

# Occupational Health and Safety Governance and Strategic Framework 2021 - 2024

| Author:                              | Head of Health and Safety  |
|--------------------------------------|--|
| Responsible Lead Executive Director  | Chief Executive (With Delegated Authority To The Director Of Human Resources To Administer This Framework On Their Behalf) |
| Endorsing Body                       | Occupational Health and Safety Performance Group (OHSPG)   |
| Governance or Assurance<br>Committee | Staff Governance Committee   |
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| Responsible Person(s)                | Head of Health and Safety and Salus<br>Occupational Health, Safety and Return to Work<br>Service General Manager           |

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| CONS                   | CONSULTATION AND DISTRIBUTION RECORD  |  |  |
|------------------------|---|--|--|
| Contributing Author    | Salus Occupational Health, Safety and Return to Work<br>Service General Manager         |  |  |
| Consultation Process / | Members of the Staff Governance Committee   |  |  |
| Stakeholders:          | <ul> <li>Members of the Occupational Health and Safety<br/>Performance Group</li> </ul> |  |  |
|                        |   |  |  |
| Distribution:          | All Staff through Staff Briefing  |  |  |
|                        | NHS Lanarkshire Corporate Polices Open Access Web Portal                                |  |  |
|                        |   |  |  |

|                   |   | CHANGE RECORD   |                |
|-------------------|---|---|----------------|
| Date              | Author(s)   | Change(s)   | Version<br>No. |
| August<br>2009    | Human<br>Resources<br>Director  | Development and Implementation of an Occupational Health and Safety Strategy for NHS Lanarkshire  | 1              |
| September<br>2014 | Salus Occupational Health, Safety and Return to Work Service General Manager                            | Update governance, monitoring and auditing arrangements in line with CEL2011 (13). Removal of Management arrangements, Health and Safety Policy Statement to be included within a new separate Health and Safety Policy. Key relationships section removed as no longer relevant to revised document  | 2              |
| September<br>2017 | Head of Health and Safety/ Salus Occupational Health, Safety and Return to Work Service General Manager | Change in title from 'Occupational Health and Safety Strategy and Governance Arrangements' to 'Occupational Health and Safety Governance and Strategic Framework'. Revised and additional content introduced. Updated high level health and safety governance structure (Appendix 1)  | 2.1            |
| December<br>2018  | Head of Health and Safety/ Salus Occupational Health, Safety and Return to Work Service General Manager | General Data Protection Regulation (GDPR) changes applied to 'Change Record' and GDPR statement added to Section 7, 'Communication Plan'  | 2.1            |
| September<br>2021 | Head of Health and Safety/ Salus Occupational Health, Safety and Return to Work Service General Manager | <ul> <li>Policy template revised to reflect NHS         Lanarkshire Policy Template 'Developing         Organisation Policies' Version 6.0, October 2019         – Writing a NHSL Policy         <a href="http://firstport2/resources/policies/Pages/default.aspx">http://firstport2/resources/policies/Pages/default.aspx</a></li> <li>Section 2.2 Covid-19 occupational health risk acknowledged with a commitment to continue to enhance staff and patient safety</li> </ul> | 2.2            |

| CHANGE RECORD  |   |  |                |  |
|----------------|---|--|----------------|--|
| Date           | Author(s)   | Change(s)  | Version<br>No. |  |
| September 2021 | Head of Health and Safety/ Salus Occupational Health, Safety and Return to Work Service General Manager | <ul> <li>Section 3. Expansion and clarification of specialist support and services available to staff to facilitate occupational health and wellbeing. This includes acknowledgement of Occupational Health Advisors, Health and Safety Specialists; Moving and Handling Advisors and Specialist Trainers; Prevention and Management of Violence and Aggression Advisors (PaMoVA) and Specialist Trainers; Vaccination programmes for new and existing staff; Face Fit Testing for respiratory protection; Health surveillance for a wide range of occupational conditions including noise, vibration, lung function testing, etc.; Wide range of accessible e-learning courses; Practical training for a wide range of Health, Safety and Clinical courses; Inspection and audits for occupational health and safety as part of day-to-day operational activities i.e. workplace transport, environmental audits for Covid-19 safeguarding, ventilation audits, site inspections, moving and handling, PaMoVA, Staff support for mental health including specially trained staff helpline for advice and guidance, absence reporting, counselling, musculoskeletal issues, etc.</li> <li>Section 3.1 Strategic Aims updated to include compliance, enhancement of staff knowledge, skills and the application of these through a wide range of training courses including e-learning, practical face to face, clinical, job and task specific</li> <li>Section 3.2 Objectives updated to highlight the need to ensure that feel supported when at work as well as when they are absent from work and to make reasonable adjustments to support staff returning to the workplace. Acknowledgement that the NHS Lanarkshire Control Book continues to be the key safety management system employed by NHS Lanarkshire to comply with the HSE system of Plan, Do, Check and Act</li> </ul> | No. 2.2        |  |

