Health Education and Improvement Wales

Lone Working Policy and Procedure

Policy Owner: Director of Workforce and OD

Approved by: Executive Team

Issue Date: 27 January 2021

Review Date: January 2024

Version: 1

Contents   Page

Lone Working Policy
Version 7 02/12/2021

1. Introduction

Health Education and Improvement Wales (HEIW) is committed to providing a safe environment for all of its employees whilst at work.

2. Purpose

This policy sets out how HEIW will ensure the safety of employees required to work alone. It provides a framework and describe the responsibilities of both the individual and HEIW to ensure the health, safety and welfare of employees whilst at work, according the duty of care specified in the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

The aims of the policy are to:
- raise awareness across all levels of employees to understand their responsibilities when lone working,
- highlight that regular lone working is an activity requiring risk assessment, and how this is achieved,
- provide guidance for Managers to ensure that employees performing lone working activities are safe to do so and that activities being performed whilst lone working are appropriate,
- outline the process for reporting incidents both through Datix and the Anti-Violence Collaboration,
- signpost support mechanisms in place.

3. Scope

This policy applies to all staff employed by or seconded to HEIW, including former Cardiff University employees, those from within Hosted Organisations and agency workers, who undertake lone working.

4. Definitions

For the purposes of this policy, **lone working is defined as when an employee is regularly engaged in official work tasks which, by their design, will probably be carried out in isolation, out of the sight and hearing of a trusted colleague (an HEIW employee or otherwise), who would be available to assist in an emergency, and may last for some time.**

There are no specific guidelines about how far away other people must be or what intervals must lapse between contacts or how capable the nearest trusted colleague is, before special arrangements for lone working can be put in place. A common sense approach should be adopted, considering the activity itself, the environment in which it takes place and the actual and perceived risks that arises from working alone.

Some examples of lone working, but not limited to these, are:

- working in a fixed establishment or other NHS premises with no other persons or trusted colleague on site, or when others may be elsewhere on site, but out of sight and hearing,
- visiting a trainee's, appraisee's or supplier's home or premises,
- travelling in the course of work (but not commuting to and from home, apart from those that have home as their base).

Employees working from their own home, even if they don't live with anyone, are not considered to be lone workers. In those cases, reference should be made to the HEIW Agile Working Policy (in development at 27/11/2020).

When considering the risk, it is important to distinguish between the chance occurrence of an employee finding themselves on their own and specific work or routines which are carried out in isolation. HEIW recognises that almost everyone may be a lone worker at some point in their normal work activity e.g. first to arrive or last to leave the office or having to go into a store or meeting room by themselves, this does not require a risk assessment, but employees should be aware of the situation they are in and assess any potential risks.

There are four threats which either directly or indirectly increase risk for the lone worker;

1. **health condition** where a sudden onset **may go unnoticed** e.g. epilepsy,

2. **mental health condition which may be exacerbated** by the stress or perceived dangers of working alone or dealing with harassment or conflict alone e.g. anxiety,

3. **unsafe physical environment** causing accident or injury e.g. trip or electrical hazards, car breakdown, no health and safety assessment undertaken, which **may go unnoticed**

4. **likelihood of experiencing verbal of physical abuse**, potentially exacerbated by racial, homophobic, gender tensions, because they don't have the immediate support of colleagues or security staff.

HEIW recognises that all employees are at risk when working alone, however, due to inequalities in society some employees may be more vulnerable due to their disability, gender identity, race or sexual orientation, and some may feel safer in certain settings than others.

5. Roles and Responsibilities

5.1 Employee's Responsibilities

All employees are responsible for taking reasonable care of their own health and safety, and ensuring others are not harmed or injured by their activities.

The key areas for the employee are:
- ensure that you perform your duties in a safe way **without taking unnecessary risks**,
- if appropriate, discuss with your manager any **health or medical conditions** which may impact on your work or make you more vulnerable when working alone,
- **participate in the risk assessment process** in order to identify hazards and realistic control measures that can be implemented to minimise the risks where possible,
- take reasonable steps **in advance** to protect yourself, and, **if you have any concerns** regarding your health or safety whilst actually working alone or feel threatened or vulnerable at any time, withdraw to a place of safety and/or rearrange the appointment, and discuss future options with your line manager.
  A place of safety may be to lock yourself in, retreat to your car or find somewhere public.
  In all instances, your action will always be supported by your line manager.
- ensure **someone is aware of your whereabouts**, maintain a shared appointment diary or log in and out with colleagues (buddy system), where appropriate and reasonable to do so,
- **attend training** to help you in lone working situations, such as management of violence and aggression, conflict resolution, personal safety and the use of lone worker devices / systems, if identified as needed by the risk assessment,
- **report all accidents or incidents, including near misses via datix** that happen within the course of the working day, including any aggressive or threatening behaviour, verbal abuse or physical assault, unsafe environments and important information on the risks faced, even if no further action is required.

