

Company Level Health and Safety Framework and Arrangements

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**AMENDMENTS**

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| **Last Review** | **Revision Description** | **Reviewed By** | **Date** |
| V1.0  May 21 | Removed reference to Ulysses as this system is no longer used and minor  amendment to change title on Page 16. | A Willis | 06/05/21 |
| V2.0  July 21 | Document checked for accuracy; minor  amendments made | A Willis | 13/07/21 |
| V3.0  April 2022 | Document checked for  accuracy; minor amendments made | A Willis | 28/04/2022 |
| V3.1 May 2022 | Key roles and responsibilities updated in line with changes Policy and procedure list updated, training coordination changed to H&S rather than L&D, added new riskbase software into data and  systems section | E Thornber  Liz Thompson | 20/05/22  26/05/22 |
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**CONTENTS PAGE**

[STRUCTURE OF HEALTH AND SAFETY WITHIN DELPHI MEDICAL 4](#bookmark0)

[HEALTH AND SAFETY KEY RESPONSIBILITIES 6](#bookmark1)

[REPORTING 11](#bookmark2)

[LEGISLATIVE AND REGULATORY REQUIREMENTS 11](#bookmark3)

[ARRANGEMENTS FOR IMPLEMENTATION 12](#bookmark4)

[RISK ASSESSMENTS 15](#bookmark5)

[CONTRACTORS 16](#bookmark6)

[TRAINING ARRANGEMENTS 16](#bookmark7)

[MONITORING AND MEASURING PERFORMANCE 16](#bookmark8)

[DATA AND SYSTEMS 17](#bookmark9)

[ACCIDENT, INCIDENT AND NEAR MISS REPORTING 17](#bookmark10)

[BUSINESS CONTINUITY AND EMERGENCY RESPONSE PLANNING 17](#bookmark11)

[ENGAGING WITH CUSTOMERS 18](#bookmark12)

[MENTAL HEALTH AND WELLBEING 18](#bookmark13)

# STRUCTURE OF HEALTH AND SAFETY WITHIN DELPHI MEDICAL



Delphi Medical Consultants & Delphi Medical Ltd recognises that health, safety and welfare are an inherent part of the business. For this reason, the effective implementation of the Group policy will include the Board, Executive, Company Lead, Managers and members of staff.

If a management level is absent the next senior position in the line of management will ensure continuity for health and safety responsibility.

Delphi Medical’s structure for managing Health and Safety is as follows:

Key Responsibilities





**Group Board**

**Syncora Board**

**MD of Syncora**

**Head of Governance & Assurance**

**Director of Treatment & Recovery**

**Group H&S Manager**

**Senior Leadership Team**

**H&S Business Partner**

**Operational Managers**

**All Employees**

Delphi Medical H&S Governance and Reporting

H&S KPIs

H&S Board Report

Health & Safety Performance Team Meeting

H&S KPIs

H&S KPIs

Monthly

Quarterly H&S Board Report

Bi-monthly

H&S KPIs

H&S Rep Meeting

Building Safety Sub Group Meeting

Audit Reports

Audit & Risk Committee Meeting

H&S Board Report

Group Board Meeting

Quarterly

Syncora Board Meeting

Delphi Medical Monthly Report

H&S Update

Delphi Medical Monthly Managers Meeting

Delphi Medical SLT/Business Meeting

H&S Update

# HEALTH AND SAFETY KEY RESPONSIBILITIES

Syncora Board

Members serving on Syncora Board will ensure that appropriate arrangements are in place for:

* Effective implementation of the requirements of the Health and Safety Policy and any supporting arrangements at all levels of the organisation
* promoting a positive health and safety culture.

