

HEALTH AND SAFETY PROCEDURE

BULLYING, HARASSMENT & VICTIMISATION

Page | 1

Health & Safety Procedure Title:		THE DETECTION & PREVENTION OF BULLYING, HARASSMENT and VICTIMISATION.	
Procedure Number:		Rev. Level	004
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Edited by :	Hilda Joyce		
Approved by:	Mary Thomakutty	Commence	May 2022
Next Review Date:	May 2025	Review by:	Mary Thomakutty

Date	Rev Level	Revision Description	Reviewed by
2014		Original	
2017	1	No changes	
2020	2	COVID - 19	
2020	3	REVIEWED	
19/05/2022	4	REVIEWED	Throughout

INTRODUCTION

The Safety, Health and Welfare at Work Act 2005 provides that employers carry out a risk assessment in their nursing homes in the preparation of a safety statement. Such an assessment should include the risk associated with bullying and harassment. Procedures or preventative measures should follow this risk assessment in order to eliminate or reduce the level of risk to an acceptable level. Providers are obliged to document the results of this risk assessment and to provide every employee with a documented copy of the risk assessment setting out the risks identified.

The issue of bully and harassment is a health and safety issue in so far as bullying has been identified as hazardous or dangerous as it can lead to both safety

problems and health problems. It is also a HR issue, often a legal issue and a personal and public health issue. So many agencies and interested parties are stakeholders in this difficult area. (HSA)

Discrimination and workplace bullying is a rising cause for concern, due to Covid-19.

While those identified as 'keyworkers' have been told to continue going to work, there's increasing concern over workplace bullying regardless as to where people are working at the moment.

Sickness in the workplace is not uncommon, but as strict guidelines are put into effect to reduce the impact of Covid-19, people are becoming hyper-aware of their co-workers' health.

"People are stifling coughs to avoid bullying and harassment from colleagues, while others are feeling like they're being avoided unnecessarily because of office hearsay."



LAW/ REGULATIONS/GUIDELINES / CODES OF PRACTICE

Concerning: Bullying

Under current employment legislation, Nursing Homes have vicarious liability in relation to bullying and / or harassment. In other words, when it comes to bullying and harassment, the Provider is responsible for the actions of its employees, suppliers, residents and visitors even if it is not aware that one (or more of this group) is bullying in the workplace and / or harassing a member of staff.

Government Task Force on the Prevention of Workplace Bullying 2001.

The Task Force have made the following assertion concerning the legal context of bullying in the workplace:

Some employment and industrial relations statutes had a bearing on workplace bullying. However, there was no specific legislation on the topic. The main statutes identified by the Task Force were:

- *Safety, Health and Welfare at Work Act, 1989, has now been replaced by the Safety, Health and Welfare at Work Act, 2005*
- *Industrial Relations Acts, 1946 to 1990, and the Industrial Relations (Amendment) Act 2015*
- *Unfair Dismissals Acts, 1977 to 2021*
- *Employment Equality Act, 1998 to 2015*

Providers also need to be aware of:

Code of Practice for Employers and Employees on the Prevention and Resolution of Bullying at Work 2007. This Code of Practice came into operation on 23 December 2020, and revokes and replaces the Code of Practice for Employers and Employees on the Prevention and Resolution of Bullying at Work 2007

(Failure to follow this Code is not an offence but the Code is admissible in evidence in criminal proceedings under section 61 of the 2005 Act.)

*Data Protection Act is now replaced by GDPR. The EU wide General Data Protection Regulation (the GDPR) came into effect on 25 May 2018 (Regulation (EU) 2016/679). As a regulation, it is directly effectively law in all European Union States. **It is now the principal source of Data Protection Law in the UK and Ireland***

Concerning: *Harassment*

s6 (1) Employment Equality Act 1998 to 2015

Employment Equality Act 1998 to 2015 (Code of Practice) (Harassment) Order Act 2012, effective from March 2012,

- Explanatory Note (This note is not part of the Instrument and does not purport to be a legal interpretation.) The effect of this Order is to declare that the draft Code of Practice set out in the Schedule to this Order is a Code of Practice for the purposes of the Industrial Relations Act 1990 *and the Industrial Relations (Amendment) Act 2015*

