

Estates Operations

Health & Safety Code of Practice

Version	Reviewed by:	Title	Tracking	Date
2.1	Stephen Hughes	H&S Advisor (FM)	Review	Mar 2018
2.2	Sangita Kerai	H&S Advisor (FM)	Handover review	Mar 2019
2.3	Sangita Kerai	H&S Advisor (FM)	Minor amendments	Nov 2019
2.4	Sangita Kerai	H&S Advisor (FM)	Endorsement by Chief Financial Officer	Aug 2020

Table of Contents

1. INTRODUCTION.....	3
2. PROFILE OF THE ESTATES OPERATIONS	3
i. Building Operations	4
ii. Maintenance Operations	4
iii. Fire	4
iv. Space Management & Planning	4
v. Project Operations.....	4
vi. Health and Safety	4
vii. Property Management	4
viii. Soft Services	5
ix. Energy, Engineering and Environment	5
x. Strategic Infrastructure	5
3. MANAGEMENT OF HEALTH & SAFETY	5
4. ROLES & RESPONSIBILITIES.....	5
4.1 Director of Estates Operations.....	5
4.2 Head of Section.....	6
4.3 Employees	6
5. ORGANISATION & ARRANGEMENT.....	7
5.1 Local Arrangements.....	7
5.2 Group Safety Arrangements	8
5.3 Communications and Consultation	8
5.4 Accident, Incident & Near Miss.....	9
5.5 Competence and Control.....	9
6. RISK ASSESSMENTS.....	10
7. INFORMATION, INSTRUCTION, TRAINING AND SUPERVISION	11
8. MONITORING & REVIEWING.....	11
i. Active systems.....	12
ii. Reactive systems	12
iii. Review	13
9. AUDITING PERFORMANCE.....	13
10. SUMMARY	14

1. 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 Estates 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.

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’.

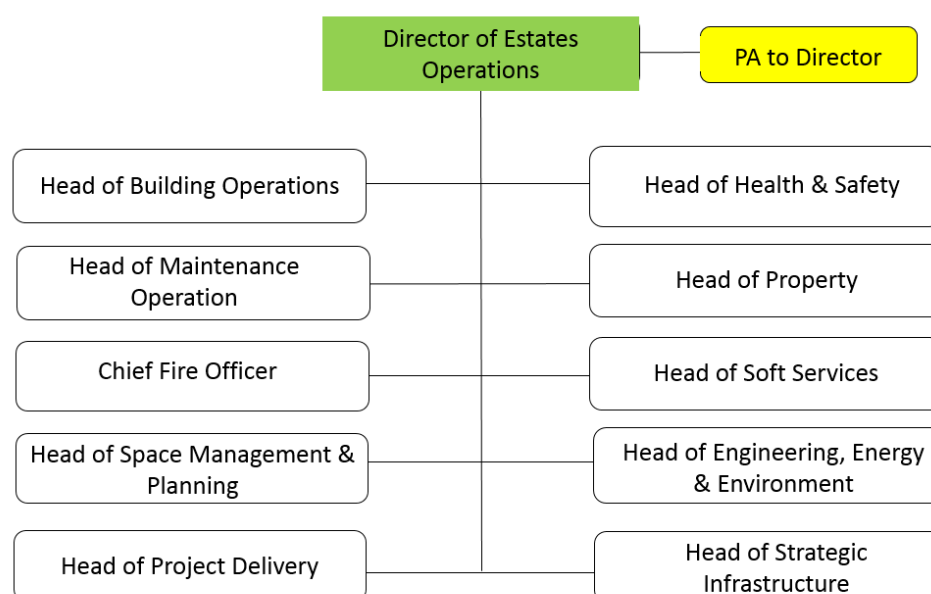
The purpose of this Code of Practice is to set out the management arrangements (safety management system) Estates Operations Group has in place to enable it to implement College policy and procedures and comply with Health and Safety Regulations.