An employee checklist is attached at **Things for** the Employee to think about
 and a useful NHS Staff Council brochures containing advice on what employees should consider in order to improve their personal safety when working alone, available [here](#).

5.2 Line Manager's Responsibilities

Line Managers are responsible for
- promoting this policy within their department and for ensuring lone workers are made aware of it,
- **ensuring pro-active risk assessment** and review of any lone working tasks or activities within their remit. The risk assessment should identify hazards that the workplace itself presents, the risk to the lone worker of violence and aggression or from the activity being completed whilst working alone e.g. manual handling.
- **making reasonable and tailored adjustments** to their work or workplace, including those required by the Equality Act 2010, to remove or reduce any risks to the lone working employee*.
- as part of the PADR process, ensuring that their team members are trained and assessed as competent to perform their full range of duties whilst working alone and that the duties are assessed as appropriate for one person. Setting the limits to what can and cannot be done while working alone and ensuring employees are competent to deal with the requirements of the job and are able to recognise when to seek advice from elsewhere,
- developing local procedures that support and protect lone workers in the team e.g. buddy systems,
- encouraging and supporting employees to complete incident reporting in both Datix and the Anti-Violence Collaboration, as appropriate,
- providing support, allowing employees to attend counselling, if required, and following-up and acting upon incident reports.

* If a lone worker has a pre-existing mental health condition or disability, employers may need to make reasonable adjustments to their work or workplace and this may require additional interventions, including those required by the Equality Act 2010 i.e. where a risk is identified, the employer must take steps to remove it or reduce it as far as reasonably practicable.

A line managers' checklist is attached at **7. Implementation, Monitoring, Review and Distribution**

This policy will be maintained and updated by HEIW People Team. HEIW will review the operation of the policy as necessary. At a minimum the policy will be reviewed at least every 3 years.

The policy will be available to employees via HEIW's intranet site. Where employees do not have access to the intranet, their manager must ensure that they have access to a paper or electronic copy of this policy.

8. Integrated Equality Impact Assessment (EqIA)

HEIW is committed to ensuring that, as far as is reasonably practicable, the way it treats its employees reflects their individual needs and does not discriminate against individuals or groups.

HEIW has undertaken an Integrated Equality Impact Assessment (EqIA) and received feedback on this policy and the way it operates. HEIW wanted to know of any possible adverse or differential impact that this policy may have on any groups in respect of: age, disability, gender identity; marriage (including same sex) or civil partnership, pregnancy and maternity issues, race, religion and or belief sexual orientation, transgender, carer, Welsh language, or other protected characteristics.

In exploring these possible adverse or differential impacts HEIW acknowledge the intersectionality of individuals. Meaning that due regard has been given to the way in which power structures based on factors such as: age, disability, gender identity, sexuality, race, religion, belief or non-belief and religion interact with each other to create barriers of overlapping discrimination and disadvantage.

The assessment found that there was an overwhelming number of positive impacts on individuals and groups and enables line managers to make plans for any necessary actions required to minimise any potential negative impacts, promote good practice and ensure that HEIW meets its responsibilities under the equalities, Welsh language and human rights legislation.

Appendix 1 and The NHS Staff Council brochures containing advice on what manager can do to support lone working employees, available [here](#).

5.3 Planning, Performance & Corporate Services' Responsibilities

The Facilities & Compliance Manager is responsible for:
- ensuring that an effective Risk Management System is in place,
- ensuring that an effective accident and incident reporting system is in place i.e. Datix.

5.4 People Team's Responsibilities

The People Team are responsible for
- ensuring that the policy is promoted and communicated,
- providing advice and guidance to all employees and line managers on policy and procedural matters relating to the Lone Working Policy to ensure a safe working environment for all employees,
- liaising with employees and line managers to ensure access to Occupational Health and signposting other support, if required,
- reviewing the policy as required and at least after 3 years.

6. Principles and Procedure

The Health, Safety and Wellbeing Partnership Group (HSWPG) of The NHS Staff Council has produced two brochures containing advice on what employees should consider in order to improve their personal safety when working alone and what managers can do to support lone working employees:

https://www.nhsemployers.org/case-studies-and-resources/2018/03/improving-safety-for-lone-workers-a-guide-for-staff-who-work-alone

https://www.nhsemployers.org/case-studies-and-resources/2018/03/improving-safety-for-lone-workers-a-guide-for-managers

It is recommended that these are read in conjunction with this policy.

