LONE WORKING POLICY

JANUARY 2020

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Date to be reviewed:	3rd January 2023

Policy Title:	Lone Working Policy V2.0	
Supersedes: (Please List)	Lone Working Policy V1.0	
Description of Amendment(s):	Updated into new format, impact assessment reviewed, no material changes	
This policy will impact on:	All staff/contractors	
Policy Area:	Corporate	
Version No:	V2.0	
Author:	Helen Johnson, Health & Safety Advisor	
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	Health Safety and Security Meeting Members	December 2019
	Integrated Audit and Governance Committee	January 2020
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CONTENTS

		Page
1.	**INTRODUCTION**	4
2.	**SCOPE**	4
3.	**POLICY PURPOSE AND AIMS**	4
4.	**IMPACT ANALYSIS**	
4.1	Equality	5
4.2	Bribery Act 2010	5
5.	**NHS CONSTITUTION**	6
6	**ROLES / RESPONSIBILITIES / DUTIES**	6
7.	**ADDITIONAL MATTERS**	8
8.	**TRAINING AND AWARENESS**	10
9.	**MONITORING AND EFFECTIVENESS**	11
10.	**POLICY REVIEW**	11
11.	**REFERENCES**	11
APPENDICES		
Appendix 1	**Driver and Vehicle Safety Checks**	12
Appendix 2	**Impact Assessment**	15

1.   **INTRODUCTION**

Although there is no specific legislation relating to Lone Working, it is the statutory duty of the employer (Hull CCG) under both The Health & Safety at Work etc Act (1974) and The Management of Health & Safety at Work Regulations (1999) to take all reasonably practicable steps to reduce to a minimum the risk to their employees from lone working. Hull CCG must provide and maintain suitable risk assessments, procedures and control measures, including Personal Protective Equipment (PPE) if appropriate.

Risk assessments must be carried out in all areas of work where working alone poses an actual or potential risk to staff, including the risk of verbal or physical abuse. Risk assessments should be completed by competent persons, be recorded, reviewed and communicated to all staff who may be potentially at risk.

2.   **SCOPE**

This policy applies to all employees of Hull CCG, any staff who are seconded to the CCG, contracted and agency staff.

This policy applies to all CCG premises whether owned or leased, and forms part of the overall risk management strategy. To this end, this policy will be circulated to representatives of tenant and contractor organisations.

3.   **POLICY PURPOSE AND AIMS**

The primary objective of this Policy is to ensure that lone workers are safe and feel secure whilst carrying out their work based activities. Hull CCG will take all reasonably practicable steps to protect staff, visitors and contractors from the hazards and risks to health and wellbeing that may be encountered in their work based activities.

This Policy provides an overview of the lone working arrangements within Hull CCG business.

For the purposes of this policy, lone working is defined as *'any situation or location in which someone works without a colleague nearby; or when someone is working out of sight or earshot of another colleague'*. Lone working may be a constituent part of a person's job or it could occur on an infrequent basis and may include travelling for work.

This Policy makes it clear that if any time a member of staff feels unsafe they have a right:

- Not to conduct a consultation/visit (in discussion with relevant Line Management) until suitable control measures are in place

- To leave the location if they feel their own safety and security or that of others is compromised.

4.   IMPACT ANALYSIS

4.1   Equality

The CCG is committed to:

- Eliminating discrimination and promoting equality and diversity in its Policies, Procedures and Guidelines, and

- Designing and implementing services, policies and measures that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.

In applying this policy, the CCG will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation.

In developing this policy, an Equality Impact Analysis has been undertaken and is attached at Appendix 2. As a result of the initial screening, the policy does not appear to have any adverse effects on people who share protected characteristics and no further actions are required at this stage.

The application of this policy will be monitored alongside recruitment monitoring data to ensure fair application

4.2   Bribery Act 2010

NHS Hull Clinical Commissioning Group has a responsibility to ensure that all staff are made aware of their duties and responsibilities arising from The Bribery Act 2010.

The Bribery Act 2010 makes it a criminal offence to bribe or be bribed by another person by offering or requesting a financial or other advantage as a reward or incentive to perform a relevant function or activity improperly performed. The penalties for any breaches of the Act are potentially severe. There is no upper limit on the level of fines that can be imposed and an individual convicted of an offence can face a prison sentence of up to 10 years.

