who may be affected by our activities. We have assessed the reasonable level of first aid provision required for our business and have made the appropriate arrangements. Employees should refer to site first aid notices which detail first aid kit locations, first aiders and emergency arrangements.

## Equipment

We strive to ensure that all equipment used for our business is maintained in good condition, serviced to manufacturer's schedules and is safe to use. The workforce is provided with suitable and sufficient information and training to enable them to use work equipment safely. They must not use equipment unless they have been properly trained in its use, including any safety related devices, and guarding. Employees have been given responsibility for ensuring that equipment issued to or used by them is maintained in good order. They have been told to report any defects or problems to their manager. It is our policy that defective equipment will be withdrawn from use until repaired or replaced. Where we use equipment which requires statutory examination (PUWER, LOLER) at specified frequencies, we make the required arrangements. All equipment used is logged and copies of inspections and maintenance records are held as part of our management system records.

## Purchasing

When we purchase or hire new work equipment and materials, we consider the health and safety implications of its use. We also look to obtain the safest available equipment and substances. We always obtain Manufacturers Safety Data Sheets for substances and similarly, technical data and instructions for work equipment. We consider the hazard and risk data that is provided and inform and train our employees as necessary. We also consider the environmental implications of the products that we purchase namely, whether the products or materials come from sustainable sources, whether the products or materials can be sourced locally and their disposal requirements.

## Hazardous Substances

During our operations, we use a number of potentially hazardous substances where a safer alternative cannot be sourced. Where possible we only use small quantities that reduce the

risk to health unless deliberately misused. We list and assess all the chemicals and substances that we use. Where there are potential risks, we implement suitable control measures and provide clear instruction and information to the workforce. All hazardous substances are handled and used only by people trained in accordance with the requirements of COSHH regulations. Up to date COSHH and safety data sheet records can be found on the Company's AssessNET portal.

## **Infection Prevention and Control**

All employees possess an appropriate awareness of their role in the prevention and contamination of infection control in their area of work through training, education, procedures, and guidance. Not only is this part of their professional duty of care to the Service Users with whom they are involved, but it is also their responsibility to themselves and to other employees under the Health and Safety at Work Act (1974). The Control of Substances Hazardous to Health (COSHH) Regulations (2002), require actions to be taken to control the risk of hazardous substances, including biological agents.

Staff must report serious untoward incidents pertaining to infection prevention and control in accordance with Health and Safety and Quality Adverse Incidents Procedures and near-miss reporting procedures. This will include non-adherence with infection prevention and control procedures. Non-adherence to the policy may result in disciplinary action being taken.

## **Occupational Health**

Some of our roles within the company require colleagues to undergo regular screening programmes in areas that are subjected to dust, noise, and use of hand arm vibration equipment. It is a condition of their employment that our employees comply with the health and safety guidelines within those areas, and they familiarise themselves with the instructions and safe systems of work.

Employees that work on any night or twilight shift will be asked to complete a health questionnaire prior to commencing employment or transferring onto the night or twilight shift. The purpose of this is to identify colleagues who could be at risk. If a Medical Practitioner advises that an employee is suffering from health problems, which the Practitioner considers to be connected to the fact that they work through the night, the Company shall endeavour to transfer the affected employees to suitable work during the day whenever this is possible.

Regular assessments will take place for all staff working nights to ensure that we are aware of any problems or issues which may affect them whilst at work.

## **Wellbeing**

Millbrook Healthcare places a high value on creating a healthy and safe working environment for all its colleagues and recognises that this duty of care extends to mental health as well as physical health at work. Recognition and management of stress at work are central to the Group's aim to promote healthy working practices. Stress is what we experience when we feel we cannot cope with the pressure and demands placed upon us. All work has its different pressures, and we vary in our capacity and ability to cope with different types of pressure. Many things, including work demands, concerns about job security, change and low self-confidence, can cause stress at work. Stress-related problems can also have contributory causes including difficulties in family life and at home. Although we cannot have any control on external stress factors, we acknowledge that recognising and

reducing workplace stress factors through the provision of guidance and support will have a beneficial effect on the relationship between work and home commitments.

As a Group we aim to support colleagues in a variety of ways from providing general guidance to referring you, when necessary, for professional help. To support this, the Company has a dedicated team of fully trained mental health first aiders as well as a My Wellbeing page on its Millbrook and Me reward and recognition portal. Employees can access a variety of resources such as the Employee Assistance Programme providing 24/7 support for Millbrook employees and their immediate family members.