In addition to ensuring that appropriate arrangements are in place for the above, members of Syncora Board will:

* Ensure that an effective health and safety management system is in place and
* where appropriate, give guidance, instruction, recommendations and comment for the development of the Health and Safety Policy.
* Ensure that an annual review of the Health and Safety Policy takes place. Chief Executive

The Chief Executive has overall responsibility for health and safety within Calico, including ensuring the development and maintenance of Calico’s Business Continuity, Disaster Recovery and Emergency Response Plans. However, the duty to implement the requirements and arrangements of the policy on a day-to-day basis within Delphi Medical is delegated to the Company Lead of Delphi Medical.

The Chief Executive will provide support to those implementing the policy, encouraging the Company Lead to set health and safety specific objectives and will ensure that the Boards of Management and the Executive Team periodically review health and safety performance.

Managing Director of Syncora

The Managing Director of Syncora has responsibility for implementation of the Health and Safety Policy within their areas of control, including Delphi Medical, setting health and safety related objectives for The Director of Treatment and Recovery (as appropriate). They will give assistance and support to the Chief Executive, Company Lead of Delphi Medical and Group Health and Safety Manager so that the policy objectives can be achieved.

The Director of Treatment and Recovery will ensure that there is a provision of adequate funds and resources to enable the requirements of the Health and Safety Policy and accompanying procedures to be fulfilled.

They will promote the development of a positive health and safety culture and ensure effective communication and consultation with employees on health, safety and welfare matters.

The Director of Syncora will deputise for the Chief Executive in his absence in their area of responsibility.

Director of Treatment and Recovery

The Director of Treatment and Recovery has devolved responsibility under the Chief Executive and Executive Director of Operations for the delivery of Delphi Medical’s Health and Safety Framework and Arrangements and Action Plan.

The Director of Treatment and Recovery will ensure all Delphi Medical service managers are aware of their health and safety responsibilities and actions within the action plan and will be responsible for the successful delivery and review of the action plan on an annual basis.

They will promote the development of a positive health and safety culture within the company and ensure effective communication and consultation with employees on health, safety and welfare matters.

The Director of Treatment and Recovery will be responsible for regular review and reporting of health and safety performance.

Group Health and Safety Manager

The Group Health and Safety Manager has responsibility for facilitating the effective implementation of the Health and Safety Policy and accompanying policies and procedures which meet the legislative requirements.

The Group Health and Safety Manager will assist Delphi Medical in the promotion of a positive safety culture and will in particular; ensure that appropriate systems are in place for:

* communication and consultation with employees
* the provision of occupational health services
* compliance with statutory requirements for accident and incident reporting
* provision of programs to cater for the training needs of the business.
* maintaining records of training attendances and achievements of all employees
* together with the Group Health and Safety Business Partner, developing and distributing publications to assist in communicating the safety messages to all employees.

Group Health and Safety Business Partner

The Group Health and Safety Business Partner for Delphi will develop, implement and review an effective health and safety management system designed to deliver the requirements of the Health and Safety Policy and any supporting arrangements. In particular:

* support the Chief Executive, Company Lead and Delphi Medical’s Management Team in the promotion of a positive health and safety culture and the provision of a safe, healthy workplace.
* co-ordinate health and safety activities advise on relevant legislation and recommend changes in policy and procedures to ensure on-going legal compliance or best practice.
* provide support, assistance and guidance on all issues relating to health and safety in the workplace.
* arrange regular health surveillance (as directed by Calico’s occupational health provider) for all employees who are exposed to principle risks as laid down in legislation.
* arrange regular fire drills and maintain an adequate number of trained Fire Wardens to assist in evacuation of all places of work.
* oversee the ‘lone worker’ system contract.
* monitor risk assessments and ensure these are reviewed and updated within timescales.
* oversee the provision of qualified First Aiders and materials and carry out periodic First Aid Needs Analysis.
* investigate accidents, incidents, occupational ill-health and dangerous occurrences, identify actions to prevent re-occurrence and maintain appropriate records.
* ensure Calico meets its statutory obligations under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
* arrange and co-ordinate the internal and external audits of the operation of the safety management system and assist Managers in the completion of action plans following audit recommendations.
* chair regular meetings of the Health and Safety Representatives Committee

Delphi Medical Managers

All Delphi Medical Managers shall have a clear understanding of Calico’s Health and Safety Policy and supporting arrangements and apply these to their areas of responsibilities.