For further information see http://www.justice.gov.uk/guidance/docs/bribery-act-2010-quick-start-guide.pdf.

If you require assistance in determining the implications of the Bribery Act please contact the Local Counter Fraud Specialist on telephone number 01482 866800 or email at nikki.cooper1@nhs.net.

Due consideration has been given to the Bribery Act 2010 in the development of this policy (or review, as appropriate) of this policy document and no specific risks were identified.

5. NHS CONSTITUTION

5.1 The CCG is committed to:

- Designing and implementing services, policies and measures that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.

5.2 This Policy supports the NHS Constitution as follows:

The NHS aspires to the highest standards of excellence and professionalism in the provision of high-quality care that is safe, effective and focused on patient experience; in the planning and delivery of the clinical and other services it provides; in the people it employs and the education, training and development they receive; in the leadership and management of its organisations; and through its commitment to innovation and to the promotion and conduct of research to improve the current and future health and care of the population.

6. ROLES / RESPONSIBILITIES / DUTIES

6.1 Chief Officer

- The Chief Officer has the overall responsibility to ensure that Hull CCG complies with all relevant health and safety legislation. Specific duties include:

  - Provide reports/feedback, where appropriate, to the Health & Safety Group on all matters relating to the safety and security of lone workers.

  - Ensure that the Health and Safety Advisor works with Line Management to ensure suitable arrangements for lone workers are in place on a day to day basis.

  - Ensure that following any incidents involving lone working, a thorough investigation is undertaken.

  - Receive reports/audits of the arrangements for lone workers from the Health and Safety Advisor and ensure that, if appropriate, recommendations are acted upon and corrective actions are taken.

6.2 Line Managers

- Line Managers should be the first point of contact for staff with concerns over lone working arrangements. Specific duties include:

  - Ensuring that this Policy is brought to the attention of all members of staff who are involved in lone working activities.

  - Ensure that a risk assessment is completed for all activities identified within their assigned area of control which may involve lone working.

  - Ensure that completed risk assessments are reviewed as required.

  - Maintain local copies of all risk assessments that are relevant to the lone working activities within their area of responsibility and ensure that the assessments are available for all concerned to view, and ensure that copies of such assessments are sent to the Health & Safety Advisor.

  - Ensure that the findings of risk assessments are communicated to those who may be affected by the lone working activity.

  - Ensure that control measures identified by the risk assessment are put in place and acted upon.

6.3 The Health & Safety Advisor

- The Health and Safety Advisor has responsibility for the ongoing monitoring of the security arrangements for lone workers. Specific duties include:

  - Review completed risk assessments to ensure that they have been completed in accordance with this Policy and provide guidance as necessary to Line Managers.

  - Audit the lone working arrangements on a regular basis and provide a report to the Director with responsibility for Health and Safety on such audits.

  - Review and update this Policy on a regular basis to ensure it meets regulatory requirements, and the requirements of Hull CCG Health and Safety Policy.

6.4 All Staff

- It is the duty of all staff and any others who may be affected by the work activities of Hull CCG to comply with the findings of all risk assessments.

- Staff should make themselves aware of the potential risks and control measures in place for all activities that may involve lone working within their work routines.

  - It is also the duty of all staff to report any deficiencies within the lone working arrangements, and to cooperate in developing a safe outcome to identified deficiencies.

  - All staff involved in lone working must report any concerns to Line Management as soon as they arise and if involved in a lone working incident must report it via the DATIX system.

7. ADDITIONAL MATTERS

7.1. Risk Assessments

All managers should identify the lone workers in their teams. A risk assessment should be made of the lone worker activities staff are engaged in. This should include the risks presented by the varied working environments. Lone working can also occur in an office environment when a member of staff is working alone outside normal hours.
The risk assessment should include impact factors such as:

- The environment – hazardous conditions such as dangerous steps, unhygienic conditions, poor lighting, driving or an isolated working area.

- The work activities – delivering unwelcome information or refusing an appointment.

- The increased risk of violence from others due to alcohol, drug misuse, a mental or personality disorder.

- The necessity to carry equipment and the capacity of the lone worker to handle the equipment themselves.

- Evaluation of physical capability to carry out lone working. This should include physical disabilities, temporary injuries, pregnancy, etc.

