

PRESSURE SYSTEMS POLICY

		POLICY	
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	X		
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Sponsor (Position)	Associate Director of Estates & Facilities		
Author (Position & Name)	Head of Estates and Facilities, Mark Jackson		
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Lead Specialty/ Service/ Department	Estates and Facilities		
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1.0 INTRODUCTION

This policy is issued and maintained by the Director of Strategic Planning & Commercial Development [the sponsor] on behalf of Sherwood Forest NHS Foundation Trust [herein known as the Trust], at the issue date defined on the front sheet, which supersedes and replaces all previous versions.

The Trust, in recognition of its statutory duties endeavours to comply with the Pressure System Safety Regulations 2000 Approved Code of Practice L122.

Pressure vessels are containers that hold liquid, gas, air or steam under sufficient pressure where a sudden unexpected release of contents may cause potential harm.

This policy document is provided to ensure that all staff involved with pressure systems understand their management and individual responsibility, and that methods employed by the Trust and its partners, ensure a safe operational practice for pressure systems.

The Pressure Systems Safety Regulations (PSSR) 2000 applies to all plant and/or systems which contain relevant fluid where the pressure is greater than 0.5 bar (7 psi) above atmospheric. Also certain small vessels, where the combination of the internal volume and pressure of the vessel is less than 250 bar litres are exempt from parts of the Regulations.

However if the relevant fluid is steam then the regulations apply regardless of the pressure. Examples of pressure systems and equipment are:-

- Steam boiler, pipework and protective devices.
- Steam sterilising autoclave and associated pipework and protective devices.
- Compressed air systems (fixed and portable).
- Medical Gas Systems.
- Pressurised process plant and piping.
- Heat exchangers and refrigeration plant.
- Valves, steam traps and filters.
- Pipework and hoses.
- Pressure gauges and level indicators.

2.0 POLICY STATEMENT

The Trust will ensure that premises are designed and maintained to high standards and comply with all the statutory and mandatory requirements as well as NHS technical standards.

This Policy is intended to ensure compliance with the relevant statutory requirements which apply to the in-service aspects of pressure systems such as operation and periodic examination. It also contains controls to reduce hazards when operating or working safely with pressure systems via safety rules.

This document applies to all properties owned and maintained by the Trust including properties leased, rented or occupied under lease or other occupancy agreement. It covers maintenance on all pressure system plant and associated installations (such as compressed gas distribution systems) undertaken by the Trust and its partners.

The purpose of this policy is to create a safe working environment that ensures the pressure systems in use within the Trust are maintained and operated within the requirements of PSSR 2000 according to the recommended frequency held within the 'Written Scheme' for each individual pressure system.

3.0 DEFINITIONS/ ABBREVIATIONS

3.1 The Trust: This means Sherwood Forest Hospitals NHS Foundation Trust.

3.2 Staff: Means all employees of the Trust including those managed by a third party organisation on behalf of the Trust.

3.3 Private Finance Initiative [PFI]: The initiative under which the Trust has entered into an agreement with partners to build and provide certain services [such as Planned Preventative Maintenance [PPM] at its hospitals.

3.5 PFI Project Agreement: The agreement or contract between the Trust and partners for the building of the new hospital buildings and the provision of a facilities management services.

3.6 Project Co.: This is the term used for the Central Nottinghamshire Hospitals PLC [or CNH]. It is the organisation appointed by the Trust who built the new hospital building, providing facilities services and then manage these facilities for the life of the contract, at which time they are then handed back to the Trust

3.7 Skanska Facilities Services [SFS]: This is the organisation appointed by Project Co to provide certain facilities management services including estates and maintenance functions.

3.8 Schedule 14 Service Level The part of the PFI Project

3.9 Specifications: Agreement mainly concerned with the facilities management services provided by Project Co through their subcontract with SFS.