6.1 Prevention

Sometimes the risk may be reduced by eliminating the hazard e.g. the meeting is taken out of the remote premises to a shared office, even if this means both parties travelling, or the employee is accompanied by a colleague.

Prevention is better than cure.

6.2 Training

Training is particularly important where there is limited supervision to control, guide and assist employees in uncertain situations and may be crucial in enabling employees to cope in unexpected circumstances. As a lone worker may be unable to ask a more experienced colleague for help, they need to be sufficiently experienced and fully understand the risks and precautions involved in their work and the location that they work in.

New workers or workers new to a situation may need to be accompanied at the start and should be supervised by periodically visiting and observing individuals working alone.

Lone workers, in particular, are encouraged to complete the Violence and Aggression mandatory module in ESR (Level 2).

Employee safety and wellbeing in relation to hate crime is especially key for lone workers. With Victim Support reporting that having a limiting disability, having transitioned or currently undergoing transition, being transgender or being from a minority group puts the employee at significantly greater risk of suffering from violence and theft, equality training is essential to ensure line managers are aware of these vulnerabilities. As is disability awareness training to ensure reasonable adjustments are not discounted.

6.3 Risk Assessment

Managers are responsible for ensuring that the risks of lone working activities are assessed in line with the organisational risk assessment procedure: (https://nhswales365.sharepoint.com/sites/heiw-intranet/SiteAssets/SitePages/Health-and-Safety/Risk%20Assessment%20Procedure.pdf).

It is anticipated that only one risk assessment is completed to cover all regular activities undertaken in that role e.g.
- using a 'borrowed' meeting room at a host health board alone, or maybe meeting with trainee, but no other HEIW employees around. Health Board employees might be elsewhere in building,
- meeting an external stakeholder at a coffee shop,
- running an event in a hotel and arriving alone to set-up an hour beforehand,
- meeting at a GP surgery or other premises out of hours.

The assessment should include the activities being completed, where they are done (the environment), the people involved (i.e. Are they known to HEIW?) and any factors specific to the employee such as training, competencies and suitability to work alone. It should also include an evaluation of the controls in place and whether they are practical and appropriate i.e. risk controls should be identified that are proportionate to the risk.

The checklists at **7. Implementation, Monitoring, Review and Distribution**

This policy will be maintained and updated by HEIW People Team. HEIW will review the operation of the policy as necessary. At a minimum the policy will be reviewed at least every 3 years.

The policy will be available to employees via HEIW's intranet site. Where employees do not have access to the intranet, their manager must ensure that they have access to a paper or electronic copy of this policy.

8. Integrated Equality Impact Assessment (EqIA)

HEIW is committed to ensuring that, as far as is reasonably practicable, the way it treats its employees reflects their individual needs and does not discriminate against individuals or groups.

HEIW has undertaken an Integrated Equality Impact Assessment (EqIA) and received feedback on this policy and the way it operates. HEIW wanted to know of any possible adverse or differential impact that this policy may have on any groups in respect of: age, disability, gender identity; marriage (including same sex) or civil partnership, pregnancy and maternity issues, race, religion and or belief sexual orientation, transgender, carer, Welsh language, or other protected characteristics.

In exploring these possible adverse or differential impacts HEIW acknowledge the intersectionality of individuals. Meaning that due regard has been given to the way in which power structures based on factors such as: age, disability, gender identity, sexuality, race, religion, belief or non-belief and religion interact with each other to create barriers of overlapping discrimination and disadvantage.

The assessment found that there was an overwhelming number of positive impacts on individuals and groups and enables line managers to make plans for any necessary actions required to minimise any potential negative impacts, promote good practice and ensure that HEIW meets its responsibilities under the equalities, Welsh language and human rights legislation.

Appendix 1 and **Things for** the Employee to think about
 can be used to inform the Risk Assessment.

Annual reviews of arrangements should be held to ensure that all measures are effective and continue to meet the requirements of the lone worker, **and always revisited after any incident or when circumstances change**.

If the line manager becomes aware of an employee has a disability, they will need to review the lone worker risk assessment to make sure it covers risks that might be present for that employee. They may need to involve others, for example occupational health specialists or the employee's GP, to understand any effects that the disability may have on workplace health and safety and how to minimise those risks and make reasonable adjustments to ensure the employee is not disadvantaged, but this should not be done without consulting the employee and obtaining consent. Reasonable adjustments may also be provided for employees with mental health conditions, including those which have been linked to stress. The line manager and employee should work together to discuss what might be helpful.

