



Item No. 14

Meeting Date Wednesday 14th April 2021

**Glasgow City
Integration Joint Board
Finance, Audit and Scrutiny Committee**

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**Health and Safety Annual Report
January 2020 - December 2020**

Purpose of Report:	To provide the IJB Finance, Audit and Scrutiny Committee with an overview of the main Health & Safety challenges faced in 2020 as well as performance and notable key issues and the implications for the HSCP.
Background/Engagement:	<p>This is the first Annual Report for Health and Safety provided to the IJB Finance, Audit and Scrutiny Committee.</p> <p>Two Management Systems are used in the governing of Health and Safety as part of the partnership; Glasgow City Council's and that of NHS GG&C. Both employers have a duty of care for the health and safety of all HSCP employees as part of the partnership, as well as service users and others who may be affected by their operations, acts and omissions.</p>
Recommendations:	<p>The IJB Finance, Audit and Scrutiny Committee is asked to:</p> <ul style="list-style-type: none">a) Note the findings made within this report and the data attached;b) Note the main challenges faced throughout the year, and current service and future developments; andc) Note the potential implications and resources which may be required from investigations and enforcement notices.

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Relevance to Integration Joint Board Strategic Plan:

Ongoing transformation and improvement of Health and Safety is a key element to the operation of the IJB/HSCP in order to meet the relevant statutory requirements and strive for best practice. In addition, it is imperative that both employees and service users are free from harm whilst at work or whilst engaging with services, so far as is reasonably practicable.

Effective management of Health and Safety ensures that staff have the correct information, instruction and training to enable them to carry out their work safely. Ongoing monitoring and improvement is essential in continuing to achieve best practice. This in turn, is key to reducing accidents and incidents, whilst also minimising lost time, absence, and potential claims and prosecutions.

Implications for Health and Social Care Partnership:

Reference to National Health & Wellbeing Outcome:	This report is relevant in supporting GCHSCP in achieving all nine health and wellbeing outcomes, however outcomes 7, 8 and 9 are directly related.
Personnel:	All employees throughout GCHSCP have responsibilities for health and safety. All managers have a responsibility for contributing to the management and ongoing improvement of this.
Carers:	N/A
Provider Organisations:	N/A
Equalities:	N/A
Fairer Scotland Compliance:	N/A
Financial:	<p>The report contains several potential financial implications for the Health and Social Care Partnership. Internal investigations carried out, and recommendations as part of these may have costs associated.</p> <p>In addition, any investigation carried out by the Health and Safety Executive may have costs associated with any Fee For Intervention / Notice of Contravention.</p>
Legal:	Failure to adhere to Health and Safety law and comply with the requirements of GCC and NHS GG&C Health and Safety Management systems have the potential to have criminal and civil legal implications to the organisations.
Economic Impact:	N/A
Sustainability:	N/A

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Sustainable Procurement and Article 19:	N/A
Risk Implications:	<p>The effective management of health and safety is pertinent in managing the risks associated with the operations and services operated by the HSCP. This includes ensuring that all those acting on behalf of the HSCP continue to have the relevant information, instruction and training to enable them to carry out their job safely and ensuring all reasonably foreseeable hazards are assessed with suitable and sufficient control measures in place.</p> <p>Failure to effectively manage health and safety may result in accidents, injury, ill-health, workplace fatalities, and both civil and criminal prosecutions.</p> <p>There are moral, legal and financial obligations to manage health and safety, whilst continuing to maintain the reputation of GCHSCP.</p>
Implications for Glasgow City Council:	<p>Glasgow City Council have the legal responsibility to manage the health and safety of their employees as well as those who may be affected by their operations. Failure to manage this effectively may result in accident and incidents, potential legal and financial implications, in addition to having an impact on the reputation of Glasgow City Council.</p>
Implications for NHS Greater Glasgow & Clyde:	<p>NHS GG&C have the same legal responsibility for the management of health and safety. Failure to manage this effectively may result in accidents and incidents, legal and financial implications, in addition to reputational impact.</p>

1. Purpose and Structure of the report

- 1.1. The purpose of this report is to provide the IJB Finance, Audit and Scrutiny Committee with an overview of the main Health & Safety challenges faced in 2020 and data on performance.
- 1.2. Due to the structure of the HSCP, two Health and Safety Management systems work alongside each other in order to manage the legal duties of both organisations, under the Health and Safety at Work Act 1974 and all other relevant legislation.
- 1.3. This report will provide overview from both the Glasgow City Council and NHS Health and Safety teams.

