



**Public – To be published on the Trust external website**

# **Title: Pressure Systems Policy**

**Ref: HS-0019-v1**

**Status: Ratified**

**Document type: Policy**

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## 1 Introduction

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The Health and Safety at Work etc Act 1974 puts a duty of care upon both employer and employee to ensure the safety of all patients, staff and visitors whilst using Trust premises.

The Trust implements best practice for pressure systems safety by following the principals and recommendations of Pressure Systems Safety Regulations, associated guidance documents HSG253 Safe Isolation of Plant and Equipment and L122 Pressure Systems Safety Regulation Approved Code of Practice.

Examples of pressure systems and equipment are:

- Boilers and heating systems
- Compressed air systems (fixed and portable)
- Pipework, hoses and pressure gauges

Relevant Fluids:

- Compressed Air over 0.5 bar g
- Steam at any Pressure
- Hot water over 110C
- Gas over 0.5 bar g
- Liquids where vapour pressure over 0.5 bar g is generated at a temperature over 15.5C

Living our values is never more important than at this time and this policy links to the creation of a workplace that is fit for purpose by creating a safe working environment and influencing staff, visitor and service user behaviours in regard to the management of Pressure Systems within the Trust.

This policy also supports the Trust's strategic goals. It is important that we work closely with the patients, ward teams and our pressure system sub-contractors, so that the service can be as good as it possibly can be, working to ensure that all involved have as much choice and control as possible, whilst ensuring everything linked to the service is dealt with in a safe and efficient manner, ensuring there is not any adverse impact on the workplace. We will work closely with our Trust colleagues, so they understand the key aspects of this policy.

Finally, we will work in close partnership with the other agencies involved with this service, to ensure seamless and responsive service.

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## 2 Why we need this policy

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## 2.1 Purpose

- This policy reflects the Trust’s strategic direction of travel and Our Journey to Change, by supporting the Trust values and goals. This policy will ensure pressure systems are constructed and maintained so as to prevent danger to patients, staff and visitors whilst on Trust premises by implementing the duties set out under the Pressure Systems Safety Regulations 2000 and other authoritative industry guidance.

## 2.2 Objectives

Adhering to this Policy will ensure that:

- The Trust fulfils its legal and legislative duties;
- All Trust personnel dealing with pressure systems are adequately qualified and are authorised accordingly;
- All pressure systems comply with legislative requirements;
- All buildings pressure systems are tested and certified in line with the Written Scheme of Examinations (Insurance Inspections) as recommended by the statutory bodies;
- All nominated ‘duty holders’ are fully trained.

## 3 Scope

The Pressure Systems Safety Regulations 2000 requires every employer and employee to comply with the provisions of the Regulations where they relate to matters within their control.

The Trust has a legal obligation to comply with all statutory legislation and it is their responsibility to ensure that all pressure systems are safe and fit for intended use

### 3.1 Who this policy applies to

This Policy applies to ALL staff, patients, visitors and Contractors (see control of contractors Policy)

### 3.2 Roles and responsibilities

Role	Responsibility
Chief Executive	Overall responsibility for Health and Safety within the Trust. Delegated to Executive Directors, Heads of Service, Nominated Officers and all Employees as defined in the Health and Safety at Work etc Act 1974
Director of Estates Capital Planning and Facilities Management	Delegated responsibility from the Chief Executive the Executive Director is designated as responsible for

	overseeing all aspects of safety management for the Trust for the purpose of this Policy is the Designated Person
Head of Estates and PFI	Delegated responsibility for implementing arrangements for statutory compliance in respect of all engineering services and ensuring suitably qualified persons are in place to assess and advise the Trust on all aspects of Pressure Systems.
Estates Engineering Officers (Authorised Persons Pressure Systems)	The nominated "duty holders" for the Trust who supervise the effective management of pressure systems and practical implementation of EMCOR UK MP-SSOW-04 and associated statutory requirements
Authorising Engineer Pressure Systems	Responsible for implementing, administering and monitoring the application of EMCOR UK MP-SSOW-04 guidance
Heads of Service/Service Managers/Locality Managers/Site Managers	Reporting of issue's that effect the safe use of pressure systems and to maintain a register of all maintenance repair requests relative to their respective departments.
Competent Persons	A named "Competent Person" is deemed to have sufficient training and/or experience to carry out work in a specific field to specific standards required by legislation
Employees	All employees have a responsibility under the Health and Safety at Work Act 1974 to ensure their own safety in the workplace which will include the general inspection of items of portable equipment to ensure they are suitable and in a "safe" condition before use.