Concerning: *Victimisation*

- *Industrial Relations Act 1990 and the Industrial Relations (Amendment) Act 2015 (Code of Practice on Victimisation) (Declaration) Order 2004.*
- *The Safety, Health and Welfare at Work Act 2005*
- *The National Minimum Wage Act 2000*
- *Carer's Leave Act 2001*
- *Protection of Employees (Part-Time Work) Act 2001.*
- *Protection of Employees (Fixed-Term Work) Act 2003.*
- *Protection of Employees (Temporary Agency Work) Act 2012*

PURPOSE

The aim of this policy is to prevent harassment, bullying and/or victimisation, provide guidance to resolve any problems should they occur, and avoid recurrence.

HEALTH AND SAFETY PROCEDURE

BULLYING, HARASSMENT & VICTIMISATION

Page | 5

SCOPE

The scope of this Policy and procedure policy describe what is meant by harassment, bullying and victimisation at work

It includes a non-exhaustive list of examples of bullying behaviour

It provides a support contact person who may be approached by a person wishing to complain of bullying at work;

It states that the protection extends to: bullying at work by management, fellow employees, subordinates, residents/relatives and other parties

POLICY STATEMENT

All employees have the right to be treated with dignity and respect at work.

The risk of harassment, bullying and/or victimisation has been assessed and preventive measures are included in the Safety Statement

Consultation with employees, including the Safety Representative has taken place as regards the risk of harassment, bullying and/or victimisation at work.

Employees also have responsibility in creating and contributing to the maintenance of a work environment free from harassment, bullying and victimisation or from conduct likely to contribute to harassment, bullying and victimisation;

Complaints by employees of harassment, bullying and victimisation at work will be treated with fairness, sensitivity, respect and confidentiality for all parties concerned;

Harassment, bullying and victimisation at work where the culprits may be, the Provider; the PiC; other employees; residents; relatives; and by other parties, will not be tolerated and the appropriate action to deal with a complaint will be taken;

Any complaint of bullying which is found, following investigation, to be vexatious will be dealt with through the procedures as at page 10 below.

This policy will be updated to reflect the home's experiences in implementing it and relevant changes in the workplace and any external factors that are relevant.

Harassment, bullying and victimisation are viewed as gross misconduct, and disciplinary action, including dismissal, may be taken if any complaint is upheld. All staff have an obligation to comply with this policy.

We undertake to comply with all Codes of Practices related to bullying, harassment and victimisation which are enforced at present or in the future.

This policy will be brought to the attention of every employee before they enter a contract with the home. A formal grievance procedure is in place to ensure access to management and any employee or third party can address a complaint to the provider /PiC.

DEFINITIONS

Bullying: The Health and Safety Authority's definition of bullying is:

"Repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual 's right to dignity at work." (Task Force on the Prevention of Workplace Bullying 2001)

Harassment: refers to an entirely different set of behaviours.

Harassment is outlined under employment legislation and refers to discriminatory behaviour due to a person's race, religion, marital status, family status, sexual orientation, disability and gender, membership of the Traveller community or age. These are the nine grounds under which it is specifically illegal to

discriminate against someone or treat them less favourably. (s6 (1) Employment Equality Act 1998 to 2015.

Victimisation:

The term *victimisation* is used to describe unfair treatment of a worker by an employer because of some action the worker has taken. This means that an employer may not penalise an employee by dismissal, unfair treatment or an unfavourable change in their conditions of employment.

THE DETECTION & PREVENTION OF BULLYING:

There is an absolute obligation on the provider to implement health and safety measures and this is particularly the case when addressing the identification of bullying and stress in the workplace. The employer must carry out a risk assessment on an ongoing basis and this risk assessment must form part of the safety statement.

Code of Practice came into operation on 23 December 2020. This code provides practical guidance to providers on identifying and preventing bullying.

The Code provides a non-exhaustive list describing *patterns of behaviour* which are examples of bullying.

