Operations Group

Health & Safety

Code of Practice
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Introduction

The Health and Safety policy statement for Imperial College states “the University is committed to pursuing excellence in everything it does and this includes the management of health and safety”.

The Operations Group plays a crucial role in providing and maintaining a safe community in which to learn and, a controlled environment where the boundaries of research can be pushed to their fullest extent.

As Chief Operations Officer I expect the Directors of Departments to create and maintain a positive health and safety culture, to lead by example and strive to continually improve safety performance thereby minimising losses and injuries to employees, students, contractors, visitors and business assets.

Many of the services delivered from within the Group are ‘business critical’ and must be provided in strict compliance with the relevant Regulations. The Directors will therefore ensure that their staff are fully competent and suitably resourced to fulfil their roles.

Good health and safety is good business and, providing employees at all levels embrace their individual responsibility for health and safety, as set out in Imperial College policy, we will achieve ‘excellence’.

The purpose of this Code of Practice is to set out the management arrangements (safety management system) Operations Group has in place to enable it to implement College policy and procedures and comply with Health and Safety Regulations.

Simon Harding-Roots
Chief Operations Officer
1. Profile of Operations Group

The Operations Group is made up of the following Departments and for each is stated an overall purpose:

**Campus Services** - is a group of Departments all of which seek to provide affordable amenities, services and recreational facilities for Imperial College students and staff. This includes conferencing and catering, sport & leisure, residences and the student hub.

**Master Planning & Development** - The Masterplanning and Development team forms a key part of the broader Estates group within Operations, working closely with Estates Projects and Estates Facilities to provide a seamless transition from strategy, through delivery, to the use, maintenance and operation of the College’s facilities and estate.

**Estates Projects** - This Department is responsible for the design and management of all major building, construction and refurbishment works at Imperial College. Estates Projects collaborates closely with Masterplanning to ensure that capital projects are delivered in line with the vision set out in the Masterplan.

**Estates Facilities** - The overall function of the Department is to maintain and manage all the buildings and infra-structure owned or leased by the College from which it operates to provide a range of educational, research and business services. It is also responsible for the acquisition and overall management of Imperial College’s built asset.

**Information and Communications Technologies (ICT)** - provide information technology services appropriate to the College’s world-class standing in teaching and research, supported by regular renewal and enhancement. Services include provision of networks, individual desktop support, email, file storage, management information and teaching / research clusters.

2. Management of Health and Safety at Imperial College

Being a highly complex organisation operating across a number of campuses and offering a diverse range of services presents a particular challenge when it comes to managing health and safety.

The effects of a breach of a health and safety duty in any one Faculty or Department could have devastating consequences for the College’s reputation and business continuity. It is therefore an imperative for the College to determine the most appropriate means of managing health and safety in an organisation where responsibility for operational decision making is delegated to front line managers.

In response to the above the College has implemented a safety management system which is predicated on the Health and Safety Executives publication ‘Successful Health & Safety Management’ (HSG65). The illustration below
identifies the component parts of the management system which organisations can use to benchmark themselves against in terms of safety management.

The following provides a succinct description of the elements which make up the safety management model:

**POLICY** – Effective health and safety policies set a clear direction for the organisation to follow

**ORGANISATION** – An effective management structure and arrangements are in place for delivering the policy

**PLANNING & IMPLEMENTATION** – There is a planned and systematic approach to implementing the safety policy through an effective health and safety management system

**MEASURING PERFORMANCE** – Performance is measured against agreed standards to reveal when and where improvement is needed

**AUDITING AND REVIEWING PERFORMANCE** – The organisation learns from all relevant experience and applies the lessons
3 Health & Safety Management in Operations Group

The Chief Operations Officer Simon Harding-Roots acknowledges, in the Introduction, the crucial role the Operations Group plays in providing the ‘safe community’ that is Imperial College London.

To achieve ‘excellence’ in health and safety it needs to be managed with the same degree of expertise and to the same standard as other core business activities. It is therefore critical to nurture a positive culture within the organisation which demonstrates that health and safety is fully integrated in to the business.