Muir Sanderson

Chief Financial Officer

2. PROFILE OF THE ESTATES OPERATIONS

The overall function of the Division is to maintain and manage all the buildings and infrastructure owned or leased by the College from which it operates to provide a range of educational, research and business services. The Division is made up of the following sections:



i. Building Operations

Each building is assigned a Building Manager (BM) and Assistant Building Manager (ABM) whose role it is to ensure the building is fully serviced in line with a 'service level agreement' (SLA) existing between the various users and the Estates Operations. They are to ensure that accessibility of all College buildings and maintain the College risk and hazard register. BMs/ABMs manage the building dealing with any infrastructure related enquiries. They carry out investigation of any accidents, incidents, near misses and inspections of buildings and curtilages. They conduct Building and Campus User Group meetings.

ii. Maintenance Operations

The College comprises of nearly 6 million square feet of floor space which requires constant attention if it is to remain fully operational and fit for purpose. Estates Operations employs a team of engineering staff, both mechanical and electrical, who are available during core hours to respond to faults arising to plant and services. Estates Operations carry out a programme of planned maintenance across all buildings and also assist with more specialist areas of reactive maintenance and utilises an advanced computer aided facilities management system (Planon).

iii. Fire

The Fire Team advises the Director of Estates Operations on all matters in respect to compliance with the Regulatory Reform (Fire Safety) Order 2005 as it affects the built environment. The Fire Team also has a responsibility to discharge the role of designated 'competent person' as appointed by the President of Imperial College who is the named 'responsible person' under the Order 2005.

iv. Space Management & Planning

This team manages building information and provide space, planning and data reporting across Imperial College. The team manage the allocation of College space update and maintain College software for building information drawings and data. They also manage College estates records and archive. They issue and monitor standards for drawings and data from external suppliers.

v. Project Operations

The Project Operation team is tasked with the delivery of new build, refurbishment and infrastructure projects which are funded through College Capital budget. Quality outcomes are achieved by working closely with the user group and supply chain. Also by encouraging collaborative working with contractors and consultants.

vi. Health and Safety

The role of this team is to advise the Director of Estates Operations, Head of Sections and contractors on all matters in respect to compliance covering the range of College's health and safety policies and procedures that govern business operations.

vii. Property Management

On behalf of the College, this team administers all matters arising out of the Landlord and Tenants Act including acquisitions / disposals, tenancy agreements, preparations of legal documentation, rates assessments and appeal, also letting of properties to third parties

viii. Soft Services

Soft Services substantially provide janitorial services to the College including ground maintenance, collection of all forms of waste for recycling, internal and external cleaning and conference / meeting room set ups. Facilities are in place to re-use or recycle as much as College's waste as possible and ensure hazardous regulated waste is managed and disposed of, in a compliant manner. The team ensure compliance with all statutory and environmental legislative requirements, by engaging with College staff and students to consider waste as a resource.

ix. Energy, Engineering and Environment

This section is responsible for ensuring that the College's demand for energy is satisfied at the most economics cost whilst keeping within the targets set by the Government for carbon emissions and sustainability. Develop technical standards for building and engineering services particular requirement (BESPRs). Responsible for monitoring design for all College construction projects. Manage the BEMS system for all College buildings.

x. Strategic Infrastructure

The role of this team is to assess and develop at a strategic level, the requirement for services infrastructure to support the on-going operations and future development of the College estate. The team works closely with the Development Team, and coordinates with the Building Operations, Project Operations and Energy, Engineering and Environment teams.

3. MANAGEMENT OF HEALTH & SAFETY

Responsibility for the development of College health and safety policy resides with the [Safety Department](#) and [Occupational Health](#) who also produce guidance and codes of practices to assist service departments to implement policy to a consistent standard. Each of these Departments offers specialist advice and support to Departments to enable them to understand their legal duties and to implement robust health and safety management systems.

The Director of Estates Operations acknowledges that where suitable guidance or CoP do not exist, responsibility will rest with them to ensure that they are produced on behalf of the managers and staff. CoP will therefore, be produced as necessary to assist managers to identify risk and put in place measures to eliminate or control the risk.

