Organisational Arrangements for the Management of Health and Safety

Health and Safety Services
1.0 Introduction & Scope

The purpose of this document is to establish the system by which the College manages health and safety and to help ensure that employees and all other persons using or working on College premises, and/or who are affected by the College’s undertakings are aware of their health and safety responsibilities. These organisational arrangements fulfil part of the College’s duties under The Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999.

The College operates a healthy and safe environment for over 15,000 students, 2000 employees, visitors and contractors working on maintenance and refurbishment activities.

The College operates from two main sites in London Bloomsbury and Stratford. It works closely with other Colleges of the University of London, most notably University College.

This document aims to explain and act as a guide to the College’s Health & Safety Management system. It is laid out in the same format as the OHSAS 18001 standard which will be replaced by the ISO 45001 standard later in 2016.

This document forms part of the College’s organisational arrangements for managing health, safety and welfare. It is not exhaustive as some specific risks (e.g. the risk arising from asbestos, radiation etc) have separate arrangements.

2.0 Health and Safety Policy

The College’s Statement of Health and Safety Policy is a statement of intent by which The College undertakes to comply with all measures required by law to ensure the health, safety and wellbeing of its employees, students, contractors and others that may be affected by its activities.

Detail of how the statements of intent are enacted can be found in this document, associated procedures, local rules, guidance documents and safe systems of work.

3.0 Hazard Identification, Risk Assessment and Determining Controls

Specialised risk assessments are carried out as required by specific regulations before operational or research changes are implemented.

At the local level, line managers are responsible for the completion of these risk assessments and the implementation of any additional controls identified. Risk assessments are undertaken using a hierarchy of control and recorded, reviewed and revised as appropriate. A procedure for risk assessment can be found on the
Health and Safety Services web page. Examples of risk assessments can be found on the web page and in the test area of the Sevron risk assessment system. Examples given are of:

- General risk assessments
- CoSHH assessments
- DSE assessments

Suitable training is available to all personnel undertaking risk assessments.

4.0 Legal and Other Requirements

To ensure that it complies with relevant legislation a register of applicable legislation is maintained by the Health and Safety Office on the Health and Safety Services web pages.

The College regularly accesses the Health and Safety Executive website and subscription sources to review all forthcoming changes to UK legislation and European Union Directives. New and or changing legislation likely to affect The College is raised at the Health and Safety Committee and where necessary existing processes are updated or new ones are introduced.

When approved they are published on The College’s Intranet and communicated as detailed in section 8.0 Communication, Participation and Consultation.

5.0 Objectives and Programmes

The College’s occupational health and safety objectives are set as a result of performing an annual Management Review. Information from the following sources may also be used during their development:

- New or changed legislation, regulations or European Directives;
- Analysis of accident/incident statistics;
- Information from audits & inspections;
- Feedback from staff;
- Feedback from the College Health and Safety Committee.

The Objectives will be periodically reviewed by The College Health and Safety Committee and annually as part of the Management Review, and updated as required to respond to internal and external drivers.

Progress against project plans will be established to achieve specific health and safety objectives.
6.0 Resources, Roles, Responsibility, Accountability and Authority

This section specifies who is responsible for implementing The College’s health and safety policy and it parallels the line management structure. Each level of management is accountable to the one above and responsible for the one(s) below.

Figure 1 below shows the reporting responsibilities and routes of communication of health and safety issues throughout The College. Any health and safety issues should be addressed via the line manager in the first instance. If the issue is not resolved the matter should be raised via Safety Representatives and thence the Health and Safety Committee. In addition there is also a separate grievance policy & procedure produced by Human Resources.

6.1 The Governors

It is the responsibility of the Governors through its officers to ensure that statutory requirements are met and appropriate standards are applied. Responsibility for health and safety within The College falls to Governors. They delegate specific functions but ultimate responsibility cannot be delegated. It is important that sufficient information concerning The College’s health and safety performance be conveyed to them. The Governors receive an annual report from the Chair of the College Health and Safety Committee via the Finance and General Purposes Committee. Extracts of Minutes of the Governors meetings pertaining to health and safety are considered at The College Health and Safety Committee. In exceptional circumstances the Chair of The College Health and Safety Committee will be given direct access to the Governors.
6.2 The Master

The Governors delegate responsibility to the Master, who is a member of the Board, and who is responsible for the success of the health and safety management system.

6.3 Deans of Schools and College Secretary

The Master delegates operational responsibility for health and safety matters through the Deans of Schools and the College Secretary. They bear the primary responsibility for deciding on policy and for its effective implementation. They have absolute authority to stop or suspend any dangerous activities or practice if necessary. In cases of serious breaches of health and safety policy The College's disciplinary procedures can be invoked. Because health and safety is an integral part of the corporate management the Senior Managers take these issues into account when planning corporate strategy.