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## 4 Policy

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This policy seeks to establish conditions whereby the use of pressure systems are constructed and maintained so as to prevent danger to patients, staff and visitors whilst on Trust premises by allocating adequate resources to implement and maintain the requirements of the policy and the duties set out under the Pressure Systems Safety Regulations 2000 and other authoritative industry guidance

The Trust aims to continually promote and develop a pro-active pressure systems regime by:

- Ensuring the appointment of Authorised personnel in accordance with the EMCOR UK MP-SSOW-04 Pressure Systems Safety Rules
- Providing relevant information, instruction and training for all employees;
- Implementing safe workplace Policies and rigorous maintenance routines for all pressure systems.

Staff must:

- Implement the safe working practices defined in this Policy;
- Report any perceived danger when using pressure systems and equipment;  
Implement corrective and preventative actions when it is safe and when authorised to do so.

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## 5 Definitions

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### 5.1 Designated Person

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- The Trust will appoint in writing Designated Person who will have overall authority and responsibility for the pressure systems within the premises and who has a duty under the Health and Safety at Work etc. Act 1974 to prepare and issue a general policy statement on health and safety at work, including the organisation and arrangements for carrying out that policy.

### 5.2 Authorising Engineer (Pressure Systems)

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- The Trust will appoint in writing an independent Mechanical Engineer who will act as Authorising Engineer for pressure systems and have the responsibility for implementing, administering and monitoring the application requirements of EMCOR UK MP-SSOW-04.
- For properties managed by other organisations on behalf of the Trust the Designated Person will review the arrangements in place for the appointments of

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the Authorising Engineer, assuring that the appointed person(s) have the appropriate qualifications/experience.

### **5.3 Authorised Persons (Pressure Systems)**

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- The Trust will ensure that Authorised Persons (Pressure Systems) are appointed in writing by the management on the recommendation of the Authorising Engineer (Pressure Systems) in accordance with EMCOR UK MP-SSOW-04.
- The Authorised Persons (Pressure Systems) will be responsible for the implementation and operation of EMCOR UK MP-SSOW-04 guidance with regards to work on, or the testing of, defined pressure systems and equipment
- Whilst acting in relation to the management and implementation of defined pressure systems and equipment, the Authorised Person will have overriding authority in relation to all aspects of pressure systems safety.

### **5.4 Competent Persons (Pressure Systems)**

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- The Trust will ensure that Competent Persons (Pressure Systems) are approved and appointed in writing by the Authorised Person (Pressure Systems).
- Any work on pressure systems equipment or services located on Trust premises must be carried out by a Competent Person or authorised contractor who should be an approved contractor with a recognised trade body.
- A person is deemed competent to carry out work on pressure systems equipment on Trust premises if they have:
  - have a recognised qualification in mechanical engineering and specifically for the system they are working on;
  - have sufficient training and experience to carry out the work in accordance with current best practices or protocols for safe systems of works to the standards required by the legislation, and are able to apply this to the tasks assessed or required by the Trust;
  - recognise the limitations of their own knowledge and experience; and
  - understand the principles of risk assessment and risk prevention.

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## 5.5 Risk assessment

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- All work carried out on pressure systems equipment on the Trust Premises including work carried out by authorised contractors is subject to a Permit to Work/Risk Assessment process.
- The results of all Risk Assessments for work on pressure systems equipment will be documented and include a detailed method statement that documents the following:
  - the steps that will be taken to ensure or verify that there is adequate working space, adequate means of access, and adequate lighting at all pressure systems equipment on which or near which work is being done;
  - the means by which the pressure systems equipment to be worked on shall be disconnected from every source of electrical energy;
  - the steps that will be taken to ensure that pressure systems equipment to be worked has been made safe by using a suitable isolation and depressurisation process as per HSG 253 'Safe Isolation of Plant and Equipment';
  - the precautions that will be taken to prevent pressure systems equipment, which has been isolated, from becoming pressurised during that work;
  - the personal safety equipment and tools that shall be required to prevent injury;
  - the action to be taken to segregate the work area and post warning notices;
  - the inspections and tests required on completion of the work;
  - the action required to return the pressure systems equipment to service;
  - and what information if any must be included on record drawings.
  - The process for reporting and documenting of incidents

