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Health and Safety Policy



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Author(s)	Registered manager
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Reviewed by	

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Review Data

Initial Production

Name	Role/Department	RACI	Date
Registered manager	Registered Manager	RA	17.07.2017
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R = Responsible for document production; A = Accountable; C = Consulted; I = Informed

Change History

Version	Date	Details of Change	Author
2.0	17.07.2017	Re-write and re-structure of original policy in line with most recent legislative updates.	Registered manager

Emergency Contact Details

Name	Email	Mobile
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CQC Fundamental Standards

Regulation Number	Regulation Details
Regulation 10: Dignity and respect	Clients must be treated with dignity and respect.
Regulation 12: Safe care and treatment	Providers must assess the risks to people's health and safety during any care or treatment and make sure that staff have the qualifications, competence, skills and experience to keep people safe.
Regulation 15: Premises and equipment	There should be regular health and safety risk assessments of the premises (including grounds) and equipment. The findings of the assessments must be acted on without delay if improvements are required.
Regulation 17: Good governance	Systems or processes must be established and operated effectively to assess, monitor and mitigate the risks relating to the health, safety and welfare of Clients and others who may be at risk which arise from the carrying on of the regulated activity.

Key Lines of Enquiry

KLOE	How this applies to Health and Safety
Safe	Properly adhering to health and safety policies and procedures helps ensure the safety of Clients, staff and other stakeholders as we deliver services.
Effective	By providing appropriate training and supervision in health and safety, as well as incorporating best practice, we help ensure the effectiveness of our service.
Well led	This health and safety policy sets out responsibilities and accountability, evidencing that the service is well led.

Related Documents

This policy should be read in conjunction with our:

- **Care Planning Policy**
- **Dignity and Respect Policy**
- **Health and Safety Policy**
- **Risk Assessment Policy**

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Policy Statement

Policy Aim

The Health and Safety Policy provides basic guidance on the key principles of Health and Safety, in a vital area of both staff welfare and regulatory compliance. It is not intended as a detailed information resource and will be supported by a selection of more detailed Policy documents covering mandatory and good practice requirements such as:

- Fire Safety
- Manual Handling
- Risk Management
- Control of Substances Hazardous to Health (COSHH)
- Lone Working
- Incident Reporting
- Serious Incidents

Living Carers Ltd understands the importance of health, safety and welfare for its entire staff at all locations of work and acknowledges its responsibility as an employer to provide a safe and healthy working environment.

This duty also extends to Clients, contractors, visitors, and self-employed persons who may be affected by the activities of the Company.

Living Carers Ltd will, as far as is reasonably practicable, provide a suitable environment to fulfil this duty.

Living Carers Ltd is committed to ensuring high standards of health and safety in the workplace for all staff and visitors.

Living Carers Ltd will comply with all relevant legislation.

The following responsibilities are essential to the success of this policy:

To provide adequate control of the health and safety risks arising from our work activities.

To consult with our employees on matters affecting their health and safety.

To provide and maintain safe plant and equipment.

To ensure safe handling and use of substances.

To provide information, instruction and supervision for employees.

To ensure all employees are competent to do their tasks, and to advise them to take adequate training where necessary.

To prevent accidents and cases of work-related ill health.

To maintain safe and healthy working conditions and review and revise this policy as necessary at regular intervals.

In order to reach an appropriate level of statutory compliance, the Company will therefore ensure that:

- 1) An updated assessment of the Health and Safety risks associated with work activities and premises is conducted and that appropriate measures are taken to eliminate or reduce those risks so far as is reasonably practicable.
- 2) Safe systems of work are utilised as required and that a suitable level of supervision is accessible at all times.
- 3) Every employee is given suitable and sufficient information, instruction and training to undertake their work activities safely.
- 4) Sufficient numbers of competent persons are appointed to enable the Company to meet its duties.
- 5) Full co-operation with other employers and sites controlled by other organisations is co-ordinated to ensure the safety and well-being of staff.
- 6) A suitable system is available for reporting and dealing with serious and imminent danger, including provisions for fire and accidents.