6.4 Heads of Department and Directors of Professional Services

The Heads of Department and Directors of Professional Services take the lead in driving the health and safety programme in their areas of responsibility and for ensuring that The College's policy is implemented, for monitoring relevant standards and ensuring the safe application of their resources. Heads of Department and Directors should consider conducting their own inspections and audits as part of their management role. Where a Head of Department or Director also directly manages a team they are responsible for carrying out the duties of team leaders. The Heads of Departments and Directors are held accountable to the Deans of School and College Secretary for their performance as managers.

6.5 Health and Safety Coordinators

Heads of Department and Directors of Professional Services may wish to delegate duties (but not their accountability) to a nominated Health and Safety Coordinator. This role should be undertaken by a member of staff in their area of responsibility whose regular presence in the workplace can be assured. The appointment should normally be in writing and sufficient resources in terms of time, finance and facilities must be afforded to the Health and Safety Coordinator to enable them to effectively undertake their role.

If they choose to do so, then that person must be given authority to enforce rules and to suspend work if safety is compromised. It is important for this person to be sufficiently competent in health and safety matters to be able to proffer advice.
6.6 Line Managers

Line Managers may be known by a number of different titles other than Manager such as Supervisor or Team Leader. Anyone who has responsibility for directing the work of another shall be known as a Line Manager for the purposes of these management arrangements. Line Managers bear the main responsibility for implementing the health and safety policy. They must ensure that suitable and sufficient risk assessments are made and appropriate preventive, control and protective measures are applied at whatever time persons are at work. Also they must ensure that:

- any local rules, safe systems of work, method statements or other control documentation for safe working and risk assessments are revised when necessary;
- staff are given sufficient information, instruction, training and supervision;
- equipment is maintained in a safe condition, and appropriate records are kept.

Line Managers can either carry out risk assessments themselves or they can appoint a person who is competent to do so. They must ensure that the findings of any risk assessment pertinent to their staff are brought to their attention. Before applying for research grants, or adopting an experimental protocol, the Line Manager must consider how the proposal could affect people’s health and safety.

The Heads of Department and Directors of Professional Services will hold their Line Managers accountable for their performance.

6.7 Post-Doctoral Researchers

Postdoctoral researchers pursue their own research under the supervision of a Line Manager who may also be known as a Team Leader (see above). They should be responsible for risk assessing their own project work. Where they are directly responsible for the supervision of other staff they will be responsible for managing matters pertaining to their health and safety. They should ensure that those staff receive appropriate information, instruction, training and supervision. Postdoctoral scientists are to be held accountable for their own performance by their Line Manager.

6.8 Other Supervisors

All staff with supervisory responsibilities must ensure that risk assessments are carried out for the activities of the staff they supervise. They should ensure that those staff receive appropriate information, instruction, training and supervision.
6.9 Research Student Supervisors

Faculty staff have special responsibilities to research students who may be less experienced in the work situation than other staff and therefore may be at greater risk. Student supervisors are responsible for providing students with as much information, instruction, training and supervision as is necessary to ensure their health and safety. In circumstances in which supervisors cannot provide these themselves, then they must arrange in writing, for another suitable person to do it in their stead.

6.10 Research Students

In The College, research students have the same responsibilities for health and safety as any other member of staff. However, Research Students must not be given special responsibilities for health and safety matters. They should however, be encouraged to conduct risk assessments, in consultation with their supervisors, where this is relevant to their own studies.

6.11 Human Resources

Human Resources is responsible for the efficient transfer of essential information to managers, the Occupational Health provider, job applicants, and other employers, as well as providing secure long term storage of the records of former employees. Human Resources have specific responsibilities under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.

6.12 Estates and Facilities

Estates and Facilities have extensive involvement in health and safety matters. The Directors are directly accountable to the College Secretary.

6.13 All Staff, Students and Contractors

All staff and students have duties under the law to:

- take reasonable care for the health and safety of themselves and of other persons who might be affected by their acts and omissions;
- co-operate with The College in the implementation of its policy;
- not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare;
- use equipment provided by The College in accordance with their training;
- assist The College in identifying risks to health and safety at work;
- bring to The College's attention any shortcomings in its arrangements for health and safety.
7.0 Competence, Training, and Awareness

Employees and Students & Contractors

The College is committed to providing adequate and appropriate safety training for its staff and, where necessary, for students, contractors and visitors.

8.0 Communication, Participation and Consultation

The College recognises the roles of trade union-appointed safety representatives and their role in representing non-union staff. Representatives attend the College Health and Safety Committee.