- An estimation and assessment of 'emergency equipment' that may be required, such as a torch, map of the local area, telephone numbers for emergencies (including the local Police and ambulance service), a first aid kit, mobile phone charger, etc.

- When working alone in a building, emergency arrangements in the event of an accident, fire, break-in, etc. will need to be considered. Using lifts out-of-hours should be avoided wherever possible.

    Staff should have knowledge of the risk assessment before carrying out their duties

7.2. Management of Meetings/Appointments

Managers of lone workers and lone workers themselves should always ensure that colleagues are aware of their movements and appointments when away from their base, or working at their base out-of-hours.

A list of meetings/appointments should be accessible to a Line Manager or colleague.

The list of movements and appointments should include the full address of where they will be working, the details of persons with whom they will be working or visiting, telephone numbers if known and indications of how long they expect to be at those locations. Details of vehicles used by lone workers should also be available, including registration number, make, model, colour, etc.

Procedures should be in place to ensure that lone workers are in regular contact with a Line Management or a colleague, particularly if they are delayed or have to cancel an appointment.

Where there is a genuine concern, as a result of a lone worker failing to attend a visit or an arranged meeting, the Line Manager or colleagues should attempt to make contact with the lone worker. In the event of failure to make contact, the Line Manager should consider involving the Police if this is felt appropriate.

7.3. Points to consider for Lone Workers

- There are no absolute restrictions on working alone; it will depend on the findings of a risk assessment. The broad duties of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 require that hazards of work activities are identified, risks involved are assessed and measures are put in place to avoid or reduce the risk. Risk assessment should help decide the right level of control measures required.

- Control measures may include instruction, training, supervision, personal attack alarms, working in twos, 'buddy' systems etc. An awareness of where employees are during working hours is key to management of risks. Employers should take steps to check that control measures are applied and periodically review the risk assessment to ensure it remains suitable and sufficient.

- When risk assessment determines that it is not possible for the work to be carried out safely by a lone worker, arrangements for providing help or back-up should be put in place. When a lone worker is working at another employer's workplace, that employer should inform the lone worker's employer of any risks and control measures that should be taken. This helps the lone worker's employer to assess the risks.

- Lone workers should not be more at risk than other employees. This may require extra risk control measures. Precautions should take account of normal work and foreseeable emergencies such as fire, equipment failure, extreme weather, illness and accidents.

- Employers should identify situations where people work alone and ask questions such as:

  - Does the workplace present a special risk to the lone worker?

  - Is there safe access and egress for one person?

  - Can all the equipment, substances and goods involved in the work be safely handled by one person? Consider whether the work involves manual handling of patients or objects that are too large for one person.

  - Is there a risk of violence or aggression?

  - Are women especially at risk if they work alone?

  - Are young workers especially at risk if they work alone?

  - Is the employee medically fit and suitable to work alone?

  - What happens if the employee becomes ill, has an accident or there is an emergency such as a road traffic accident?

Guidance from the Suzy Lamplugh Trust is available as Appendix 1 to this document and further information can be found at http://www.suzylamplugh.org/personal-safety-tips

8. TRAINING AND AWARENESS

All staff will be made aware of the lone worker risks identified in association with their duties and will also be made aware of risk assessments and the control measures that are in place to control identified risks. Suitable training will be given in order for staff to comply with these control measures.

9.   MONITORING AND EFFECTIVENESS

Compliance with, and effectiveness of this policy will be monitored by the Health & Safety Advisor who will annually audit the premises against the risk assessments and the policy to ensure continuing compliance. Any such audit will be recorded and retained with the copy of the risk assessments. Reports will also be submitted to the Integrated Audit & Governance Committee as and when required.

10.   POLICY REVIEW
This Policy will be reviewed within 3 years of the date of implementation except where legislative changes apply, or there has been a significant event.

11.   REFERENCES - Statutory Requirements and Guidance Documents

The main Acts and Regulations which have a bearing on lone working are:

- The Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999

Each of these statutes contains provisions which stipulate that non-compliance is a criminal offence and set out the penalties for such offences. The penalties on conviction include fines, imprisonment or both. Those with managerial responsibility within Hull CCG, as well as the corporate body, may be prosecuted.
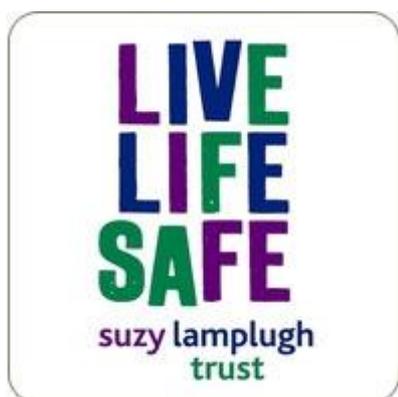
Suzy Lamplugh Trust are the pioneers of personal safety. They campaign, educate, and support people to help reduce the risk of violence and aggression for everyone.