4. ROLES & RESPONSIBILITIES

4.1 Director of Estates Operations

The Director Estates Operations is committed to providing and maintaining a positive health and safety culture by:

- being compliant with the College's health and safety policy statement and industry best practice
- leading by example
- continually striving to improve safety performances
- being fully aware that many of the services provided by the teams are critical to providing a safe environment in which the College can conduct its business

- ensure health and safety is considered when planning and budgeting and that resources are used effectively and in proportion to local risks
- ensuring all the Heads of Sections are motivated and committed to delivering a high standard of health and safety within their individual groups
- ensuring Heads of Section are suitably resourced and competent in implementing the College's policy
- ensuring training needs are identified and adequately resourced
- empowering all managers to suspend activities where health and safety is being, or is likely to be, compromised

4.2 Head of Section

The Heads of Sections play a key role by:

- ensuring that the HSMS is fully implemented within their section
- producing a Code of Practice (CoP) setting out their arrangements for managing health and safety
- being responsible for health and safety of their own and other College employees, visitors, and anyone else who may be affected by the activities in their section
- are able to delegate their health and safety tasks - *but not the responsibility*.
- clarifying the roles and responsibilities of staff
- establishing clear performance standards and targets
- providing the resources appropriate to do the job including Personal Protective Equipment (PPE)
- ensuring all workplace incidents, accidents and near misses are reported and investigated and that suitable provision is in place to administer first aid
- ensuring arrangements are in place for regularly monitoring, reviewing and auditing health and safety practice / performance and reporting the findings to the Director of Estates Operations
- ensuring that suitable action is taken to address failures on the part of employees to comply with reasonable instruction, information and training provided for their safety and welfare whilst at work

4.3 Employees

Every employee has a responsibility to ensure their own health and safety, and to ensure others are not put at risk by their acts or omissions at work. In particular, employees' duties and responsibilities are:

- To understand and comply with the organisation's health and safety policies and procedures and those specific to their team.
- To always act in a manner so as to ensure their own health and safety at work and that of others who may be affected by their work activities.
- To report accidents, symptoms of work-related ill health, damage to the building or equipment, near misses (that might have resulted in injury or damage), and other health and safety hazards, promptly to their Line manager, Head of Department or local Safety Officer.

The Building Manager has overall responsibility for the safe and effective running of the building, and as such, is a member of the **Building User Group (BUG)**. Building Managers are also responsible for investigating all incidents and near misses submitted through SALUS within their buildings together with the local safety officer.

5. ORGANISATION & ARRANGEMENT

This section set out the general arrangements in place within Estates Operations for the management of health and safety and the provisions of a safe place of work for staff.

5.1 Local Arrangements

All managers and supervisors within Estates Operations are responsible for ensuring that a safe place of work is provided for their staff, and are required to ensure the following essential arrangements are in place:

Welfare: all staff will be provided with reasonable access to toilet and personal hygiene facilities including hot and cold running water. There must be a supply of fresh drinking water and a facility where hot drinks can be prepared, ideally staff will be provided with access to a refrigerator, a means of heating food and a place to sit and eat their meals.

Imperial's commitment to creating and maintaining a healthy environment for its community and for visitors. The College has a [Smoke-Free Policy](#) in place which means that smoking by staff and students will not be permitted on, or within, 20 metres of College land.

Fire Safety: all staff will be made aware of the arrangements for safely evacuating their place of work in the event of a fire alarm or emergency and where they should assemble outside the building. Where staff are grouped in offices which constitutes their main place of work, arrangement will be made for the appointment of a Fire Warden (s) whose role it will be to assist with the safe evacuation of employees in an emergency. Provisions will also be made for access to suitable fire extinguishers for use by those employees trained to use them. Safety training available via the [Learning & Development Centre](#) (LDC).

First Aid: All staff will be provided with access to competent first aid services which are commensurate with the hazards to their role. Access to an emergency first aider as required in the [College's First Aid policy](#).

Estates Operations will ensure that sufficient numbers of trained First-aiders are available, to deal with the level of risk identified in each Section.

Departmental First Aiders are identified on clear signage which will be provided in each workplace informing staff how to access First Aid assistance which will substantially be provided by [College Security Officers](#) who are all fully qualified first aiders and members of the Emergency Response Team.

Induction of New Staff – The [College's induction](#) procedures will be completed in respect of all new staff. More can be found under [First Day Essentials](#).

ID card and security – all staff will be provided with a personal identification card, subject to completing the [Day One induction](#). It will be programmed to allow them to access those parts of the College required by their role. The line manager will ensure that the induction process includes a safety briefing in respect of all those locations the employee is likely to visit during the course of their job.