They will promote Calico’s positive health and safety culture and ensure effective communication and consultation with their team members on health and safety matters.

In particular, they shall ensure that:

* health and safety objectives are set for supervisors, and health and safety objectives specific to their role are considered for team members.
* health and safety plans, including action plan monitoring arrangements are developed and implemented.
* the procedures contained in the Health and Safety section of QUIP are used to formulate specific processes and guidance within their area of responsibility, which will be accessible in turn by their team members.
* they work in conjunction with the relevant health and safety representative to continually improve health and safety practices within their service area.
* risk assessments, safe systems of work and COSHH documents are routinely reviewed and shared with their teams.

Corporate Services have an overview of the asset register. Facilities will have specific responsibility for all matters relating to property compliance and will ensure effective liaison with the location managers, health and safety team and other group companies and leads to ensure all required compliance activities and functions in respect of locations and domestic appliances are identified, delivered and reviewed in a timely manner.

In particular, they shall ensure that:

* Ensure that all accidents and incidents are reported immediately.
* Ensure that all near misses are recorded and acted upon.
* Ensure that the team have the appropriate tools and PPE to complete the task safely.
* Ensure that the appropriate staff are using the lone worker devices and report any concerns immediately.
* Ensure all tasks are completed as per the H&S monitoring matrix.

Facilities Manager

The Facilities Manager has a range of health and safety duties relating to some Delphi locations. These duties include:

* arranging and overseeing planned preventative maintenance contracts and statutory inspections for: fire detection; alarm systems; fire extinguishers; lifts; air-con systems; portable appliance testing; legionella control
* providing personal protective equipment to employees

Health and Safety Performance Team

The Health and Safety Performance Team consists of the Chief Executive, along with other key Directors and Company Leads across the Calico Group, assisted by the Group Health and Safety Manager and the Facilities Manager.

Their role is:

* To ensure the organisation complies with all appropriate Health and Safety Legislation and requirements.
* To ensure an appropriate corporate and leadership focus is given at all levels of the organisation to the importance of Health and Safety within Calico
* To oversee delivery of the Health and Safety Strategy and Policy
* To report on health and safety KPIs and updates for Delphi Medical

Building Safety Subgroup

The Building Safety Group is a subgroup of the Health and Safety Performance Team, made up of people from across the Group with the appropriate level of responsibility, as well as autonomy and knowledge of building safety.

The purpose of this group is to ensure the organisation complies with all appropriate Fire and building Legislation and requirements, and to ensure an appropriate corporate and senior management focus is given at all levels of the organisation to the importance of Building Safety within The Calico Group. The group meets quarterly and feeds back into the Health and Safety Performance Team meeting.

Health and Safety Representatives

The purpose of the Health and Safety Representatives is to aid consultation with our people by representing employees, agency staff, volunteers, contractors, visitors, apprentices, customers and members of the public from across the group and making recommendations on health and safety matters. Functions include:

* Educating and guiding the workforce on the benefits of a positive health and safety culture
* Promoting the importance of reporting accidents, incidents and near misses
* Assisting in the development and implementation of policies, procedures, safe working practices and risk assessments in line with best practice
* Reading and reviewing safety audit reports, accident / incident statistics and any other relevant reports so that recommendations on preventative measures can be made.
* Raising awareness of the initiatives Calico has been working on in relation to health and safety through the use of various communication channels available, e.g., QUIP.
* Consulting with colleagues on health and safety matters
* Carrying out housekeeping checks Fire Wardens

The role of a Fire Warden is to assist in the overall management of fire safety in the workplace and to undertake specific duties in the event of a fire emergency to ensure the full and safe evacuation of all people in the premises and to ensure as far as is reasonably practicable, the risk of fire spread is minimised. Further information can be found within the Fire Wardens’ Roles and Responsibilities Procedure.