## 6 Planning Work on Pressure Systems Equipment

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- Work on pressure systems equipment must be planned both in advance and while the work progresses. When planning work, the following factors will be considered:
  - the work to be done;
  - the hazards of the system or equipment to be worked on;
  - the people doing the work and the level of control/supervision necessary;
  - the precautions to be taken; and
  - the safe systems of work to be employed.



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## 6.1 Notification

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- Any work on pressure systems equipment that may have an effect on clinical or safety critical systems must be notified to the Authorised Person in advance.
- Notifications will set out:
  - the work to be carried out;
  - the effect that it will have; and
  - the duration of the work.
- Authorised Person must ensure that notification is sent to any department, or contractor who may be affected by the work.

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## 7 Permit to Work

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The following works carried out on pressure systems equipment on Trust Premises are subject to a safe system of work including a permit-to-work system and shall be carried out only as directed by the Authorised Person:

- switching, isolation or breaking into the pressure system that may affect clinical or safety critical systems, the safety of any patient or member of staff, or any other person working on or visiting the Trust premises:
- work on pressure system equipment; (which will only be for testing purposes under the authority of the Authorised Person)
- work on or preparing pressure systems for Insurance Inspection as per the Written Scheme of Examination and under the supervision of the Competent Person (Examiner)

Permits to Work for work on pressure systems equipment are issued by an Authorised Person following Trust standard Policies and guidance contained within EMCOR UK MP-SSOW-04 documentation.

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## 8 General Pressure Systems Work

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- A Permit-to-Work is not required for the following work if it is carried out by Competent Person or authorised contractor:
  - isolation of pressure systems and equipment to make them safe.
  - daily operational tests and level control checks of pressure systems,

## 9 Policy for working on isolated pressure systems equipment

Step	Action
1	<p>Before any work is carried out on pressure systems equipment that may give rise to danger, the Competent Person ensures there is adequate:</p> <ul style="list-style-type: none"> <li>• working space;</li> <li>• means of access; and</li> <li>• suitable and sufficient lighting.</li> </ul>
2	<p>Take all steps to protect against inadvertent contact with hot or cold object parts nearby by erecting physical barriers and/or using temporary insulation.</p>
3	<p>Nobody should work on pressure systems equipment on the Trust’s premises unless they are sure of the requirements of the safe working Policies set out in the safe systems of work and or method statement for the work. EMCOR UK MP-SSOW-04</p>
4	<p>Before isolating any pressure systems equipment, identify the plant to be worked on or near. Pressure systems equipment will be physically identified, aided by drawings, diagrams and other written information where possible. Valves and equipment may be labelled to help the identification process. However, never assume that labelling is correct.</p>
5	<p>Disconnect the equipment to be worked on from every source of electrical energy.</p>
6	<p>Take precautions to prevent pressure systems equipment, which has been isolated, from becoming pressurised during the work:</p> <ul style="list-style-type: none"> <li>• Lock off all isolators (safety lock).</li> <li>• Isolation valves (double block and bleed) must be fitted with safety locks, securing devices (wheel device/chain)</li> <li>• Depressurisation valves used for proving and venting must be locked in the open position</li> </ul>

## 10 Safety equipment

The Authorised Person **must** ensure that the following equipment is available, and *used where necessary* during any work on pressure systems equipment located on Trust premises (including work carried out by authorised contractors):

- safety glasses and face shields;
- ear defenders (where required)
- safety locks (differing from any normal system locks).

Equipment	Action
Safety equipment	<ul style="list-style-type: none"> <li>✓ Must be suitable for the hazard potentially encountered during the work;</li> <li>✓ Must be kept in approved containers when not in use and stored where it is not exposed to damage or deterioration.</li> </ul>

Contractors will be required to provide their own personal protective equipment, tools, safety devices and instruments, in the execution of any pressure systems work on Trust premise

## 11 Safety locks, caution signs and danger signs

Equipment	Action
Caution signs	✓ Will be fixed on all points of isolation (including electrical and fuel supplies) and depressurisation.
Safety locks	✓ (Differing from any standard locks) will be used on all points of isolation and points of depressurisation. The padlock should be the colour RED with a single key operation.
Danger signs	✓ Will be fixed on any equipment that remains live and is adjacent to the equipment to be worked on or tested. .
Keys for safety locks	✓ Will be retained in the possession of the Competent Person who applied them. If applied by an Authorised Person prior to issue of a permit to work they will be placed in a safety key box.