Computer Health – the majority of staff use computer screens as an integral part of their job. All users are required to access the [computer health guidance](#). Line managers will ensure that all staff have read and understood the guidance and completed the work station assessment. Assistance can be sought through the EO's Safety Team.

All users are entitled to a free eyesight test and thereafter at an interval prescribed by their optician. A contribution to the cost of spectacles required specifically for computer use is also available.

Electrical Equipment – arrangements will be made by Estates Operations for all portable / plug-in electrical apparatus to be tested in compliance with [Electricity at Work Regulations 1989](#). Staff are not permitted to bring portable electrical appliance in to College without prior permission from their line manager.

Lone Working – The College has a [Lone Working policy](#) which sets out a definition of lone working and the College's expectations as to how manage it yourself and by managers.

Responsibility rest with Estates Operations managers to determine where and when it is permissible for their staff to 'work alone'. Managers must determine the risks and put in place control measures to mitigate the risk of working alone and where appropriate, record the findings in the risk assessment format.

In Estates Operations the core hours are defined as being between 07.00 to 19.00 hours Monday-Friday, any periods outside of these are '[out of hours working](#)', and if lone working is to take place during these times a College Lone Working Consent must be completed and authorised by the line manager.

5.2 Group Safety Arrangements

In compliance with the College policy, a Health and Safety code of practice exists which sets out how the FOGIT group will ensure that the policy is implemented across the Group.

As stated in the Introduction, the overall aim and purpose of this document is to describe the management arrangements the Director of Estates Operations deems suitable and sufficient to enable him to effectively discharge the duties delegated to him by the Chief Financial Officer of Imperial College. The role of the Director of Estates Operations is:

- a) Establishing and maintaining a robust 'safety management system' within the Department which ensures that College policy and procedure is effectively implemented;
- b) Ensuring that sufficient resources are allocated so as to comply with all statutory requirements placed upon Estates Operations;
- c) Appointing competent persons to advise Estates Operations in respect of its statutory duties;
- d) Ensuring that systems are in place to identify hazards and develop strategies for effective risk mitigation and control, including task specific risk assessments and protocols
- e) Ensuring that staff are provided with suitable and sufficient training to enable them to competently carry out their duties;
- f) Ensuring that staff and contractors are clear as to their health and safety roles and responsibilities;
- g) Establishing an Estates Operations Health and Safety Committee;
- h) Receiving and reviewing reports from the Departmental Health and Safety Committee and ensuring action is taken to address issues arising;
- i) Reviewing the Estates Operations health and safety management performance on an annual basis.
- j) 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.

5.3 Communications and Consultation

If an effective safety management system is to be present within Estates Operations it is imperative that all staff have ownership of the aims and objectives as listed at the Introduction to this document. This will be achieved in part by involving staff in the development of codes of practices, risk assessments and

safe systems of work which will impact upon their area of work. These documents will be shared with staff via Team meetings, internal training and tool box talks.

The Estates Operations will use a range of mediums including notice boards, emails, safety notices and team meetings / briefings to share information across the various sections. The Estates Operations and Section Safety Committees, will also serve as a forum for addressing safety issues raised either by staff or managers.

A further source of information and feedback is the accident reporting and investigating systems ([SALUS](#)). Results of inspections and audit will also be shared amongst managers and staff.

5.4 Accident, Incident & Near Miss

The College has an online accident reporting system called [SALUS](#). SALUS is managed by the Safety Department and all incidents involving Estates Operations staff, building and infrastructure will automatically be forwarded to Head of Health & Safety, Estates Operations for information, investigation and/or delegation.

The closing out of investigations is important, as we can, in many instances, identify underlying causes and the lessons learnt provide opportunities for improvements, or changes, to existing controls. SALUS reports are then considered “closed out”, when no further actions are considered necessary.

All staff will be made aware of their duty to report all accidents, incidents and near misses. All Estates Operations accidents reported through SALUS, are copied to the person investigating and additionally, to Line Managers and Heads of Sections.

5.5 Competence and Control

Establishing and maintaining control is critical if an organisation is to successfully mitigate the risk present from its operations. Hazards can easily be introduced where staff either ignore good safety practice or choose not to work in accordance with a prescribed safe system of work.