#### 1.0 EXECUTIVE SUMMARY

- 1.1 NHS Lanarkshire is required by CEL 13 (2011) 'Safe and Well at Work: Occupational Health & Safety Strategic Framework for NHS Scotland' to have an Occupational Health and Safety Governance and Strategic Framework in place to outline how NHS Lanarkshire will "approach occupational health and safety to keep staff motivated and healthy, engaged and safe" (source CEL 13 (2011). This framework provides an outline of strategic aims and objectives for delivering occupational health and safety governance arrangements within NHS Lanarkshire.
- 1.2 NHS Lanarkshire seeks excellence in all aspects of its healthcare and operational activities and is committed to prioritising health and safety and the prevention of injury and occupationally acquired ill health as an equal priority in its organisational aims and objectives.
- 1.3 The Board and Corporate Management Team places great importance on the health, safety and welfare of staff, students, patients, volunteers, visitors, members of the public, contractors and partner companies/agencies. NHS Lanarkshire acknowledges it has statutory obligations under health and safety legislative requirements and the responsibility for managing health and safety risks.
- 1.4 Occupational health and safety is a central component of effectively executing organisational commitments and by working in partnership NHS Lanarkshire can ensure it provides healthcare services which are safe and secure for patients, the public and its workforce. This strategy forms an integral part of NHS Lanarkshire's occupational health and safety management arrangements. The strategy also seeks to share the management of occupational health and safety risks with other services and departments to promote the management of occupational health and safety.
- 1.5 NHS Lanarkshire operates from multiple sites, each presenting different occupational health and safety risks. The main responsibilities for ensuring the occupational health, safety and welfare of staff, students, patients, volunteers, visitors, members of the public, contractors and partner companies/agencies rests with the senior management team who delegate day to day management responsibilities to line managers.
- 1.6 NHS Lanarkshire has a range of policies, procedures and other associated documents that support this strategic framework which describe in more detail the organisational structure and arrangements of NHS Lanarkshire's occupational health and safety management systems. This includes the roles and responsibilities of managers and staff detailed within a range of other respective policies and procedures.
- 1.7 As part of this strategy it is also acknowledged that not all occupational health and safety risks can be eliminated. Ultimately it is for the organisation to decide which risks it is prepared to accept based on the knowledge that an effective risk assessment has been carried out and the risk has been reduced as far as is reasonably practicable as a consequence of the assessment and/or the implementation of effective control(s).
- 1.8 This strategy also includes support for the occupational health, safety and wellbeing of all staff and persons undergoing training within NHS Lanarkshire. NHS Lanarkshire will seek to work with stakeholders, services and partner agencies to promote health and wellbeing, prevention of absence, and support for staff in terms of rehabilitation and return to work services.