- The authorised person will fix and remove locks and signs when they need to be fixed to pressure systems equipment and a Permit-to-Work is required.

## 12 Operation of pressure systems equipment

- o The operation of the pressure system is to be under the control of the Authorised Person as appropriate.

## 13 Live working on pressure systems

Live work on a pressure system is the repair or adjustment of a leaking component whilst the pressure system remains above atmospheric pressure.

- o All live work on pressure systems shall be considered as a ‘highly significant risk’ and must therefore be avoided and alternative methods employed to carry out the work.
- o In extremely exceptional circumstances, live working is permitted provided it is undertaken in accordance with the following;
- o It is unreasonable in all circumstances for the system to be depressurised, and

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- It is reasonable in all circumstances to undertake live work, and
  - A detailed written Task Risk Assessment has been carried out, and
  - A written Safety Programme has been drawn up, and
  - The Safety Programme must be checked, approved and countersigned by an appropriate Authorising Engineer (Pressure Systems), and
  - Suitable precautions (including the provision of personal protective equipment) have been taken to prevent injury, and
  - A Sanction to Work Live has been issued.

## 14 Definitions

Term	Definition
<b>Reasonably Practicable</b>	Where a statement is qualified by the words 'reasonably practicable' a slightly less strict standard is imposed. It means that an assessment must be made balancing the magnitude of the risks of a particular work activity or environment with cost in terms of physical difficulty, time, trouble and expense which would be involved in taking steps to eliminate or minimise these risks.
<b>Authorising Engineer (Pressure Systems)</b>	A Chartered Engineer or Incorporated Mechanical Engineer who possesses the necessary degree of independence from local management and is appointed in writing by management to implement, administer and monitor the safety arrangements for the pressure systems of the organisation to ensure compliance with the Pressure Systems Regulations and to assess the suitability and appointment of candidates in writing to be "Authorised Persons".
<b>Authorised Person</b>	An individual appointed in writing who, in the opinion of an Authorising Engineer, has sufficient technical knowledge and experience required to prevent <b>danger</b> while carrying out work on defined pressure systems.
<b>Competent Person</b>	An individual appointed in writing who, in the opinion of an Authorised Person, has sufficient technical knowledge and experience required to prevent <b>danger</b> while carrying out work on defined pressure systems.
<b>Designated Person</b>	The Designated Person is an individual appointed by a healthcare organisation (a board member or a person with responsibilities to the board) who has overall authority and responsibility for the pressure systems within the premises and who has a duty under the Health and Safety at Work etc Act 1974 to prepare and issue a general policy statement on health and safety at work, including the organisation and arrangements for carrying out that policy. This person should not be the Authorising Engineer (Pressure Systems).
<b>Duty Holder</b>	A person on whom the Pressure Systems Safety Regulations impose a duty in connection with safety
<b>Pressure System</b>	A system comprising one or more pressure vessels of rigid construction, and associated pipework and protective devices. The pipework with its protective devices to which a

	transportable pressure receptacle is, or is intended to be, connected or a pipeline and its protective devices.
<b>Accompanying Safety Person (Pressure Systems)</b>	An Accompanying Safety Person is a person not directly involved in the work or test who has adequate knowledge, experience and ability to recognise danger, keep watch, prevent interruption, apply first-aid and summon help. The person is to be familiar with the system or installation being worked on or tested, and is to have been instructed on the action to be taken to safely rescue a person in the event of an accident.