The methodology used in Estates Operations to gain control is:

- Identify risk and define appropriate control measures / safe systems of work;
- Establish performance standards;
- Provide staff with information, instruction and training in respect of the standard;
- Monitor performance against the standard; and
- Use appropriate sanctions to reinforce the standard.

There is of course a reciprocal requirement for managers within Estates Operations, to provide a safe workplace including, safe systems of work, safe tools and equipment, appropriate Personal Protective Equipment (PPE), training and supervision.

As previously noted, the Director of Estates Operations will ensure that a training/competency framework exists for all posts within the Department. Accountability for providing the competency framework will be delegated to the Heads of Sections and the Estates Operations Senior Learning and Development Officer.

The identification of training needs will be informed from a full understanding of the roles which staff undertake, and the environments in which they perform their role as set out in their job description. By applying this understanding it should be possible to determine those tasks that staff undertake which are intrinsically hazardous. The principles of risk assessment should then be used to identify the risk associated with the task and control measures which will be applied to mitigate the risk.

The above knowledge will then be used by the Heads of Sections to determine the most appropriate means of providing staff with the skills and knowledge required for them to safely undertake their roles. This may be via attendance on a nationally certified course such as NEBOSH General Certificate, gaining a PASMA certificate of the safe erection of tower scaffolds or an internal course on the principles of safely moving and handling.

Each Head of Section will maintain an up-to-date record of training undertaken by their staff.

6. RISK ASSESSMENTS

The Head of Section will ensure that all significant health and safety risk (to both employees and non-employees) arising from the work activities of the team are assessed to a suitable and sufficient standard, as required by [The Management of Health and Safety at Work Regulations 1999](#).

A Register of Risk Assessments will be maintained by Head of Section. Copies of the Register should be provided to all staff, and individual risk assessments will be available to all staff.

Risk assessment will be used to identify priorities and set objectives for eliminating hazards and reducing risks. Wherever possible, risks will be avoided or eliminated through the appropriate selection and design of facilities, equipment and processes. If risks cannot be eliminated, they will be reduced, as far as is reasonably practicable, by the provision of physical controls, training and systems of work or, as a last resort the use of personal protective equipment (PPE). Risk assessments will be reviewed every 12 months, or sooner in the event of significant legislative changes or changes to the work or workplace to which an assessment relates, or following any accidents or near misses which highlight deficiencies in existing control measures.

A generic risk assessment may be produced to cover the entire department for low risk activities, such as general office work.

Lone working is covered by the College's "[Lone Working Policy](#)".

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

- a) **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;
- b) **Dynamic Risk Assessments** - Prior to commencing a task, employees will be encouraged to stop momentarily and ask themselves the question ie. 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.

- c) **Specific Risk Assessments** - 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.

7. INFORMATION, INSTRUCTION, TRAINING AND SUPERVISION

Staff will be provided with sufficient health and safety information, instruction and training to ensure they are aware of the hazards in the workplace and know what safe working procedures to follow to reduce the risk of injury or work-related ill health, to themselves and others. Training will take the form of:

- a) induction training on first starting (Day One Training) and during the first month of starting (Month One Safety Training - MOST);
- b) training identified with the line manager when new tasks and equipment are introduced and
- c) refresher training where necessary to update skills and knowledge.

Day One Training

This must occur on the first day of starting work, and is a familiarisation session, using a checklist. Anyone who is familiar with the department can carry out induction. It doesn't matter who it is! The Safety Training webpage contains guidance and the latest checklist (needed to obtain a College ID card).

Month One Safety Training (MOST)

All new staff are required to complete this course and the associated test. They have two attempts – if they fail these, they must go to their line manager or safety coordinator for assistance. MOST contains much more detailed information on the College's hazards and the systems for controlling them.

Training Needs Analysis – staff may require additional training depending on their current experience and new role. Some training is mandatory, in addition to the two listed above, [Fire Safety and Awareness Training e-Learning course](#); [Risk Assessment Foundation Training \(RAFT\)](#). The training needs analysis process (including a form) should assist with the formal process for assessing safety training needs.