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2. Responsibilities

- 2.1. The GCHSCP Chief Officer has overall responsibility for ensuring the health and safety organisational arrangements developed by GCC & NHS GG&C are implemented throughout GCHSCP.
- 2.2. Management and other senior employees have delegated responsibility to implement and manage these arrangements within their particular service area or premises, and the delegation of health and safety responsibilities reflects the management structure within GCHSCP.
- 2.3. The GCC Health and Safety Management System is used to govern and support all employees of GCC, as part of the HSCP. Where GCC has responsibility for the operation of the building, this will be managed by the GCC Health and Safety Management System and the person responsible for the building made aware of the processes and procedures in place, with delegated authority for their implementation.
- 2.4. Where employees of NHS GG&C work within the building, GCC H&S procedures and processes will be used to ensure they remain free from injury and harm whilst at work. The NHS remains to owe a duty of care to their own employees under Health and Safety Law, regardless of their work location.
- 2.5. The NHS GG&C Health and Safety Management system is used to govern and support all employees of the NHS, as part of the HSCP. Where NHS Estates has responsibility for the operation of the building, this will be managed by the NHS GG&C Health and Safety Management System and the person responsible for the building made aware of the processes and procedures in place, with delegated authority for their implementation.
- 2.6. Where employees of GCC work within the building, NHS GG&C H&S procedures and processes will be used to ensure they remain free from injury and harm whilst at work. GCC remains to owe a duty of care to their own employees under Health and Safety Law, regardless of their work location.
- 2.7. There is recognition that GCC and NHS GG&C are accountable for their respective services as part of the Partnership, however it is pertinent that there is an integrated approach and that both Health & Safety Management Systems work in cooperation with each other to achieve operational consistency.
- 2.8. GCHSCP holds quarterly Health & Safety Committee meetings, however these have been suspended since the beginning of the Covid-19 pandemic and will resume in 2021.

3. The role of GCC H&S Team Jan - Dec 2020

- 3.1. The COVID-19 pandemic has presented many challenges throughout GCHSCP, with GCC SWS H&S team playing a key role in assisting services managing risk throughout all Social Work Services. Support in managing the risks associated with COVID-19 became the key role of the team, supporting services in the implementation of public health guidance and providing advice and guidance on infection control measures and risk assessments.

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- 3.2. The role of the SWS H&S team diversified significantly between March 2020 and December 2020, with a hiatus placed on traditional auditing and inspection.
- 3.3. The SWS H&S team provided adaptations to the GCC Corporate Safety model for Risk Assessments in managing COVID-19 throughout the service, and the Safe Return to the Workplace, to better reflect the needs of GCHSCP. This captured the requirement of the essential nature of the services and the need to operate in a different manner throughout the various Scottish Government Tiers.

4. The role of NHS H&S Team

- 4.1. The Health and Safety Team's primary purpose is to ensure our workforce has a safe working environment. The team are required to provide appropriate, professional and competent Health, Safety and Welfare advice, guidance and support to the NHSGGC Board, its Directors/Chief Officers and employees, and representatives of Staff Associations and Trade Unions. The Team both collectively and individually provide support and advice to the local management teams and staff within Acute Services, Health and Social Care Partnerships and Corporate Directorates (e.g. Estates and Facilities).
- 4.2. The COVID-19 pandemic affected operations across the whole of NHS GGC and the focus of the H&S Service during this time has been to; support a mass face fit programme across GGC, as well as, the development and implementation of a focussed risk assessment programme.

5. Key Challenges for GCC SWS H&S

- 5.1. The COVID-19 pandemic had an initial adverse effect on the completion of Fire Safety Risk assessments and Audits throughout Social Work Services, throughout the first and second quarter of 2020. For all high risk premises in SWS (Residential, Elderly Day Care and complex buildings) these are carried out annually by SWS H&S. In normal risk premises annual Fire Safety Risk Assessments are carried out by the nominated person within the building or under the delegated responsibility of the Responsible Person.

The H&S team have diversified the way in which audits and Fire Risk Assessments have been carried out in the last quarter of 2020, with desktop and remote practices being used.

The team have continued to work closely with service management to ensure both legal compliance and strengthening relationships with Scottish Fire and Rescue to meet their expectations. It is anticipated in 2021, work will be carried out with services to reinstate pre-pandemic regimes of audit and inspection.