To aid the development of a positive culture the Chief Operations Officer and Directors of the Operations Group have adopted the following ‘key principles’ which represent the core values and beliefs underpinning the safety management system. They will be applied consistently to inform the decisions, actions and behaviours of staff across Operations Group.

Directors will ensure the following:

**Leadership** – managers at all levels are accountable for health and safety and will demonstrate leadership through personal example and continually striving to improve safety performance. Managers will motivate and encourage staff to take their individual responsibilities seriously and not to do anything which will place themselves or others at risk;

**Hazards, Risk & Control** – managers will identify the hazards and risks associated with their business, put in place the necessary control measures and continually challenge them to ensure continuous improvement.

**Employee Engagement** – managers will consult with and engage employees in the development and maintenance of safe working practices.

**Competence and behaviour** – managers will ensure that all employees are suitably trained and competent to perform their role safely and are able to make a positive contribution to safety performance.

**Incident Analysis and Prevention** – managers will ensure work-related accidents, incidents and near misses are reported, investigated and analysed to prevent recurrence. Investigations will focus on root causes and recommendations will be shared and implemented appropriately.

**Contractors and Partners** – managers will work in partnership with our approved contractors in the development and implementation of high standards of health and safety practice. We will only select contractors who can demonstrate the required competences and commitment to health and safety.

**Monitoring, Audit & Review** – managers will conduct regular audits of the risk control measures and management systems. Qualitative and quantitative indicators will be used to determine the success of the safety management system that Imperial College requires Operations Group to have in place

**Health & Well-being** – managers will promote and improve the health and well-being of staff.
Written Arrangements

The College requires each of its Faculties and Departments to set out in a Code of Practice the arrangements it has in place and how it will organise itself to ensure it delivers the objectives as defined in Imperial College Health and Safety policy, guidance and associated procedures.

The Operations Group comprises four separate Departments and as such each is required to produce and publish its own Code of Practice.

Using HSG65 as a framework, the following sets out how health and safety is organised and managed in the Operations Group.

3 (i) Policy

Organisations that are committed to health and safety recognise that effective policies contribute to business performance by:

- Minimising the financial losses which arise from avoidable unplanned events;
- Recognising that accidents, ill health and incidents result from failings in management control and are not necessarily the fault of individual employees;
- Recognising that the development of a culture supportive of health and safety is necessary to achieve adequate control over risks;
- Ensuring a systematic approach to the identification of risks and the allocation of resources to control them;
- Supporting quality initiatives aimed at continuous improvement.

The College Safety Department is instrumental in developing a framework of policies and guidance which identify the duties imposed upon the College by the Health & Safety at Work Act 1974 and, the associated Regulations. These policies and guidance can be found on the College intranet.

The overall goal within the Operations Group is to achieve compliance with the legal requirements placed upon it by virtue of its business and services.

Health and safety policy and guidance devised by the Safety Department will in most cases cover the legal liabilities placed upon the Operations Group although it may be necessary to develop codes of practice which assist managers to interpret and, apply the policy within their service.

Where service specific policy is deemed necessary it will be formulated in accordance with the principles as expressed in the statements above. It will be developed by designated ‘competent person(s)’ in consultation with representatives from those staff groups who will be required to operate in accordance with the policy and should therefore have ownership of it. Where it is considered necessary to develop health and safety policy specifically for the Operations Group this will be undertaken in consultation with the College Safety Director and will be signed off by the Chief Operations Officer.
3 (ii) Organisation

For College policy and procedure to be effectively implemented the Operations Group must have in place a robust framework of arrangements which aim to establish management control, promote co-operation, secure the competence of employees and provide for good communication. The following chapter sets out how the Operations Group will organise itself to achieve its aims.

3 (ii)(i) Roles & Responsibilities

Operations Group is managed by the Chief Operations Officer who has duties delegated to him by the Chief Financial Officer of Imperial College London. The Health & Safety responsibilities of the Chief Operations Officer are summarised below:

- To support the Chief Financial Officer in the discharge of his or her health and safety responsibilities;
- To promote a positive health and safety culture throughout the College;
- To ensure that adequate resources are allocated to the management of health and safety across the Group;
- To ensure that effective arrangements are in place for implementation of College policies, procedures and codes of practice;
- To delegate duties, responsibilities and authority to the Directors of Departments within the Operations Group for health and safety management.

