

PSSR – Organisational roles and summary of associated responsibilities



Chief Executive (the Duty Holder)

Ultimate accountability for this policy lies with the Chief Executive who, on behalf of NHS Lothian (Lothian NHS Board) recognises and accepts its responsibility as an employer for providing a safe and healthy work environment for its employees and others, including patients, visitors, contractors and other users who may be affected by its work.

Director of Estates and Facilities

The Director of Estates and Facilities has the devolved specific responsibility for the implementation of this policy. In their absence, the Associate Director of Estates and Facilities will deputise.

Head of Operations Hard FM (appointed as Designated Person by the Duty Holder)

The Head of Operations Hard FM has the overall delegated management responsibility for operational procedures within premises owned by NHS Lothian, by:

- ensuring that NHS Lothian is compliant with its statutory duties in relation to the Pressure Systems Safety Regulations 2000 (PSSR) and other allied legislation;
- ensuring that this policy is implemented;
- ensuring that the management procedures associated with this policy are implemented;
- appointing an Authorising Engineer (Pressure Systems) to carry out nominated duties across NHS Lothian (*see Section 1.8 of SHTM 08-08: Pressure Systems: Policies and Guidance for details of those nominated duties*);
- appointing a competent person (as defined by PSSR) to carry out third-party, impartial statutory examinations across NHS Lothian. (*Please refer to Regulation 2 of PSSR – Interpretation – and corresponding ACOP and guidance within L122 for definition of the term “competent person”*);
- reviewing the policy in line with NHS Lothian policy review guidelines; and
- amending the policy as a result of any legislative changes or as a result of recommendations arising from an adverse incident.

Area Manager Hard FM

The Area Manager Hard FM has the overall responsibility for the implementation of this policy within their area. They also have overall responsibility for:

- ensuring compliance with PSSR and the NHS Lothian operational procedures;
- ensuring that there are enough appointed Authorised Persons (Pressure Systems) to provide necessary cover within their area;

- ensuring that those appointed Authorised Persons (Pressure Systems) are fulfilling their duties and obligations thoroughly;
- liaising with the Authorising Engineer (Pressure Systems) and by delegation, ensure that any remedial actions called upon by audit non-compliances are dealt with in a timely manner, so far as is reasonably practicable;
- ensuring that any other remedial actions advised by other persons or organisations (for example the competent person, as set out in PSSR) resulting from in-service defects or non-compliances, are acted upon by their delegated staff, so far as is reasonably practicable;
- implementing changes within the operational procedures as a result of any legislative changes;
- ensuring that any pressure systems-related accident or incident is reported via the DATIX system in line with the NHS Lothian Adverse Event Management Policy;
- investigating any pressure systems-related incident and the report of findings to the Head of Operations Hard FM; and
- informing their Sector Estates Managers and/or Operations Officers of any improvements to be implemented following incident investigation.

Sector Estates Managers and/or Estates Operations Officers

Sector Estates Managers and Estates Operations Officers have the day-to-day responsibility for the implementation of compliance with PSSR and the NHS Lothian operational procedures within the area or upon the equipment which they control. In addition, they are responsible for:

- ensuring all pressure systems and equipment are operated and maintained in a compliant manner, utilising safe systems of work;
- ensuring that all personnel working on pressure systems under their direction are competent to do so; and
- ensuring that where any doubt exists over the suitability, integrity or safety of any pressure system, that the matter is referred to the appointed Authorised Person (Pressure Systems) in the first instance.

Where the Sector Estates Manager or Operations Officer is an appointed Authorised Person (Pressure Systems), he or she should carry out those duties diligently. Responsibilities include, but are not limited to:

- liaising with the Authorising Engineer (Pressure Systems) and ensuring that any remedial actions called upon by audit non-compliances are dealt with in a timely manner, so far as is reasonably practicable;
- liaising with the competent person (as set out in PSSR) and ensuring that the statutory examination of all relevant pressure vessels / systems are carried out within the appropriate timescale, that such vessels are suitably prepared beforehand;
- ensuring that any advice from the competent person, especially relating to repairs following in-service defects or remedial actions due to non-compliances, are acted upon, so far as is reasonably practicable;

- taking corrective action to make a pressure system safe should an in-service failure occur, or should an in-service defect be detected that is likely to give rise to imminent danger;
- ensuring that any other remedial actions advised by other persons or organisations (for example, specialist contractors) following in-service defects or non-compliances are acted upon, so far as is reasonably practicable;
- ensuring that the risk assessments for work on pressure systems are up-to-date and are amended as required;
- assessing and appointing in writing mechanical tradespersons within NHS Lothian as being competent to work on pressure systems;
- taking responsibility for any repairs, modifications, or newly commissioned equipment to ensure compliance and safety;
- liaising with organisations that lease pressure equipment that is kept on NHS Lothian sites (for example, gas storage vessels) to ensure their compliance with the relevant regulations and to confirm demarcation arrangements; and
- undertaking tool-box talks with the relevant skilled tradespersons on an annual basis or within five working days of a pressure systems related incident.