In addition, when employees are going to be working alone, they should assess any immediate and unfolding risks to their safety. This is called '**dynamic risk assessment**' and the employee should be assured that their line manager will support any decision they make at the time to withdraw to a place of safety if they feel in serious or imminent danger.

6.4 Lone Working Systems

Where regular lone working is unavoidable and involves risk, HEIW may invest in implementing a safe system of work that deals with the risks to lone workers, which may include a means of discreetly raising the alarm, if required. This technology will be supported by robust reporting systems that include colleagues knowing where the lone workers is, regular scheduled contact and emergency contacts should the lone worker get in trouble.

6.5 Incident Reporting

Employees must report all accidents or incidents that occur during the course of their work duties, relating to lone working or not and even if they feel no further action is required, and record it within the Datix risk management system, in line with the HEIW incident reporting policy e.g. car accident, trip/fall, other injury or electrical shock, hate crime, violence or abuse. A data breach does not fall into this category.

This must be done at the earliest possible opportunity to ensure that
- any injuries are documented,
- the employee may be properly debriefed and receive a physical assessment and access to post-incident support,

Lone Working Policy
Version 7 02/12/2021

- any additional controls can be put in place to minimise risk of harm in the future,
- separate incidents can be collated in order to highlight any patterns or repeat occurrences.

All incidents that are recorded on the Datix system are reviewed initially by the Facilities & Compliance Manager and then at each Health and Safety Committee meeting and monthly by the board, in order to share issues and potentially prevent others from encountering the same unsafe situation or risky environment.

In addition, all HEIW employees are also strongly encouraged to actively report violent incidents to the **NHS Wales Anti Violence Collaborative**. This is a partnership between NHS Wales, the Police and Crown Prosecution Service (CPS) which enables data to be collected, aggregated and acted upon under the 'Obligatory responses to violence in healthcare' agreement, provides co-ordinated support and a case adviser for the for the victim and facilitates prosecution of those who deliberately verbally and physically assault NHS employees. It is hosted by NHS Wales Shared Service Partnership: https://nwssp.nhs.wales/about-us/our-publications/nhs-wales-anti-violence-collaborative/

6.6 Employee Support

Full support will be provided to an employee following any incident at work. It is the manager's responsibility to provide support and reassurance, allow time to attend counselling, if required, and follow-up and act upon incident reports, including, but not limited to, reviewing the risk assessment and liaising with the police in the case of prosecutions.

In addition, support is available through the NHS Wales Anti Violence Collaborative and there is a wealth of wellbeing resources available to all HEIW employees on the intranet: https://nhswales365.sharepoint.com/sites/heiw-intranet/SitePages/Occupational-Health.aspx.

External agencies signposted in other policies may also be useful:
HEIW Dignity at Work Policy
HEIW Mental Health and Wellbeing Policy
HEIW Managing Attendance at Work Policy
HEIW Domestic Abuse Policy
HEIW Equality and Diversity Policy
HEIW Travel and Subsistence Policy

7. Implementation, Monitoring, Review and Distribution

This policy will be maintained and updated by HEIW People Team. HEIW will review the operation of the policy as necessary. At a minimum the policy will be reviewed at least every 3 years.

The policy will be available to employees via HEIW's intranet site. Where employees do not have access to the intranet, their manager must ensure that they have access to a paper or electronic copy of this policy.

8. Integrated Equality Impact Assessment (EqIA)

HEIW is committed to ensuring that, as far as is reasonably practicable, the way it treats its employees reflects their individual needs and does not discriminate against individuals or groups.

HEIW has undertaken an Integrated Equality Impact Assessment (EqIA) and received feedback on this policy and the way it operates. HEIW wanted to know of any possible adverse or differential impact that this policy may have on any groups in respect of: age, disability, gender identity; marriage (including same sex) or civil partnership, pregnancy and maternity issues, race, religion and or belief sexual orientation, transgender, carer, Welsh language, or other protected characteristics.

In exploring these possible adverse or differential impacts HEIW acknowledge the intersectionality of individuals. Meaning that due regard has been given to the way in which power structures based on factors such as: age, disability, gender identity, sexuality, race, religion, belief or non-belief and religion interact with each other to create barriers of overlapping discrimination and disadvantage.

The assessment found that there was an overwhelming number of positive impacts on individuals and groups and enables line managers to make plans for any necessary actions required to minimise any potential negative impacts, promote good practice and ensure that HEIW meets its responsibilities under the equalities, Welsh language and human rights legislation.