The Chief Operations Officer plays a key role in ensuring that the Departments reporting to him have effective arrangements in place to manage the risk arising from their functions and services. The Chief Operations Officer therefore expects each of his Directors to comply with the duties as set out below:

- Establishing and maintaining a robust ‘safety management system’ within their Department which ensures that College policy and procedure is effectively implemented;
- Ensuring that sufficient resources are allocated so as to comply with all statutory requirements placed upon Operations Group;
- Appointing competent persons to advise it in respect of its statutory duties;
- Ensuring that systems are in place to identify hazards and develop strategies for effective risk mitigation and control;
- Ensuring that staff are provided with suitable and sufficient training to enable them to competently carry out their duties;
- Ensuring that staff and contractors are clear as to their health and safety roles and responsibilities;
- Receiving and reviewing reports from their Departmental Health and Safety Committee and ensuring action is taken to address issues arising;
- Reviewing the Departments’ health and safety management performance on an annual basis;
• Liaising with the Heads of Faculties to ensure that ‘safety critical’ plant and services are provided professionally, cost effectively and in compliance with statutory requirements.

The delegation of responsibilities as above will not in themselves ensure that a positive health and safety culture or indeed a robust safety management system will prevail in the Operations Group. In order to assist Operations Group to achieve its aims and objectives and deliver high quality services it will need to give consideration to the following:

• Establishing and maintaining control over factors which could lead to ill health, injury or loss;
• Gaining the co-operation of all stake-holders enabling them to share their knowledge and experience and, contribute positively to safety performance;
• Acknowledging the contribution good communications can make to ensuring the right messages are passed consistently through the organisation;
• Recognising that fully competent staff can make a maximum contribution to the health of the organisation by minimising accidents, injuries and losses

The four objectives above will be further discussed in Section 3 (iii) (v) where they will be used to describe the management arrangements devised by the Operations Group to effectively plan for and implement the safety management system.

Organising for effective health and safety management also requires the provision of suitable resources which will aid the organisation to comply with its statutory duties and responsibilities delegated via College policy.

3 (ii) (ii) Competent Persons

Organisations are required to ensure they have access to competent advice which will enable them to identify and manage the risk arising from the conduct of their operations.

To satisfy this requirement the Operations Group makes funding available for three full time posts as follows:

• Construction Safety Manager. This post provides advice to Estates Projects and reports to the Director of Estates Projects
• Construction Safety Adviser. This post provides essential support to the Construction Safety Manager and wider Projects Team
• Head of Health & Safety. This post principally provides advice to the Director of Estates Facilities and the Facilities team but is also available to advise the wider Operations Group.

In addition to the full time ‘competent persons’ Heads of Departments have the discretion to appoint Departmental Safety Officer’s (DSO) whose primary responsibility is to assist their Head of Department with the development,
implementation, monitoring and review of the Department’s health and safety management system.

This role is used in Operations Group to supplement the full time appointed safety personnel as detailed above. [The role of the DSO can be viewed here.]

The following Departments have appointed DSOs:

- Conferencing and Catering;
- Sport Imperial;
- Residences;
- Security;
- Information & Communications Technologies.

3 (ii) (iv) Communication & Consultation

Good communication and consultation is essential if staff at all levels are to be engaged in the aim of achieving high standards of safety practice. In recognition, the Operations Group has a structure of Health and Safety Committees, these are:

- the Operations Group Health and Safety Management Committee;
- the Estates Facilities Health and Safety Committee;
- the Health and Safety in Sport Committee;
- the ICT Health and Safety Committee;
- the Campus Services Health and Safety Committee.

There are also Building User Groups which meet to provide a forum for coordinating health and safety in multi-tenanted buildings. These Groups are coordinated by the relevant Building Manager, [their Terms of Reference can be found here.]

Where issues arise at the above Committees / Groups that cannot be resolved at a local level and require consideration at a corporate level they will be escalated to the College Health, Safety & Environment Committee which comprises representation from all Faculties and Business functions. [The Terms of Reference for this Committee can be found here.]