## 2.0 OCCUPATIONAL HEALTH AND SAFETY GOVERNANCE AND STRATEGIC FRAMEWORK

#### 2.1 INTRODUCTION

- 2.1.1 NHS Lanarkshire recognises occupational health and safety practice as a core activity within the organisation which needs to be managed effectively. Occupational health and safety is a fundamental part of NHS Lanarkshire's governance framework.
- 2.1.2 This strategy sets out the occupational health and safety strategy and governance arrangements within NHS Lanarkshire. It is based upon and incorporates Safe and Well at Work: Occupational Health & Safety Strategic Framework for NHS Scotland (2011), a commitment from Scottish Government to ensure that NHS Scotland Boards confirm their commitment to be exemplar employers who value their staff and have integrated strategies for ensuring a safe and healthy working environment, including occupational health and safety policies and services.
- 2.1.3 The overall aim of the Occupational Health and Safety Governance and Strategic Framework is to continue to develop and promote a positive health and safety culture within NHS Lanarkshire.
- 2.1.4 Inadequately managed health and safety has the potential to prevent NHS Lanarkshire from achieving its strategic intentions and objectives and may directly or indirectly cause harm to those it cares for, employs or otherwise affects as well as incurring loss relating to assets, finance, reputation, goodwill, partnership working and/or public confidence.
- 2.1.5 This strategy is supported by a range of other policies and procedures and outlines NHS Lanarkshire's commitment to proactively manage its health and safety management system and to ensure it remains fit for purpose in a continually changing health and social care environment. The strategy identifies the ways in which NHS Lanarkshire will address these systematically through its occupational health and safety framework and has been endorsed by the Staff Governance Committee, outlining a clear structure of responsibility and accountability to the Board and Corporate Management Team (please refer to Appendix 1).
- 2.1.6 Effective health and safety management seeks to reduce sickness absence, improve health and wellbeing and provide a safe and secure environment.

#### 2.2 OCCUPATIONAL HEALTH AND SAFETY RISKS

- 2.2.1 NHS Lanarkshire has to manage a range of occupational health and safety risks as part of its operational activities. The following are examples of wide ranging issues affecting staff, students, volunteers and patients with the areas highlighted being neither exclusive nor exhaustive:
- 2.2.1.2 Violence to staff and patients from members of the public and patients in care. This is significantly more complex when there is an on-going requirement to meet patients' health needs and condition(s).
- 2.2.1.3 Fire safety in hospitals specifically where there are inpatient facilities and patients are immobile and/or have capacity issues.
- 2.2.1.4 Manual handling and moving of patients and heavy objects without risk to either staff or patient(s).

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#### 2.2 OCCUPATIONAL HEALTH AND SAFETY RISKS (continued)

- 2.2.1.5 Sharps injuries from needles, scalpels and instruments contaminated with blood or other biological fluids.
- 2.2.1.6 Patient and staff slips, trips and falls in particular where there are environmental aspects which add to the risk of older and/or frail patients.
- 2.2.1.7 Caring for patients and vulnerable people in the community including visits to patients' homes, remote locations or environments.
- 2.2.1.8 Staff lone working and working in isolation including travelling on NHS Lanarkshire business to dispersed/community sites.
- 2.2.1.9 The handling and use of hazardous substances and/or pathogens.
- 2.2.1.10 Risk presented to staff from occupational exposure to Covid-19 and its variant strains. Potential exposure during the provision of care, treatment and service provision to patients and service users. Safeguarding arrangements will continue to focus on enhancing current safeguards in place to protect staff, patients, service users, students, volunteers, contractors and partner companies/agencies.

## 2.3 WORKING IN PARTNERSHIP WITH STAFF, STUDENTS, VOLUNTEERS, CONTRACTORS AND PARTNER COMPANIES/AGENCIES

- 2.3.1 NHS Lanarkshire requires and benefits from input from staff, students, volunteers, contractors and partner companies/agencies, particularly in relation to:
- 2.3.1.1 Any health risk associated with clinical work, high-risk equipment, asthma, stress and intensive computer work;
- 2.3.1.2 Safety issues which may include fire safety, first aid, electrical, gas and water safety, chemical safety, accident reporting and investigation and advice, guidance and risk assessment of all other hazards associated with the workplace including legionella and asbestos;
- 2.3.1.3 Health promotion in the workplace including well-being and managing stress;
- 2.3.1.4 Employment issues including young workers, night workers, lone working and expectant mothers:
- 2.3.1.5 Delivery of training in manual handling, violence and aggression, risk management/assessment, DSE safety, COSHH, fire safety and specific targeted specialised training for staff working in other or higher risk areas.
- 2.3.2 Staff, students, volunteers, contractors and partner companies/agencies at all levels of the organisation are responsible for their own health and safety and for the safety of others who may be affected by their actions. They must also work closely with NHS Lanarkshire to ensure adherence to relevant policies and procedures.
- 2.3.3 All of the above are supplemented with professional advice from internally appointed and professionally accredited staff with support from Control Book holders and Service/Line Managers who are involved with undertaking suitable and sufficient risk assessments.
- 2.3.4 NHS Lanarkshire works closely with a number of external agencies to improve Health and Safety within all areas of the Health Board. Responsibility for ensuring NHS Lanarkshire complies with current health and safety legislation rests with a number of enforcement agencies including but not exclusively the Health and Safety Executive, Scottish Fire and Rescue Service, Police Scotland, Local Authorities, all of whom NHS Lanarkshire seeks to develop a mutually collaborative and positive working relationship.

