



PWYLLGOR IECHYD A DIOGELWCH HEALTH & SAFETY COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	12 November 2024
TEITL YR ADRODDIAD: TITLE OF REPORT:	Estates Low Voltage (LV) Electricity Compliance
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Andrew Carruthers, Chief Operating Officer
SWYDDOG ADRODD: REPORTING OFFICER:	Simon Chiffi, Head of 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 is being brought to the Health and Safety Committee (HSC) to provide assurance against a key area of the Health and Safety regulations.

The Electricity at Work Regulations (EAWR)1989.

The intention is to demonstrate the progress made as noted in the recent low voltage (LV) annual report submitted by NHS Wales Shared Services Partnership – Specialist Estate Services (NWSSP-SES) April 2024. The List of Regulation Titles within the EAWR 1989, are attached as Appendix A.

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 sets out the following:

1. What legislation and guidance the HB is expected to comply with.
2. Provide information on what actions have been introduced by the HB to minimise risk.
3. Update on progress of the recommendations from the Authorising Engineers (AE) audits.

Cefndir / Background

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 under it, many of which are applicable to the healthcare working environment.

The legislative requirements for Electrical compliance 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).

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

We are measured in terms of compliance by our appointed AE's at NWSSP - Specialist Estates Services (NWSSP-SES) following their site audits and reports issued to the HB's Designated Person (DP).

2. The HB has introduced a range of measures to help support our compliance with the regulations and guidance and these are set out below:
 - Officially appointed an AE from NWSSP-SES to provide expert advice and offer full independent audit & assurance for LV compliance.
 - Trained and officially appointed in writing authorised persons (AP's) for LV at each acute site to be the professional and technical lead (x2 members of staff per acute site, AE expectation is x3 members of staff per acute site).
 - At each acute site, we have competent persons (CP's as electrical engineers) for LV to ensure safety and resilience of electricity hospital infrastructure.
 - Developed and implemented a HB wide LV electrical safety policy.
 - Established a multi-disciplined Electrical Safety Group or (ESG) for the HB to discuss and manage electrical safety compliance for both LV.
 - Pre-Planned Maintenance system in place to undertake specific checks of electrical infrastructure.
 - External contract to undertake both Portable Appliance Testing and Fixed Board testing across the HB with an increased budget availability for 24-25.
 - From a resilience perspective our acute sites are equipped with a range of IPS/UPS electricity backup systems that will ensure continued power to equipment in the event of power failure.
3. The HB's appointed AE has undertaken a range of audits for LV to measure our compliance against the WHTM 06-02. The latest audit report was completed and received in September 2024 to the DP and disseminated to senior estates staff for action.

Asesiad / Assessment

The following section aims to provide an update on the status of our recommendations and items to address as part of our AE audits, and the considerable progress we have achieved in recent months.

Since the previous update to HSC, noteworthy progress has been made regarding our high-risk actions as shown in Table 1.0a, 1.0b and 1.0c below.

Since the previous update, 86% of high-risk recommendations and 71% of all audit-related recommendations have been closed. This reflects the HB's commitment to addressing the most pressing issues effectively.

The HB is now in the process of transitioning over to the Audit Management and Tracking AMAT system to track all current and future audit recommendations. With the implementation of the new AMAT system, it will be possible to have complete visibility over actions and deadlines. This system enhances the HB's ability to monitor progress and ensures accountability for all action owners.

Please find below the Table 1.0 a, b and c illustrating the completed recommendation.

**Table 1.0 a) -L.V
As of August 2023**

Site	No of Recs	H	M	L	Recs Completed to date				Assurance Rating (RA = Reasonable Assurance LA = Limited Assurance)
					H	M	L	Total	
BGH	9	1	7	1	1	4	0	5	R.A & L.A
WBH	21	7	12	2	5	11	1	16	L.A
PPH	27	4	7	16	0	0	1	1	L.A
GGH	25	2	8	15	0	1	4	5	L.A
					43%	44%	17%	33%	
	Total recs=82				Completed recs=27				

* High (H), Medium (M), Low (L)

**Table 1.0 b) -L.V
As of April 2024**

Site	No of Recs	H	M	L	Recs Completed to date				Assurance Rating (RA = Reasonable Assurance LA = Limited Assurance)
					H	M	L	Total	
BGH	9	1	7	1	1	4	0	5	R.A & L.A
WBH	21	7	12	2	6	11	1	18	L.A
PPH	27	4	7	16	2	4	12	18	L.A
GGH	25	2	8	15	1	2	5	8	L.A
					71%	62%	53%	60%	
	Total recs=82				Completed recs = 49				