- 5.2. The COVID-19 pandemic had a significant impact on the GCC SWS H&S training schedule in 2020. The challenges arose as a result of the tiered lockdown system and 'Stay at Home' Guidance, in addition to staffing levels and availability. Social and physical distancing further impacted the number of delegates who were able to attend each course – in some instances reducing numbers to a maximum capacity of 30% of normal course spaces.

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From June 2020 – December 2020 the team adapted current courses and traditional learning methods, working with services to deliver training in a way that maintained COVID-19 compliance requirements, as well as being tailored to their needs and business continuity plans. It is anticipated in 2021, ongoing work will be required to close the mandatory training gaps as a result of the COVID-19 pandemic.

- 5.3. The 'Stay at Home' guidance led to a significant increase in employees who worked from home throughout 2020. Guidance was provided to managers in supporting employees to work from home, as well as information provided to employees as to how to work well from home and protect their mental health and wellbeing.

A council-wide Interim Home Working DSE assessment was created and distributed for use, in order to assess any adjustments required, and equipment was provided where appropriate. A longer term strategy is underway throughout the council at present including a GOLD course in DSE to digitalise these assessments.

6. Key Challenges for NHS GG&C H&S

- 6.1. The key challenges faced in the reporting year were directly related to the COVID-19 response. The significant increase in the volume of staff who required a high level of Respiratory Protective Equipment (RPE), namely, FFP3, coupled with changing supplies of FFP3 masks through National Procurement, resulted in a re-direction of H&S resources and an enduring programme to refit staff.

- 6.2. In response to Government guidance and in order to reduce the risk associated with COVID-19, a guidance document for managers and staff was developed by the service.

To comply with the guidance and to ensure that suitable and sufficient control measures were in place to protect staff, patients and visitors, required a focussed response through a multi-disciplinary team namely; Health and Safety, Estates and Facilities, Infection Control, HSCP and Acute Services and staff-side. An Operational Group was therefore established to manage and facilitate a risk assessment process across NHS GGC. This was to ensure that service specific workplace risk assessments were completed and any required physical controls were implemented. The COVID-19 risk assessment process reached a completion status in September 2020.

- 6.3. Aside from the physical controls that were implemented in response to COVID-19, it became apparent that there was a need to continue to communicate and educate staff on the importance of social distancing measures. A Social Distancing Communications group was later established in October 2020.

Both groups remain active.

- 6.4. NHS GG&C created Home Working Risk Assessment self-assessment and employees and management were notified through the core brief to complete this. It was ensured that any equipment required was provided as part of this.

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7. Accident and Incidents GCC (Jan – December 2020)

- 7.1. Accidents and Incidents within GCC are recorded on the HandS incident reporting system. The system has been developed bespoke to the needs of GCC for data recording and statistical analysis.
- 7.2. During 2020 the GCC H&S team continued to work with services to utilise the system, as well as providing training to those who required it.
- 7.3. The accident and incident data for GCC is shown in Appendix 1 Figure A. This data reflects where the injured person is a GCC employee, NHS employee working in a GCC building, agency worker or contractor.
- 7.4. The data available indicates that slips and trips, and falls whilst ascending and descending are the leading incidents within GCC. It should be noted that 68% of slips and trips and 70% of falls whilst ascending and descending are reported within Home Care.
- 7.5. A total of 43 incidents were reported to the HSE under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), with the injured person being an employee. The breakdown of why these incidents were reportable is highlighted in Appendix 1 Figure B, with a breakdown of the incident type outlined in Appendix 1 Figure D. The most reported incidents were slips and trips which account for 37% of all incidents.
- 7.6. Two RIDDOR reportable incidents were reported to the HSE where a service user was the injured person. These were both reported as a 'Member of the public taken directly to hospital'.
- 7.7. 1262 incidences of Violence were recorded, where the employee was deemed to be the affected person. Incidents are recorded as Verbal only, Physical only or a combination of both Verbal and Physical violence. Appendix 1 Figures E & F show the incidents by area, as well as the percentage of incidents which each service area is accountable for reporting.
- 7.8. 30 fire events and 60 false alarms were recorded on the HandS system in 2020. Fire events include where there is flame or smoke, and this includes events where these may have accidentally set off the fire alarm including cooking, as well as deliberate fire raising events. The locations of these are outlined within Figure G.

8. Accident and Incidents for NHS GG&C (Jan-December 2020)

- 8.1. The total number of recorded employee incidents for NHS GG&C within GCC HSCP was 2624. Appendix 2 highlights the accident and incident data for where the injured person is an employee.
- 8.2. Appendix 2 identifies incidents by type with 234 incidents categorised as "other incidents". From this, it is anticipated that staff education is required to ensure these are categorized effectively.