#### 3.0 STRATEGIC AIMS AND OBJECTIVES

The overarching aim of this framework is to provide strategic direction and to encourage all NHS Lanarkshire Services to integrate health and safety into their day to day operational activities. Doing so will assist NHS Lanarkshire to become an increasingly safer and healthier place to work and receive care.

All services already address occupational health and safety in a positive and constructive manner which includes specialist support and access to:

- Occupational Health Advisors.
- Health and Safety Specialists.
- Moving and Handling Advisors and Specialist Trainers.
- Prevention and Management of Violence and Aggression Advisors (PaMoVA) and Specialist Trainers.
- Vaccination programmes for new and existing staff. Face Fit Testing for respiratory protection.
- ➤ Health surveillance for a wide range of occupational conditions including noise, vibration, lung function testing, etc.
- Wide range of accessible e-learning courses.
- Practical training for a wide range of Health, Safety and Clinical courses.
- Inspection and audits for occupational health and safety to review operational activities i.e. workplace transport, environmental audits for Covid-19 safeguarding, ventilation assessments and audits, site inspections, moving and handling, PaMoVA.
- > Staff support for mental health including specially trained staff helpline for advice and guidance, absence reporting, counselling, musculoskeletal issues, etc.

The above services help to ensure occupational health and safety continues to form an integral part of the support service available to staff which helps to safeguard staff, patients and any persons who could potentially be adversely affected by NHS Lanarkshire's activities.

#### 3.1 STRATEGIC AIMS

Strategic aims are intended to promote a positive occupational health and safety culture with coherent policies and procedures which are compliant with applicable Health and Safety Acts, Regulations, Approved Codes of Practice and/or Guidance.

In principle, the 3 key strategic aims of this framework are:

- 3.1.1 **Culture -** To engender an effective occupational health and safety culture through the continuing development of attitudes, perceptions, competences and patterns of behaviour which determine the commitment to enhance NHS Lanarkshire's occupational health and safety management systems and services.
- 3.1.2 **Coherence -** To provide a framework of policies, procedures, guidance and advice to enhance the knowledge, skills and application of these for staff, students, volunteers, contractors and partner companies/agencies.
- 3.1.3 **Compliance** To ensure as far as is reasonably practicable that NHS Lanarkshire services adhere to all relevant occupational health and safety legislative requirements and where appropriate monitor compliance with NHS Lanarkshire policies and procedures including Covid-19 infection prevention and control.

#### 3.2 OBJECTIVES

The occupational health and safety objectives for NHS Lanarkshire over the next three years are to:

- 3.2.1 Continue to review and seek to enhance NHS Lanarkshire's occupational health and safety management structures and arrangements, with an emphasis on monitoring the implementation of policies, processes and associated outcomes.
- 3.2.2 Support managers and staff in achieving suitable levels of occupational health and safety knowledge, skills and practical application of these.
- 3.2.3 Encourage staff involvement in occupational health and safety performance through their line management structure with a view to an emphasis on partnership working.
- 3.2.4 Consistent and effective organisational commitment to improving the occupational health, safety and wellbeing of all staff.
- 3.2.5 Assess workplace risks and where appropriate introduce and/or enhance current safe systems of work.
- 3.2.6 Seek to ensure that staff feel supported, when affected by illness or injury and as far as possible to remain in the workplace and/or return to their workplace following an absence with reasonable adjustments and support as required.

These core objectives are linked to the wider governance agenda incorporating risk management. NHS Lanarkshire has a statutory duty to proactively manage occupational health and safety and that there are internal systems to monitor the health and safety provision in the delivery of NHS Lanarkshire services.

NHS Lanarkshire is committed to building upon existing systems of management, including those covering occupational health and safety risks and controls and to drive forward improvements against the strategic aims outlined within this framework.

The NHS Lanarkshire Control Book continues to be the key safety management system employed by NHS Lanarkshire to comply with the HSE system of Plan, Do, Check and Act.