Formal communication on issues related to health and safety takes place via the Health and Safety committee. Any significant changes to working practices or equipment which affect health and safety risks will be raised via the College Health and Safety Committee to ensure these are adequately controlled.

In addition, the College has a grievance procedure maintained by Human Resources which outlines how complaints including any related to Health and Safety may be raised within the College.

The minutes of the College Health and Safety Committee and a list of employee representatives and attending officers are published on The College’s intranet.

Examples of sources of information and communication include:

<table>
<thead>
<tr>
<th>Health and Safety Information</th>
<th>Method of Communication</th>
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</thead>
<tbody>
<tr>
<td>Health and Safety policy and guidance documents</td>
<td>Intranet</td>
</tr>
<tr>
<td>College Health and Safety Committee meeting minutes</td>
<td>Intranet</td>
</tr>
<tr>
<td>Management Executive &amp; Integrated Risk &amp; Performance Committee / Trustee minutes</td>
<td>Summaries published on College intranet</td>
</tr>
<tr>
<td>Memoranda from the Master</td>
<td>General email to all employees</td>
</tr>
<tr>
<td>First Aid/Fire Wardens</td>
<td>Intranet</td>
</tr>
<tr>
<td>Safety Alerts</td>
<td>Intranet, email</td>
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9.0 Documentation

The College’s Health and Safety Management System consists of the following controlled documents:
   a. Policies; Author appointed by The College Health and Safety Committee. Approved by the Committee and The Master on behalf of the College. The Finance and General Purposes Committee and the Governors maintain oversight. Updates to these documents are also approved by The Health and Safety Committee and the Master.
   b. Organisational Arrangements; Author appointed by The College Health and Safety Committee. Approved by The College Health and Safety Committee. The F&GP Committee maintains oversight.
   c. Guidance documents; Author appointed by The College Health and Safety Committee. These documents are published directly on the College Intranet. The College Health and Safety Committee maintains oversight.

2. Other documents and records required by The College to plan; operate and control those processes that are necessary for the management of occupational health and safety.

10.0 Control of Documents (Clause 4.4.5)

All controlled documents are listed in the Health and Safety Services section of the College Intranet. Earlier versions of documents are archived from the management system as soon as a revised document is added.

All relevant Health and Safety documentation is available and searchable on the College intranet via the Health and Safety Services website.

Where minor changes are made to spelling or grammar; notes are added; or the locations of associated documents are changed, the date on the approved document will be changed but the revision number will remain unchanged.

Any new documents required will be allocated to an author and the relevant as above will be applied depending on the type of document. Any printed documents will only be considered current if it has the current days date on it.

The College’s and external database servers are backed up according to schedules. Sevron, Awaken and iAuditor databases are backed up into a Data Farm.

11.0 Operational Control (Clause 4.4.6)

See section 3.0 Hazard Identification, Risk Assessment and Determining Controls, for a description of the way in which potential risks are identified at The College.

The risk assessment processes will take into account any changes that take place within the organisation.
Further operational controls are maintained for specific work areas. These include;

**Permits / Authorisations to work**

Permits /authorisations to work are used as a method of communicating hazard information and of providing instructions to minimise risks to employees; members of the public and contractors when working on or near College premises.

The permit /authorisation to work procedure is maintained on the Health and Safety Services Intranet site.

**Safe Systems of Work**

Employees are obliged to follow detailed work instructions when carrying out a range of specified jobs such as operating X-Ray equipment.

Local management monitors these instructions by carrying out routine inspections. The Health and Safety Office check on these processes as part of its ongoing audit regime.

In addition, the Health and Safety Office take a proactive approach to minimising operational health and safety risks by being involved in the design of work areas and other installations.

**Safety Arrangements for visitors & contractors**

Safety arrangements for visitors & contractors are outlined in the competence training & awareness procedure.

**Safety Arrangements for goods equipment & services**

The College’s purchasing department maintains a preferred supplier system and is part of the London Universities Purchasing Consortium which maintains a tendering system both of which include health & safety issues for goods purchased.

**12.0 Emergency Preparedness and Response**

The College has established procedures for a range of potential emergency situations. These procedures are assembled in the Emergency Procedures Manuals.

Testing of The College’s Emergency Procedures are performed periodically.