- 7) Suitable and sufficient resources are available to enable the facilitation of appropriate Health and Safety arrangements.
- 8) Suitable safety standards are set and best practice is encouraged.
- 9) Employees are made aware of all aspects of Health and Safety and are consulted on these by means of various committees and staff side representative groups.
- 10) Each employee understands that they have a legal obligation to take reasonable care for their own Health and Safety and the safety of others who may be affected by their actions or omissions.
- 11) All employees understand their duties under Health and Safety law and are aware of the potential consequences of any failure to comply.
- 12) Suitable and relevant policies and procedures relating to Health and Safety are provided as required.
- 13) A positive safety and 'risk aware' culture is promoted throughout the company

The Health and Safety Policy therefore provides basic guidance on the key principles of Health and Safety, in a vital area of both staff welfare and regulatory compliance. It is not intended as a detailed information resource and will be supported by a selection of more detailed Policy documents covering mandatory and good practice requirements such as:

- **Fire Safety**
- **Manual Handling**
- **Risk Assessment**
- **Control of Substances Hazardous to Health (COSHH)**
- **Lone Working**
- **Display Screen Equipment (DSE)**
- **Lone workers**
- **Health and Safety of Clients**

This list is not exhaustive and this Health and Safety Policy is reviewed annually for Health and Safety Improvement and it is adopted as a fundamental business objective of our company.

Roles and Responsibilities

Managing Director

The Managing Director is ultimately responsible for the control of Health, Safety and Welfare matters in relation to the Company's activities and must delegate competent staff to carry out those duties to ensure not only the protection of those at risk but also to comply with Health and Safety legislations. The MD is accountable for Health and Safety matters, and is responsible for ensuring, so far as is reasonably practicable, that:

- Suitable and sufficient resources in terms of time, money and manpower are made available to satisfactorily carry out those duties and to maintain a healthy and safe working environment.
- Day-to-day responsibility for ensuring this Policy is put into practice is appropriately delegated.
- The organisation operates within the requirements of the Health and Safety at Work Act 1974, and all other relevant statutory provisions, and that all employees are made aware of these requirements and arrangements.
- Policies and procedures are maintained and updated as required.
- All identified risks are notified to relevant parties and that appropriate corrective action is identified and monitored.
- Suitable consultation with employees takes place as per the Health and Safety (Consultation with Employees) Regulations, 1996.
- Arrangements are in place to effectively disseminate relevant information, monitor Health and Safety performance and maintain any records required to meet statutory compliance.



Registered Manager

The Registered Manager is equally responsible for ensuring that all significant risks are brought to the attention of the Managing Director Officer and must ensure that suitable and sufficient resources and reporting processes are provided as required to facilitate this process. Relevant Health and Safety associated priorities include

- Finance
- Training
- Supervision
- Information
- Instruction

The Registered Manager will further ensure that:

- The terms and agreed actions of this Policy are implemented throughout the Company to the satisfaction of the Managing Director.
- Suitable 'competent person' advice is available to the Company to enable it to fully discharge its responsibilities.
- All Health and Safety issues are dealt with at a suitable level and that appropriate reporting systems are in place to facilitate the Health, Safety and Welfare of staff, clients, Clients, contractors and all who use the services of Living Carers Ltd and it's CSCI registered care services.
- Required resources are identified and allocated to ensure the delivery of an appropriate level of Health and Safety.
- All reportable incidents, accidents and near misses are notified to the correct office in the required time frame and that all Serious Untoward Incidents are immediately reported to the Managing Director and the relevant regulatory body.
- Suitable and adequate processes are in place for the investigation of incidents and for the formulation of robust action plans to prevent future recurrence and facilitate organisational learning.
- Related policies and procedures are maintained and updated as required.
- Consultation with employees takes place as per the Health and Safety (Consultation with Employees) Regulations, 1996.
- Suitable liaison arrangements exist with enforcement agencies and other bodies with a statutory or advisory role, such as the Health and Safety Executive (HSE), the NHS, Commission for Social Care Inspection, the Medicines and Healthcare Products Regulatory Agency (MHRA), Police and Fire Services, the National Patient Safety Agency (NPSA) and the Insurer of the Company.



