UNIVERSITY COLLEGE LONDON

ORGANISATION AND ARRANGEMENTS FOR SAFETY

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Introduction

The UCL Statement of Safety Policy acknowledges UCL’s statutory obligation to manage its work in such a way as to minimise health and safety risks to its staff, students and others who might be affected by its activities. This is set out in general terms in the Management Regulations but is described in much greater detail in guidance from the Health and Safety Executive aimed at all UK employers. UCL has sought to develop its safety management systems in accordance with the principles laid down in this national guidance.

Each Department must record its own organisation and arrangements to implement UCL Safety Policy and these must be reviewed annually. The organisation and arrangements documents describe how the Department supports the achievement of the corporate aims and objectives as well as documenting the Department’s health and safety objectives. They also describe the responsibilities and mechanisms by which the Department will meet the relevant corporate requirements and how the corporate responsibilities cascade to the Department. In addition, they will describe any relevant Departmental documentation, associated responsibilities and how they relate to corporate documentation.

This document contains the current organisation and arrangements for implementing the safety policy and identifies where further detail on specific arrangements may be found. The document is broken down into a number of core components. These are:

- Safety Management Structure
- Safety Committees and Forums
- Safety Responsibilities
- Safety Support
- Safety Arrangements

This document is authorised by the Provost and President. Changes to this document are the responsibility of the Head of Safety following approval by the HSC or SMT. In this way the document remains an accurate record of the current arrangements of UCL for meeting its Safety Policy. A summary of the changes will be reported annually to the Council as part of the HSC report.
1. **SAFETY MANAGEMENT STRUCTURE**

The diagram below gives an overview of the structures in place for the management of health and safety within UCL. Specific details on responsibilities are covered in subsequent sections.
2. SAFETY RESPONSIBILITIES

2.1 Safety Responsibilities of Individuals

2.1.1 Overview
Responsibility for health and safety cascades through the organisation from the President and Provost to each individual. Responsibilities are allocated based on the principle that you are responsible for the work under your control, for those working under your control and for the people who are affected by your work. Arrangements are in place to facilitate and support management in meeting their responsibilities.

2.1.2 The President and Provost
The President and Provost, in his capacity as UCL’s Chief Executive Officer, is responsible to UCL Council for the manner in which all of UCL’s activities are conducted; this includes the management of health and safety. The Chair of Council and the President and Provost shall authorise the UCL Statement of Safety Policy and the arrangements made under it. The President and Provost shall satisfy UCL Council that the Policy has been adequately implemented by UCL senior management and Heads of Department.

2.1.3 UCL Senior Management
The general management responsibilities including those for health and safety apply to all individuals who have direct management control of areas of UCL activity. This includes Institute Directors and Deans who may have several Departments under their authority whether collectively labelled as Institute, School or Faculty. UCL senior management are responsible to the President and Provost for the safe management of all work under their authority. They are responsible for ensuring the health and safety of those under their management authority and for monitoring the performance of their management teams.

2.1.4 Heads of Department
Heads of Department are responsible ultimately, through their senior management, to the President and Provost for the safe management of all work under their authority. They are responsible for and take a lead in:

- the preparation, annual review and authorisation of the organisation and arrangements specific to each department for managing health and safety including confirmation of the departmental Responsible Persons Register
- ensuring the allocation of the necessary resources including the appointment of Departmental Specialist Officers
- the identification and review of significant risks and the setting of departmental safety objectives and action plans to manage those risks
- the identification of activities critical to their business continuity and preparation of plans to minimise the impact of a major incident, in conjunction with the overall UCL plan
- the planning, implementation, monitoring and review of measures to control risk arising from the activities of their department
- ensuring that all persons who may be affected by the department’s activities understand the arrangements for health and safety and have access to the necessary information

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1 The recorded departmental organisation and arrangements together with this document and the UCL Safety Policy document represent the UCL Statement of Safety Policy as required under S 2(3) of the Health and Safety at Work etc Act 1974.
• establishing local consultative health and safety arrangements or, in low risk departments, placing health and safety as a standing item on the agenda of the departmental management committee if a departmental health and safety committee is not justified
• making explicit and documenting the cooperation and coordination responsibilities and arrangements where workplaces are shared with other UCL departments and other employers
• ensuring all new members of staff and full-time postgraduate research students complete the health and safety induction requirements
• ensuring the competence of employees including the maintenance of records on the appropriate UCL systems eg training records
• ensuring all activities undertaken on behalf of UCL are carried out by, or supervised by, competent people who have the necessary authority to meet their responsibilities
• ensuring adequate supervision of all students and visitors to UCL
• reviewing the health and safety performance and adequacy of existing health and safety arrangements of the Department in accordance with agreed standards.