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- 8.3. 1916 of the incidents recorded relate to violence, making this the most common type of incident reported. "Other", Infection Control (COVID-19 related), Stress and Slip/Trip/Falls were the top four otherwise reported.
- 8.4. A total of 27 incidents were reported to the HSE as RIDDOR reportable incidents, with a breakdown of these incidents outlined in Figure 3 of Appendix 2. With the exception of two incidents all of the RIDDOR reportable incidents have been investigated by H&S Partnerships and reports shared with Line Managers for recommendations to be implemented by Sector.
- 8.5. Appendix 2 Figure 4 outlines the approval status of these incidents.

9. Notable Incidents & Enforcing Authority Involvement GCC

- 9.1. A staff member within a Residential unit was injured whilst carrying out a physical intervention. This incident was reported to the HSE and was subject to investigation. An internal investigation was carried out by SWS H&S and a number of recommendations made, and improvement opportunities identified.

An Improvement Notice was served upon Glasgow City Council by the HSE and a target date for compliance with this notice was set at 3rd March 2021, with a number of action points to be complied with. On 24th December 2020 the HSE identified that they were satisfied that the Improvement Notice has now been complied with.

- 9.2. The Equipu store, under the direction of Glasgow City Council and in its role of service provider, is responsible for the maintenance of community equipment on behalf of partnership organisations. The Equipu Partnership is a multi-authority collaboration, in which Glasgow City Council is also the lead partner. Following a service user falling from a defected hoist within one of the Local Authority areas, a review of the roles and responsibilities related to inspection and maintenance of community equipment was carried out.

Recommendations have been made to the Equipu Review Board on the role of Equipu in ensuring compliance with their duties under The Health and Safety at Work Act 1974, Lifting Operations Lifting Equipment Regulations 1998 and Provision and Use of Work Equipment Regulations 1999.

10. Notable incidents & Enforcing Authority Involvement NHS GG&C

10.1. Non Glasgow - Mental Health In- Patients Unit – HSE Visit

The HSE contacted NHS GG&C Health & Safety Service in September 2020, having been made aware of a patient suicide incident that occurred in January 2020. A HSE investigation is currently underway.

In tandem with the HSE investigation a review of ligature risk and governance of ligature risk reduction across NHS GGC is underway. It should be noted that whilst this is not within GCHSCP, the investigation details are likely to have implications across the wider HSCPs.

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11. Audits and Fire Safety Risk Assessments GCC

- 11.1. The SWS Health and Safety Team had scheduled a minimum of 33 audits and 41 Fire Safety Risk Assessments for 2020, at the beginning of the year. Due to the pandemic, the priorities for the service altered.
- 11.2. Through diversifying techniques and ensuring adherence to relevant Covid-19 restrictions, 7 audits and 23 Fire Safety Risk assessments were carried out in 2020 by the Health and Safety team.
- 11.3. The H&S team also assisted Scottish Fire & Rescue and Managements in their desktop audits, to prevent face-to-face visits from being carried out. Desktop Fire Safety Risk Assessment reviews were carried out in the interim for Elderly Residential Units in an attempt to limit any footfall. These will be visited in early 2021 in order to ensure the assessments remain suitable and sufficient.
- 11.4. Over these audits, the average score at date of audit was 89% compliance. It should be noted that this cannot be classed as a true reflection

12. Audits NHS GG&C

- 12.1. The NHSGGC Health & Safety Action plan requires 25% of H&S Management Manual Audits manuals are audited annually. Seventeen Health & Safety Management Manual Audits had been scheduled to be undertaken across Glasgow City HSCP for the first quarter of 2020, with four being completed during January to March 2020.
- 12.2. The audits have been paused due to the NHS GGC Health & Safety Service workload being reassigned with the priority being to assist in the delivery of Quantitative Face Fit Testing programme in response to the COVID-19 pandemic
- 12.3. Below are the scores from the four anonymous locations audited, it is noted that 2 areas scored Poor overall which is below 59% and 2 scored Moderate 60 to 79%.

General	Hazard Identification & Risk Assessment	Hazardous Substance	Violence & Aggression	Lone Working	Moving & Handling	Display Screen Equipment	Stress	Workplace Inspection	Slips, Trips, Falls	Sharps	Total
56%	50%	45%	69%	83%	0%	8%	0%	0%	0%	38%	39%
44%	38%	20%	25%	50%	83%	38%	50%	50%	25%	N/A	42%
66%	19%	90%	N/A	N/A	42%	N/A	25%	75%	100%	88%	60%
81%	83%	N/A	67%	42%	N/A	67%	58%	88%	25%	100%	70%

Please note that Fire Safety doesn't fall under the remit of Health & Safety Services.