3.10 Schedule 22 The part of the PFI Project

3.11 Variations: Agreement mainly concerned with Trust variations enquiries in regards to the PFI contract

3.12 Mansfield Community Hospital: NHS Property Services are the owners of Mansfield Community Hospital and therefore have a responsibility as a duty holder. Sherwood Forest Hospitals NHS Foundation Trust occupies certain areas of the building for services to the local community. The Trust's Partners through Skanska Facilities Services [SFS] provide the maintenance via the PFI agreement.

3.13 Pressure System: Equipment and systems that use a liquid or gas under pressure in order to operate

4.0 ROLES AND RESPONSIBILITIES

4.1 Trust Board

The Trust Board, through The Chief Executive (who is the Accountable Officer), has overall responsibility for Health and Safety within The Trust, and as so carries the ultimate responsibility for providing a safe and appropriately functioning environment for patient care.

4.2 Collective Responsibilities (Policy & Procedures)

The Trust and its PFI partners both have responsibilities as duty holders to ensure they maintain the provision of Pressure System safety.

Each key party of the PFI scheme (Trust, Project Co and Skanska Facilities Services) has relevant responsibilities to develop, implement, manage and monitor the safety, quality and resilience of these key systems. This is undertaken both through policies and procedures that reflect each party's respective responsibilities as responsible partners.

The 'principal' duties and responsibilities of the key appointments are highlighted below,

4.3 Trust Duty Holder

The Chief Executive is the statutory Duty Holder. The Duty Holder and the Board have overall responsibility for Health and Safety within The Trust, including Pressure System safety. They shall appoint in writing the Trust Designated Person [Pressure Systems].

4.4 Trust Designated Person [Pressure Systems]

The Trusts Director of Strategic Planning & Commercial Development, is the Appointed Board Level Executive responsible for the safety of Pressure Systems.

Under the direction of the Chief Executive they are therefore responsible for the organisational arrangements, which will ensure that compliance with standards is achieved and that where problems occur, they are identified and resolved with minimum risk to employees, patients or members of the public.

They shall appoint in writing the Trust Senior Operational Manager.

4.5 Trust Senior Operational Manager

The Senior Estates Manager is appointed in writing by the Trust Designated Person [Pressure Systems]. They fulfil the appointed Senior Operational Management role, under the direction of the Trust Designated Person [Pressure Systems] and as such, have responsibility for co-ordinating resources, ensuring the policy is reviewed, ratified and implemented.

They will be responsible for notifying SFS, via Project Co, in advance of any works on any of the Pressure Systems initiated by the Trust if undertaken outside of the formal PFI schedule 22 change process. For changes on the site covered by the PFI variation process i.e. works undertaken by Project Co the PFI variation process will cover off notification to Project Co and SFS of new systems to be added to the scheme of control. The Trust will ensure that its directly employed contractors comply with SFS' permit procedures.

4.6 Trust Other Professionals [i.e. Capital planning / Strategy / Projects].

Capital Project Officer/Managers will consult with the appointed external specialist with respect to system capacity and Pressure System compliance as follows:

All new and altered Pressure Systems shall comply with the requirements of this policy and current regulations.

The specification and the consulting engineer's competence and interpretation of the requirements.

The contractor's competence and their interpretation of the requirements.

The engineer's competence and interpretation with respect to site conditions, the existing and new installation and commissioning requirements.

The Clerk of Works competence and interpretation of the requirements.

4.7 Project Co [CNH] Duty Holder

Project Co is not an employer and therefore does not have duties under Section 2 and 3 of the Health and Safety at Work Act, the Management of Health and Safety at Work Regulations 1999 or the Control of Substances Hazardous to Health Regulations 2002.

Project Co has entered into a sub-contract with SFS in respect of certain obligations under the PFI agreement with the Trust. SFS is an employer and has duties under the above requirements.

Project Co does however have duties under Section 4 of the Health and Safety at Work Act to take such steps as are reasonable to ensure so far as is reasonably practicable the premises over which it has control are safe and, as such is a "Duty holder" for the purposes of both this policy and Section 4 of the Health and Safety at Work Act in relation to those matters for which it is responsible under the PFI agreement with the Trust. They shall appoint in writing the Project Co Designated Person [Pressure Systems].

