

## HEALTH & SAFETY ASSURANCE COMMITTEE PWYLLGOR ANSAWDD IECHYD A DIOGELWCH

<b>DYDDIAD Y CYFARFOD: DATE OF MEETING:</b>	01 September 2022
<b>TEITL YR ADRODDIAD: TITLE OF REPORT:</b>	Estates Low Voltage & High Voltage (LV,HV) Electricity Compliance
<b>CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:</b>	Andrew Carruthers, Executive Director of Operations
<b>SWYDDOG ADRODD: REPORTING OFFICER:</b>	Simon Chiffi , Head of Estates and Operations

**Pwrpas yr Adroddiad (dewiswch fel yn addas)**

**Purpose of the Report (select as appropriate)**

Er Sicrwydd/For Assurance

### ADRODDIAD SCAA

#### SBAR REPORT

##### Sefyllfa / Situation

This follow up report from 14<sup>th</sup> March 2022 is presented to the Health and Safety Committee (H&SC) to provide assurance against a key area of the Health and Safety regulations. This report concerns the Electricity at Work Regulations 1989.

The intention is to show the progress that has been made from the low voltage (L.V) audit actions from March 2022 and also incorporate for the first time the high voltage (H.V) audit actions.

The Health Board (HB) has a diverse property portfolio with a wide range of electrical installations, and electrical components in use in order to conduct its core business. The HB has introduced a range of policies and procedures to minimise the risks associated with the use of electrical equipment.

This report therefore sets out the following:

1. Identifies what legislation and guidance the HB is expected to comply with.
2. Provides information on what actions have been introduced by the HB to minimise risk.
3. Lists the recommendations, actions and timelines that have have been issued in order to improve compliance and resilience for electricity by our independent advisors.
4. Provide an overview of the ongoing Organisational Change Policy (OCP) within Estates Operations and Compliance, with the inclusion of additional resources and what positive impact this will have once embedded.

##### Cefndir / Background and Asesiad / Assessment

1. The Health and Safety at Work etc. Act (HASAWA) 1974 is the primary piece of legislation covering health and safety in Great Britain. It has over 100 delegated regulations included, many of which are applicable to the healthcare working environment.

The legislative requirements for electricity are set out by the Electricity at Work Regulations 1989, which are very broad, ranging from Regulation 1 through to Regulation 33. (These are identified in appendix A for further information).

However in healthcare estates and engineering, principle guidance documentation called Welsh Health Technical Memorandums or WHTM's is adhered to. These are set out for each operational discipline (for example - WHTM 06-02 for LV, WHTM 06-03 for HV) as well as relevant British Standards, which combined, sets out clear definitive guidelines to ensure ongoing compliance is maintained.

This is also measured in terms of compliance by the appointed authorising engineers at NWSSP-SES with site audits and reports issued to the HB's designated person (DP).

2. The HB has introduced a range of measures to help support compliance with the regulations and guidance and these are set out below:

- The appointment of an Authorising Engineer (AE) from NWSSP-SES to provide expert advice and offer full independent audit & assurance for LV & HV compliance.
- As an operational estates function, authorised persons (AP's) for LV at each acute site have been designated and trained to be the professional and technical lead. HV AP's are contractually appointed by Western Power and Scottish power (for Bronglais), and a designated estates officer has attended HV management training.
- At each acute site, there are competent persons (CP's as electrical engineers) for LV to ensure safety and resilience of electricity and there are HV Officers at each site as to ensure safety and resilience of hospital infrastructure.
- The development and implementation of a HB wide Electrical Safety Policy.
- The establishment of a multi-disciplined Electrical Safety Group or (ESG) for the HB to discuss and manage electrical safety compliance for both L.V and H.V.
- The implementation of a Pre-Planned Maintenance system to undertake specific checks of electrical infrastructure.
- An external contract is in place to undertake both Portable Appliance Testing and Fixed Board testing across the HB.
- From a resilience perspective there are a number of sites that are equipped with IPS/UPS electricity backup systems that will ensure continued power to equipment in the event of power failure.
- There is a HV Policy in draft ready for review in November 2022.

3. The HB's appointed AE has undertaken 2 triennial site based audits for LV to measure our compliance against the WHTM 06-02, these were undertaken at Bronglais General Hospital on the 17<sup>th</sup> June 2021 and at Withybush General Hospital on the 19<sup>th</sup> April 2021 and both reports have been received. A further HB wide annual audit report was completed on the 11<sup>th</sup> February 2022 and the report has been received. In regard to H.V the HB's appointed AE has undertaken 1 triennial site based audit to measure compliance against the WHTM 06-03, this was undertaken at Prince Philip Hospital 17<sup>th</sup> February 2022 and the report has been received, a further HB wide annual audit report was completed in March 2022.

