



University Health and Safety Policy Part 3 - Management Arrangements

Document No: HSPol 003

Safety, Health and Environment Unit

Title **University Health and Safety Policy
Part 3 Management Arrangements**

Reference Number HSPol 003

DOCUMENT HISTORY -

Issue	Date	Details
	11.11.03	Draft on University internal website
	20.05.08	Draft to SHEEC 20 th May 2008
	04.09.08	Revised version 4 th September 2008
	29.04.10	Revised version 29 th April 2010
	12.02.13	Revised version 12 th February 2013
	19.10.15	Revised version 19 th October 2015

Author	Bernard Angus		Date 19 October 2015
Reviewer	Denise Everitt		Date
Authorised by	Chair of SHEEC		Date
Issued by	Safety, Health and Environment Unit		Date

CONTENTS

	Page
1.0 Introduction	4
2.0 Planning and Implementing the Policy	4
2.1 Planning	4
2.2 Performance Standards	5
2.3 Risk Assessment and Control	5
2.4 Management of Contractors	6
2.5 Occupational Health Assessment	7
2.6 Serious and Imminent Danger	7
3.0 Measurement of Performance	7
3.1 Active Monitoring	7
3.1.1 School/Departmental Inspections	8
3.1.2 Behaviour Monitoring	8
3.1.3 Monitoring of School/Departmental Plans, Objectives, Standards	8
3.1.4 Monitoring by University Safety, Health and Environment Unit	8
3.1.5 Auditing	9
3.2 Reactive Monitoring	9
4.0 Review	10
4.1 University level review	10
4.2 School/Department level review	11

Arrangements for implementing University Health and Safety Policy

1.0 Introduction

Part one of the University's Health and Safety Policy outlines the University's goals and key objectives for health and safety and Part two describes the management organisation in place to implement the policy. Part three of the policy outlines the arrangements and systems that University management are required to implement in order to comply with University Policy.

The arrangements set out here are based on the recommendations given by the Health and Safety Executive and reflect the requirements of the Management of Health and Safety at Work Regulations 1999 and approved code of practice and guidance for effective health and safety management systems, HSG 65 and the Universities and Colleges Employers' Association code of best practice. They lay down principles based on preventing harm and aim to control risks, react to changing demands and sustain a positive health and safety culture.

These standards should be seen as the level of performance that the University expects all schools/departments to aim for. Where individual school/department performance does not yet meet particular standards, the school/department must put in place an action plan to achieve the standard within a reasonable time frame. For many of the key arrangements summarised in this document specific University health and safety performance standards will be produced to assist managers. Those already in operation will be referenced in the appropriate section of this policy and will be available on the Safety, Health and Environment (SHE) Unit website at www.kent.ac.uk/safety

2.0 Planning and Implementing

2.1 Planning

Effective planning at both University and School/Departmental level is essential for the implementation of this policy. The University's planning system is based on the health and safety management principles laid down by the Health and Safety Executive.

- a) Health and safety planning must begin at the earliest phase of any new project, including educational programmes, research or organisational change. Senior managers in particular have a key responsibility to consider potential risks of a project and to ensure that sufficient resources are made available to control these risks adequately.
- b) Health and safety plans will:
 - establish clear, measurable objectives which can be monitored and audited effectively
 - identify required resources
 - assign responsibility for implementation
 - set timescales for action and
 - be reviewed periodically.
- c) The Safety, Health and Environment Executive Committee (SHEEC) produces and maintains a University Strategic Health and Safety Plan. Implementation is monitored by SHEEC and the

SHE Unit and reported to Council and the Health, Safety and Environment Consultative Committee (HSECC) on an annual basis.

- d) Schools/Departments are required to produce an annual health and safety plan appropriate to their activities and complementary to the University plan. Implementation must be reported in their annual Health and Safety report sent to the SHE Unit which summarises and reports key issues to SHEEC and Council. These reports are normally discussed between the Head of School/Department and the Director of SHE, in meetings at the end of each Summer Term.
- e) Individuals with responsibilities identified by health and safety plans should be set personal objectives. Where appropriate these should be monitored by the Head of School/Department, for example, through appraisal.
- f) The University maintains a Major Incident Response Plan, which outlines action to be taken and key staff to be contacted. It is required to be updated annually and revised periodically.