Health and Safety Information - A Health & Safety Notice boards (Safety, Fire, Occupational Health) is provided on Level 2, Sherfield Building (outside the Great Hall) if you are not based at the South Kensington Campus, please familiarise yourself with your nearest Health and Safety notice board. It is maintained by the Department Health and Safety Officer and displays as a minimum:

- College's Health & Safety Policy statement
- fire advice/evacuation notice;
- list of area First-Aiders and Life Savers and
- updated Health and Safety Law poster
- contact details of the local safety personnel

8. MONITORING & REVIEWING

Health and safety performance will be monitored on an ongoing basis and reviewed at least annually, through the review of risk assessments, accident, ill health and incident records, and the results of workplace and equipment inspections. Any necessary action will then be taken so as to improve our overall health and safety performance, i.e. health and safety reviews will be used to identify priorities and set objectives. Workplace inspections will be undertaken and recorded by a nominated member of the Building User Group (usually the Building Manager), accompanied by the Departmental Safety Officer

of the relevant area and if requested any Safety representatives of Trade Unions recognised by the College.

There are two principal methods which will be applied in the Estates Operations to general information on safety performance which are:

i. Active systems

This system monitors the achievements of plans and the extent of compliance with standards.

Each Section will be required to put in place arrangements which enable it to pro-actively monitor its safety performance that should incorporate some or all of the following:

- Monitoring individual performances of Managers charged with demonstrating leadership and promoting a positive health and safety culture;
- The assessment of staff training needs and provision of suitable training;
- The systemic 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. [Access controls and permits](#) to include [Permit to Work](#) (PTW)
- The review of the Departments '[risk register](#)' to identify whether the nature of the risk changes and/or the control measures need to be reviewed
- The consideration of regular reports and feedback on health and safety performance by Health and Safety Committee (s).

ii. Reactive systems

This system monitors the breaches or failures of safe systems of work, workplace accidents and ill health.

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. SALUS it will be possible for Estates Operations 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, plant and services interruptions
- The findings from investigations undertaken following accidents and incidents which aim to identify root cause(s) of the event thereby preventing a recurrence

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 finding of the investigation will then be considered by Senior Managers and 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'.

The Estates Operations will also need to consider incidents encountered by students and visitors having business at the College. This is of particular importance as Estates Operations have responsibility for the maintenance of common areas such as paths, roadways, building entrances, stairs, corridors etc.

Each Section will have a protocol in place which ensures that reports of incidents and investigations are brought to the attention of the management team and the Health & Safety Committee.

iii. Review

Estates Operations is committed to continuously improving 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 communication 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 team meeting where staff can be encouraged to suggest ways to 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 services provided by Estates Operations.

9. AUDITING PERFORMANCE

Auditing is a 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.

Information gained from audits result in improved management at all levels, it should be a continuous, cyclic process of: *plan, do, check, act*. Audits by College staff or external auditors, check whether College policies (including any attendant arrangements, organisations and systems) are implemented and effective at both College and department level, and enable other departments to learn from shared experience.

The [Safety Department's Audit team](#) carry out internal safety audits of all areas of the College.

These audits are designed to review the effectiveness of the health and safety policy, throughout the College and including all of its activities, paying particular attention to:

- the College HSMS, on whether it has been implemented fully in a department or if not, whether there are gaps in the College HSMS itself
- the degree of compliance with health and safety performance standards (including legislation); particularly training, knowledge of responsibilities and risk assessment procedures
- areas where standards are absent or inadequate
- the presence and effectiveness of control measures and emergency procedures
- achievement of stated objectives within given timescales;
- injury, illness and incident data analyses of immediate and underlying causes, trends and common features
- how the Head of Department sets, promotes and monitors health and safety standards
- identifying, sharing and promoting best practice throughout the College



It is generally assumed that control measures deteriorates over time or become obsolete as a result of organisational change. Auditing provides managers with information on how effectively the various components of the HSMS are being implemented and maintained.

The key objective of the HSMS, is to control risk the audit process the element that completes the loop and informs senior managers if and where the risk control systems are failing.

Each Section should be conducting their area mini-audits on a periodic basis, or in the event of facilities/process change.