These include:

- Exclusion with negative consequences
- Verbal abuse/insults
- Intrusion – pestering, spying or stalking
- Physical abuse
- Being treated less favourably than colleagues

- Menacing behaviour
- Intimidation
- Aggression
- Undermining behaviour
- Excessive monitoring of work
- Humiliation
- Withholding work related information
- Blame for things beyond the employees' control

The Code differentiates between isolated incidents of bullying and a campaign of repeated behaviour. It asserts that an isolated incident is considered an affront to dignity at work but, as a one-off incident is not considered to be bullying.

Specific reference is also made to physical assault at work which is not covered by the Code. *(See Policy and Procedure on Aggression)*

The Code distinguishes between bullying and harassment. Harassment is governed by equality legislation. In contrast to bullying, which is not replicated by membership of any distinct group, harassment is predicted on the person being a member of one of the nine categories specified within the equality legislation.

The Code clearly states that bullying in the workplace does not include the “reasonable and essential discipline arising from the good management of the performance of an employee at work or actions taken which can be justified as regards the safety, health or welfare of an employee or resident in the home.

An employee whose performance is continuously flagged as being at a level below the required target and while the employee may feel threatened and insecure; this in itself does NOT indicate bullying.

Risk Assessment and Bullying Prevention Policies.

Role of Employees - Prevention

Employees have rights and duties as regards safety, health and welfare at work under the 2005 Act

Employees have rights to be treated with dignity and respect at work and not be put at risk through bullying by the employer, by other employees, residents or other persons. They have a right to complain to the employer if bullied and not to be victimised for so doing.

Employees have duties to behave and conduct themselves so as to respect the right of the employer, residents, relatives, visitors and other employees to dignity, courtesy and respect and the right not to be placed at risk as regards to their safety, health and welfare from bullying at work.

Role of Provider - Prevention

Every employer has a duty to manage and conduct work activities in such a way as to prevent any improper conduct or behaviour likely to put at risk employee's safety, health or welfare at work. The prevention of bullying must therefore be part of the management system.

The Provider will consider if bullying at work is likely to be a hazard, the extent of risk involved and what preventive measures are necessary. This will form part of the Safety Statement.

How to Identify if Bullying is a Hazard at Work

- If unacceptable conduct or behaviour has been observed – as outlined in *patterns of behaviour* examples above
- If substantiated complaints of bullying at work have been made by employees

- If there is sick leave above the norm, particularly with work related stress certified.

Assessing the Risk

The risk assessment should be based on:

- *Patterns of behaviour* examples outlined above
- Information from these factors/ patterns which signal risks to safety, health and welfare if bullying does exist;
- Information derived from observations, organisational climate, employee assessments or similar feedback mechanisms that may exist in the nursing home;
- Views gathered from consulting with employees during the normal course of day to day activity.

Preventive Measures

Measures to prevent bullying include:

- Having in place this Bullying Prevention Policy
- Addressing the risks that have been assessed
- Where bullying has been identified as a risk, the risk will be referenced to in the Safety Statement
- Providing appropriate training and development at all levels but particularly for the nurses and other supervisors

- Ensuring clarity of individual and department goals, roles and accountabilities
- Ensuring access to relevant competent and supportive structures if so required.

Dealing with a Complaint of Bullying

Confidentiality will be maintained throughout any investigation to the greatest extent consistent with the requirements of a fair investigation.

The following procedures, both informal and formal for dealing with a complaint, should be followed.

Informal process

A problem-solving approach will be used to ensure that the behaviour complained of, if established in fact, is eliminated and that working relationships are restored.

On receipt of a complaint of alleged bullying, or a complaint that a bullying atmosphere or bullying type behaviours are occurring, the provider will try to have the matter resolved informally with the consent of the parties involved.

Informal resolution of a specific bullying allegation could include for example, clarification of what bullying is, agreement to alter verbal style. Agreement by the person complained of, if they accept that their behaviour was inappropriate, that the conduct will not be repeated, or an explanation to the complainant about what occurred from the point of view of the person complained of which dispels the complaint.

Formal Complaint

The complainant should make a formal complaint, ideally in written form and signed and dated.

The complaint should be confined to precise details of alleged incidents of bullying, including their dates, and names of witnesses, where possible.

The person complained against should be notified in writing that an allegation of bullying has been made against him/her. He or she should be assured of **Name of Home a presumption** of his or her innocence of any wrongdoing at this juncture.