2.1.5 Departmental Managers, Principle Investigators and Supervisors

Departmental managers, Principle Investigators and supervisors (an inclusive term to describe all those who have a duty to manage any aspect of the work activity of the department, whether carried out by staff or students) shall be accountable to the Head of Department for the health and safety management of the work activities under their control as directed by the Head of Department. Their duties include:
• assessing the risks of the work under their control
• ensuring the implementation and maintenance of relevant risk control measures
• ensuring the provision of suitable information, instruction, training and supervision of staff, students and academic visitors under their control taking into account the experience and skills of these people
• ensuring the safe handling and use of hazardous substances and the maintenance of safe plant, machinery and equipment
• ensuring that the operation and effectiveness of the risk control measures are monitored
• ensuring all accidents and incidents are reported and investigated in accordance with agreed procedures and guidance
• familiarising themselves with fire and emergency drills (including the location of emergency telephones) and escape routes
• ensuring that they have appointed a suitable deputy to maintain appropriate supervision of the work under their control in their absence from the Department.

2.1.6 UCL employees

The attention of all UCL employees is drawn to their legal responsibilities:
• to take reasonable care of themselves and all others who may be affected by their acts and omissions
• to co-operate with both the central and Departmental policy and arrangements for safe working including any training and occupational health requirements
• not to interfere with or misuse anything, objects, structures or systems of work, provided by UCL in the interests of health and safety.

Any failure to comply with the above may lead to disciplinary action which could result in dismissal. Any breach of UCL’s health and safety rules that places a member of staff or

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2 Section 7 of the Health and Safety at Work etc Act 1974
3 Section 8 of the Health and Safety at Work etc Act 1974
others in danger will be treated as gross misconduct under UCL’s Disciplinary Procedure.

2.1.7 Students and Visitors
The attention of all students and all visitors is drawn to their legal responsibility not to interfere with or misuse anything, objects, structures or systems of work, provided by UCL in the interests of health and safety.

It shall be a condition of registration of students and the terms of reference of academic visitors that they co-operate with UCL by complying with this Policy.

2.2 Management Team Safety Responsibilities

2.2.1 UCL Council
The ultimate responsibility for health and safety rests with UCL Council as the employer. The Council assures itself through annual reports and ad hoc interventions that health and safety is being properly managed. It has delegated the duty of the day-to-day running of UCL, which includes the management of health and safety, to the President and Provost. Details concerning the current membership of the Council may be obtained from the Director of Academic Services.

2.2.2 SMT
The President and Provost and the SMT set UCL safety policy, objectives and UCL requirements for health and safety and are responsible for the establishment and effective implementation of the organisation and arrangements for health and safety management. They are key in the communication, promotion and leadership of health and safety. The SMT review on a quarterly basis UCL’s safety performance and receive papers of key issues for discussion and approval at their regular meetings where required by HSC or the Vice-Provost (Operations).

2.2.3 Faculty, School and Divisional Management Teams
These teams are responsible for setting business unit objectives aligned to corporate objectives, approving management plans, reviewing progress and monitoring safety performance at least quarterly and more frequently as necessary. Each team should nominate a member to take a lead responsibility in the oversight and championing of health and safety for the business unit.

2.3 Nominated Safety Management Responsibilities

2.3.1 Vice-Provost (Operations)
The Vice-Provost (Operations) is the executive member with responsibility for the oversight and championing of the effective management of health and safety. The Vice-Provost (Operations) is responsible for ensuring that the health and safety management system is properly implemented and performing to requirements in all locations and spheres of operation identified within the system scope. The Vice-Provost (Operations) is also responsible for the effectiveness of UCL's health and safety organisation and arrangements and ensures the provision of appropriate resources to enable persons with specific responsibilities for health and safety, including relevant committees, to perform their functions properly.

The Vice-Provost (Operations) is responsible for:
keeping the SMT informed of, and alert to, significant health and safety issues and initiatives that affect the organisation
• ensuring that UCL has access to appropriate sources of competent advice and resource
• sponsoring the annual review of health and safety performance
• chairing or appointing the chair of the HSC
• approving the appointment of the Head of Safety

2.3.2 Nominated Senior Manager - Faculty, School and Divisional Management Teams
Each senior team should nominate a member to take lead responsibility and champion health and safety for the area. The nominated manager will have overall responsibility for the establishment and effective implementation of the organisation and arrangements for health and safety management and for reporting to the senior team the overall performance against key safety objectives and action plans. The nominated managers are key in the communication, promotion and leadership of health and safety issues.