First Aiders

The role of a First Aider is to provide treatment for the purposes of preserving life and minimising the consequences of injury and illness until medical help is obtained. Staff are trained in Basic Life Skills and there are qualified Nurses in all locations.

Mental Health First Aiders

Delphi Medical have a number of trained Mental Health First Aiders who are able to recognise signs of poor mental health and be able to sign post colleagues to the right place to get help.

COSHH Champions

The COSHH champions within Delphi Medical are trained to carry out COSHH risk assessments and take control of managing substance safety in their respective areas.

All Employees (including volunteers)

The *Health and Safety at Work etc. Act 1974* places duties on all employees to:

* take reasonable care of their own health and safety and that of others who may be affected by their work
* co-operate with Syncora in implementing the Health and Safety Policy and complying with legal duties and responsibilities
* make themselves familiar with the Health and Safety Policy and Procedures and any instruction relevant to their work
* report to their line manager any hazards, accidents, incidents and near misses whether injury is sustained or not
* report to their line manager any new or uncontrolled risks arising from their work activity, or any faults or defect in the workplace or work equipment
* use any safety equipment and/or protective clothing correctly and in accordance with training provided
* conduct themselves in an orderly manner in the workplace and refrain from any form of horseplay or other unsafe behaviour
* familiarise themselves with the fire evacuation procedures and the location of all emergency exit routes and assembly point relevant to their workplace.

# REPORTING

All reports are prepared by Delphi Corporate Services Team in collaboration with Group Business Services and approved by the Company Lead. The following reports including health and safety are produced:

* Quarterly H&S Performance KPI report for the HASP Team
* Quarterly H&S Board report
* Monthly H&S KPIs
* Monthly Delphi Medical Performance Report
* Monthly Delphi Medical Business Meeting Report
* Monthly Incident reports

# LEGISLATIVE AND REGULATORY REQUIREMENTS

A memorandum of understanding (MoU) was agreed in 2018 between the Care Quality Commission (CQC) and the Health and Safety Executive (HSE). It applies to both health and adult social care in England. The purpose of the MoU is to help ensure that there is effective, co-ordinated and comprehensive regulation of health and safety for patients, service users, workers and members of the public.

It outlines the respective responsibilities of CQC, HSE and local authorities (LAs) in England when dealing with health and safety incidents in the health and adult social care sectors, and the principles that will be applied where specific exceptions to these general arrangements may be justified. The MoU applies to all activities; therefore, it describes the principles for effective liaison and for sharing information more generally.

HSE, LAs and CQC will co-operate effectively to enable and assist each other to carry out their responsibilities and functions, and to maintain effective working arrangements for that purpose.

Other organisations also have roles or responsibilities for investigation, prosecution and/or oversight in relation to offences in health and adult social care settings – such as ill-treatment or wilful neglect. Appropriate liaison with other prosecutors/regulators/oversight bodies, such as the police, Crown Prosecution Service (CPS) and Safeguarding Adults Boards is essential. Some of these may be signatories to the Work-related Deaths Protocol (WRDP). CQC, HSE and LAs will notify relevant bodies of incidents and agree the coordination of activity or work with them as appropriate to protect patients, service users, workers and the public from risk of harm.

CQC is the lead inspection and enforcement body under the Health and Social Care Act 2008 for safety and quality of treatment and care matters involving patients and service users in receipt of a health or adult social care service from a provider registered with CQC.

HSE/LAs1 are the lead inspection and enforcement bodies for health and safety matters involving patients and service users who are in receipt of a health or care service from providers not registered with CQC.

HSE/LAs are the lead inspection and enforcement bodies for health and safety matters involving workers, visitors and contractors, irrespective of registration.

The Health and Safety at Work Act (1974) is the most significant piece of overarching legislation relevant to this framework although detailed guidance is contained in separate codes of practice linked to the legislation.