## 15 Related documents

- The Trusts Health and Safety Policy
- Control of contractors policy

## 16 How this policy will be implemented

- The Chief Executive has ultimate accountability for this policy. Specific responsibility for policy implementation is delegated to respective Directors and Heads of Service etc. A Senior Manager within the Estates Department will appoint Authorised Persons to adopt responsibility for controlling and managing any identified risks from electrical equipment/work activities within the Trust.
- The implementation of this policy shall be delegated to appropriate identified Estates Staff with assistance from maintenance supervisors and craftsperson’s. Those persons appointed to carry out the control measures shall be suitably informed, instructed and trained to a standard which, ensures that tasks are carried out in a safe, technical competent manner. The operational requirements shall be determined and scheduled with a planned preventive maintenance regime set in place for identified tasks in accordance with relevant guidance.
- This policy will be published on the Trust’s intranet and external website.
- Line managers will disseminate this policy to all Trust employees through a line management briefing.
- Appropriate training is an essential element of safe working practices and Estates persons who are suitably electrically qualified shall be fully trained prior to being appointed or instructed to undertake duties under the safety Policies

## 16.1 Training needs analysis

Staff/Professional Group	Type of Training	Duration	Frequency of Training
Authorised Person Pressure Systems	Initial/Refresher	5 Days initial/3 days refresher	3 Years
Competent Person Pressure Systems	Initial/Refresher	2 Days	3 Years
Emergency First Aid	Refresher	1 Day	3 Years

## 17 How the implementation of this procedure will be monitored

Auditable Standard/Key Performance Indicators		Frequency/Method/Person Responsible	Where results and any Associate Action Plan will be reported to, implemented and monitored; (this will usually be via the relevant Governance Group).
1	Update/Amendments	Change in guidelines	TBC
2	Compliance	Compliance manager	Annual Review
3	Authorising Engineer Review	Audit	Annual Review

- A Senior Manager within the Estates Department in conjunction with the Authorising Engineers, Authorised Persons and the Mechanical and Pressure Systems Compliance Group will review this policy and the Trusts maintenance Policies on an annual basis and update as required to take account of new legislation, guidance, changes to personnel, Policies, protocols etc. and as a result of audit findings.

## 18 References

Health and Safety Executive Guidance Notes:-

- Pressure Systems Safety Regulation Approved Code of Practice L122
- The Safe Isolation of Plant and Equipment HSG253
- Guidance on the Safe Operation of Boilers BG01
- Written Schemes of Examination INDG178
- The Health and Safety at Work etc Act 1974
- Pressure Systems Safety Regulations
- Pressure Equipment Regulations
- The Electricity at Work Regulations 1989
- The Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations
- Lifting Operations and Lifting Equipment Regulations

EMCOR MP-SSOW-04 Pressure Systems Safety Rules

## 19 Document control (external)

To be recorded on the policy register by Policy Coordinator

Date of approval	20 July 2022 (pending)
Next review date	20 July 2025 (pending)
This document replaces	N/A – new document
This document was approved by	Health, Safety, Security and Fire Group
This document was approved	18 November 2021
This document was approved by (second group)	Estates and Facilities Management Directorate Team Meeting
This document was approved (second group)	14 October 2022
This document was ratified by	Management Group
This document was ratified	20 July 2022
An equality analysis was completed on this policy on	September 2021
Document type	Public



FOI Clause (Private documents only)	n/a

**Change record**

Version	Date	Amendment details	Status
1	20 July 2022	New document	Ratified

## Appendix 1 - Equality Analysis Screening Form

Please note: The Equality Analysis Policy and Equality Analysis Guidance can be found on the policy pages of the intranet

Section 1	Scope
Name of service area/directorate/department	Estates and Facilities Management
Title	Pressure Systems Policy
Type	Policy
Geographical area covered	Trustwide
Aims and objectives	This Policy aims to ensure Pressure systems are constructed and maintained so as to prevent danger to patients, staff and visitors whilst on Trust premises by implementing the duties set out under the Pressure Systems Safety Regulation and other authoritative industry guidance.
Start date of Equality Analysis Screening	September 2021
End date of Equality Analysis Screening	September 2021