#### 4.0 OCCUPATIONAL HEALTH AND SAFETY GOVERNANCE

#### 4.1 GOVERNANCE COMMITTMENT

NHS Lanarkshire is committed to robust and transparent governance arrangements. This framework approach to the occupational health, safety and wellbeing of staff complements and supports the important role which the workplace plays in preventing ill-health and in promoting health and wellbeing, as well as identifying the link between staff health, wellbeing, productivity and high quality patient care.

## 4.2 ACCOUNTABILITY AND RESPONSIBILITY ARRANGEMENTS FOR OCCUPATIONAL HEALTH AND SAFETY GOVERNANCE

(Please refer to Appendix 1)

The undernoted section summarises the roles and responsibilities of the Board, Non-Executive Directors, Chief Executive, Directors, Managers, Professionals and Staff in respect of the governance arrangements for occupational health and safety governance within NHS Lanarkshire.

#### 4.0 OCCUPATIONAL HEALTH AND SAFETY GOVERNANCE (continued)

#### 4.2.1 The Board

The Board is responsible for ensuring that appropriate governance structures are in place within the organisation and for receiving assurances from the Chief Executive, Executive Directors and Non-Executive Directors for health and safety matters ensuring that it is an integral part of the Board's culture, values and performance standard.

#### 4.2.2 Corporate Management Team

Members of the Corporate Management Team (CMT) will receive a copy of the quarterly Occupational Health and Safety report following submission and approval at the Occupational Health and Safety Performance Group (OHSPG) and/or highlight reports as required. This will allow them to be briefed on occupational health and safety issues of note, health and safety legislative compliance matters by exception and occupational health and safety performance. Where appropriate additional exception reports related to occupational health and safety will be submitted to the CMT.

#### 4.2.3 Staff Governance Committee

In accordance with the Staff Governance Standard, the General Manager for the Salus Occupational Health, Safety & Return to Work Service will submit a high level annual work programme (Staff Governance Action Plan) to the Staff Governance Committee with updates submitted at agreed intervals and/or as required.

An annual report for occupational health and safety will be submitted to the Staff Governance Committee by the Salus General Manager for review and comment with any specific areas of interest noted. The Staff Governance Committee reports to the Board and can acknowledge any specific highlights/concerns related to occupational health and safety performance for NHS Lanarkshire as appropriate.

#### 4.2.4 Occupational Health and Safety Performance Group

NHS Lanarkshire's health and safety reporting mechanism is determined and overseen by the Occupational Health and Safety Performance Group (OHSPG) which has representation from the Divisional and Health and Social Care structures within the Board. Key measures of occupational health and safety performance will be reviewed and exceptional items escalated to the Corporate Management Team as and when required.

## 4.2.5 Divisional, Health and Social Care and General Acute Hospitals Occupational Health & Safety Partnership Committees/Groups

Divisional, Health and Social Care and General Acute Hospitals Occupational Health & Safety Partnership Committees/Groups will meet at agreed scheduled intervals (at least tri annually i.e. 3 times in one year) and are responsible for submitting an exception report and/or outline action plan to the Occupational Health and Safety Performance Group following each meeting. Divisional, Health and Social Care and General Acute Hospitals Occupational Health & Safety Partnership Committees/Groups will be chaired by a member of their Senior Management Team i.e. the Head of Health for Health and Social Care, the Site Director for each of the three Acute sites, the Property & Support Services Department (PSSD) General Manager and a nominated senior manager for other Corporate Service Committees/Groups. Where appropriate an alternative senior management team lead may be nominated to chair the group.

#### 4.0 OCCUPATIONAL HEALTH AND SAFETY GOVERNANCE (continued)

## 4.2.5 Divisional, Health and Social Care and General Acute Hospitals Occupational Health & Safety Partnership Committees/Groups (continued)

Due to the nature of NHS Lanarkshire Divisional and Service structures and sites, etc. and the interface between the Property Support Services Division (PSSD) and clinical services are afforded the opportunity to be represented on each local committee/group as are other relevant Corporate Service functions as appropriate i.e. Infection Control. Any local third party providers (e.g. Facilities Management) should be represented on the local committee/group. The designated chair of a committee/group can nominate a co-chair or other senior manager to act as a chair in their absence and/or as their nominated representative. The Occupational Health and Safety Partnership Committees/Groups are responsible for the localisation, implementation and monitoring of relevant aspects of this occupational health & safety strategic framework.