10. SUMMARY


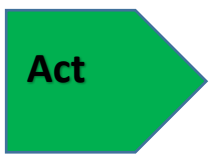
Director of Estates Responsibilities

	Annually approve the Estates commitment to Imperial College's Health and Safety Policy statement.	DIRECTOR OF ESTATES RESPONSIBILITIES
	Ensure that the risk implications of strategic decisions are considered	
	Identification and review of significant risks through a systematic method for risk profiling and the maintenance of a risk register.	
	Set divisional objectives and action plan to manage the identified risks which are aligned to the Imperial College strategy and which are assigned to Estates Operations members.	
	Ensure significant health and safety risks are in the business risk register.	
	Identification of activities critical to business continuity and approval of plans to minimise the impact of a major incident.	
	Ensure the allocation of adequate resources including the appointment and registration of Responsible Persons.	
	Ensure systems are in place for the implementation and testing of risk control measures required as a result of Estates activities.	
	Ensure there is a forum chaired by a senior members of Estates Operation team to review and oversee identified risks.	



	<p>Ensure that there is a process for employees to be made aware of arrangements in the Department and they are involved and engaged in decisions about how the risks are managed and controlled.</p> <p>Undertake regular tours of all areas of the business and engage with staff regarding health and safety issues and how they are managed.</p>	
Check	<p>Evaluate relevant health and safety reactive and proactive data and information.</p> <p>Review major incidents, approve mitigation and management actions and ensure that poor performance has been appropriately dealt with.</p> <p>Ensure that management systems allow that senior management team receive assurances about all estates activities including significant third party relationships.</p> <p>Confirm senior leadership team awareness of inspections, audits and investigations relevant to their management areas and that appropriate action plans are in place.</p> <p>Ensure there is a system for key managers to be made aware of significant failings in risk management.</p>	
Act	<p>Review the performance and adequacy of existing arrangements of the Department and senior members and take corrective action where targets are not being met.</p> <p>Review the Department risk profile and the deployment of resources to manage these risks eg. sufficient, competent, effective.</p> <p>Be satisfied that there are regular independent management reviews across the division and that lessons are learned from accidents and near misses.</p> <p>Establish regular review meetings with the Head of Health and Safety and senior leader members.</p> <p>Communicate the results of reviews of performance and progress against action plans to the Department.</p>	

Head of Section



Plan	<p>Support their respective Director to fulfil their accountabilities and act on behalf of the Director in a governance capacity in the implementation of the standards.</p> <p>Ensure the programming and scheduling of work is managed to minimise risk</p>	HEAD OF SECTION RESPONSIBILITIES
Do	<p>Ensure there is clear responsibility for the management of every contracted project or business as usual activity via the appointment of a person responsible for overseeing the project or activity.</p> <p>Ensure interfaces between all activities and projects under their sphere of operation and other activities are sufficiently considered to manage the risks</p> <p>Ensure their managers have the right competencies and that activities undertaken on behalf of Imperial College are arrived out by, or supervised by, competent people who have the necessary authority to meet their responsibilities.</p> <p>Ensure procedures are in place for persons who may be affected by their teams' activities to understand Imperial College arrangements and have access to the necessary information.</p> <p>Implement a system for recording and tracking of actions until completed</p> <p>Ensure that contractors and service providers engaged have the competence and stated intention to be compliant with related legislation and standards.</p> <p>Head of Engineering: Assure that Authorised Persons and Responsible Persons are identified and competent for the relevant risks of their activities through the development and implementation of suitable processes for the area.</p>	

 Check	Maintain visibility of contractor compliance with contractual obligations including those stated in the Construction, Health, Safety and Environment Code of Practice.
	Validate and resolve breaches of contractor obligations prior to escalating to Directors (including non-compliance or poor performance)
	Assuring all works are compliant with the Imperial College standards (ie Asbestos Management Plan (AMP), Legionella)
	Ensure staff under their management understand the obligations placed on them to manage health and safety
 Act	Review your performance and those of your direct reports and take corrective action where targets are not being met or where they are failing to discharge their responsibilities.
	Review deployment of resources eg. are they sufficient, competent and effective.
	Review the performance and adequacy of existing arrangements of the team and take corrective action where targets are not being met.