Forthcoming legislation that will strongly influence how Calico manages fire and building safety is detailed in the Building Safety Bill and Fire Safety Bill, both of which are currently going through the parliamentary process.

# ARRANGEMENTS FOR IMPLEMENTATION

Delphi Medical’s Health and Safety actions have been identified for the next 12 months and included in the action plan that accompanies this document. All actions have been prioritised and progress against the action will be included in the reporting cycles detailed in the Reporting section in page 12 of this document.

The Group Health and Safety Policy sits at the front of a suite of health and safety related policies and procedures. Below are all the Health and Safety policies and procedures which relate to Delphi Medical:

Accident, Incident and Near Miss Reporting Procedure Accident, Injury and First Aid Policy

Adrenaline (Emerade) PGD Aftercare and Support Protocol Alcohol Detox Protocol Analgesia Protocol

Asbestos Management Plan Asbestos Policy Assessment Protocol

Audit Protocol Benzodiazepine Protocol Blood Pressure Protocol Buprenorphine Protocol

Burner Phone Protocol (In Draft) Buvidal Protocol

Bus (Blackburn with Darwen) Protocol (In Draft)

Business Continuity Policy - Service Recovery Plan for Delphi CCTV Protocol

Chlordiazpoxide PGD Clinical Treatment Policy

Community Alcohol Medically Assisted Withdrawal Protocol Complaint Protocol

Consent to Examination or Treatment Protocol Control of Vibration Policy

Control of Vibration Procedure

Controlled Drugs SOP Protocol (HMP Manchester) Controlled Drugs SOP Protocol (Pavilion) Diazepam Rectal PGD

Death of a client Protocol

Delphi Services and Ethos Overview Dissemination of NICE Guidance and Safety Alerts Drug Testing Protocol

Dual Diagnosis Protocol DVLA Protocol

ECG Monitoring Protocol Electrical Safety Procedure

Emergency Protocol (Barton Moss & Marydale) Emergency Protocol (Blackburn with Darwen) Emergency Protocol (Blackpool)

Emergency Protocol (HMP Garth) Emergency Protocol (HMP Manchester) Emergency Protocol (HMP Wymott) Emergency Protocol (Pavilion) Environmental Policy

Feedback Policy Feedback Protocol

Fire Risk Assessment Procedure Fire Safety Management Procedure Fire Safety Policy

Flea Procedure Flu Vaccines PGD

Group Complaints Policy

Gas Safety and Servicing Policy Health Surveillance Policy Health Surveillance Procedure Hep B Vaccine PGD

Hep C Protocol

Holiday prescribing Protocol

Infection Control (inc Hand Hygiene) Protocol Information Governance

Information Governance Protocol Injectable Prescribing Protocol

In Possession Medication (Pavilion) Protocol Joint Working Protocol

Keeping Safe Procedure Legionella Policy Legionella Procedure

Managing Challenging Behaviour

Management of Hazardous Substances Procedure

Manual Handling Procedure Medicines Management Policy Methasoft SOP Protocol Metoclopramide PGD

Missed Dose Protocol

Missing Prescriptions - in service Protocol (In Draft) Motivational Drug Testing Protocol (Garth & Wymott) Needlestick and Body Substance Precautions Naloxone Protocol

Naltrexone Protocol

Needle Exchange Protocol (In Draft) NMP Protocol

Non attendance Protocol On Call Protocol (n Draft) Opioid Detox Protocol Opioid Prescribing Protocol

Outreach Protocol (In Draft) Overdose Protocol Oxazepam PGD

Oxygen PGD

Panic Alarm Procedure

Personal Safety and Lone Working Policy Positive Reengagement (BwD) Protocol Positive Reengagement (Horizon) Protocol Positive Reengagement (Prisons) Protocol PPE Procedure

Preceptorship Protocol Prescribing in Pregnancy Protocol Prescribing Admin Protocol Privacy Notice