Below are some hints and tips on personal safety both at work and at home taken from the Suzy Lamplugh Trust website.

WORKING ALONE

ON THE FRONTLINE - For example receptionists, retail staff etc:

- Ensure you have a means of communicating with others.
- Some form of emergency alarm system should be in place which will enable you to summon assistance if necessary. Is it tested? Do people know how to respond?
- Make sure that any cash is kept out of sight.

WORKING FROM HOME

- Try not to advertise that you work from home to prospective clients.
- Consider setting up a buddy system with someone so they know your plans for the day. Think about asking your 'buddy' to call you 10 minutes into any meeting with a new client to check that you are ok and feel comfortable with them. Have a predetermined code word ready in case you want to summon help.
- If clients have to come to your house, use rooms that are as professional looking as possible.
- When visiting others, conduct your own risk assessment on the door step before you enter.
    - Give some thought before you arrive as to what exit strategies you could use if you felt uncomfortable or threatened.
    - If you feel at all uncomfortable or unsure, make an excuse and leave. Trust your instincts and be mindful of the fact that you are entering someone else's territory. Your presence there may be unwanted and/or pose a threat.
    - As you enter, make a note of how the door opens and closes so that you can leave quickly, if necessary.
    - Give the client an idea of how long the meeting will take and try to adhere to this.
    - Avoid actions or words which may appear judgemental, aggressive or an invasion of privacy or space.

- It is important that a tracing system is in place that enables your employer/colleagues to know where you are and who you are with at all times.
- Risk assessments should be carried out by your employer to identify any risks related to the people, environment or tasks involved in your job.

- You also need to be able to make quick risk assessments yourself, which can help you decide how safe a situation is and what action you should take to avoid danger.

TRAVELLING FOR WORK

Public Transport
- Obtain timetable and fare information before travelling to prevent you waiting around for long periods at bus stops or stations.
- When waiting for public transport after dark, try to wait in well-lit areas and near emergency alarms and CCTV cameras.
- If you work for an organisation that receives unwelcome attention from the public, try to hide anything that would make you identifiable as an employee of that organisation.

Walking

- Plan ahead. Before you go out, think about how you are going to get home, e.g. What time does the last bus/train leave?
- Avoid danger spots like quiet or badly-lit alleyways, subways or isolated car parks. Walk down the middle of the pavement if the street is deserted.
- Try to use well-lit, busy streets and use the route you know best.
- Try to walk against oncoming traffic to avoid kerb crawlers.
- If something or someone makes you feel uncomfortable, act upon your instinct. It may be better to move away before a problem arises.

Taxis and MiniCabs

- Ask your employer to put together a list of licensed taxi or minicab companies or contact your local council for details for such firms in your area.
- Try to carry the telephone number of a licensed taxi or minicab firm with you at all times or add a suitable booking app to your phone.
- When making a booking, ask for the driver and/or car details and confirm them when the cab arrives. Also ask the driver whose name the taxi/cab is booked under.
- When you are in the cab, avoid giving out any personal details.
- If the driver makes you feel uneasy for any reason, trust your instincts and ask them to stop in a busy area and let you out.
- Always book your minicab in advance. Un-booked cabs are illegal and potentially very dangerous.

Driving

- Put together an emergency kit for your car. This might include an extra coat, bottle water, a torch, spare change and an emergency mobile telephone charger.
- When driving to meetings, try to plan where you will park before you go. Park as close to your destination as possible. If you will be returning after dark, consider what the area will be like then and try to park near street lights.
- When parking in a car park, consider where the entrances and exits are. Try to avoid having to walk across a lonely car park to get to your car. Park away from pillars/barriers. If you can, reverse into your space so you can drive away easily.