3 (iii) Planning & Implementation

Effective planning and implementation is essential if the Operations Group is to successfully discharge its duties as expressed in Imperial College Health and Safety policy and manage the risk that arises as a direct result of the services it provides.

These services are provided by Imperial College staff to ‘internal customers’ and also through the selection and appointment of approved contractors and, via partnership with NHS Trusts.

The following section will discuss the methodology applied by the Operations Group to identify and control risk, more precisely it will look at:
(a) Risk Identification and control;

(b) Risk Assessment and Safe Systems of Work

(c) Risk management arrangements including the ‘4Cs’ (Control, Communication, Co-operation, Competence), control of contractors, and training.

3 (iii) (i) **Risk Identification**

If compliance is to be achieved with Health & Safety Regulations and College policy it is essential to identify risk that has the potential to cause accidents, incidents and losses which could have a detrimental impact on the business. Prevention will be achieved if the organisation systematically identifies, eliminates or controls the hazards and risk present in the workplace.

It is acknowledged that risk can be prevented or minimised at three key stages i.e. prior to it entering the organisation, when inherent within the business, and at the point of being exported out of the organisation.

**Risk entering the organisation** will be prevented, so far as is reasonably practicable, by use of the following measures:

- Selection and appointment of staff according to the skills and attributes prescribed in a person specification;
- Selection of tools and work equipment which are ‘fit for purpose’;
- Selection of approved contractors who are committed to good health and safety, and
- The design of safe workplaces and design of buildings in respect of the CDM Regulations

**Risk present within the organisation** will arise partly from intrinsic risk e.g. potentially hazardous areas where staff are required to work and, partly from the tasks they undertake which could be hazardous.

**Risk exported by the organisation** could arise from waste products generated via processes undertaken by staff or contractors.

3 (iii) (ii) **Risk Control**

Having identified that risk exists, there is a duty to eliminate, combat or minimise it, this is often referred to as the ‘hierarchy of control’. These measures are described below:

Elimination – often it will not be feasible to eliminate a task but it may be possible to undertake the task in a different way and therefore eliminate the hazard. e.g. substituting a toxic chemical with one that achieves the same desired outcome but is non-toxic.

Combat – many tasks undertaken by e.g. Maintenance staff are intrinsically dangerous for example going on to a roof which is not fully edge protected to
undertake some form of repair to plant. Neither the location nor the task can be eliminated but it is possible to combat the risk of falling by providing collective edge protection to the roof or insisting the individual wears a personal fall arrest system where the former is impractical.

Minimising – the majority of staff rely on information technology to function effectively in their roles and it is becoming increasingly possible for individuals to develop some form of repetitive strain injury (RSI) from the use of personal computers. The potential for developing RSI can be minimised by providing an ergonomic work environment / equipment, informing users of the hazards of working with IT and how to avoid them and, monitoring their behaviour to ensure it complies with good practice.

The above are the underpinning principles of a *risk control system* (RCS) which will be operated in the Operations Group. This system operates on the basis that a systematic analysis of risk will be undertaken throughout Operations Group.

A key part of that systematic analysis will require each Head of Department to identify the job types that appear in their structures e.g. Maintenance Engineer, Project Manager, ICT Technician etc., and for each job type identify those tasks typically performed which could be hazardous and how.

Having identified the job types and potentially hazardous tasks performed it will be necessary to consider what action can be taken to eliminate, combat or minimise the risk e.g. to carry out risk assessments.

3 (iii) (iii) *Risk Assessment*

The Management of Health and Safety at Work Regulation’s 1999 requires every employer to make a suitable and sufficient risk assessment of those work activities undertaken by their staff which could cause them or others harm. Where significant risk is identified the risk assessment has to be recorded.

The Operations Group has considered how it can comply with the duty expressed above and the requirements as set out in Imperial College policy. The outcome of this consideration is communicated via a Risk Assessment Code of Practice (CoP) which can be found here.