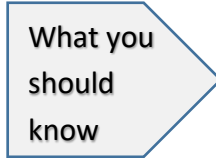
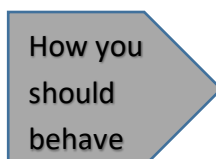
Line Managers and Supervisors Responsibilities

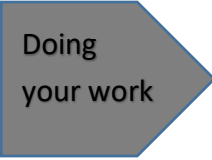
 Plan	Establish the responsibilities of their staff and ensure specified responsible person roles are recorded.
	Ensure that each employee knows their responsibilities (and the competencies performance required to meet them) and have the necessary competencies (including appropriate training)
	Set annual performance objectives in consultation with their staff
	Consult with the relevant support services in a timely manner on matters of a technical nature which need expert advice.
 Do	Ensure that all new staff received induction training and are issued with personal protective equipment as required.
	Ensure visitors and contractors are provided with relevant information.
	Ensure risk assessments are undertaken and control measures identified and authorised by competent individuals and that they are up to date, communicated and reviewed.
	Ensure control identified, including procedures and method statements are consistent with relevant standards and guidance and that they are implemented and maintained.
	Ensure staff are competent and provided with suitable equipment, information, instruction, training and supervision. This includes actions to be taken if an emergency occurs.
	Ensure risks which are significant or outside their sphere of control and not able to be managed at their level are escalated to their manager/supervisor.
	Be involved in the preparation of risk assessments and undertaking local workplace inspections, attend relevant forums where risks are discussed and support the development of solutions to issues raised.
	Ensure incident, near miss and hazard observation procedures are understood and complied with.
	Lead on investigations into accidents and other reports and ensure lessons learned are captured and communicated.

LINE MANAGERS AND SUPERVISORS RESPONSIBILITIES

	<p>Managers who manage programmes of work:</p> <ul style="list-style-type: none"> support the Heads of Sections to fulfil their accountabilities with regards to managing programmes of work and acting on behalf of the Head of Sections in a governance capacity in the implementation of the standards. Ensuring competent Appointed Persons are identified when applicable for the relevant hazards of Estates activities and that they are meeting their responsibilities. 	
	Monitor the implementation of arrangements, procedures and operation and effectiveness of the risk control measures through a program of inspections, performance data reviews and incident investigations	
	Monitor the completion/progress of actions arising from audits, investigations, inspections	
	Analyse relevant data to identify emerging trends for area of responsibility	
	Monitor their employees training programs and ensure that attaining required competencies are part of ongoing appraisal processes	
	Ensure employees are held account and dealt with according to the appropriate College performance policy if failing to meet their responsibilities.	
	<p>Managers who manage programmes of work:</p> <ul style="list-style-type: none"> Ensure their staff are monitoring contractor compliance with contractual obligations Maintain visibility of compliance with contractual obligations and escalate breaches to Head of Section 	
	Undertake annual appraisals of performance in accordance with the above objectives	
	Ensure that processes and procedures are in place so that activities within their sphere of control are regularly reviewed and lessons learnt and SALUS data taken into consideration	

Employees Responsibilities

	<p>Have an awareness and cooperate with the Imperial College London's <u>Health and Safety Policy Statement</u> and the EO Code of Practice.</p> <p>Familiarise yourselves with fire and emergency arrangements and escape routes.</p> <p>Participate in any induction and training required for safe working.</p> <p>Maintain competence for your role.</p>	EMPLOYEES
	<p>Take reasonable care of yourselves and all others who may be affected by what you do or don't do.</p> <p>Not to participate in horseplay or place fellow employees in danger by your actions.</p> <p>Set a high personal standard and carry out activities in a manner consistent with <u>Imperial Expectations</u> of mutual respect, excellent service, collaboration, empowerment and innovation.</p> <p>If aware of, or in any doubt about, any unsafe practice or condition tell your manager/supervisor.</p>	

 <p>Doing your work</p>	<p>Understand the risks of your work and comply with procedures and method statements. Only engage in activities when competent to do so.</p> <hr/> <p>Tell your manager/supervisor of any arising unforeseen risks which do not have control measures in place.</p> <hr/> <p>Avoid improvising arrangements and suggest safe ways of eliminating hazards.</p> <hr/> <p>Obtain and use the correct tools/equipment for the work and don't use any that are unsafe or damaged.</p> <hr/> <p>Use and store personal protective equipment properly and where guarding or other protective mechanisms are in place, check they are secure and have not been tampered with.</p> <hr/> <p>Consider the safety of others who may be working with or affected by you and your work</p> <hr/> <p>Report any incidents, near miss, dangerous occurrence or dangerous conditions on SALUS.</p> <hr/>	
--	---	--