2.2 Performance Standards

- a) Performance standards are specific targets that are set in order to maintain and improve health and safety, including compliance with the law.
- b) Performance standards must be measurable, make a positive contribution to accident/ill-health reduction and be realistically achievable.
- c) Management performance standards are established by the University and approved through SHEEC for the various elements of the safety management system and for the management of specific hazards. Where applicable these must be implemented by school/departmental management. Details can be found on the SHE Unit website.
- d) Schools/Departments must set performance standards to identify the contribution that people are expected to make in operating health and safety management systems established to control risks.
- e) A timescale for realistic achievement of standards should be set by schools/departments along with a date for review and evaluation.

2.3 Risk Assessment and Control

- a) All managers and supervisors must ensure that every work activity or location having foreseeable risks has been subjected to a suitable and sufficient risk assessment for health and safety prior to the activity starting.
- b) Heads of School/Department must identify the members of staff who will carry out risk assessments, including where applicable specific assessments of hazards such as manual handling, display screen equipment, hazardous substances, ionising radiation and lasers. Performance standards and procedures related to specific hazards within the University can be found on the SHE Unit website or by contacting the SHE Unit directly.
- c) Competent persons must undertake assessments. Training is essential and can be arranged through the SHE Unit.
- d) Practical measures must be identified for the elimination or control of risks.

- e) Risk control systems must be devised to ensure that workplace precautions are implemented and monitored to ensure that they are kept in place. Records must be kept of any monitoring or maintenance of equipment undertaken and these shall be kept as long as the relative statutory provision stipulates.
- f) Assessments must be used to prioritise the contents of the health and safety plan.
- g) Arrangements must be made to review assessments regularly and to ensure that all relevant staff and students where appropriate, are made aware.
- h) A written record of assessments must be completed which identifies the significant hazards and describes the preventative and protective measures required to avoid, eliminate, reduce or control the risks identified to a tolerable level.

2.4 Management of Contractors

The University employs a wide range of contractors ranging from those undertaking building and maintenance to those providing services, goods or deliveries. As the client the University therefore has a duty to ensure that contractors are competent, have safe work procedures and that they adhere to them.

To achieve this, the University will ensure that:

- only suitably competent, financially viable contractors are engaged to work on the University's behalf.
- a database of competent contractors ('Approved Contractors List') is maintained by the Estates Department.
- all work which involves construction, demolition or invasive work to any building or structure must only be contracted either through, or with the full knowledge, of the Director of Estates or his/her authorised nominee.
- all contractors are provided with all necessary information and instruction relating to works on University of Kent premises, including any relevant standards and procedures with which the contractor shall be expected to comply (*as required by current health and safety legislation and associated statutory provisions*).
- suitable and sufficient procedures are in place to gain effective communication, co-operation and co-ordination of all contractor works.
- all contractors are visibly identifiable.
- all contractors plan and manage works effectively with regard to health and safety, and quality of product.
- where contractors are engaged to carry out high-risk works, then those works shall be subject to a Permit-to-Work.
- Permits-to-Work are only issued by suitably competent persons (Authorised Persons).
- contractor performance is reviewed/audited on project completion.
- the Approved Contractor List is reviewed/audited periodically to ensure continued competence.
- this policy will be monitored proactively with regard to proposed legislative and best practice standards to ensure that this policy continues to achieve its aims.
- contractors who fall below the required standards are notified in writing and their performance and risk assessments reviewed to ascertain their suitability to continue working for the University.

2.5 Occupational Health Assessment

Certain work tasks carry risks to health and any health assessment carried out on an employee must be tailored to identify not only health problems arising out of the demands of the job, but also the effect an employee's health can have on a job.

It is recognised that certain work activities, if not properly controlled, can be detrimental to an employee's health, e.g. working with pesticides, asbestos (**see note below*) or hazardous substances. It may also be that some employees are not suited to undertaking certain activities, or that some suitable adjustments to the work activity may need to be made. Such employees must be identified to Occupational Health and where appropriate, a system of health surveillance implemented. Schools/Departments are required, as part of their risk assessments, to identify the hazards to health inherent in the work undertaken and the control measures required in order to manage the risks. Where a need for health assessment is indicated a referral must be made to Occupational Health prior to exposure to the hazard or if employees subsequently report work-related symptoms.

Referrals to Occupational Health can be management referrals or individual self referrals. In all cases medical confidentiality will be strictly observed.