Section 2	Impacts
Who does the Policy, Service, Function, Strategy, Code of practice, Guidance, Project or Business plan benefit?	Patients, Staff, Visitors and FM Provider
Will the Policy, Service, Function, Strategy, Code of practice, Guidance, Project or Business plan impact negatively on any of the protected characteristic groups?	<ul style="list-style-type: none"> <li>• <b>Race</b> (including Gypsy and Traveller) <b>NO</b></li> <li>• <b>Disability</b> (includes physical, learning, mental health, sensory and medical disabilities) <b>NO</b></li> <li>• <b>Sex</b> (Men, women and gender neutral etc.) <b>NO</b></li> <li>• <b>Gender reassignment</b> (Transgender and gender identity) <b>NO</b></li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Sexual Orientation</b> (Lesbian, Gay, Bisexual and Heterosexual etc.) <b>NO</b></li> <li>• <b>Age</b> (includes, young people, older people – people of all ages) <b>NO</b></li> <li>• <b>Religion or Belief</b> (includes faith groups, atheism and philosophical beliefs) <b>NO</b></li> <li>• <b>Pregnancy and Maternity</b> (includes pregnancy, women who are breastfeeding and women on maternity leave) <b>NO</b></li> <li>• <b>Marriage and Civil Partnership</b> (includes opposite and same sex couples who are married or civil partners) <b>NO</b></li> <li>• <b>Veterans</b> (includes serving armed forces personnel, reservists, veterans and their families) <b>NO</b></li> </ul>
Describe any negative impacts	
Describe any positive impacts	By Implementing this Policy will ensure Pressure systems are constructed and maintained so as to prevent danger to patients, staff and visitors whilst on Trust premises by implementing the duties set out under the Pressure Systems Safety Regulation and other authoritative industry guidance.

<b>Section 3</b>	<b>Research and involvement</b>
What sources of information have you considered? (e.g. legislation, codes of practice, best practice, nice guidelines, CQC reports or feedback etc.)	Yes - See references section
Have you engaged or consulted with service users, carers, staff and other stakeholders including people from the protected groups?	Yes
If you answered Yes above, describe the engagement and involvement that has taken place	Trustwide consultation has taken place and trust staff comprise all protected characteristics

If you answered No above, describe future plans that you may have to engage and involve people from different groups

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Section 4	Training needs
As part of this equality analysis have any training needs/service needs been identified?	Yes - Only suitably trained staff
Describe any training needs for Trust staff	Yes – see training needs analysis section
Describe any training needs for patients	No
Describe any training needs for contractors or other outside agencies	Yes – see training needs analysis section

**Check the information you have provided and ensure additional evidence can be provided if asked**

## Appendix 2 – Approval checklist

	Title of document being reviewed:	Yes/No/ Not applicable	Comments
<b>1.</b>	<b>Title</b>		
	Is the title clear and unambiguous?	Yes	
	Is it clear whether the document is a guideline, policy, protocol or standard?	Yes	
<b>2.</b>	<b>Rationale</b>		
	Are reasons for development of the document stated?	Yes	
<b>3.</b>	<b>Development Process</b>		
	Are people involved in the development identified?	Yes	
	Has relevant expertise has been sought/used?	Yes	
	Is there evidence of consultation with stakeholders and users?	Yes	
	Have any related documents or documents that are impacted by this change been identified and updated?	Yes	
<b>4.</b>	<b>Content</b>		
	Is the objective of the document clear?	Yes	
	Is the target population clear and unambiguous?	Yes	
	Are the intended outcomes described?	Yes	
	Are the statements clear and unambiguous?	Yes	
<b>5.</b>	<b>Evidence Base</b>		
	Is the type of evidence to support the document identified explicitly?	Yes	
	Are key references cited?	Yes	
	Are supporting documents referenced?	Yes	
<b>6.</b>	<b>Training</b>		
	Have training needs been considered?	Yes	
	Are training needs included in the document?	Yes	
<b>7.</b>	<b>Implementation and monitoring</b>		

	<b>Title of document being reviewed:</b>	<b>Yes/No/ Not applicable</b>	<b>Comments</b>
	Does the document identify how it will be implemented and monitored?	Yes	
<b>8.</b>	<b>Equality analysis</b>		
	Has an equality analysis been completed for the document?	Yes	
	Have Equality and Diversity reviewed and approved the equality analysis?	Yes	
<b>9.</b>	<b>Approval</b>		
	Does the document identify which committee/group will approve it?	Yes	
<b>10.</b>	<b>Publication</b>		
	Has the policy been reviewed for harm?	Yes	
	Does the document identify whether it is private or public?	Yes	
	If private, does the document identify which clause of the Freedom of Information Act 2000 applies?	N/A	