Other Senior Managers/ Team Leaders

Our Managers and Team Leaders will ensure that all areas under their control operate within the systems, policies and procedures agreed by the Company. They will address all areas of non-compliance and ensure that no unsafe activities are carried out within areas for which they are directly responsible. They will further advise other staff of unsafe practices in areas outside their immediate control. They will lead by ownership of issues related to Health, Safety and Welfare within the Company and will ensure that:

- Local Health and Safety Policies are drafted and implemented for all areas within their control.
- Legal and good practice requirements are complied with in all areas of operation.
- All relevant issues relating to their area of responsibility are reported to the Health and Safety Committee.
- The implementation of related policies and procedures is appropriately initiated and monitored, and that suitable alternative arrangements are implemented to meet compliance with necessary legislation, subject to approval by the CEO
- The operational delivery of Health and Safety improvement is monitored via Line Managers/Team Leaders.
- Each area of responsibility has nominated and appropriately trained Health and Safety Co-ordinators and Risk Assessors who will ensure safe systems of work and will undertake refresher training as required.
- All risks identified via Risk Assessment are forwarded to the CEO for entry onto the Risk Register and significant risks must be brought to her attention immediately.
- All incidents occurring within the workplace are notified immediately to the Registered Manager and that staff within their control co-operate fully with any consequent investigation and learning processes

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Line Managers

Line Managers must ensure that suitable and sufficient training is advised and completed and supervision is provided to enable tasks to be carried out safely and competently. They are equally responsible for dealing with immediate operational risks and for bringing any areas of Health and Safety risk, which cannot be immediately resolved, to the attention of the relevant Manager. Senior Managers provide a supervisory role within all working areas, including those directly owned by the company. Line Managers have responsibility for the areas they control regarding the Health, Safety and Welfare needs of staff within those locations, for example when arranging training etc.

Line Managers are equally responsible for raising risk and Health and Safety matters, which cannot be immediately resolved, with more senior management. They are responsible for the day-to-day implementation of Health, Safety and Welfare to enable full compliance with the Health and Safety at Work Act, 1974 and all other associated legislation.

Line Managers/Team Leaders must ensure that:

- supervision is provided to enable tasks to be carried out competently and safely.
- A suitable, sufficient and documented Risk Assessment has been carried out before a hazardous task or operation is undertaken and any actions or recommendations are acted upon, so far as is reasonably practicable;
- Safe systems of work are identified and used as required;
- All equipment is fit for purpose and complies with the directives governing it at the time of use, including CE marking, guarding etc. and that suitable Personal Protective Equipment (PPE) is used and adequately maintained.
- All portable equipment is tested in accordance with the agreed schedule.
- All employees are competent and that this is recorded as per the company's training procedures.
- Suitable Health and Safety training is, where identified by Risk Assessments, provided as required.
- All accidents, incidents and near misses are reported in accordance with agreed policies and procedures.
- Office environments are kept free from potential hazards such as trailing cables, blocked access and egress routes etc.
- All fire exits and routes are clear at all times and fire doors are kept closed.
- Suppliers, sub-contractors and other outside parties are made aware of all risks identified in working areas controlled by the company.
- Ensure that all chemicals used have COSHH Data Sheets and where required an assessment is completed as per Section 6 of this Policy.
- Ensure that local safety procedures, where issued, are adhered to and up to date.



All Employees

- All employees will be expected to take reasonable care for the Health and Safety of themselves and others whom their actions or omissions may affect.
- They must never intentionally or recklessly misuse or interfere with any Health, Safety and Welfare provision.
- They are expected to co-operate with management and fellow staff in all matters relating to Health and Safety.
- They must report all accidents, incidents, hazards, near misses and dangerous occurrences in accordance with the company policy on accident reporting.
- They must comply with all relevant policies and procedures.

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Working Alone in Safety

Employees have a responsibility to take reasonable care of themselves and other people affected by their work and to co-operate with their employers in meeting their legal obligations. Living Carers Ltd conducts meetings with employees prior to their working alone to discuss and identify potential hazards of the work and assess any risks involved; this includes putting measures in place to avoid or control any risks.

Employees working alone must adhere to the following:

- They must inform their line manager in writing if they have a medical condition that makes them unfit and unsuitable to work alone.
- They must adhere to instructions given on fire safety and evacuation, first aid advice and health and safety.
- They must contact the out-of-office number provided during induction/training to state they have arrived home safely if finishing work late at night.

If a Lone Worker becomes ill, has an accident, or there is an emergency, they must firstly, contact the national emergency number 999. If able to do so, contact their supervisor on the number(s) provided during induction/training. In cases of other uncertainties, their supervisor should be contacted in the first instance. Other points of contacts are made available during induction/training and are regularly updated.