PSI Protocol

PSI Competency Assessment Protocol Psychosocial Interventions Policy Psychoactive Substances Protocol Quality Assurance Policy

Quality Framework (Blackburn with Darwen) Quality Framework (Blackpool)

Quality Framework (HMP Garth) Quality Framework (HMP Manchester) Quality Framework (HMP Wymott) Quality Framework (Pavilion)

Radon Policy Radon Procedure

Record Keeping Protocol Recovery Peer Protocol

Risk Management Policy and Framework Risk Assessment and Management Protocol Safeguarding Adults Policy

Safeguarding Adults Protocol (Blackburn with Darwen) Safeguarding Adults Protocol (Blackpool) Safeguarding Adults Protocol (HMP Garth) Safeguarding Adults Protocol (HMP Manchester) Safeguarding Adults Protocol (HMP Wymott) Safeguarding Adults Protocol (Pavilion)

Safeguarding Children Policy

Safeguarding Children Protocol (Barton Moss & Marydale) Safeguarding Children Protocol (Blackburn with Darwen) (In Draft) Safeguarding Children Protocol (HMP Garth & HMP Wymott) Safeguarding Children Protocol (Horizon)

Safeguarding Children Protocol (The Pavilion) Salbutamol Inhaler PGD

Shared Care Protocol (In Draft) Sleep Management Protocol

Slow Release Prescribing in Prison Protocol Smoking Policy

Stay Put Policy Stimulants Protocol

Storage of Vaccines Protocol Symptomatic Relief Protocol Supervised or Unsupervised Protocol Therapeutic Community Policy Therapeutic Community Protocol Tool Equipment Policy

Tool Procedure

Training and Development Policy

Untoward and Serious Untoward Incident Policy Untoward and Serious Untoward Incident Protocol Volunteer Protocol

Vulnerable Workers Procedure Warning Marker Procedure Wellbeing Therapy Dog Protocol Work Equipment Procedure Working at Height Procedure

Workstation DSE Assessment and Eye Test Procedure Workstation DSE Policy

These specific procedures must be covered during initial induction. Amendments will be discussed at team meetings and refresher training.

# RISK ASSESSMENTS

Delphi Medical Managers ensure that a suitable and sufficient risk assessment is undertaken (by a competent person) for any activity where there is a significant risk, using the Group Risk Assessment Template, ensure that preventative and protective control measures have been put in place to either eliminate or minimise the risk, ensure that information, instruction, training and supervision is provided to all personnel who are exposed to the identified risks, ensure all activities (deemed to pose a significant risk) undertaken by personnel are done so in a safe manner that controls the risk of injury or ill health, ensure that compliance with this procedure is audited on an annual basis.

Managers carry out the risk assessments and reviews in consultation with employees who are familiar with the role or task being assessed.

The Group Health and Safety Business Partner ensures that the inventory of all risk assessments within Delphi Medical is kept up to date, informs the Managers when their risk assessments are due to be reviewed and conducts spot checks on the risk

assessments to ensure they capture the required risks and controls and are suitable and sufficient.

Employees carrying out work activities must adopt the control measures put in place to eliminate or minimise the risk and use any protective equipment identified in a sensible and safe manner.

# CONTRACTORS

Delphi Medical will only use contractors who have completed the Approved Contractor form and can demonstrate they have the required H&S processes and procedures in place. Service Managers and Facilities Manager ensure that contractors employed to carry out work on behalf of Delphi Medical are suitably qualified to carry out the work required and have provided Risk Assessments and Method Statements prior to commencing work.

# TRAINING ARRANGEMENTS

Delphi Medical is committed to providing the required training as determined by health and safety legislation and any other training in relation to safe working practices and best practice. As such, all Employees, Managers, Directors and Board Members will receive relevant regular training, and this will be directed and coordinated by the Group Health and Safety Manager who will also update the

employee’s training record.