The investigation should be governed by terms of reference which should include the following:

The HSA Code of Practice Act, 2020

The likely time scale for its completion

The scope of the investigation

Statements from all parties should be recorded in writing

The investigation should be conducted by either a designated member(s) of management or, if necessary, an agreed, external third party.

The investigator should meet with the complainant and the person complained of and any witnesses or relevant persons on an individual confidential basis with a view to establishing the facts. A work colleague or employee/trade union representative may accompany the complainant and the person complained of, if so desired.

The investigator should submit the report to the employer which should include his or her conclusions.

The complainant and the person complained of should be given a copy of the report by the employer and given an opportunity to comment, within a set deadline, before the employer decides on any action to take.

The employer should decide in the light of the investigator's report and the comments made, if any, what action is to be taken arising from the report. The

employer should then in writing inform the complainant and the person complained against of the next steps.

At the end of the process the documentation should be kept by the employer in line with the retention guidance within the Data Protection Act and made available only in compliance with that Act.

Where the complaint is upheld

Where a complaint has been upheld, eliminating the hazardous behaviour and controlling the risks of it re-occurring is a requirement of the employer as part of his/her duty of care under Health and Safety legislation.

Action will be taken to eliminate the risk of the bullying behaviour.

A record of the interventions used for this purpose should be kept.

If a complaint is upheld the matter is now a disciplinary issue and the employer should follow the appropriate disciplinary procedures.

Non-employees should be informed that, in the event of the complaint being upheld, appropriate sanctions may be imposed which could in particular circumstances include termination of contract, suspension of service, exclusion from premises etc. as appropriate

Where complaint is not upheld

It is important that the provider, PiC and supervisors monitor the situation to ensure that there is no victimisation or appearance of victimisation of a complainant following an investigation.

Where a complaint is not upheld, the employer has a duty to the person complained against. It should be made clear to both parties that the complaint is not upheld, and no wrong doing has been found.

THE DETECTION & PREVENTION OF HARASSMENT:

The Employment Equality Acts 1998 to 2015 place an obligation on all Nursing Home Providers to prevent harassment in the workplace. Under this law, an employee is entitled to bring a claim to the Equality Tribunal and your employer may be obliged to pay you compensation if you are harassed by reason of your:

- Civil status
- Gender
- Family status, for example, as a parent of a child
- Sexual orientation
- Age
- Disability
- Race
- Religious belief
- Membership of the Traveller community

Harassment based on any of the above grounds is a form of discrimination in relation to conditions of employment. The Employment Equality Acts 1998-2015 define harassment as “unwanted conduct” which is related to any of the 9 discriminatory grounds above. Sexual harassment is any form of “unwanted verbal, non-verbal or physical conduct of a sexual nature”. In both cases it is defined as conduct which “has the purpose or effect of violating a person’s dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person” and it is prohibited under the Acts.

The “unwanted conduct” includes spoken words, gestures or the production and display of written words, pictures and other material. This includes offensive gestures or facial expressions, unwelcome and offensive calendars, screen-savers, e-mails and any other offensive material.

Harassment can be by a fellow worker, the provider, a resident, a relative or someone in a superior position, a visitor to the home or any other person.

Employment Equality Act 1998 to 2015 (Code of Practice) (Harassment) Order 2012.

In keeping with the requirements of the Code of Practice we undertake to not treat an employee less favourably because of their:

Gender: man, woman, (this also includes transgender).

Civil Status: single, married, separated, divorced, widowed, in a civil partnership within the meaning of or being a former civil partner in a civil partnership that has ended by death or been dissolved.

Family Status: responsibility as a parent or as a person in loco parentis a person with a disability which is of such a nature as to give rise to the need for care or support on a continuing, regular or frequent basis.

Sexual Orientation: heterosexual, bisexual or homosexual.

Disability: This includes most disabilities and bodily malfunctions as defined in 2(1) of the Employment Equality Act.

Age: the protection against age-related discrimination (including harassment) in Employment, applies only to employees over the maximum age at which a person is statutorily obliged to attend school.

Race: race, colour, nationality or ethnic or national origins.

Religious Belief: includes different religious background or outlook.