#### 4.2.6 Consortium & Facilities Management (FM) Service Providers

PSSD will promote a positive and collaborative working relationship with partner companies i.e. Private Finance Initiative (PFI) and other outsourced Facilities Management (FM) providers i.e. Principal Contractors who provide maintenance, construction, refurbishments, re-models, extensions, new builds and demolition services across NHS Lanarkshire.

The PSSD General Manager has overall responsibility for the management of these contracts. Within each of the FM contracts, arrangements are in place for the management, monitoring and recording of contract performance. These arrangements will include monitoring and reviewing issues associated with occupational health and safety.

#### 5.0 ORGANISATIONAL ARRANGEMENTS

Organisational arrangements for the governance of occupational health and safety are established to ensure they operate effectively. Appendix 1 identifies the OHSPG as setting the strategic direction for occupational health and safety and for ensuring the coordination of the various health and safety committees and partnership groups. In addition, if there are any significant organisational areas of concern related to occupational health and safety, these must be brought to the attention of the Director of Human Resources as soon as is practicable.

The Salus General Manager reports to the Director of Human Resources and where appropriate can submit update papers to the Chief Executive and/or Executive Directors through the Corporate Management Team where there is a need to highlight any significant concern regarding compliance with occupational health and safety.

#### 5.1 NATIONAL STANDARDS AND LEGISLATIVE REQUIREMENTS

As noted in 1.1 this framework strategy seeks to encapsulate specific areas identified within CEL2011 (13) safe and Well at Work: Occupational Health & Safety Strategic Framework for NHS Scotland (2011). In addition, a 'Statutory Legislative Compliance Register' is administered through the Staff Governance Committee. The register identifies the key legislative framework applicable to NHS Lanarkshire's activities and services in order that compliance with statutory requirements are sighted and are included within appropriate governance arrangements.

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#### 5.2 MONITORING AND AUDITING ARRANGEMENTS

The Occupational Health and Safety Governance and Strategic Framework is subject to review at a strategic level by Staff Governance Committee members. It will be monitored at an operational level by the OHSPG and monitored for fitness of assurances/controls by the auditing of the Boards occupational health and safety management systems and subject to audit by the Health Board's internal auditors who submit periodic reports to the Audit Committee. Planned audits and inspections and/or workplace visits/reviews will also be conducted by the Salus Health and Safety Section.

#### 5.3 REVIEW

The Occupational Health and Safety Strategy and Governance Arrangements will be subject to review by the Occupational Health and Safety Performance Group.

#### 6.0 RESOURCE IMPLICATIONS

- 6.1 Time for nominated staff to prepare for and attend scheduled occupational health and safety committees and partnership forums.
- 6.2 Members of occupational health and safety committees and partnership forums to participate in site inspections on behalf of the chair of local safety committees and partnership forums.
- 6.3 Time and support for Departmental Managers/Control Book Holders to attend training to administer a Control Book to assess hazards, potential risks to staff related to occupational health and safety matters, undertake periodic inspections and communicate assessment content/control measures to relevant staff. Control Books are subject to audit within a 3-year audit cycle.

#### 7.0 COMMUNICATION PLAN

This policy is posted on the NHS Lanarkshire public website and is accessible by all. From revision of the policy, there will be no further formal programme of introduction or cascade, however, there will be general notification of the revision through the staff briefing process. It is the responsibility of General Managers/Heads of Service and Departmental Managers to ensure the Occupational Health and Safety Governance and Strategic Framework is communicated to their staff.

NHS Lanarkshire take care to ensure your personal information is only accessible to authorised persons. Our staff have a legal and contractual duty to keep personal health information secure, and confidential. In order to find out more about current data protection legislation and how we process your information, please visit the Data Protection Notice on our website at www.nhslanarkshire.scot.nhs.uk or ask a member of staff for a copy of our Data Protection Notice.

#### 8.0 QUALITY IMPROVEMENT – MONITORING AND REVIEW

This policy will be reviewed every 3 years by the Staff Governance Committee.

#### 9.0 EQUALITY IMPACT ASSESSMENT (EQIA)

NHS Lanarkshire is committed to ensuring that, as far as is reasonably practicable, the way we provide services to the public and the way we treat our staff reflects their individual needs and does not discriminate against individuals or groups on any grounds. This policy has been appropriately assessed.

EQIA completed?