3. SAFETY COMMITTEES AND FORUMS

3.1 Health and Safety Committee (HSC)
The Health and Safety Committee (HSC) has been established under the delegated authority of the President and Provost with the purpose of developing and managing UCL’s safety policy and strategy. It is the focal point for health, safety, and fire safety compliance. It aims to support managers and ensure that there is a co-ordinated approach across Departments. The HSC is constituted in accordance with the Safety Representatives and Safety Committees Regulations (1977) as amended by the Management of Health and Safety at Work Regulations (1992) and the Health and Safety (Consultation with Employees) Regulations (1996).

Subject to any general or particular direction that may from time to time be given by the Council, the Health and Safety Committee is charged by Council:

• To maintain an overall assessment of the key UCL health and safety risks from which priorities for action are set and reviewed annually.
• To set objectives, standards and targets to improve health and safety management.
• To approve policy, standards and strategy for the management of health and safety at work within UCL and compliance with health and safety legislative and other requirements.
• To establish specific safety sub-committees and working groups as appropriate.
• To provide a forum for consultation and discussion between UCL Management and trade union safety representatives on health and safety matters.
• To receive items of significance from such specialist committees or other groups with responsibility for health and safety-related matters as HSC may set up and/or which operate under the aegis of the HSC.
• To consider reports and factual information provided by inspectors of the enforcing authorities appointed under the Health and Safety at Work etc Act 1974;
• To consider reports that trade union safety representatives may wish to submit.
• To monitor progress against objectives, targets, plans and remedial actions, and determine actions necessary to address areas of non-compliance where there is significant risk.
• To monitor and review the adequacy and implementation of UCL arrangements, including training and safety and health communication and publicity within UCL.
• To review safety performance indicators, investigations of significant failures, independent inspection and audit reports and associated remedial actions.
• To submit an annual report to Council, summarising the Committee’s work in terms of safety and occupational health.
• To report to Council by submission to the Council officers of Minutes of each meeting of the Health and Safety Committee.

The Terms of Reference and membership of HSC can be found on the UCL website (http://www.ucl.ac.uk/staff/committees/health-safety/). Standing Advisers are responsible for providing guidance and assistance to members of the Health and Safety Committee in the formulation of policy and arrangements for the management of health and safety. Other Advisers (such as the Fire Safety Manager) are invited to attend meetings on an ad hoc basis.

Stress and well-being is treated like any other health & safety risk and is considered in the wider context of health and safety risk management at the University. This ensures that a wider audience has the opportunity to consider and contribute to matters associated with stress and wellbeing at work, thereby improving the effectiveness of stress risk management. The HSC considers issues relating to the management of stress risk and wellbeing at UCL, including the:
• review of UCL’s Policy on Managing Stress at Work and associated procedures to ensure its effectiveness and compliance with the Health and Safety Executive Standards for Managing Stress at Work;
• review of data (such as those resulting from employment policy monitoring, reports of Employee Assistance Programme take up, sickness absence data and Staff Survey results) for indicators of stress risk and to formulate proposals to address areas of concern identified; and
• development of proposals to ensure that staff are provided with appropriate support to build resilience and work effectively at times of pressure.

For the purposes of the Health and Safety (Consultation with Employees) Regulations 1996 any employee may seek representation on health and safety matters through one of the Trade Union Safety Representatives. A list of Safety Representatives is available from the Director of Human Resources. The names of the convenors of the three recognised trade unions, UCU, Unite and Unison, are shown on the statutory Health and Safety Law posters issued to departments for display at prominent locations.