Membership of the Traveller Community: “Traveller community” means the community of people who are commonly called Travellers.

The following are typical types of harassment and is illustrative rather than exhaustive:

- Verbal harassment – jokes, comments, ridicule or songs
- Written harassment – including faxes, text messages, emails or notices
- Physical harassment – jostling, shoving or any form of assault
- Intimidatory harassment – gestures, posturing or threatening poses

- Visual displays such as posters, emblems or badges
- Excessive monitoring of work

Sexual Harassment

As providers and employers we accept that we are legally responsible for the sexual harassment and harassment of employees carried out by co-employees, residents, relatives, visitors to the home or others.

Sexual harassment is defined in section 14A(7) of harassment- S14A(7) the Employment Equality Act as any form of unwanted verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

Many forms of behaviour can constitute sexual harassment. It includes

- Physical conduct of a sexual nature
- Verbal conduct of a sexual nature
- Non-verbal conduct of a sexual nature

Dealing with a Complaint of Harassment

Confidentiality will be maintained throughout any investigation to the greatest extent consistent with the requirements of a fair investigation.

The following procedures, both informal and formal for dealing with a complaint, should be followed.

Informal process

A problem-solving approach will be used to ensure that the behaviour complained of, if established in fact, is eliminated and that working relationships are restored.

On receipt of a complaint of alleged harassment, the provider will try to have the matter resolved informally with the consent of the parties involved.

Informal resolution of a specific harassment allegation could include for example, clarification of what harassment is, agreement to alter verbal style. Agreement by the person complained of, if they accept that their behaviour was inappropriate, that the conduct will not be repeated, or an explanation to the complainant about what occurred from the point of view of the person complained of which dispels the complaint.

Formal Complaint

The complainant should make a formal complaint, ideally in written form and signed and dated.

The complaint should be confined to precise details of alleged incidents of harassment, including their dates, and names of witnesses, where possible.

The person complained against should be notified in writing that an allegation of harassment has been made against him/her. He or she should be assured of our presumption of his or her innocence of any wrongdoing at this juncture.

The investigation should be governed by terms of reference which should include the following:

- The Code of Practice
- The likely time scale for its completion
- The scope of the investigation

Statements from all parties will be recorded in writing

The investigation should be conducted by either a designated member(s) of management or, if necessary, an agreed, external third party.

The investigator should meet with the complainant and the person complained of and any witnesses or relevant persons on an individual confidential basis with a view to establishing the facts. A work colleague or employee/trade union representative may accompany the complainant and the person complained of, if so desired.

The investigator will submit the report to the employer which should include his or her conclusions.

The complainant and the person to whom the complaint is made against, should be given a copy of the report by the employer and given an opportunity to comment, within a set deadline, before the employer decides on any action to take.

The employer should decide in the light of the investigator's report and the comments made, if any, action is to be taken arising from the report. The employer should then in writing inform the complainant and the person whom complaint is made against of the next steps.

At the end of the process the documentation should be kept by the employer in line with the retention guidelines of the Data Protection Act and made available only in compliance with that Act.

Where the complaint is upheld

Where a complaint has been upheld, eliminating the harassing behaviour and controlling the risks of it re-occurring is a requirement of the employer as part of his/her duty of care to the harassed employee.

Action will be taken to eliminate the risk of the harassment reoccurring.

A record of the interventions used for this purpose should be kept.

If a complaint is upheld the matter is now a disciplinary issue and the employer should follow the appropriate disciplinary procedures.

Non-employees should be informed that, in the event of the complaint being upheld, appropriate sanctions may be imposed which could in particular circumstances include termination of contract, suspension of service, exclusion from premises etc. as appropriate

Where complaint is not upheld

It is important that the provider, PiC and supervisors monitor the situation to ensure that there is no victimisation or appearance of victimisation of a complainant following an investigation.

Where a complaint is not upheld, the employer has a duty to the person to whom the complaint is made against. It should be made clear to both parties that the complaint has not been upheld, and no wrong doing has been found.

THE DETECTION & PREVENTION OF VICTIMISATION

*Industrial Relations Act 1990 to 2015 (Code of Practice on Victimisation)
(Declaration) Order 2004.*

While the issue of victimisation is in reality an Industrial Relations issue as distinct from an Employment law issue the inclusion of the procedure along with Bullying and Harassment seems sensible in the circumstances.