Appendix 1

Improving Safety for Lone Workers

A Checklist for Managers

☐ Are you familiar with HEIW Lone Worker Policy and, therefore, your responsibility as a manager to protect the health and wellbeing of any of your team undertaking lone working?
  o HEIW Lone Working Policy
  o NHS Employers, Safety for Lone Workers Manager's Guide
  o All Wales Managing Attendance at Work Policy
  o HEIW Mental Health and Employee Wellbeing Policy
  o HEIW Equality and Diversity Policy

☐ Has the lone worker been issued with all policies and procedures relating to lone working?
  o HEIW Lone Working Policy
  o NHS Employers, Safety for Lone Workers Employee's Guide
  o HEIW Equality and Diversity Policy

☐ Do they understand their responsibility for their own safety?

☐ Have they received induction and sufficient training and supervision in order to be aware of the risks and do their job safely?
  o HEIW Travel and Subsistence Policy (specifically claiming for taxi and hotel expenses, if they feel unsafe)
  o HEIW Agile Working Policy
  o HEIW Manual Handling Procedure
  o HEIW Travelling for Work Procedure

☐ Do they require training in conflict resolution and appropriate strategies for the prevention and management of violence?
  o Violence and Aggression (Level 2) Mandatory ESR Module,
  o Please talk to the People Team about access to other training, as appropriate,

☐ Has a risk assessment been completed and/or reviewed annually and appropriate action taken to reduce risks to their health and safety?

- ☐ Do they understand the importance of proper planning before a visit, the need to be aware of the risks and do everything they can in advance to ensure their own safety?
- ☐ Are they aware of appropriate lone worker procedures such as sharing their appointment diary, scheduling check-in calls with colleagues, storing emergency numbers on their mobile phones?
- ☐ Are they aware of the need to carry out continual dynamic risk assessments during their visits and have a contingency plan?
- ☐ Are they aware that they should never put themselves or colleagues in danger and that, if they feel threatened, they should withdraw immediately?
- ☐ Do they appreciate the circumstances under which visits should be terminated and have the reassurance of your full support?
- ☐ Do they know how important it is to report all incidents when they occur and how to do this?
  - o via Datix
  - o to NHS Wales Anti Violence Collaboration
- ☐ Are you up-to-date with Equality and Diversity training in order to properly assess differential vulnerability and discuss reasonable and tailored adjustments?

Appendix 2

<u>Improving Safety for Lone Workers</u>

<u>Things for the Employee to think about</u>

- Are you familiar with the policies and local procedures relating to lone working?
    - HEIW Lone Working Policy
    - NHS Employers, Safety for Lone Workers Employee's Guide
- Do you understand your responsibility for your own safety?
- Do you understand your manager's responsibility to protect your health and wellbeing whilst undertaking lone working?
    - NHS Employers, Safety for Lone Workers Manager's Guide
    - All Wales Managing Attendance at Work Policy
    - HEIW Mental Health and Employee Wellbeing Policy
    - HEIW Equality and Diversity Policy
- Have you received induction and sufficient training and supervision in order to be aware of the risks and do your job safely?
    - HEIW Travel and Subsistence Policy
    - HEIW Agile Working Policy
    - HEIW Manual Handling Procedure
    - HEIW Travelling for Work Procedure
- Are you aware that you can use a taxi, where your safety is at risk?
- Do you require training in conflict resolution and appropriate strategies for the prevention and management of violence?
    - Violence and Aggression (Level 2) Mandatory ESR Module,
    - Please talk to the People Team about access to other training, as appropriate,
- Has a risk assessment been completed and/or reviewed annually, and appropriate action taken to reduce risks to your health and safety whilst lone working?

- Do you understand the importance of proper planning before a visit, the need to be aware of the risks and do everything you can in advance to ensure their own safety, as appropriate? For example, but not limited to:
  - Share and maintain lone working appointments in your calendar,
  - Park in a public and well-lit place,
  - Remove your ID badge when not on NHS premises,
  - Storing emergency numbers on your mobile phone.
- Are you aware of the need to carry out continual dynamic risk assessments during your visits and have a contingency plan?
- Are they aware that you should never put yourself or colleagues in danger and that, if you feel threatened, you should withdraw immediately?
- Do you understand that you are assured your manager's full support, if you need to terminate an appointment?
- Do you know how important it is to report all incidents when they occur and how to do this?
  - via Datix
  - to NHS Wales Anti Violence Collaboration
- Are you aware of the support you can expect from your manager, internal health and wellbeing resources and external agencies?