The Risk Assessment CoP is predicated on three main principles which are:

1. *Generic Risk Assessments* - Many of the work activities undertaken by staff are repetitive and common across a group of employees e.g. a number of ICT staff will unpack a computer, install it on a workstation and commission it. Similarly a maintenance engineer(s) will strip down and replace the bearings on a fan coil unit. It can therefore be concluded that the majority of risk is foreseeable and it is possible to define a range of control measures e.g. a *generic risk assessment*, that if applied appropriately will reduce the risk to a level which is tolerable;
2. **Dynamic Risk Assessment** - Prior to commencing a task, employees will be encouraged to stop momentarily and ask themselves the question: is the hazard present in the task and the environment sufficiently mitigated through the application of the standard controls as set out in the *generic risk assessment*?

In the event that the hazard presented by the task exceeds that which can be mitigated by the standard control measures, the member of staff will be expected to conduct a ‘60 second’ or ‘dynamic’ *risk assessment*. The aim of the dynamic risk assessment is to identify additional control measures, which if applied appropriately, will enable the task to be carried out safely.

In the event that the employee cannot apply further controls, he should report back to his or her Supervisor for further advice.

3. **Specific Risk Assessment** - There will be a number of tasks undertaken which in themselves are so specific in their nature that they will require a *specific risk assessment*, an example could be mobilising a MEWP (Mobile Elevating Working Platform) to a location where it will be deployed to replace high level luminaries in an atrium;

3 (iii) (iv) **Safe Systems of Work**

Each generic / specific risk assessment produced will in effect be a ‘safe system of work’ (SSoW) which staff will be trained to use and expected to follow when carrying out the task to which it applies.

The SSoW will describe the measures to be applied when undertaking the task which will serve to eliminate, combat or minimise the risk. These measures will, where appropriate, specify equipment or procedures that are to be applied e.g. use of 110v electrical apparatus or a lock-out system. They will also specify any ‘Personal Protective Equipment’ (PPE) that is to be worn such as hearing protection, eye protection, personal fall arrest equipment etc.

The SSoW will also refer to any relevant codes of practice which have been developed by Imperial College / Operations Group to address such activities as working safely at height, safe moving & handling, locking out electrical supplies and lone working as examples.

All SSoW will be reviewed annually or following any significant accident, incident, change in equipment, working practice or legislation.

The Risk Assessment Code of Practice will describe the method used to set out and record assessments.

3 (iii) (v) **Management Arrangements**

The *risk control system* as referred to in 3 (iii) (ii) has been designed to enable the Department to satisfy its duty to carry out a suitable and sufficient assessment of risk. This however will not function effectively unless it is supported by a set of management arrangements which serve to ensure that the principles of risk identification and control are practiced consistently across Operations Group,
The management arrangements will assist the Department to communicate its values and beliefs as at Section 3 and instil a positive health and safety culture across the Department. The foundation of the arrangements will be:

1. Establishing and Maintaining Control

Control can be achieved within an organisation through the assignment of accountabilities for employees at all levels, but particularly at the managerial level. Managers play a key role in assisting the organisation to discharge its safety objectives thereby minimising injuries or losses that could arise from unsafe working practice.

Each Department / Section will therefore aim to define roles and responsibilities for those staff who will be required to gain the commitment of the wider work force to those health and safety policies which impact upon their work at Imperial College. Where appropriate, roles and responsibilities will be spelt out in Codes of Practice, or implementation strategies. Another essential contributor towards achieving ‘control’ is the setting of performance standards which define the behaviours and practices that staff are expected to demonstrate whilst undertaking their duties, these standards will commonly be referred to as Safe Systems of Work (SSoW).

In adopting the above as a means of maintaining control it will enable the Department / Section to identify, via safety auditing, whether those staff assigned specific responsibilities are carrying them out effectively and whether staff are demonstrating the appropriate behaviours and practices.

The conduct of Imperial College’s framework contractors will also be closely managed by setting clear standards of practice within the contract terms and having in place robust monitoring and reporting systems.

2. Gaining Co-operation

Seeking and gaining the co-operation of staff is crucial if health and safety is to be successfully managed. This will be achieved by engaging staff at all levels in the process of hazard identification, risk analysis and the subsequent development of safe working practices.

Where possible, existing team briefing and communications mechanisms will be used to engage staff in discussions regarding the development of safe working practices. Where appropriate, focus groups will be used to ensure that potentially conflicting views can be worked through, and successful solutions identified.