- 12.4 A Social Distancing self-assessment audit was developed and implemented in December 2020. Managers / Health and Safety Management Manual holders were requested to participate and complete the audit.

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13. Training GCC

- 13.1. The H&S training calendar had a proposed 111 training courses scheduled for employees to attend in 2020. Due to Covid-19 restrictions, the training calendar was suspended in March.
- 13.2. A total of 25 H&S training courses were carried out across the year, with priority for those staff who were new, or those within our residential units who required refresher training in Fire.
- 13.3. At this time, it is not possible to identify the true nature of the training gap or compliance level at this time. It is hoped that in 2021, work towards a more effective training recording system will help to allow gaps to be more readily identified. Focus and resources will be required in 2021 from the H&S team to assist services in closing the gap.

14. Training NHS GG&C

- 14.1. For the HSE training requirement for the HSCP compliance level is detailed below

	January 20	December 20
Sharps	57 %	76%
Moving & Handling	37%	74%
Falls	11%	85%

It is noted that there has been a significant improvement in compliance, however the expectation by NHS GG&C Board is that all staff (who are in scope) must complete this training. The requirement is to achieve 100% compliance in 2021. This should be addressed as a priority for all staff.

- 14.2. Statutory & Mandatory Compliance as at January 2021

Equality & Diversity	Fire Safety	Health & Safety	Infec. Control	Info Governance
95.50%	84.50%	95.70%	95.10%	93.50%
Manual Handling	Public Protection	Security & Threat	Violence & Aggression	
95.30%	94.90%	95.40%	95.80%	

15. Recommendations

- 15.1 The IJB Finance, Audit and Scrutiny Committee is asked to:
- Note the findings made within this report and the data attached;
 - Note the main challenges faced throughout the year, and current service and future developments; and
 - Note the potential implications and resources which may be required from investigations and enforcement notices.

Appendix 1 - Accidents and Incidents (GCC)

Figure A: Accidents by category and service area, where the affected person is an employee*


	Slip/Trip	Collision w/object, fixture, or person	Fall whilst ascend / descend	Injured whilst carrying loads	Injured whilst M&H people	Hit by moving, flying, falling obj.	Contact with sharp object	Needle-stick	Equip. Failure	Horseplay (non-violence)	Nip/pinch	Finger Jam	Animals	Burn/Scald	Contact w/ machinery	Crush	Contact with biological agent	Sport activity	Unexplained injury	Electric shock	RIDDOR	
	Children's Residential	3	1	1	0	0	1	1	0	0	2	0	0	0	0	0	0	0	1	0	0	0
Home Care	52	14	24	2	1	4	2	2	0	0	0	2	10	1	1	1	0	0	0	1	0	30
Elderly Residential	9	3	0	1	9	0	3	0	0	0	2	1	0	3	0	2	0	0	2	0	0	4
Homelessness, CJ & Asylum	2	0	3	0	0	0	1	2	1	0	0	0	0	0	0	0	1	0	0	0	0	0
Equipu	2	1	1	5	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TaSS	2	0	0	2	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Alarm Response centre	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
OP Day Care	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
South Area Services	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
North West Services	2	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
North East Area Services	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
	76	20	30	11	11	9	9	5	1	2	2	3	11	4	1	3	1	1	2	1	43	