Yes

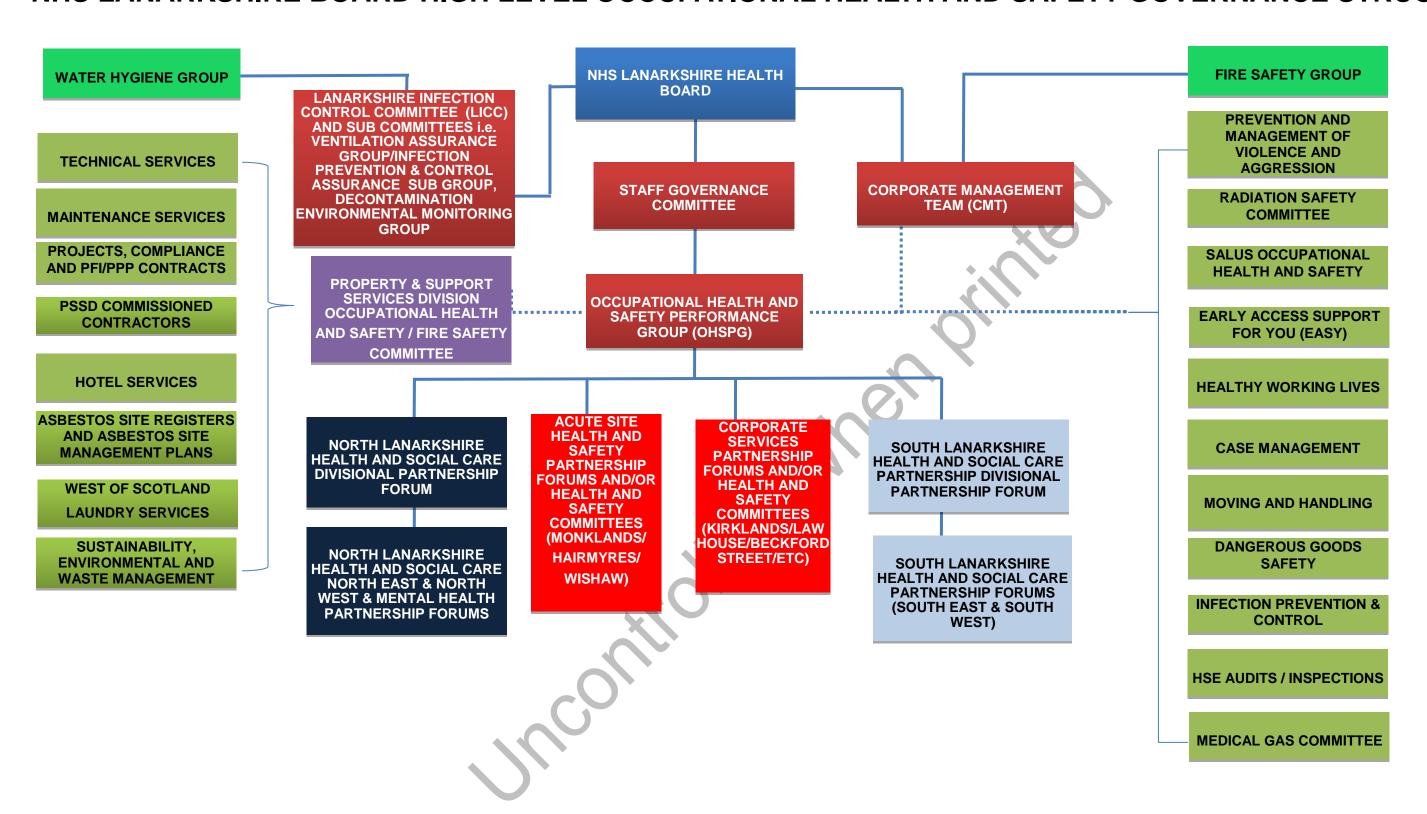


#### 10.0 REFERENCES

10.1 CEL 13 (2011) - 18 March 2011 'Occupational Health and Safety Strategic Framework for NHS Scotland'. https://www.sehd.scot.nhs.uk/mels/CEL2011\_13.pdf (link correct at time of issue).

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## APPENDIX 1 NHS LANARKSHIRE BOARD HIGH LEVEL OCCUPATIONAL HEALTH AND SAFETY GOVERNANCE STRUCTURE



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