4.8 Project Co Designated Person [Pressure Systems]

The General Manager for Project Co is the Project Co Designated Person [Pressure Systems] they shall be appointed in writing by the Project Co Duty Holder for Project Co.

They shall have responsibility for compliance with this policy document.

4.9 Skanska Facilities Services [SFS] Duty Holder

The SFS Chief Executive is the statutory Duty Holder. The Duty Holder has overall responsibility for Health and Safety within SFS, including Pressure system safety. They shall appoint in writing the SFS Designated Person [Pressure Systems].

4.10 SFS Designated Person [Pressure Systems]

The General Manager for SFS is the SFS Designated Person [Pressure Systems] they shall be appointed in writing by the SFS Duty Holder.

Has responsibility for ensuring that suitable information, instruction and training are provided to the SFS Authorised Person/s [Pressure Systems] & SFS Competent Persons and formally appoint each. Ensure any risk assessments remain current and are reviewed and updated as required.

They shall inform the Trust, Project Co & SFS Designated Person [Pressure Systems] when system non compliances / deficiencies are found. They shall appoint in writing the Independent Authorising Engineer [Pressure Systems].

4.11 SFS Independent Authorising Engineer [Pressure Systems]

This independent engineer (contracted by SFS to provide expert support and to control the appointment of their AP's) will be suitably qualified in accordance with the requirements of PSSR 2000 and have specialist knowledge of the systems on each site.

The specialist acting in this role will be responsible for:

- The Authorising Engineer [Pressure Systems] will, subsequent to performing an assessment of a potential Authorised Person [Pressure Systems], recommend to the Designated Person of the submitting organisation either that the person is able to proceed to written appointment or requires further training.
- To ensure that all Authorised Persons [Pressure Systems] have satisfactorily completed an appropriate training course and that all training is documented.
- To ensure that all Authorised Persons [Pressure Systems] are re-assessed every three years and have attended a refresher or other training course prior to such re-assessment.
- To conduct an annual audit and review of the management systems of the Pressure Systems including Permit to Work and SOP, to be submitted for review by the Trust and its Partners.
- Review of written procedures and operational policies as well advising on changes in technology.
- To assist the Authorised Person [Pressure Systems], when required, with monitoring the implementation of the Pressure Systems Policy and SOP's.

The role shall be kept independent of organisations submitting potential Authorised Persons [Pressure Systems] for assessment.

4.12 SFS Authorised Person [Pressure Systems]

The Estates Officer for SFS is the SFS Authorised Person [Pressure Systems] they shall be appointed in writing by SFS Designated Person [Pressure Systems]. Has responsibility for the day-to-day operational management and safe systems of work of Pressure systems on the Trust's premises.

The Authorised Person(s) [Pressure Systems] are responsible for the practical implementation and operation of this policy and the systems and installations for which management is in control of, this includes known dangers for which the AP has been appointed to manage. More than one Authorised Person may be appointed for a system or installation but, at any one time, only one

Authorised Person is required to be on duty. Each transfer of responsibility between Authorised Persons is to be recorded in the respective Lift logbook as appropriate.

The Authorised Person(s) must ensure that any person working on the Pressure systems are competent to do so and that test equipment is maintained in good condition and in calibration.

Where any defects, dangerous practices, dangerous and/or unusual occurrences are experienced; the Authorised Person(s) must report these to the Designated Person and Authorising Engineer in writing.

They will also ensure their respective SFS Competent Persons (Insurance Inspector and or Service Provider) remain current and up to date with training.

Adequate numbers of Authorised Persons shall be available to cover for sickness or annual leave etc.

4.13 SFS Competent Persons [Pressure Systems]

The Competent Person (Pressure Systems): for Pressure Systems this role can be undertaken by:

- SFS own in-house estates representative;
- An individual person (e.g. a self-employed person);
- An organisation providing independent inspection services (possibly, the Insurance Company's inspector).