Figure B: RIDDOR Categories

Specified injuries Absence over 7 days

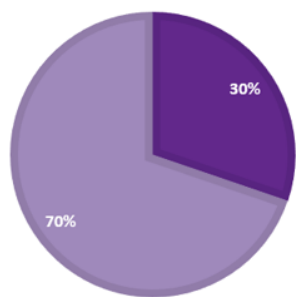


Figure C: RIDDOR 2019 v 2020

	2019	2020
Specified Major Injuries	8	13
Over 7 day injuries	37	30
Total	45	43

Figure D: RIDDOR incident Type

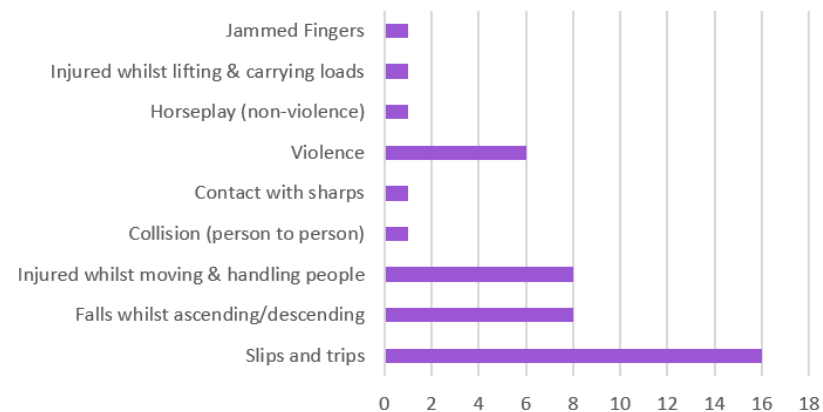


Figure E: Violence to staff Incidents

	Violent incidents (by category)		
	Verbal only	Physical only	Verbal & Physical
Children’s Residential	115	63	457
Home Care	54	41	47
Elderly Res	41	115	255
Homelessness, CJ & Asylum	23	0	3
Equipu	0	0	0
TaSS	2	0	0
Alarm Response centre	0	0	2
OP Day Care	2	2	0
South Area Services	7	1	3
North West Services	8	0	2
North East Area Services	13	2	4
	265	224	773

Figure F: Violence to staff by area

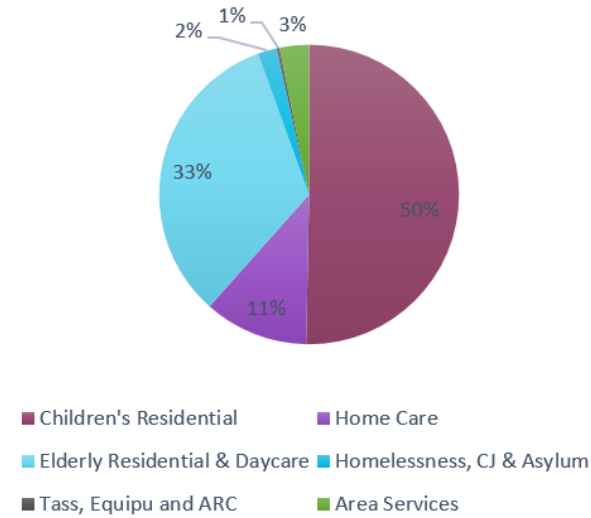
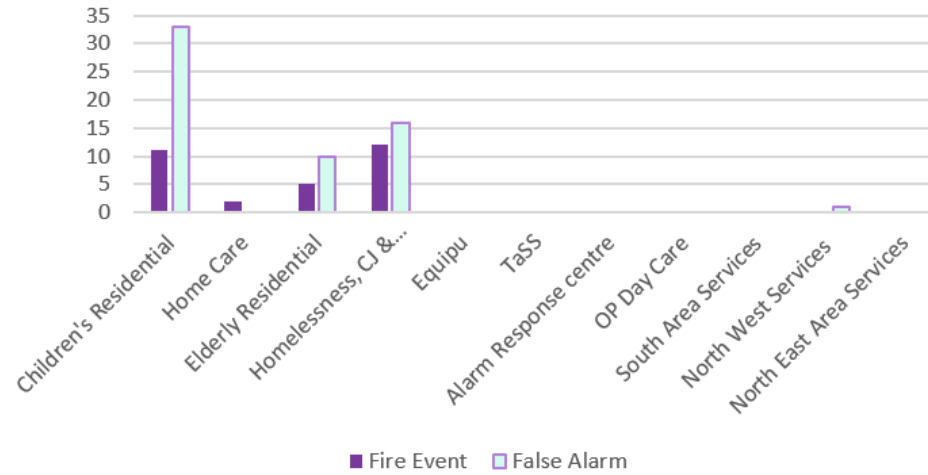


Figure G: Fire Incidents



Appendix 2 - Accidents and Incidents (NHS GG&C)