The purpose of the Code of Practice is to outline, for the guidance of employers, employees and trade unions, the different types of practice which would constitute victimisation. Victimisation in the context of this Code of Practice refers to victimisation arising from an employee's membership or non-membership, activity or non-activity on behalf of a trade union or an excepted body, or a manager discharging his or her managerial functions, or any other employee in situations where negotiating arrangements are not in place and where collective bargaining fails to take place (and where the procedures under the Code of

Practice on Voluntary Dispute Resolution have been invoked or steps have been taken to invoke such procedures).

The term *victimisation* is used to describe unfair treatment of a worker by an employer because of some action the worker has taken. Some employment legislation protects from victimisation. This means that an employer may not penalise by dismissal, unfair treatment or an unfavourable change in an employee's conditions of employment. Some legislation refers to this conduct as "penalising" an employee; other legislation refers to it as victimisation. If an employee is being victimised but not because you are claiming your rights under certain employment legislation then the issue may be [harassment or bullying](#) in the workplace.

Employment legislation prohibiting victimisation

Minimum Wage

The National Minimum Wage Act 2000 prohibits an employer from victimising an employee exercising a right under the Act. If an employee is due a pay increase under this Act the employee may not be victimised by the employer, for example, by a reduction in hours of work.

Employment Equality

If an employee, for example, brings a claim or gave evidence in proceedings against an employer under the Employment Equality Acts 1998-2011 the employee is protected against victimisation. An employee who is victimised may bring claim to the Equality Tribunal

Health and Safety

Under *The Safety, Health and Welfare at Work Act 2005* an employee may not be penalised for exercising their rights under safety and health legislation. For example, an employer may not penalise or dismiss an employee for making a complaint about health and safety at work to the Health and Safety Authority.

Carer's Leave

Under the *Carer's Leave Act 2001* an employee is protected against being victimised for taking carer's leave, or proposing to take it.

Part-time employees

A part-time employee may not be penalised for claiming their rights under the *Protection of Employees (Part-Time Work) Act 2001*.

Fixed-term employees

An employer is prohibited from victimising a fixed-term employee who seeks to avail of their rights under the *Protection of Employees (Fixed-Term Work) Act 2003*. Victimisation includes dismissal in order to avoid a fixed-term contract being considered an open-ended contract.

Agency workers

An agency worker is protected against being victimised for reporting breaches of the *Protection of Employees (Temporary Agency Work) Act 2012*. This means that the hirer or the agency may not penalise an agency worker by dismissal, unfair treatment or an unfavourable change in their conditions of employment.

Other employment legislation

Other employment legislation protects the employee against dismissal for seeking to avail of or availing of rights under the legislation but does not protect you against victimisation. If an employee is dismissed because of pregnancy or for claiming rights under maternity protection legislation the dismissal is *unfair*. An employee is also protected against unfair dismissal if taking or proposing to take adoptive, parental or force majeure leave. In these circumstances an employee does not need any particular period of service with us in order to bring a claim for unfair dismissal.

Complaints

No single or persistently upsetting behaviour is too trivial to raise.

If a member of staff considers that he or she is experiencing victimisation the member of staff may wish to take individual action, by instigating the Grievance Procedure. We do not want any member of staff to suffer distress or to leave their job because they are being subjected victimisation.

In order to deal with any allegations of victimisation the provider encourages staff to resolve the problem informally in the first instance. It is up to the member of staff, however, to decide how he or she wishes to proceed and they may choose to start with *the Grievance Procedure*.

Failing to resolve issues of victimisation internally may result in the matter being **referred** to the Workplace Relations Commission. The complaint must be made within 6 months of the alleged victimisation. This time limit may be extended to 12 months at the discretion of the WRC

NOTES:

¹ A *code of practice* is a set of written rules which explains how people working in a particular profession should behave. Codes of Practice are designed to provide guidelines on arrangements, procedures and the promotion of best practice. Codes are also admissible in evidence and have been taken into consideration in relevant proceedings.

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The Workplace Relations Commission Code of Practice on Victimisation

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