Particular focus will be given to:

* new employees
* new managers
* the introduction of new or changes to systems of work

The Group Health and Safety Manager will maintain a training matrix based on the training requirements of job roles. The matrix will identify the frequency and level of training (including refresher training) to be provided for the job roles. Types of training include internal training, e-learning, external training and specific qualifications. The Group Health and Safety Manager will ensure that the health and safety training requirement is reflected in the training budget each financial year.

The Group Health and Safety Manager is responsible for overseeing internal training where appropriate. Managers are responsible for organising any job based internal training.

# MONITORING AND MEASURING PERFORMANCE

Delphi Medical is committed to monitoring and measuring health and safety performance in order to assess how effective the implementation of the health and safety policy is, how effective we are in controlling risks and how well we are developing a positive health and safety culture.

Delphi Medical recognises that monitoring and measuring is a key step in any management process and forms the basis of continuous improvement and with this in mind, has adopted a variety of monitoring and measuring tools to ensure that we can provide information on a range of health and safety issues.

Performance will be monitored and measured at each management level as set out in the responsibility section of this document.

The frequency of monitoring and measuring will depend on the level of risk and any statutory inspection requirement and therefore can include weekly, monthly, 3 and 6-monthly and annual monitoring and measuring.

Meetings will be held by the Group Health and Safety Manager with each relevant Manager and the relevant Health and Safety Representative to review results.

# DATA AND SYSTEMS

Blue Stream – The majority of Delphi’s training is done via e-learning via an on-line training platform called Blue Stream.

Incidents and Untoward Incidents are currently recorded and actioned using a clerical process until a decision is made to see whether we migrate to Greenshoots for an automated electronic incident recording system.

Active H Planned maintenance includes all assets owned, managed or leased across the Calico Group and is used to capture compliance related data in relation to:

* Gas safety
* Electrical Safety
* Fire Risk Assessments
* Emergency Lighting Checks
* Radon
* Asbestos Management

Riskbase software is used to manage fire risk assessments and actions.

The Facilities team keep a record of compliance data relating specifically to contracts that they manage across the Calico Group e.g., lift safety.

# ACCIDENT, INCIDENT AND NEAR MISS REPORTING

Delphi Medical use a clerical process to report accidents, incidents and near misses, and the Corporate Services team ensure copies are sent to the Group Health and Safety Team within 24 hours for major accidents or incidents and within 72 hours for all minor accidents, incidents and near misses. In turn, these are reported to the HASP group as per the Accident, Incident and Near Miss Reporting Procedure.

# BUSINESS CONTINUITY AND EMERGENCY RESPONSE PLANNING

The Calico Group has a business continuity plan which outlines our approach should an event take place which affects the operation of the whole or part of the group, e.g., premises, systems, suppliers.

In addition, Delphi Medical has a specific emergency response procedure which is implemented should there be an incident affecting our properties and customers e.g., fire, flood. This is regularly updated by the Head of Governance & Risk and is reviewed and updated following any incident, incorporating any new learning. The plan is available remotely via our website.

# ENGAGING WITH CUSTOMERS

We want to ensure that we are listening to and acting on the views of our customers and this includes health and safety. We have a range of mechanisms for listening to and engaging with customers around health and safety:

* We use our website and social media platforms to deliver messages around health and safety that affect our customers.
* We respond to customer concerns around health and safety that are raised through social media.
* We write to customers individually when there are important health and safety messages to let them know about e.g., service delivery during Covid- 19 lockdown.
* We listen to customer concerns at community events and pass these onto the relevant team.

We anticipate Calico will continue to develop and improve its approach to engaging customers around health and safety on the back of the anticipated building safety and fire safety legislation.

# MENTAL HEALTH AND WELLBEING

Delphi Medical takes the wellbeing and mental health of its employees very seriously. There are trained mental health first aiders and access to the employee assistance service, Lifeworks as well as financial support through CFED.

There is a separate Group policy and strategy for Wellbeing which Delphi Medical supports and implements through its management teams.