## Submission to the Public Consultation on the Health and Safety Authority's Statement of Strategy 2019-2021. May 2018

The MLSA is the trade union representing medical scientists in Ireland. Our members have been to the forefront in the health service in recognising the importance and value of accreditation to international standards; as a result most clinical pathology laboratories in Ireland are accredited by the Irish National Accreditation Board (INAB) to ISO 15189. Our members work with INAB to continuously improve the services they provide to patients and clinicians. The MLSA notes that INAB is now under the remit of the HSA and that one of the HSA's priorities in its strategy for the period 2019-2021 is to grow the National Accreditation service to enable and support enterprises and public services.

Clinical pathology laboratories are complex workplaces with a broad range of risks arising from hazards including biological and chemical hazards, automation, manual handling, use of VDUs, slips, trips and falls, complex rostering arrangements, long working hours, night working, lone working and psychosocial issues. Most laboratories provide a service 24 hours a day, seven days a week, with scientists rostered to work over and above their contracted hours to maintain out of hours services. The workplace is constantly changing with ever-increasing workload and the introduction of new processes, technology and instrumentation. Space is at a premium in most laboratories and this has often resulted in the removal of staff room and meeting room facilities to make space for laboratory equipment, storage and offices.

Reductions in the number of staff over the past twelve years due to employment embargos, accompanied by vastly increased specimen numbers and the extension of the routine hours of operation of most laboratories to 8am-8pm services Monday to Friday, has put a severe strain on staff delivering the service. Out of hours rosters are increasingly difficult to maintain due to reduced staff numbers, increase in average age of staff due to restricted recruitment of younger staff and increased specimen numbers and complexity of the service required to be provided.

Before 2010, when INAB became the sole accreditation body for Ireland, many clinical pathology laboratories had already achieved accreditation to UK standards set by Clinical Pathology Accreditation (CPA). When Irish laboratories changed over to ISO15189 accreditation by INAB, they found the system more rigorous and challenging than the CPA process. However, it has also been found that in general INAB inspectors place less emphasis on staff safety, health and welfare than CPA inspectors did. The ISO 15189 standards are test and process based and inspectors are less likely to look into matters like staff numbers, rosters, working patterns, laboratory space, staff accommodation and rest facilities. These issues will often only be noticed or commented on if they directly affect the performance of a test or process or are likely to cause a risk to <u>patient</u> safety. In contrast, the CPA inspection was also concerned with <u>staff</u> safety, health and welfare as a priority itself and inspectors were more likely to raise non-conformances or make recommendations on these matters. Such non-conformances and recommendations often proved very useful to laboratory management to secure the resources necessary to reduce the risks.

Sections 5.1, 5.2 and 5.3 of ISO 15189 provide ample grounds for assessing the adequacy of the laboratory's arrangements for ensuring the safety, health and welfare of staff but much depends on how the standards are interpreted and what the inspectors focus on. Now that INAB comes under the remit of the Health and Safety Authority, the MLSA calls on the HSA to once again make staff safety, health and welfare one of the key priorities to be assessed by INAB inspectors.