- When approaching your car, be aware of your surroundings; have your keys ready and check that no one is inside before entering quickly.
- If you break down, check out your surroundings and only get out of your car when and if you feel it is safe to do so.
- Road rage incidents are rare and can often be avoided by not responding to aggression from other drivers.
- If the driver of another car forces you to stop and then gets out of his/her car, stay in your car, keep the engine running and if you need to, reverse to get away.

HR / Corporate Policy Equality Impact Analysis:	
Policy / Project / Function:	Lone Working Policy V2.0
Date of Analysis:	7th December 2019
Completed by: (Name and Department)	Helen Johnson, Health & Safety Advisor
What are the aims and intended effects of this policy, project or function?	To ensure that all staff who undertake lone working are aware of the associated risks and are aware of how to minimise those risks To ensure that Hull CCG fulfils its obligations under the Health & Safety at Work etc. Act 1974
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	No material changes to previous policy
Please list any other policies that are related to or referred to as part of this analysis	NHS Hull CCG Health & Safety Policy
Who will the policy, project or function affect?	All staff employed by NHS Hull CCG who undertake driving for work
What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?	This policy has been agreed by the local staff side representative Toni Yel
Promoting Inclusivity and Hull CCG's Equality Objectives.	This policy and the associated risk assessment process aims to ensure equality of all staff in relation to lone working, regardless of any

How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation? How does the policy promote our equality objectives: 1. Ensure patients and public have improved access to information and minimise communications barriers 2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job 3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve 4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs 5. To demonstrate leadership on equality and inclusion and be an active champion of equalities in partnership programmes or arrangements.	protected characteristic.

Equality Data

Is any Equality Data available relating to the use or implementation of this policy, project or function? Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine *Protected Characteristics* – referred to hereafter as	Yes	X
	No	
	Where you have answered yes, please incorporate this data when performing the *Equality Impact Assessment Test* (the next section of this document). If you answered No,	

'Equality Groups'. Examples of *Equality Data* include: (this list is not definitive) 1: Recruitment data, e.g. applications compared to the population profile, application success rates 2: Complaints by groups who share / represent protected characteristics 4: Grievances or decisions upheld and dismissed by protected characteristic group 5: Insight gained through engagement	what information will you use to assess impact? **Please note that due to the small number of staff employed by the CCG, data with returns small enough to identity individuals cannot be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or issues, these should be recorded in the EIA.**

Assessing Impact

Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?
(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)

Protected Characteristic:	Neutral Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a *Genuine Determining Reason*[1] exists (see footnote below – seek further advice in this case)
It is anticipated that these guidelines will have a positive impact as they support policy writers to complete meaningful EIAs, by providing this template and a range of potential issues to consider across the protected characteristics below. There may of course be other issues relevant to your policy, not listed below, and some of the issues listed below may not be relevant to your policy.				
Gender	X			This policy applies to all staff regardless of gender, the policy does specifically ask line managers to consider women working alone as part of the risk assessment.
Age	X			This policy applies to all staff regardless of age
Race / ethnicity / nationality	X			The policy applies to all staff regardless of race/ethnicity. Analysis of employee data indicates that the

1.   [1] *The action is proportionate to the legitimate aims of the organisation (please seek further advice)*

				percentage of white employees is reflective of the local population. However, the proportion of BME staff is lower than that of the local population it serves All staff require competencies which include the ability to read and understand English or to request the information in another format available to them
Disability	X			This policy applies to all staff regardless of disability Lone Working arrangements might have an adverse impact on those with disabilities as they may find they require special arrangements however the policy provides for risk assessment to identify such circumstances and make appropriate arrangements
Religion or Belief	X			This policy applies to all staff regardless of religion or belief.
Sexual Orientation	X			This policy applies to all staff, regardless of sexual orientation
Pregnancy and Maternity	X			This policy applies to all staff, regardless of pregnancy and maternity Lone Working arrangements might have an adverse impact on those employees who are pregnant, however the risk assessment process will identify any specific risks and appropriate arrangements will be made.
Transgender / Gender reassignment	X			This policy applies to all staff regardless of transgender or gender reassignment
Marriage or civil partnership	X			This policy applies to all staff regardless of marriage or civil partnership.

Action Planning:

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?				
None				

Sign-off
All policy EIAs must be signed off by Mike Napier, Associate Director of Corporate Affairs
I agree with this assessment / action plan
If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales:
Signed:
Date: 16.12.19