Who has authority to ensure that repairs and modifications are being carried out to ensure that safe operating limits are not compromised;

A skilled mechanical tradesperson becomes a competent person for a specific task or work when they are issued with a Permit to Work or formal documentation by an Authorised Person (AP pressure) and on signing the Permit to Work acknowledging that they will work as specified in the control documentation and control the risk or danger.

A Competent Person [Pressure Systems] is a person, suitably trained and qualified by knowledge and practical experience, and provided with the necessary instructions to enable the required work to be carried out safely.

Statutory Inspections should be carried out in accordance with the written examination scheme drawn up by a Competent Person [Pressure Systems], this is normally an Insurance Inspector.

Specialist contractors appointed by management should only use trained and competent persons to carry out the maintenance of Pressure Systems.

They will be appointed in writing by the SFS Designated Person [Pressure Systems] and work under the direction of the Authorised Person [Pressure Systems]. They must carry out all works in accordance with this policy, current legislation and the PPM programme. These persons are skilled and have sufficient technical knowledge in the installation, inspection and testing and / or maintenance of Pressure systems. Any non-compliances they discover they shall try to rectify immediately, alerting the SFS Authorised Person [Pressure Systems] of the issue and actions taken.

The Competent Person should use safe systems of work, safe means of access and the personal protective equipment and clothing provided for their safety.

4.14 SFS Mechanical Tradespersons

Specifically for Pressure Systems, this role will be undertaken by Craftsperson's or Semi-skilled operatives who have received sufficient training to be able to carry out expected duties in the pressure systems they will encounter but should only carry out maintenance work for which they have been trained and are deemed to be competent.

The level of competence required should be reviewed when a system is modified and should reflect the need to keep pace with developing technology, equipment and legislation.

4.15 NHS Property Services Duty Holder

The Chief Executive of NHS Property Services is the statutory Duty Holder. The Duty Holder and the Board have overall responsibility for Health and Safety within NHS Property Services, including Pressure System safety. They shall appoint in writing the NHS Property Services Designated Person [Pressure Systems].

4.16 NHS Property Services Designated Person [Pressure Systems]

Is NHS Property Services Regional Director, who is the Appointed Board Level Executive responsible for Pressure System Safety.

Under the direction of the Chief Executive they are therefore responsible for the organisational arrangements, which will ensure that compliance with standards is achieved and that where problems occur, they are identified and resolved with minimum risk to employees, patients or members of the public. They shall appoint in writing the NHS Property Services Responsible Manager.

4.17 NHS Property Services Responsible Manager [Pressure Systems]

The FM Support Service Manager for NHS Property Services is the NHS Property Services Responsible Manager [Pressure Systems] they shall be appointed in writing by the NHS Property Services Designated Person. They shall have responsibility for compliance with this policy document.

5.0 APPROVAL

The Pressure Systems Policy had been consulted with the Hard FM Group and the Estates Group prior to its approval at the Estates Governance Committee on the 5th May 2017.

6.0 DOCUMENT REQUIREMENTS

The Regulations requires the Trust to:

- Establish the “safe operating limits” of the system.
- Have suitable Written Schemes drawn up or certified by a

- Competent Person for the examination at appropriate intervals for each Pressure System.
- Ensure those parts of the pressure system in which a defect may
- give rise to danger shall be identified in the scheme
- Check operation of all safety devices.
- Identify any pipework which is potentially dangerous.

The Written Scheme is a working document produced and maintained by Skanska Facilities external 'Competent Person', who determines the frequency and nature of the examinations needed on each of the pressure systems and specifies any special measures needed to prepare the system for safe examination.

The Written Scheme should include:

- Identification of the plant or equipment.
- Those parts of the system to be examined.
- The nature of the examination required.
- The frequency of examination.
- Preparatory work needed to enable item to be examined safely.
- Inspection and testing of any protection devices.
- Date of certification.
- Name of person certifying the written scheme.
- Repair and modification testing process and certification.