*The University has no asbestos workers and any work required is undertaken by licensed asbestos contractors.

2.6 Serious and Imminent Danger, including Fire

- a) Schools/Departments must establish appropriate emergency procedures to follow in the event of serious or imminent danger, including fire.
- b) Persons should be able to stop work immediately in emergencies and proceed to a place of safety.
- c) Except in exceptional circumstances, areas where there is serious and imminent danger must not be re-occupied until made safe.

3.0 Measurement of Performance

The University is committed to measuring its performance against this policy, its predetermined plans and its performance standards. Measurement is essential in order to maintain and improve health and safety performance and therefore line management must put in place arrangements for both active and reactive monitoring of performance.

The hierarchy of monitoring will be:

- individual school/department units will self examine on a regular basis
- the School/Departmental Safety Co-ordinator will check the quality of unit monitoring
- the success of the school/departmental process will be assessed centrally by SHEEC and by the SHE Unit as part of their monitoring and auditing programme
- Council will examine monitoring data reported to it by SHEEC.

In this way each level of management examines its own activities for health and safety, checks the level below, and is itself checked by the one above.

3.1 Active Monitoring

Active monitoring is proactive as it gives feedback on performance before an accident, incident or ill-health occurs. The aim of active monitoring is to determine whether:

- the safety systems that have been set up work in practice
- plans and standards are achieved and are effective
- legal and other requirements are complied with.

It is the responsibility of management in each school/department to monitor the implementation of the University's health and safety policy. Heads are required to set up performance standards for monitoring the effectiveness of the health and safety management functions at each level within their school/department, and these standards should include the monitoring activities outlined below. Each Head of School/Department is required to complete an annual health and safety report to the SHE Unit, which is then reported to SHEEC and Council.

3.1.1 School/Departmental Inspections

Schools/Departments must have a programme of regular health and safety inspections:

- The nature and frequency of inspections will depend on the activities undertaken and the risk, however, all parts of schools/departments should be visited at least three times a year.
- More hazardous areas and equipment may require more frequent inspections.
- New work areas and those subject to substantial change should be inspected as soon as practicable after the acquisition or change.
- Inspections should be structured (checklists are recommended) and the findings and the required remedial action should be recorded.
- Arrangements should be in place to ensure that remedial actions are implemented.
- Trade Union safety representatives and non-union safety representatives, where appointed should be invited to undertake joint health and safety inspections with management.

Guidance on health and safety inspections can be found on the SHE Unit website.

3.1.2 Behaviour Monitoring

Human factors play an important part in accident causation and therefore first line supervisors/managers are required to carry out regular routine direct observation of work and the actions of staff, in order to assess compliance with workplace precautions. This should be undertaken in a positive way so that the views of employees are taken into account. Managers must intervene where unsafe working is observed in order that the causes are understood and dealt with effectively.

3.1.3 Monitoring of School/Departmental Plans, Objectives and Standards

Heads of School/Department must ensure that proactive arrangements are in place to monitor performance against predetermined school/departmental plans, objectives and standards. These could take the form of regular reports or returns to Local Safety Committees or school/departmental management meetings.

3.1.4 Monitoring by the University Safety, Health and Environment Unit

The University SHE Unit monitors the implementation of the University's policy by:

- meeting Heads of School/Department annually to discuss health and safety performance

- requiring Heads of School/Department, with the assistance of their School/Departmental Safety Co-ordinator and the Local Safety Committee, where appropriate, to submit an annual report. SHEEC, HSECC and Council review the collated responses.
- undertaking random checks and safety tours
- organising termly meetings of the School/Departmental Safety Co-ordinators, considering feedback from across the University and updating members on new legal requirements and initiatives.

3.1.5 Auditing

- a) The SHE Unit will conduct periodic health and safety management audits in schools/departments.
- b) The nature and frequency of audits will depend on work activities and level of risk.
- c) Audits will consist of questions and observations based on the safety management system in areas of policy, organisation, planning, setting standards, monitoring performance and reviews.
- d) The aim of the audit is to help school/departmental management in identifying strengths and weaknesses, assisting the development of management strategies and suggesting priorities for change.
- e) Audit reports will be submitted to Heads of School/Department for feedback and findings will also be reported to SHEEC, HSECC and Council.
- f) From time to time, independent audits of targeted schools/departments at the University will be carried out.