Figure A: Incidents by Division and Category

NHS = Total number of employee incidents for Glasgow City HSCP = 2624

RIDDOR = 27

Incidents by Division and Category																		
	Contact with an Object	Exposure to a Hazard	Fire Incidents/ Fire Alarm Activations	Information Governance	IT Operations	Infection Control	Injured by Animal	Medical Devices/Equipment	Moving and Handling	Needlesticks/Sharps	NHS GG&C Vehicle Incidents	Security Incident	Self Harm	Slips, Trips and Falls	Stress	Violence and Aggression	Other Incidents	Total
Addictions Partnership	2	1	0	0	0	0	0	0	0	0	0	1	1	3	0	30	8	46
Glasgow City HSCP - Corporate	0	4	0	2	4	2	0	2	1	1	0	2	0	1	6	31	17	73
Glasgow City HSCP - North East Sector	15	14	5	3	1	27	3	3	14	18	0	11	2	20	14	601	69	820
Glasgow City HSCP - North West Sector	18	15	2	8	0	14	0	1	7	22	1	12	1	23	30	516	50	720
Glasgow City HSCP - South Sector	8	13	3	8	3	29	4	5	9	10	2	16	2	12	13	736	88	961
Homelessness Health Services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	4
Total	43	47	10	21	8	72	7	11	31	51	3	42	6	59	63	1916	234	2624

It is noted that 234 incidents have been categorised as other incidents – Staff education should be considered in light of the number of incidents categorised as other.

It is noted from the above that the top 5 incidents are: Violence & Aggression, Other, Infection Control (COVID-19 related), Stress and Slip/Trip/Falls.