For more information on working alone in safety, please read our [Lone Working policy](#).

The Risk Assessment Process

Risk assessments have to be undertaken by all employers and they must be a suitable and sufficient assessment of foreseeable risks to employees whilst at work plus any risks to those not in the company's direct employment but who could be affected by its activities. Risk assessments should be carried out for hazardous job functions and, where necessary, a more specific assessment completed (e.g. for Display Screen Equipment or Young Persons at Work). The aim of risk assessment is to evaluate the level of risk to persons engaged in work activity or the risk to others in proximity to it. It should therefore be possible to understand the measures necessary to make all work operations as safe as possible.

All employers are expected to undertake risk assessments and to convey relevant findings to those concerned before a task is commenced. Living Carers Ltd is required to retain assessments in writing or a recorded form, which is easily retrievable.

Copies of all finished risk assessments will be retained in the relevant workplace.

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Key Question: What must a risk assessment include?

Risk Assessments must:

- Identify and record all significant hazards associated with the work task and the risk(s) arising from those hazards;
- Identify all those who may be at risk from hazard.
- Include a recorded calculation of the consequence and likelihood of an injury occurring as a result of that uncontrolled risk.
- Evaluate the risk reduction / control measures in place ensuring that they are sufficient to reduce the risk to an acceptable level;
- List any outstanding actions required to reduce risks to an acceptable level;
- Include an action plan describing the additional control measures required to reduce the risk to an acceptable level.

For more information on risk management and risk assessment, please read our [Risk Assessment policy](#).

First Aid Arrangements

In accordance with the Health and Safety (First Aid at Work) Regulations 1981, there is a general duty placed on all employers to make adequate First Aid provision for employees if injured or taken ill in the workplace. Such provision includes ensuring that there are sufficient trained First Aid staff and First Aid equipment.

‘Suitable Persons’ (First Aid Trained Staff) – a First Aider must undergo a training course in administering First Aid at work and hold a current First Aid Certificate. The training must be approved by the Health and Safety Executive (HSE). Suitable Persons would include those practising as registered medical practitioners and practising nurses whose names are entered on Part 1, 2, 10 or 11 of the Single Professional Register maintained by the Nursing and Midwifery Board. Midwifery and Health Visiting staff may also be regarded as First Aiders for the purposes of the Approved Code of Conduct.

‘Appointed Persons’ – an appointed person is someone who is chosen to:

- Take charge when an individual is injured or falls ill, including calling an ambulance or transporting the patient as required.
- Look after First Aid equipment (i.e. oversee the re-stocking of First Aid boxes)

Appointed persons should not attempt to give First Aid for which they have not been trained.

Living Carers Ltd is required to ensure that a sufficient number of First Aid trained staff is available across all sites and that a sufficient number of stocked First Aid boxes are maintained in appropriate areas, which are regularly checked by Appointed Persons.

Manual Handling

The Manual Handling Regulations, 1992 contain specific guidance on manual handling operations and their associated assessments. All staff employed to work with patients and Clients are required to have up to date, accredited, manual handling training. Staff are offered annual training updates and an update forms part of the pre-employment induction prior to staff being able to work directly in care giving. Tasks should be assessed for ergonomic considerations as well as other risk factors.

Manual handling will be identified and assessments undertaken according to the following guidance:

- The Manual Handling Regulations, 1992 require that all manual handling operations are identified and a suitable and sufficient assessment of their role and environment is undertaken.
- All assessments must be actioned and then filed with an annual review date or as and when the operation is changed.
- All employees must have received training to a level of competency for the required task.
- Leaflets and suitable training sessions will provide information regarding safe lifting techniques including the use of any specialised equipment where required. Under no circumstances should a manual handling operation be undertaken without an assessment having been completed.

- 1. If a manual handling operation is required in the work environment, a risk assessment must be completed using the required Risk Assessment Form.**
- 2. Manual handling specification and needs for specific Clients will be detailed in the care plan**
- 3. All mechanical aids supplied must not be used if they have not been tested under Lifting Operations and Lifting Equipment Regulations (LOLER) and signed accordingly.**
- 4. Staff must not use equipment on which they have not been trained or deemed competent.**
- 5. Staff will undertake Manual Handling refresher training courses as required. This will take place every year in accordance with safety guidelines for people handling and every three years for other handling operations. All Health and Safety Representatives will conduct Manual Handling Assessments where trained to do so.**

Training Methods:

All employees must be suitably instructed to adopt and consistently use the correct techniques for lifting.