Competent Person (Pressure Systems)

(Please also see Regulation 2 of PSSR (Interpretation) and corresponding ACOP and guidance within HSE publication L122 for the definition of the term “competent person”.)

Note: the regulations envisage that in all cases, the competent person referred to shall be an organisation rather than an individual person.

NHS Lothian should ensure that the appointed competent person has suitable expertise and sufficient resource to examine the equipment held, and shall be a member of the Safety Assessment Federation (SAFed) and have UKAS accreditation to BS EN ISO/IEC 17020:2012.

The competent person should provide assurance that the engineer surveyors are suitably qualified and experienced with the requisite skills and training to carry out their duties in a safe and competent manner.

The role of the competent person covers the following functions:

- Advising the user on the scope of the written scheme of examination;
- Drawing up or certifying written schemes of examination;
- Conducting statutory examinations to such a scheme;
- Issuing a report of examination within 28 days of the inspection being conducted;
- Issuing a site notice of defect before leaving site in cases of imminent danger, followed by a subsequent report of examination to that effect. A copy of such a report will also be forwarded to the Health & Safety Executive;
- Issuing a site notice of defect before leaving site in cases of defect which require a time-qualified repair, followed by a subsequent report of examination to that effect;

- Liaising with the site contact (usually the Appointed Person (Pressure Systems)) and issuing advice on inspection schedules and requirements for compliance, and any other recommendations or observations made during the course of their examinations; and
- Carry out regular reviews of the written scheme of examination and modify where necessary.

Authorising Engineer (Pressure Systems)

The Authorising Engineer will be independent of NHS Lothian and will be suitably qualified and experienced to audit the pressure systems and the work procedures employed within NHS premises.

- The appointment includes the responsibility for assessing the competency of the Authorised Person (Pressure Systems) by way of administering and seeking evidence of proper training, auditing and monitoring the application of the procedures required by PSSR and subsequently SHTM 08-08, including record keeping and certification as appropriate. The Authorising Engineer will then forward a recommendation for formal appointment of the Authorised Person by the Designated Person;
- The Authorising Engineer will liaise with the Area Managers Hard FM and the Head of Operations Hard FM to advise upon the findings of the audits, and will provide copies to the Estates and Facilities Assurance Team; and
- The Authorising Engineer will also liaise with the appointed Authorised Persons (Pressure Systems) for monitoring and advice on matters such as permits-to-work or repairs.

Capital Project Manager, Capital Planning and Project Team Officers

The project managers have responsibility for the implementation of this policy within their area of responsibility. They also have overall responsibility for ensuring that all pressure systems or equipment that is procured, purchased, designed, installed, modified or commissioned conforms to all relevant aspects of PSSR, the Pressure Equipment Regulations and the Construction (Design & Management) Regulations 2015, in addition to any relevant requirements contained within the NHS Lothian operational procedures.

It is essential to acknowledge that in order to comply with the aforementioned Regulations, the design drawings, construction, modification and installation of any pressure system or vessel will require the independent verification of a Competent Person (as defined by the Pressure Systems Safety Regulations 2000) for approval, and to enable a Written Scheme of Examination to be drawn-up or modified as appropriate.

Assurance Team

The Assurance Team shall assist with the implementation of this policy by:

- Liaising with the Authorising Engineer (Pressure Systems) as necessary for assistance with compliance issues; and
- Reviewing any pressure systems tasks by using SCART (Statutory Compliance Audit and Risk Tool) and monitoring performance.

Employees (Skilled Persons)

NHS Lothian employees who have been tasked to carry out work on any pressure system or equipment (either operation or maintenance) will:

- Only carry out the work if they are competent to do so; they will have received instruction and training to such a degree that they possess the skills and knowledge to carry out the task safely, and only use the tools and equipment for which they have been trained;
- Stop work and report back to their team leader or line manager if they feel that they are not competent or confident to carry out their allotted tasks; and
- Report any defects, faults or conditions that they think are unsafe or are likely to become so. Where any plant or part of a pressure system has developed a fault or malfunctioned, efforts should be made to make the plant safe, provided this does not adversely affect the safety of the employee in doing so.

Contractors (Skilled Persons)

Contractors and non-NHS Lothian organisations will have their own health and safety arrangements, including specific ones for working on pressure systems which they must follow in conjunction with the requirements of this policy. These should be submitted in writing and discussed with their on-site sponsor (usually the Authorised Person (Pressure Systems) or similar nominated manager) prior to the work being carried out. In addition, they must:

- only carry out the work that has been agreed and if they are competent to do so. They should stop work and report back to the on-site sponsor if they think that for any reason they cannot complete their task safely;
- report to their on-site sponsor any defects, faults or any conditions they think are unsafe or have the potential to become so. Where any plant or part of a pressure system has developed a fault or has malfunctioned, efforts should be made to make the plant safe, provided this does not adversely affect the safety of the operative in doing so; and
- adhere to the NHS Lothian Control of Contractors Policy.