The majority of incidents relate to Violence & Aggression

Figure B: Incidents by Division and Category chart

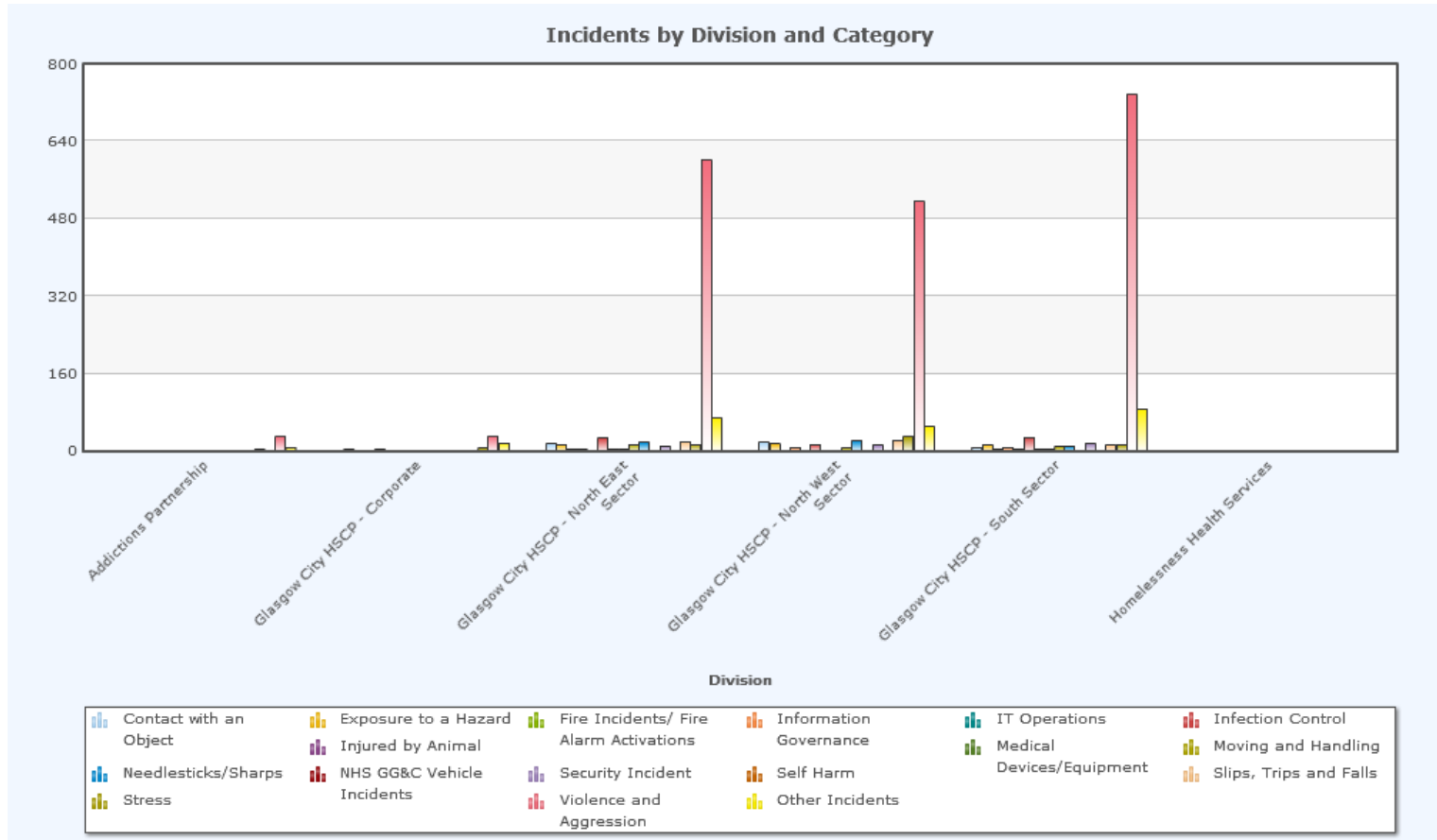
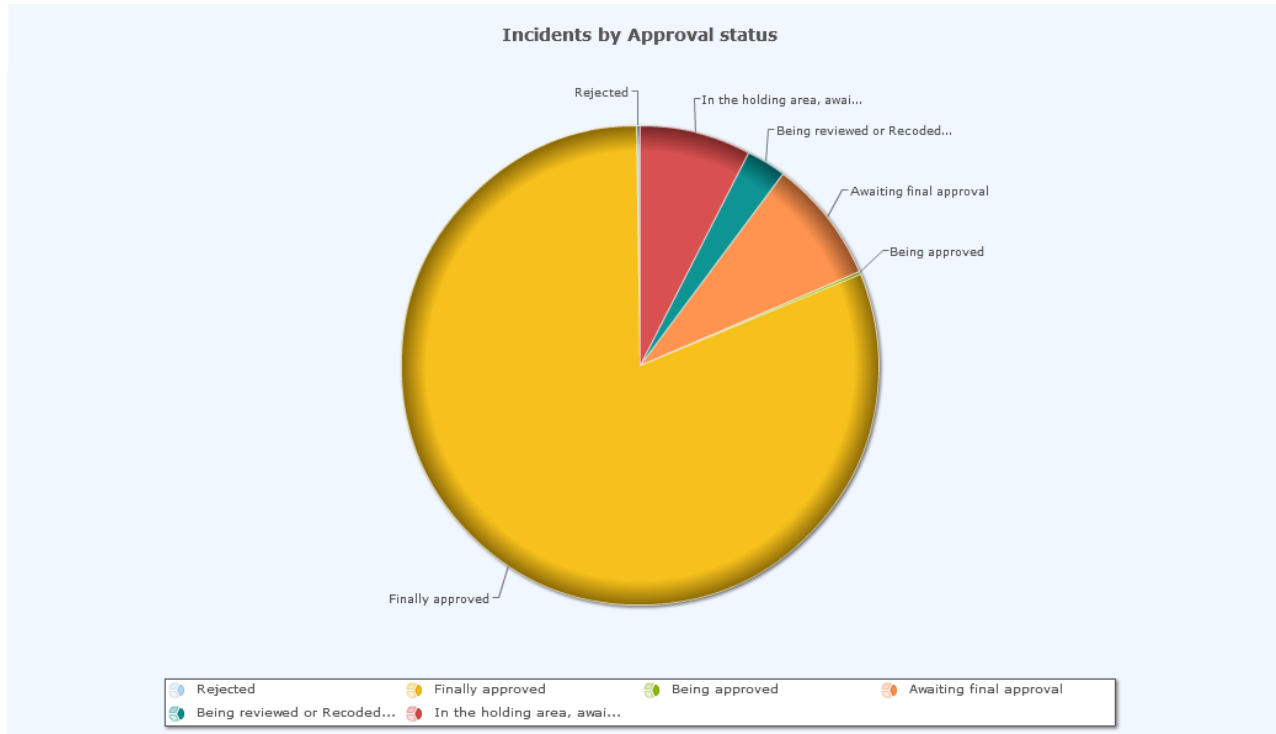


Figure C: RIDDOR by Division and Category

	Incidents by Division and Category					Total
	Contact with an Object	Moving and Handling	Occupational Disease	Slips, Trips and Falls	Violence and Aggression	
Glasgow City HSCP - North East Sector	0	1	2	2	6	11
Glasgow City HSCP - North West Sector	1	0	0	3	5	9
Glasgow City HSCP - South Sector	0	2	0	1	4	7
Total	1	3	2	6	15	27

Figure D: Incidents by Approval Status



Incidents by approval status	
2127	finally approved
198	in holding area awaiting review
70	being reviewed or re coded
219	awaiting final approval
5	being approved
5	rejected