Employee Instructions:

1. Staff must not attempt to lift anything that is beyond their own personal capability. They must always ask for help where required.
2. Staff must not attempt to retrieve any items from shelving/storage that is above shoulder height without using steps or mechanical assistance.

Living Carers Ltd Policy is:

‘No person in our employment shall lift, carry or move any load so heavy as to be likely to cause injury or harm to that person’.

Living Carers Ltd employees should always observe the following points when lifting:

- Keep your back straight
- Keep your chin into your chest
- Keep your arms close to the body
- Place your feet slightly apart
- Bend your knees and lift with the legs
- Grip the object with the palm of your hands and not your fingers

General Safety Points:

- Beware of slippery surfaces.
- Ensure that your walkway is clear.
- Assess the task before commencing and look out for jagged edges on the object to be moved and along the route that it has to be carried.
- If you are working in a team, one person must give clear instructions only.
- The basic principles listed above must be observed at all times.

Unloading Materials:

- Always try to unload heavy and awkward shaped objects by mechanical means.
- When unloading manually, try to use a platform to reduce the distance between the unloading area and the ground.
- Ramps are sometimes useful for unloading purposes. If they are to be used, ensure that they are strong enough, well supported and secured to prevent the possibility of slipping.
- Always ensure that there are enough persons available to do the job.

Moving People:

Nursing, Health Care Assistants and Homecare staff work in circumstances where they will assist people with moving and handling and will be required to move patients. The following principles should therefore be observed:

- Ensure that a risk assessment of the task in hand has been undertaken and that the risks to both patient and employee have been identified.
- Consider if the task can be avoided.
- Consider the use of mechanical aids and whether suitable training has been provided to use it safely

The Control of Substances Hazardous to Health (COSHH) Regulations

These Regulations cover the use, transportation, and storage of chemicals within the workplace, covering everything from chemical fixers to domestic cleaning materials.

These will include compounds, which have already been classified as:

Very toxic
Toxic
Harmful
Corrosive
Sensitising
Irritant

These categories appear under the Chemicals (Hazard Information and Packaging for Supply) Regulations (CHIPs).

Managers and Supervisors must:

1. Identify all substances requiring a COSHH Assessment and will undertake such Assessments following suitable training.
2. Decide what precautions are needed before starting work with hazardous substances.
3. Ensure that all potentially affected employees are informed about relevant COSHH Assessments and that control measures are used and maintained properly and that safety procedures are followed.
4. Ensure that any new substances are assessed if required and that all relevant employees are made aware of the Assessment.
5. Ensure that COSHH Data Sheets and Assessments are circulated to the appropriate individuals, maintained in secure files and copied to the Health and Safety Advisor at Living Carers Ltd (or the Registered Manager in respect of Homecare and Home Nursing services)
6. Ensure that Assessments are reviewed as required.
7. Ensure that appropriate measures for dealing with spills are drafted and made available to all concerned.
8. Where practicable, Managers and Supervisors should consider the following control provisions in dealing with hazardous substances:

- Elimination
- Substitution
- Controlled exposure by mechanical / engineering means
- The use of Personal Protective Equipment (PPE)

The use of Personal Protection Equipment (PPE) is always the last resort and must be suitable and sufficient for the task.

Consultation with Employees

1. In October 1996, the Health and Safety (Consultation with Employees) Regulations were introduced to enable all employees to discuss Health and Safety issues affecting their working environment with their employers.
2. The Health and Safety Committee will meet on a bi-monthly basis with representatives from each working area.
3. This membership will enable the Committee to function effectively and to respond on specific issues to the site-based Forums. These Forums should be constituted to enable the relevant representative to attend and then feed back to the main Committee on issues requiring specific resolution.
4. Where a specific issue or subject is not within the knowledge or skills of the Committee membership, attendees with specialist experience or knowledge may be nominated to attend and advise as required.
5. All employees have the right of access to the Managing Director regarding any Health and Safety matters, providing the matter has first been brought to the attention of a line manager and, where possible, has been considered by the Health and Safety Committee.