7.0 MONITORING COMPLIANCE AND EFFECTIVENESS

Minimum Requirement to be Monitored (WHAT – element of compliance or effectiveness within the document will be monitored)	Responsible Individual (WHO – is going to monitor this element)	Process for Monitoring e.g. Audit (HOW – will this element be monitored (method used))	Frequency of Monitoring (WHEN – will this element be monitored (frequency/ how often))	Responsible Individual or Committee/ Group for Review of Results (WHERE – Which individual/ committee or group will this be reported to, in what format (eg verbal, formal report etc) and by who)
Asset List	Skanska Facilities	Audit/review	Annual	Hard FM Group
Statutory Maintenance and Testing	Skanska Facilities	Audit/review	Annual	Hard FM Group
Policy	Trust Senior Estates Manager	Audit/review.	Annual	Hard FM Group

8.0 TRAINING AND IMPLEMENTATION

Each Head of Department will be responsible for ensuring staff are briefed regarding relevant procedures.

9.0 IMPACT ASSESSMENTS

- ☐ This document has been subject to an Equality Impact Assessment, see completed form at Appendix 1
- This document is not subject to an Environmental Impact Assessment

10.0 EVIDENCE BASE (Relevant Legislation/ National Guidance) AND RELATED SFHFT DOCUMENTS

Evidence Base:

- The Health & Safety at Work Act 1974
- The Pressure Systems Safety Regulations 2000 ACOP L122
- The Pressure Equipment Regulations 1999
- Pressure Vessels (Safety) Regulations 1991
- The Management of Health and Safety at Work Regulations 1999. The Workplace (Health, Safety and Welfare) Regulations 1992.
- Provision and Use of Work Equipment Regulations (PUWER) – 1999
- HTM 00-00 Policies and Principles of Healthcare engineering
- SFHFT Standing Orders and Scheme of Delegation
- HSE Best Practice Guidance

Related SFHFT Documents:

N/A

11.0 KEYWORDS

Pressure systems

12.0 APPENDICES

- Appendix 1 - Equality Impact Assessment Form (Eqia)

APPENDIX 1- EQUALITY IMPACT ASSESSMENT FORM (EQIA)

Name of service/policy/procedure being reviewed: Pressure Systems Policy			
New or existing service/policy/procedure: existing			
Date of Assessment: 16.2.2022			
For the service/policy/procedure and its implementation answer the questions a – c below against each characteristic (if relevant consider breaking the policy or implementation down into areas)			
Protected Characteristic	a) Using data and supporting information, what issues, needs or barriers could the protected characteristic groups' experience? For example, are there any known health inequality or access issues to consider?	b) What is already in place in the policy or its implementation to address any inequalities or barriers to access including under representation at clinics, screening?	c) Please state any barriers that still need to be addressed and any proposed actions to eliminate inequality
The area of policy or its implementation being assessed:			
Race and Ethnicity	Availability of this policy in languages other than English	Alternative versions can be created on request.	None
Gender	None	Not applicable	None
Age	None	Not applicable	None
Religion	None	Not applicable	None
Disability	Visual accessibility of this document	Already in font size 14. Use of technology by end user. Alternative versions can be created on request.	None
Sexuality	None	Not applicable	None
Pregnancy and Maternity	None	Not applicable	None
Gender Reassignment	None	Not applicable	None

Marriage and Civil Partnership	None	Not applicable	None
Socio-Economic Factors (i.e. living in a poorer neighbourhood / social deprivation)	None	Not applicable	None
What consultation with protected characteristic groups including patient groups have you carried out?			
None for this version			
What data or information did you use in support of this EqIA?			
Trust Policy approach to availability of alternative versions			
As far as you are aware are there any Human Rights issues be taken into account such as arising from surveys, questionnaires, comments, concerns, complaints or compliments?			
No			
Level of impact			
From the information provided above and following EQIA guidance document Guidance on how to complete an EIA (click here), please indicate the perceived level of impact:			
Low Level of Impact			
Name of Responsible Person undertaking this assessment: Mark Jackson			
Signature:			
Date: 16.2.2022			