## **Work at Height**

We have made arrangements to protect the health, safety and welfare of our employees and others against the risks involved in working at height. Wherever possible we avoid work at height. When it cannot be avoided, we consider the risk to our workforce ensuring that we train and instruct them to adequately plan, organise and carry out the work in a safe manner. Employees should refer to the Company's Working at Height and Ladder Safety Policy for more information.

## **Manual Handling**

From time to time some employees must manually handle loads, in such cases we have assessed the risks to their health from this type of work. Where possible we have eliminated the need for manual handling, by providing mechanical handling equipment or by introducing alternative measures. Where we have been unable to do this, we have provided work related training and instruction in manual handling techniques and have instructed employees not to attempt to lift items beyond their capabilities. Manual Handling risk assessments are available through the Company's AssessNET portal. Employees should refer to the Company's Manual Handling Policy for more information.

## **Lone Working**

We employ people who may, as part of their duties, have to work alone for all or part of the working period. We identify the risks to which these employees are exposed with the aim of eliminating these risks wherever reasonably practicable and reducing lone working activities to a minimum. Where lone working does take place, we identify and implement systems to ensure that safe working and communication exists between the lone worker and their management. Affected workers have been notified of our arrangements for the management of lone working activities and that we require them to notify management of their concerns in this area so that we can improve our ability to make work operations and travel safer for them. Employees should refer to the Company's Lone Worker Policy for more information.

## **Display Screen Equipment**

Our office-based employees are users of display screen equipment. We provide standard equipment, and all users are given information about the correct adjustment of the workstation and the correct posture for using it after induction. All display screen users complete a Training Module and Self-Assessment Questionnaire through the Company's AssessNET portal. Where these identify issues, we work to resolve them or seek further advice. We recognise our obligation to provide employees with eyesight tests and corrective glasses for DSE work if necessary.



## **New and Expectant Mothers**

Should any of our employees become a new or expectant mother we will take steps to ensure their continued health and safety at work. We use a new and expectant mothers risk assessment to assess and guide the measures we need to consider and undertake 'one to one' discussion and seek formal agreement, wherever possible, with the expectant or new mother to reduce their exposure to work related hazards.

## **Personal Protective Equipment and Clothing**

Some of the work we undertake requires use of personal protective equipment (PPE). We provide appropriate PPE, with storage facilities and replacements free of charge. We instruct and expect our employees to use any PPE identified as necessary. Employees are responsible for the day-to-day care of the PPE issued to them, to report damage and to request replacements. Failure to wear the correct protective equipment or clothing where required may result in disciplinary action.

## **Driving for Work**

Millbrook Healthcare is responsible for ensuring that vehicles allocated are safe, roadworthy, and fit for purpose but recognise that it also the responsibility of its employees to ensure that they perform daily checks on the vehicle they are allocated, to ensure it is roadworthy before driving. Employees are required to provide evidence of their valid driving licence upon commencement of employment and make further declarations regarding their driving licence at intervals thereafter.

## **Fire Safety**

The Health, Safety and Environment Manager has overall responsibility for the Company's fire and emergency arrangements and for the regular review of our external provided fire risk assessments. Day-to-day fire and emergency responsibility is delegated to the Service Centre Managers for their individual site. Each site also has appointed competent persons (fire marshals) to help identify fire risks, potential emergency situations and people who may be affected. We have provided firefighting equipment, emergency lighting, emergency signs, adequate means of escape and evacuation procedures in accordance with our fire risk assessment. We review our fire procedures and precautions every year and make sure that our fire risk assessment remains valid. Employees and visitors receive instruction in fire safety procedures as part of their induction or visit. Fire drills are held every 6 months. Details of the action we take to maintain our fire safety equipment, arrangements and procedures are kept in our Fire Safety Logbooks across our sites. Where a person may have difficulty in using the ordinary means of escape, either permanently or temporarily, a personal emergency evacuation plan (PEEP) is developed with their input and communicated to fire marshals and those that need to know. Any persons required to assist in their evacuation receive suitable training.

## **Premises**

We manage our premises to provide a safe place of work. We maintain the means of access and egress, the fabric of the building, ensure good housekeeping and provide suitable

welfare arrangements that include adequate hot and cold-water, drinking water, sanitary facilities, hand washing facilities, facilities for eating and food preparation and heat, light, and ventilation. The workplace is regularly cleaned, maintained, adequately lit and ventilated.

## Electricity

The fixed electrical systems used in our premises have been inspected, tested, and certificated by competent electrical contractors. Our employees are instructed to make a visual safety check of portable electrical equipment each time that it is used. They report defects to their site-based supervisor or manager for repair or replacement. We also carry out an annual electrical test of portable electrical equipment by appointed competent persons. We keep an inventory of equipment and records of these inspections.