3.2 Reactive Monitoring

- a) The University has in place procedures for the reporting and investigation of cases of accident and ill-health (see Accident and Ill-health reporting on the SHE Unit website).
- b) All employees and student supervisors of the University are required to report the following electronically via iCASS soon as possible after they occur:
 - accidents resulting in personal injury or time loss
 - dangerous occurrences
 - non-injury accidents resulting in significant damage
 - fire
 - false fire alarms
 - near misses where serious injury or damage could have resulted
 - work related ill-health.

The initial report should be to their line manager and School/Departmental Safety Co-ordinator using the University accident or ill-health reporting systems

- c) The University has in place an Occupational Health management referral procedure for occupational ill-health; a confidential self referral service is also available to staff through the Occupational Health Advisers, who are located in the SHE Unit.
- d) Heads of School/Department must ensure that there is an effective system for the prompt reporting and recording of incidents and that reports are sent to the SHE Unit as soon as possible.

- e) Reports must be investigated carefully to identify both immediate causes and underlying defects in health and safety management and the appropriate Trade Union/non-union staff Safety Representatives shall be invited to take part in the investigation.
- f) Any changes that are necessary to prevent repetition of accidents and ill-health must be identified and prioritised.
- g) Implementation of remedial action must be monitored.
- h) The levels of management involved in investigations should be commensurate with the severity of the incident and for all incidents which are reportable to the Health and Safety Executive, the Head of School/Department must be directly involved in the investigation.
- i) If an accident or ill-health case is reportable to the Health and Safety Executive or is of sufficiently serious nature then the Head of School/Department must lead a formal investigation (see Accident and ill-health reporting guidance on the SHE Unit website for definition of HSE reportable accidents). In this case the appropriate Trade Union safety representative or non-union safety representative, where appointed, on the HSECC will be invited to take part in the investigation.
- j) Where it appears that a major accident has occurred then the SHE Unit must be notified immediately. The University is legally obliged to report major injury accidents to the HSE at once and to ensure that the scene of the accident remains undisturbed. All University reports to the HSE will be made centrally by the SHE Unit.
- k) Where staff have been absent from work as a result of an accident or occupational ill-health then the school/department manager is required to conduct a return to work interview to determine whether the person is fit to undertake their duties and to ensure that any conditions that led to the injury or illness have been addressed.
- l) Schools/departments are required to monitor accidents and occupational ill-health reports regularly to ensure appropriate actions have been taken.
- m) The SHE Unit compiles and monitors accident and ill-health statistics, which are reported to SHEEC, HSECC and Council.

4.0 Review

Reviewing is the process of making judgements about the adequacy of performance and taking decisions about the nature and timing of actions necessary to remedy deficiencies. The main sources of information come from the measuring activities referred to in section 3 above.

4.1 University level review

- a) Council will undertake an annual review of University performance based on annual reports from the Safety, Health and Environment Executive Committee (SHEEC).
- b) SHEEC will review health and safety performance at each meeting as part of its main remit.
- c) The SHE Unit will review performance regularly and report to SHEEC.

Where significant under-performance has been identified which has not been addressed through normal management approaches then the member of EG, as Chair of SHEEC, will intervene. If performance

continues to be unsatisfactory the responsible Head of School/Department will be required to attend a meeting with the Vice-Chancellor to account for this poor performance.

4.2 School/Department level review

- a) Schools/Departments must undertake regular reviews of health and safety performance and management systems in order to assess progress towards objectives
- b) Reviews should be appropriate to the nature of activities undertaken and the level of risk.
- c) Interested parties must be informed of the results of reviews (e.g. through Local Safety Committees and team meetings).
- d) Schools/Departments should prepare a prioritised list of changes to be made as a result of the review and monitor their implementation.
- e) The Head of School/Department must submit an annual health and safety report to the SHE Unit summarising:
 - health and safety achievements
 - significant problems and
 - future plans and objectives
- f) The SHE Unit will include the significant aspects of these reports in the annual report from SHEEC to Council.
- g) The Head of School/Department is responsible for taking action where significant under-performance is observed. If, despite reasonable approaches, performance continues to be unsatisfactory then the Head should take appropriate direct action to address the health and safety risk, which, in exceptional circumstance, will include disciplinary action in accordance with University policy.