Encouraging participation amongst employees and working collaboratively with recognised Trades Unions will aid the development of a positive health and safety culture and generate joint ‘ownership’ of the Mission which is to achieve excellence.
3. Good Communications

As expressed in the ‘Key Principles’ above, ‘managers will demonstrate leadership through personal example and continually strive to improve safety performance’. It is vital that the organisation consistently demonstrates its commitment to health and safety by ensuring the messages that cascade through the structure are in accord with the intentions / objectives as set out in the policy(s).

The Team briefings procedure will be the main mechanism used to communicate health and safety throughout the Operations Group. This will make it possible to pass on the findings of accident investigations, inspections, audits, minutes of Committee meetings and feedback on overall safety performance.

The allocation of appropriate resources vis-à-vis the risk present in the organisation will give staff a clear message that Senior Management take their Health & Safety responsibilities seriously but proportionately.

4. Fully Competent Staff

Being the organisation’s most valuable asset, staff who are appropriately trained and competent will have every opportunity to work in accordance with the policies and codes of practice provided by Imperial College.

The competency needs of staff will be determined by considering the risks that staff might be subjected to in their roles, and matching this to a profile of knowledge and information they should be equipped with to enable them to avoid or sufficiently minimise the risks identified.

Competency profiles will therefore be developed on an individual job type basis or by grouping together similar job types. A clear link will be made with any risk assessments which apply to the job type and any Safe Systems of Work with which the employee is expected to comply.

Having developed the competency profiles, new and existing staff will be required to attend training courses or undertake personal development programmes where they will acquire the necessary knowledge and information to enable them to keep themselves and, others safe at work.

It may be possible to give ‘accreditation of prior learning’ to new staff joining the organisation providing competence can be demonstrated by means of professional qualifications or certification.

Managers will be required to maintain up-to-date records of training attended by staff and ensure that staff transfer their learning into the work place.

3 (iii) (vi) Control of Contractors

All Departments in the Operations Group utilise contractors / consultants to support them to fulfil their obligations to the College, they are as follows:
- Estates Projects;
- Estates Facilities;
- Estates Masterplanning;
- Information & Communications Technologies (ICT);
- Campus Services.

Each of the above bear the responsibility to have systems and procedures in place to discharge their duties to the contractors they appoint.

_Estates Projects_ is responsible for managing major building refurbishment works and all new builds on College campuses, all work is commissioned further to a tendering process which invites quotations from contractors on an approved list. Contractors must demonstrate their commitment and track record in health and safety prior to being granted ‘approved contractor’ status.

_Estates Projects_ uses a ‘Safety Code of Practice (Construction) 2011’ to assist it in defining the expectations placed upon the contractor undertaking construction or refurbishment works. Estates Projects will have in place a set of management arrangements which will ensure the Code of Practice is adhered to.

_Estates Facilities_ is responsible for the on-going management and servicing of all buildings across the College Campuses. Much of the servicing and maintenance operations are ‘contracted out’ to a Measured Term Maintenance Contractor (MTMC) who in turn sub-contracts to a number of specialist contractors.

The MTMC is responsible for appointing sub-contractors who are professionally competent and able to demonstrate fully compliant safety practices in the services they provide. The MTMC will be responsible for regularly monitoring the working practices of their sub-contractors and ensuring they maintain high standards of health and safety. Estates Facilities have produced a Code of Practice setting out how it will manage the presence of the Measured Term Maintenance Contractor at Imperial College.

As a result of the above there are thousands of individual contractor movements on the campus each year in respect of planned and reactive maintenance activities. These activities require contractors to access locations such as laboratories, research areas, plant rooms, service tunnels and roofs, many of which have sensitive operations underway or are intrinsically hazardous.

In order to discharge its duty of care to staff, students and contractors Estates Facilities has in place a Permit to Work procedure which aims to ensure the risk(s) arising from the task and/or its environment are given the appropriate consideration, and appropriate measures are put in place to mitigate any risk. _The aims and objectives of this permit system and its operations are set out in here._

_Information & Communications Technologies_ are responsible for the distributed data and voice communications systems at College, and utilise...
contractors to install new cabling and carry out repairs to existing services. This will require contractors to access areas of the College which are generally restricted to ‘Authorised Persons’, and as such will require them to work under a Permit to Work system as in Estates Facilities.