Table 1.0 c) -L.V
As of Oct 2024

Site	No of Recs	H	M	L	Recs Completed to date				Assurance Rating (RA = Reasonable Assurance LA = Limited Assurance)
					H	M	L	Total	
BGH	9	1	7	1	1	5	1	7	R.A & L.A
WBH	21	7	12	2	6	11	1	18	L.A
PPH	27	4	7	16	3	5	13	21	L.A
GGH	25	2	8	15	2	5	5	12	L.A
					86%	76%	59%	71%	
	Total recs=82				Completed recs = 58				

The previous update to HSC indicated a small but positive shift in the compliance improvement from 2022 - 2024, reflecting the significant work of the Operational Estates and Compliance Team. Specifically focusing on High-Risk recommendations as a priority, over 86% have been completed.

The table below provides anticipated timeline for the remaining recommendation to be complete.

Table 1.0 d) -L.V

Risk Level	No of Risks Remaining	Anticipated Timeline for Completion				Awaiting confirmation
		3-6m	6-12m	12-18m	18-36m	
H	2			1		1
M	8	3		2		3
L	14	7	3	3		1

Note: High and Medium risks at 12-18 months relate to Electrical schematics and ageing Electrical infrastructure. This forms part of the Major infrastructure funding request to WG.

Since the previous update, the HB has recently received an additional Withybush Hospital (WGH) audit with a number of additional recommendations, as shown in Table 1.0e. These have now been risk scored and are being tracked through AMAT.

Please find below the Table 1.0 e illustrating the completed recommendation of the latest WGH audit.

Table 1.0 e) -L.V
As of Oct 2024

Site	No of Recs	H	M	L	Recs Completed to date				Assurance Rating (RA = Reasonable Assurance LA = Limited Assurance)
					H	M	L	Total	
WBH	33	4	4	25	0	0	12	12	L.A
					0%	0%	36%	36%	

Total recs=33	Completed recs=12
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The remaining overall high-risk recommendations not complete are more complex in nature and of a higher capital value (ageing electrical infrastructure) and will inevitably take longer than 12 months to achieve. These have now been escalated within the Electrical Safety Group and have been added to DATIX for further monitoring and tracking of their status and will form part of future major infrastructure programme.

With the implementation of the current measures and the actions that have since been completed, the HB anticipates a continued improvement in risk compliance during the next audit assessment in 2024/25.

Moving forward, all future updates for LV will be communicated through the WHTM Update Paper, alongside other WHTM disciplines (Decontamination, Medical Gas, Heating & Ventilation, Water, Fire, Electrical Services & Specialist Services). This will ensure that all relevant information is consolidated and easily accessible.

Argymhelliad / Recommendation

The Health and Safety Committee is asked to:

- RECEIVE ASSURANCE that since the previous Estates Low Voltage (LV) Electricity Compliance report a number of recommendations, particularly those high risk in nature have been completed.
- NOTE that the remaining medium and high risk outstanding relate to major infrastructure works and electrical schematics. This progress is evidenced in the recent submission of the AE audit by NWSSP-SES.

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, volunteer's contractors etc.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	1105, 502
Galluogwyr Ansawdd: Enablers of Quality: Quality and Engagement Act (sharepoint.com)	Not Applicable
Parthau Ansawdd: Domains of Quality Quality and Engagement Act (sharepoint.com)	2.1 Managing Risk and Promoting Health and Safety

Amcanion Strategol y BIP: UHB Strategic Objectives:	3. Striving to deliver and develop excellent services
Amcanion Cynllunio Planning Objectives	2a Staff health and wellbeing
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2021-2022	2. Develop a skilled and flexible workforce to meet the changing needs of the modern NHS

Gwybodaeth Ychwanegol: Further Information:	
Ar sail tystiolaeth: Evidence Base:	Contained within the body of the report. Estates Audit and Inspection Tracker_
Rhestr Termiau: Glossary of Terms:	AE Authorising Engineers AP Authorised Persons CP Competent Persons DP Designated Persons HB Health Board HDUHB Hywel Dda University Health Board HSE Health and Safety Executive HSG Health and Safety Guidance HTM Health Technical Memorandum LV Low Voltage WHTM Welsh Health Technical Memorandum Contained within the body of the report.
Partion / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Ansawdd lechyd a Diogelwch: Parties / Committees consulted prior to Health and Safety Committee:	Actions form part of the ESG or HB's Electricity Safety Group.

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

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

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 18th edition