Despite the arrangements highlighted in section 2 above, there are still a range of key recommendations and items to address as part of our AE audits. Each recommendation has been assigned to a specific staff lead and a timeline for its completion agreed. All recommendations are being carefully tracked by the estates compliance team, using a RAG

rated tracker system. **Table 1.0 a,b & 2.0** below provides an overview of the quantity of recommendations received and completed

**Table 1.0 a) -L.V  
As at March 2022**

Site	No of Recs	H	M	L	Recs Completed to date				Recs Overdue agreed date	Assurance Rating	
					H	M	L	Total			
BGH	9	1	7	1	0	4	0	4	0	RA & LA	
WBH	21	7	12	2	4	10	1	15	0 (note one item on action plan)	LA	
HB Wide	13	3	4	6	0	1	1	2	0 (note one item on action plan)	LA (improved position)	
Total recs= 43					Total completed recs= 21						

**Table 1.0 b) -L.V  
As at August 2022**

Site	No of Recs	H	M	L	Recs Completed to date				Recs Overdue agreed date	Assurance Rating	
					H	M	L	Total			
BGH	9	1	7	1	0	4	0	4	0	RA & LA	
WBH	21	7	12	2	5	10	1	16	0 (note one item on action plan)	LA	
HB Wide	11*	2	3	6	0	1	1	2	0 (note one item on action plan)	LA (improved position)	
Total recs= 41					Total completed recs= 22						

\*Revised number of recommendations based on AE feedback

**Table 2.0-H.V  
As at March 2021**

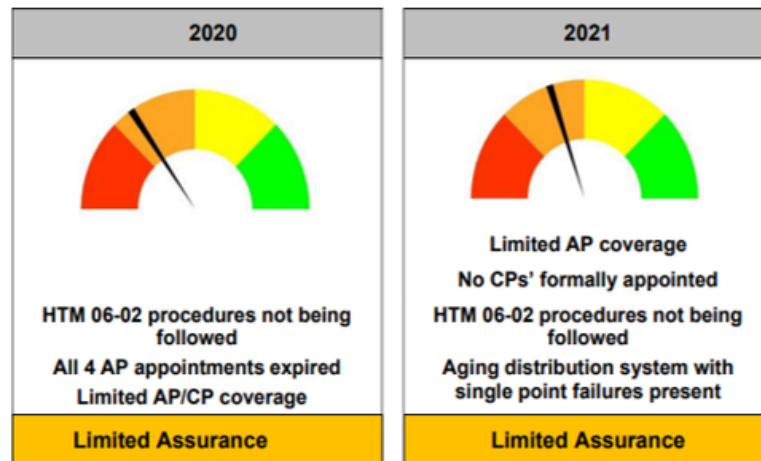
Site	No of Recs	H	M	L	Recs Completed to date				Recs Overdue agreed date	Assurance Rating
					H	M	L	Total		
HB Wide	5	1	4	0	0	2	0	2	0	RA

**As at May 2022**

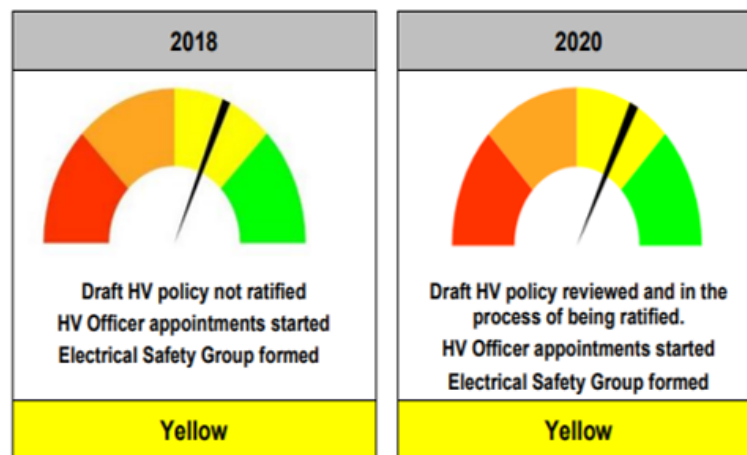
Site	No of Recs	H	M	L	Recs Completed to date				Recs Overdue agreed date	Assurance Rating
					H	M	L	Total		
PPH	5	2	1	2	0	0	0	0	0	RA

Following the previous L.V HB wide audit in 2021 and considering pressures faced during the pandemic, the HB has still made steady progress as shown from the AE report dials below in Fig 1.0. However it is appreciated that there is still some further work that needs to be prioritised and completed. There are a range of core recommendations in the coming months and the team are confident that reasonable assurance will be provide from the AE following completion of these for the next audit.

**Fig 1.0**



**Fig 2.0**



*Figure 2 High Voltage report for the Health Board*

- Following a recent OCP within the Estates Operations department, some key resource changes have been identified, which will make a significant positive impact on engineering compliance once fully embedded. These changes consist of the appointment of a dedicated Head of Estates Risk and Compliance (Jan 22 appointment), a Head of Estates Engineering (May 22 appointment). In addition to this, x1 additional operational officer for each of the acute sites has been appointed in June 2022, WGH is currently outstanding. The capacity of the operational compliance team has increased with a lead compliance manager on 30<sup>th</sup> May 2022, x3 compliance officers, with one of these officers dedicated to WHTM compliance arrangements, appointed on 30<sup>th</sup> May 2022. This resource will allow the department to introduce effective management arrangements and systems to ensure improved levels of compliance across the full suite of WHTM engineering guidance once fully embedded.