The ICT Section has developed a Code of Practice (CoP) which sets out the expectations placed upon contractors and describes the arrangements it has in place to ensure contractors adhere to the CoP.

Campus Services is the Department within College which provides student accommodation, conferencing and events and all catering facilities. The conferencing and events section have at their disposal a range of facilities which can be let to both internal and external customers, this could range from hiring out a meeting room to setting up a marquee on Queens Lawn for the Charing Cross Symposium which is an annual event attracting 2,000 delegates.

Hosting such events will often require a contractor to be commissioned to provide services on Imperial College premises which can potentially import risk into the College and also place contractors at risk from College activities. Campus Services will therefore have in place a Code of Practice which sets out the arrangements and measures it has in place to manage the risk arising from contractors accessing College buildings and grounds.

3 (iii) (vii) Induction of Contractors

The College requires that all contractors entering the premises to undertake works have been suitably inducted and duly informed of the significant range of risks which are present and can be found around the College but particularly in research areas and laboratories. Contractors must also understand that their own works and activities can introduce a significant risk to the College and its business. The College expects contractors, at a minimum, to receive the same Day 1 health and safety induction as is given to staff.

It is for each Department to devise and implement their own arrangements for the provision of Day 1 induction and these will be reflected in their Departmental Code of Practice. Estates Facilities & Projects have produced a Day 1 Health and Safety Induction DVD which serves both employees and contractors and incorporates a short test to identify whether key information has been retained.

All staff working for the Measured Term Maintenance Contractor and all subcontractors will be inducted using the College procedure as well as viewing the Estates Day 1 Health and Safety Induction DVD. In addition to the above contractors will be inducted to individual buildings by the relevant Building Manager to ensure they are familiar with any local hazards and safety arrangements.
3 (iii) (viii) Training

Each Department in the Operations Group will make its own arrangements for ensuring that staff receive the training necessary to enable them to safely carry out their contracted duties.

To assist managers in this task the College has produced a training matrix which identifies modules of training which are mandatory or essential according to specific job types. The College, through its Learning & Development Team, makes courses available for employees to attend and acquire the level of knowledge considered appropriate. When employees attend internally provided courses their attendance will automatically appear on their personal training history.

It will be necessary, where more specialised training is required, for managers to purchase training from accredited providers in the public / private sector. Where this is deemed necessary managers will consult with their Health and Safety Officer who will assist in selecting a suitable provider.

Managers may also choose to convey essential skills and knowledge to their staff through coaching or mentoring, this can be most effective where experienced staff can share knowledge which has been acquired in service. The Learning & Development Team can assist and support managers where this is being considered.

4 Monitoring Performance

The Chief Operations Officer in his Introduction to this document states that he “expects the Directors of Departments to create and maintain a positive health and safety culture, to lead by example and strive to continually improve safety performance thereby minimising losses and injuries to employees, students, contractors, visitors and business assets”.

The statement above sets a clear agenda of ‘continuous improvement’ and therefore the Operations Group is charged with quantifying its performance to determine whether improvement is being made. This ambition is embodied in the proverb…. “what gets measured gets done” and aligns with the Health and Safety Executive’s advocation that “measurement is essential to maintain and improve health and safety performance”.

There are two methods which will be applied in the Operations Group to generate information on safety performance which are:

- Active systems which monitor the achievement of plans and the extent of compliance with standards;
- Reactive systems which monitor accidents, ill health and incidents.

4 (i) Active Monitoring

Each Department will be required to develop a proprietary system for proactively monitoring its safety performance that should incorporate some or all of the following:
• Monitoring individual performances of managers charged with demonstrating leadership and promoting the positive health and safety culture;
• The assessment of staff training needs and provision of suitable training;
• The systematic inspection of premise, plant and equipment by supervisors, management and safety representatives to ensure the continued effective operation of workplace precautions e.g. Safe Systems of Work;
• The observation of employee behaviours to assess compliance with risk control systems and associated procedures and safety rules e.g. permit to work systems;
• The consideration of regular reports on health and safety performance by the Health and Safety Committee(s).