**13.0 Performance Measurement and Monitoring**

The College monitors and measures its health and safety performance in several ways. Data is collated from a variety of sources including:

- Sevron, Awaken and iAuditor records
The following data are reported via the Health and Safety Committee:

- Near Miss : Accident Ratio *Versus* Moving Annual Total (MAT) of Accidents
- Number of incidents reported under RIDDOR
- Number of confirmed cases of work related Occupational ill health
- Status of actions originating from internal and external audits
- Status of actions originating from inspections
- Status of completion of scheduled audit programme
- Status of any other corrective and preventive actions
- Number of training courses held
- Number of people trained
- Number of fire alarm activations per building vs maximum call outs (based on the number of detector heads per building)
- Status of provision of Fire Wardens & First Aiders
- Summary of status of Improvement Objectives

In addition the College Health and Safety Committee receives:

- Reports from each of the School or Departmental Health and Safety sub-committees.
- Reports on visits from enforcing agencies, e.g., the Health and Safety Executive (HSE), Environment Agency, Fire Brigades, and the Local Authority
- Reports from sub-contracted services, such as the Occupational Health Service.

The annual Management Review considers all of the above data and more detailed reports are provided on the following:

- Summary of categories of internal Health and Safety Audits findings
- Top 3 Categories of Immediate Causes for accidents and incidents
- Injury rate and RIDDOR rate
- Organisational change
- Legislation updates
- Where possible, performance data from similar organisations such as other Higher Education Institutions and research institutions will also be presented.

Following review and discussion of data, the College Health and Safety Committee then sets and agrees targets and also uses this information when setting Improvement Objectives. Please see section 5.0 Objective and Programmes for additional information.

Where appropriate, corrective and preventive actions are generated. See section 15.0 Incident Investigation, Nonconformity, Corrective and Preventive Action.

**Calibration**

Where required, any equipment used by The College or contracted personnel to measure health and safety performance, applicable operational controls or
conformance with Health and Safety objectives & targets will be calibrated in accordance with the manufacturer’s recommendations. Records of such calibration will be retained. Competence of those using such equipment is addressed in section 7 (4.4.2)

14.0 Evaluation of Compliance

The College uses several tools to evaluate compliance. The College maintains a legal register. (See section 4)

Health and Safety Management Audits (see section 17) to evaluate whether the systems in place in individual Departments of the organisation and/or key specific topic areas comply with the College Statement of Health and Safety Policy and relevant legislation. These audits are commissioned by the Health and Safety Office and take the form of a critical examination of all components of the Department or topic area’s system including management policy, training, and accident records.

The College also evaluates compliance through annual local safety inspections, internal audits and Senior Management Safety Tours.

On an annual basis the Health and Safety Office will review the results from audits and inspections and record the compliance status for each piece of H&S legislation within the legal register. The results of this H&S compliance are recorded and follow up action assigned.

The audit schedule can be consulted on the Health and Safety Services intranet.

15.0 Incident Investigation, Nonconformity, Corrective Action and Preventive Action

The College has a procedure for managing near misses, accidents and incidents.

Near misses, accident and incidents are investigated and preventative or corrective actions are generated. Such actions are reviewed at Health and Safety Committee meetings. The results of investigations are communicated to relevant parties.

Corrective and preventive actions from audits and inspections are followed up using the relevant procedure.

16.0 Control of Records

All controlled records are retained in accordance with the Records Retention Schedule for Health and Safety. The Health and Safety Office set the retention standards and authorises deletion of any records. Retention periods are specified in the Records Retention Schedule for Health and Safety.
Superseded controlled documents are archived in accordance with the Records Retention Schedule for Health and Safety. All records, which identify individuals, are held confidentially to comply with the Data Protection Act.

17.0 Internal Audit

Internal audits of The College’s occupational Health and Safety Management System take place as specified in Audit Procedure.

Health and Safety Audits
Health and Safety Audits are commissioned by the College Health and Safety Office and are carried out by trained auditors. These audits are systematic critical examinations of a Department’s activities carried out with the aim of testing compliance to the College’s policy and procedures and evaluating legal compliance with the aim of minimising accidents, incidents and damage to facilities.

The results of the above audits are reported to the College Health and Safety Committee.

18.0 Management Review

The purpose of the Management Review is to evaluate whether The College's occupational health and safety management system meets the organisations requirements.

This review is carried out annually and evaluates the overall performance of the occupational health and safety management system. The Management Review is undertaken by the College Health and Safety Committee and the Management Review report is reviewed by the Finance and General Purposes Committee and the Governors.

The following items are reviewed

- Results of audits, participation and consultation and communications
- The Health and Safety performance
- Previous objectives
- Status of Accident and incident investigations and subsequent actions
- Previous management reviews
- Changes that may affect the organisation
- Recommendations for improvement

The outputs from the review will include continual improvements which can include changes to

- Health and Safety performance
- Policy and objectives
- Resources
- Other aspects of the management system.