**Appendix A – List of Regulation Titles within the EAWR 1989.**

HSR25 – helps duty holder to meet the requirements of the Electricity at Work Act 1989.

## **Regulation 1 to 33**

- Reg 1: Citation and commencement
- Reg 2: Interpretation
- Reg 3: Persons on whom the duties are imposed by these regulations
- Reg 4: Systems, work activities and protective equipment
- Reg 5: Strength and capability of electrical equipment
- Reg 6: Adverse or hazardous environments
- Reg 7: Insulation protection and placing of conductors
- Reg 8: Earthing and other suitable precautions
- Reg 9: Integrity of referenced conductors.
- Reg 10: Connections
- Reg 11: Means for protecting from excess of current
- Reg 12: Means for cutting off the supply and for isolation
- Reg 13: Precautions for work on equipment made dead
- Reg 14: Work on or near live conductors
- Reg 15: Working space access and lighting
- Reg 16: Persons to be competent to prevent danger and injury
- Reg 17-28: Revoked by the mines regulations 2014
- Reg 29: Defence
- Reg 30: Exemption Certificates.
- Reg 31: Extension outside the GB
- Reg 32: Disapplication of duties
- Reg 33: Revocations and modifications.

WHTM 06-01 Electricity services supply and distribution systems 2018

WHTM 06-02 Electricity safety guidance for low voltage systems 2006 is our principle guidance to assist duty holders to meet the requirements of the Electricity at Work Act. 1989.

And subsequent relevant British Standards such as BS 7671:2018 18<sup>th</sup> edition.

WHTM 06-03 Electrical safety guidance for high voltage systems 2006

## **Argymhelliad / Recommendation**

The Health and Safety Committee is requested to consider the information contained in this report and to acknowledge that whilst there are key aspects not currently being complied with, work has been undertaken and is also underway to ensure an improved position on compliance rating in the coming months. An update status report will be presented in 12 month to measure this progress.

### **Amcanion: (rhaid cwblhau)**

#### **Objectives: (must be completed)**

Committee ToR Reference:  
Cyfeirnod Cylch Gorchwyl y Pwyllgor:

2.1 Provide assurance around the UHB arrangements for ensuring the health, safety, welfare and security of all employees and of those who may be affected by work-related activities, such as patients, members of the public, volunteers contractors etc.

Cyfeirnod Cofrestr Risg Datix a Sgôr  
Cyfredol:  
Datix Risk Register Reference and  
Score:

Safon(au) Gofal ac Iechyd: Health and Care Standard(s):	1. Staying Healthy 2. Safe Care 2.1 Managing Risk and Promoting Health and Safety 2.4 Infection Prevention and Control (IPC) and Decontamination
Nodau Gwella Ansawdd: Quality Improvement Goal(s):	All Quality Improvement Goals Apply Protect Patients From Avoidable Harm From Care Reduce Duplication and Eliminate Waste Choose an item.
Amcanion Strategol y BIP: UHB Strategic Objectives:	2. Living and working well.
Amcanion Llesiant BIP: UHB Well-being Objectives: <a href="#">Hyperlink to HDdUHB Well-being Objectives Annual Report 2018-2019</a>	2. Develop a skilled and flexible workforce to meet the changing needs of the modern NHS

<b>Gwybodaeth Ychwanegol: Further Information:</b>	
Ar sail tystiolaeth: Evidence Base:	Contained within the body of the report. Estates Audit and Inspection Tracker
Rhestr Termiau: Glossary of Terms:	Contained within the body of the report.
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Ansawdd Iechyd a Diogelwch: Parties / Committees consulted prior to Health and Safety Assurance Committee:	Actions form part of the ESG or HB's Electricity Safety Group.

<b>Effaith: (rhaid cwblhau) Impact: (must be completed)</b>	
<b>Ariannol / Gwerth am Arian: Financial / Service:</b>	There may be financial implications if the issues identified require monetary rectification.
<b>Ansawdd / Gofal Claf: Quality / Patient Care:</b>	There is a positive impact on staff safety, health and wellbeing through compliance.
<b>Gweithlu: Workforce:</b>	Potential for adverse future staffing impacts if this legislation is not complied with as it relates to employee safety
<b>Risg: Risk:</b>	Risk to health and safety management
<b>Cyfreithiol: Legal:</b>	Potential for enforcement action including Improvement Notices/prosecutions and claims due to breaches in legislation.

<b>Enw Da: Reputational:</b>	Potential for enforcement action including Improvement Notices/prosecutions and claims due to breaches in legislation.
<b>Gyfrinachedd: Privacy:</b>	Not Applicable
<b>Cydraddoldeb: Equality:</b>	Has EqIA screening been undertaken? Yes as part of HB Electricity Policy.