Information within the company will include:

- Health and Safety Law Poster (with all relevant sections completed);
- Minutes and Agendas of Health and Safety Committee meetings and Forums;
- Membership lists for the Health and Safety Committees and Forums;
- Fire Action details and Fire Alarm Testing information;
- The Health and Safety Policy Statement;
- Details of where local Health and Safety information can be found, as well as generic details of site-specific safety issues;
- First Aiders or appointed persons denoted with extension numbers and locations;
- The latest Health and Safety training available and who to contact for further information.

Accidents at Work and Related Ill Health (Including Violence at Work)

1. All accidents, hazards and near misses, no matter how minor, must be reported on the Accident/Incident Report Form. This information must be forwarded to Manager within 24 hours of the event occurring (see 'Incident Reporting Procedure – a Guide to Reporting Incidents, Near Misses and Hazards', 2004).
2. All adverse incidents and risks must be reported as per the Incident Reporting Procedure and may, depending on severity, be subject to external reporting under the company's Serious Untoward Incidents Procedure.
3. All places of work must have a qualified First Aider or an appointed person and adequate provision must be made for the supply and maintenance of suitable First Aid equipment.
4. Locations of First Aid equipment and the identity of qualified First Aiders should be displayed on Health and Safety Notice Boards.
5. Compliance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 will be the responsibility of the Health and Safety Advisor. Notification of RIDDOR reportable incidents will arise via the standard Incident Reporting route. Such incidents include those involving death or serious injury, injuries requiring more than three days' absence from work and any work-related disease. These categories may well include incidences of violence in the work place. Further guidance on this area is provided in the company's staff handbook. Staffs working in other locations are reminded of their requirement of adherence to that organisations own policy (see below).

RIDDOR 2013

RIDDOR 2013 is the law that requires employers, and other people who are in control of work premises, to report and keep records of

- work-related deaths;
 - certain serious injuries (reportable injuries);
 - diagnosed cases of certain industrial diseases; and
 - certain 'dangerous occurrences' (near-miss incidents).
- There are also special requirements for gas incidents (see section below).
- This leaflet aims to help employers and others with reporting duties under RIDDOR to comply with RIDDOR and to understand changes to reporting.

Accident Reporting Procedure

If an accident/ incident, dangerous occurrence or near miss has occurred, staff will:

- Contact their manager by quickest means possible for advice (where applicable)
- Enter details of accident/incident or near miss in the accident book at the earliest opportunity
- The Area/Locality Manager will notify the Director/s at the earliest possible opportunity in compliance with RIDDOR regulation reporting requirements

- The Area/Locality Manager will conduct an investigation (where applicable) Ability's Health & Safety Incident/Accident Report Form

For more Information on our Reporting Procedures, please read our Incident Reporting policy

Learning Outcomes

After reading this Policy, you should:

- Understand that safety is our prime concern in respect to service provisions.
- Understand what Health and Safety is and how a Health and Safety System operates.
- Understand how Health and Safety operates at *Living Carers Ltd* and have an awareness of the actions we undertake in identifying and mitigating risks and planning, delivering, and monitoring Health and Safety and in learning about where we can make improvements.
- Understand the role you play in Health and Safety

After reading this Policy, you should be able to:

- Understand what Health and Safety is
- Understand how it Health and Safety works in the workplace
- Understand reporting of incidents and accidents

If you have not achieved any of these points, please ask your Line Manager or trainer for further help.

Key Points to Take Away

- All employees will be expected to take reasonable care for the Health and Safety of themselves and others whom their actions or omissions may affect.
- They must never intentionally or recklessly misuse or interfere with any Health, Safety and Welfare provision.
- They are expected to co-operate with management and fellow staff in all matters relating to Health and Safety.
- They must report all accidents, incidents, hazards, near misses and dangerous occurrences in accordance with the company policy on accident reporting.
- They must comply with all relevant policies and procedures.

Policy Review

This policy will be reviewed by the Registered Manager at least annually to make any updates and amendments necessary to ensure the policy conforms to current legislation, reflects current practice and expectations.

Authorisation and Signature

This Policy is the official and authorised version agreed by the Directors of Living Carers Ltd. All employees are expected to work in accordance with this policy and failure to comply with this policy could result in disciplinary action.

Registered Manager

04.12.2017

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