4 (ii) Reactive Monitoring

Reactive monitoring, by definition, is a retrospective analysis of events which typically have a negative impact on the organisation or its business. Due to the nature of these events and the mechanisms used to collect the information, e.g. the accident reporting system, it will be possible for Operations Group to collectively gather and analyse the data which will include:

• Injuries and cases of ill health including sickness absence records;
• Other losses such as damage to property;
• Incidents and/or near misses which have the potential to cause injury or loss.

Each of the above presents the organisation with an opportunity to determine the probable causation of the event and review the measures it has in place to prevent such occurrences, this will be achieved by completion of an investigation proportionate to the nature of the near miss, injury or loss. The findings of the investigation will then be considered by Senior Managers and the Departmental Health and Safety Committee to determine what action should be taken to prevent a recurrence. It may be necessary to modify the ‘safety management / risk control system’.

A guidance document for carrying out investigations can be found here.

For a number of Departments it will be necessary to consider not only incidents to staff, but also those encountered by students and visitors having business at the College. This is of particular importance to Estates Facilities, who have responsibility for the maintenance of common areas such as paths / roadways, building entrances, stairs and corridors etc.

Each Department will have a protocol in place which ensures that reports of incidents and investigations are brought to the attention of Senior Managers.
5  Audit & Review

The Health & Safety Executive offer the following as a definition of auditing performance:

“It is the structured process of collecting independent information on the efficiency, effectiveness and reliability of the total health and safety management system and drawing up plans for corrective action.”

The above generally assumes that control systems deteriorate over time or become obsolete as a result of organisational change. Auditing provides managers with information on how effectively the various components of the Health & safety management system are being implemented / maintained.

As the key objective of the safety management system is to control risk the audit process is the element that completes the loop and informs Senior Managers if and where the risk control systems are failing.

5 (i) iCheck – College Audit System

To assist the College and individual Departments to determine the effectiveness of their safety management system the College Safety Department have implemented an audit process called ‘iCheck’.

iCheck is an audit tool which has been designed to mirror the elements of the HSG65 management framework as illustrated at 2. in this document. The audit tool comprises a series of questions covering each element of the HSG65 framework e.g. Health & Safety Training which are to be answered with a “YES”, “NO” or “N/A”. The tool also allows a comment to be added at each question to qualify and expand upon the answer.

The above facilitates a quantitative evaluation of the effectiveness of the safety management system at a Departmental or Section level which can be used to identify areas where ‘practice’ falls below the standard advocated by the safety management system.

A further facility of the iCheck audit system is for the auditor to request evidence in support of an affirmative answer for example:

Question – Is relevant health & safety training given to all staff?

Where an answer of “YES” is given to the above, the auditor could legitimately request sight of the training needs analysis and training provision record. This provides a qualitative measure of compliance and effectiveness of the safety management system.

5 (ii) iCheck – Audit Strategy

On an annual basis, the College selects to audit for effectiveness particular aspects of its safety management system, and invites Faculties / Departments to complete the associated set of questions in iCheck. The results are then
analysed by the College’s Safety Department, and reported to the College Audit Committee.

Where Faculties / Departments are unable to answer “YES” to specific questions, and therefore have failed to meet the required standard they should produce an action plan listing the corrective action to be undertaken, by whom and in what time scale.

In addition to the audit undertaken by the College, each Department can opt to self-audit their safety management system, and use the findings to inform and enhance the measures it has in place to control risk. The two appointed competent persons in Estates are able to assist Senior Managers where they wish to action a one-off audit of their service.

5 (iii) Review

The Operations Group is committed to continuously improve its safety performance, and therefore must be prepared to learn from both its successes and failures. Continuous improvement requires the contribution and commitment of all staff and as such all should be in the communications loop.

Reviewing should take place not only following the findings of high level audits but at all levels of the organisation and in the course of routine activities such as at Team meetings, where staff can be encouraged to suggest ways of improving safety.

Reviewing performance will take place formally at meetings of the Health and Safety Committee(s) where both qualitative and quantitative data will be considered. Where appropriate, action plans will be developed to address areas of non-compliance within the Services provided by the Operations Group.