## Gas

Gas appliances and supply pipes receive an annual safety check by a GasSafe registered engineer. The main isolating controls are clearly marked and accessible so that the supply can be isolated rapidly in an emergency.

## Legionella

We have a duty to protect the health of our workforce and others affected by our activities from the risk of infection by Legionella from our hot water and cooling systems. We assess the risk of infection and attempt to eliminate that risk or implement suitable control measures. The control measures are reviewed at least every 12 months and the risk assessment every 2 years.

## Asbestos

Millbrook Healthcare aims to prevent the exposure to asbestos of anyone who may be affected by their activities. Where this is not reasonably practicable, Millbrook Healthcare will reduce exposure to the lowest level reasonably practicable, by measures other than the use of personal protective equipment.

Millbrook Healthcare will also reduce the numbers of people exposed as low as reasonably practicable. Millbrook Healthcare aims to undertake a suitable and sufficient assessment of all non-domestic premises to determine whether asbestos is or is liable to be present and to apply the Millbrook Healthcare Risk Assessment Scheme. These assessments will be reviewed if there is reason to suspect it is no longer valid or there are significant changes in the premises. Where the assessment shows asbestos is present or liable to be present, Millbrook Healthcare will ensure a written asbestos plan identifying its location is prepared. This plan should be clearly understandable.

Millbrook Healthcare will maintain registers of all identified asbestos containing materials within the buildings it owns or occupies. These registers will be kept and updated by the Health and Safety Manager.

Where an assessment has not been completed, any materials not readily recognised in buildings and fittings (e.g. glass, wood etc) will be deemed to contain asbestos and treated as such.



Millbrook Healthcare will provide adequate information, instruction and training for all employees who are involved in the management and maintenance of Millbrook Healthcare property or who are or are liable to be exposed to asbestos will be required to show evidence of similar information, instruction and training to their staff, as part of the vetting procedure for the Approved List.

## Waste

Millbrook Healthcare continue to work in partnership with Baxter Environmental to reduce our unrecoverable waste streams to just under 1% and correspondingly a year-on-year reduction in our waste related CO2 emissions. The focus of the company has been **Reduce – Reuse – Recycle** with initiatives to take previously unrecyclable material out of waste streams and into newly formed recycling opportunities, as well as review our cardboard recycling process with the introduction of balers and revising our packaging to remove the presence of polystyrene boxes all contributing to these results.

## Contractors

From time to time, we employ contractors or third parties to work for us or to do work on our behalf. We expect them to comply with our health and safety procedures and to have their own arrangements for safe and healthy working. Before a contractor is employed, we ask them to provide copies of their health and safety policy, Employers Liability insurance, risk assessments and method statements, only then will permission to work be granted. If the contractor is a category 1 contractor – high risk, these contractors must also be compliant with Millbrook Healthcare Employment Check Standards. They will be subject to self-audit using the PQQ and must agree to submit to random audits of their relevant employment records by the company upon request.

## Energy Conservation

As an organisation, Millbrook Healthcare is committed to reducing its carbon footprint and achieving net zero emissions by 2050. As part of this commitment, the Company has been purchasing renewable energy backed by Renewable Electricity Guarantees of Origin (REGO) certificates. Other initiatives include our service centres fitting PIR and LED lighting, a 5 yearly TM44 inspection of all our air conditioning units across all our premises, thermostatic controls of gas heating methods, use of virtual technology to reduce unnecessary travel, ensuring equipment, lights, etc are switched off at the end of the day and regular servicing and maintenance of our fleet to ensure minimum levels of emissions.

## Water Conservation

Employees are trained to understand that water is a limited resource that continually needs to be treated and recycled and therefore recognise their duties to ensure water is conserved across our premises. Taps are turned off after use, dripping taps are reported immediately, water is not heated unnecessarily, and employees do not use or heat more water than is needed to do the job.

## Prevention of Pollution

Through guidance and instruction employees are informed not to dispose of any wastewater or substances down storm water drains, recognising that this is an offence and could lead to prosecution by the Environmental Agency. If they are unsure of where to dispose of waste liquids safely, they check with their Supervisor and Managers. Employees are trained in the event of a spillage, to not allow any spillages to enter drains, streams, rivers etc or soak into the ground and to contain them according to containment methods specified in COSHH assessment and available Spills Procedures.

If any waste handled across our sites is classed as “special” or “hazardous” and needs separate handling and disposal i.e.: Biohazards, oils, sharps, batteries, chemicals etc., our employees are aware they must adhere to the procedures in place on site.