HEALTH AND SAFETY COMMITTEE

Constitution and 2014-15 membership

Ex officio
Vice Provost, (Operations) (Convenor*) Mr Rex Knight
Director of UCL Estates Mr Andrew Grainger
Director of Human Resources Mr Nigel Waugh
Head of Safety Mr Paul Stirk
Deputy Head of Safety Ms Jillian Deans
Head of Occupational Health Services Ms Angela Graneek

Appointed
Members of staff of the following academic units of UCL, appointed by the Committee on the recommendation of the Provost's Senior Management Team:

* The Chair of the Health and Safety Committee is designated ‘Convenor’.
Two Safety Representatives from the UCU, nominated by that Trade Union
• Ms Sue Chick (4)
• Ms Jenny Head (2)

Two Safety Representatives from Unison, nominated by that Trade Union
• Mr Munya Marisa (-)
• Ms Makeba Adero (-)

Two Safety Representatives from Unite, nominated by that Trade Union
• Mr Mike Cresswell (4)
• Mr David Ladd (3)

Observers
Three Observers, one from each of UCL’s three trade unions
• Vacancy [UCU]
• Ms Linsey Chrisman [Unison]
• Vacancy [Unite]

Two Observers from the UCL Students’ Union
• Ms Leah Francis
• Mr Omar Khan

The following may be invited to attend meetings at other times, as and when required:
• Chairpersons of Sub-Committees and Advisory Groups
• Radiation Protection Officer
• Biological Safety Advisor
• Safety Manager (Construction, Maintenance & Fire)
• Fire Safety Officer
• other specialists

3.2 Ionising Radiation Safety Management Committee (IRSMC)

Subject to any particular or general direction that may from time to time be given by the Health and Safety Committee, the Ionising Radiations Safety Management Committee is charged by Council:
• To propose, implement and monitor, on behalf of Council, a policy for work with ionising radiations throughout UCL.
• To consult with users of ionising radiations and with the Trade Unions.
• To report to the Health and Safety Committee through submission of the minutes of each meeting of the Ionising Radiations Safety Management Committee to the Health and Safety Committee.

The membership of the Ionising Radiation Safety Management Committee is:
The governance arrangements for ionising radiation are shown in the diagram below:
3.3 Genetic Modification Safety Committee (GMSC)
Subject to any particular or general direction that may from time to time be given by
the Health and Safety Committee, the Genetic Modification Safety Committee is
charged by Council:

- To act as the Genetic Modification Safety Committee as required by
  Regulation 16 of the Genetically Modified Organisms (Contained Use)
  Regulations 2000.
- To advise Council, through the Health and Safety Committee, on matters
  relating to genetic modification work in UCL.
- To implement, on behalf of Council, UCL policy with respect to genetic
  modification work in UCL.
- To monitor, on behalf of Council, the use of genetic modification in UCL.
- To report to the Health and Safety Committee any matters deemed significant
  by Committee.

The UCL GMSC also provides advice on GM risk assessments prepared by the
Anthony Nolan and Royal Free NHS Trusts in accordance with local written
arrangements.

The membership of the committee is:

Chair and Genetic Modification Safety Adviser    Professor John Ward
Biological Safety Adviser                        Ms Jillian Deans
Representative from:
  Faculty of Medical Sciences                  Dr Yasu Takeuchi
  Faculty of Engineering Sciences               Professor John Ward
  Faculty of Life Sciences (Biological/ Medical) Mr Tony Langford
  Royal Free Hospital NHS Trust                 Mr Kofi Owusu
  Institute of Child Health                    Dr Owen Williams
  Institute of Ophthalmology                   Dr Sander Smith
  Eastman Dental Institute                     Dr Adam Roberts
  Institute of Neurology                       Dr Lee Stanyer
  Anthony Nolan Trust                          Dr Hazel Forde
  School of Pharmacy                           Dr Andy Wilderspin

Member being a UCL departmental Genetic Modification Safety Officer  Mrs Sonia Buckingham
Members being representative of UCL staff based at Royal Free Hospital  Mr David Brown,
                                                                      Dr Tim McHugh
Representative from the Trade Union, Unite  Mr Mike Cresswell
One member being a postgraduate student involved in genetic modification  Miss Rachel Brown
Secretary  Mr Jonathan Blackman

3.4 Departmental Safety Committees
To assist and advise the Head of Department on planning, prioritisation and
implementation of measures to manage the risks of departmental activities, the
Head of Department should constitute a Departmental Safety Committee or
management group whose size and constitution should be commensurate with the
magnitude of the risk and complexity of departmental activity. Where appropriate, and especially in smaller departments, health and safety matters should be considered regularly at departmental management meetings. The role of the committee will cover the following:

- Ensuring significant risks are being managed effectively
- Developing actions to meet corporate and departmental safety objectives
- Developing a programme of active monitoring (visits, checks and inspections) and the recording of significant findings and improvement actions.
- Establishing communication and consultation arrangements with staff, including where appropriate, local union safety committees.
- Establishing effective communication and co-operation arrangements with other parties in shared workplaces.
- Monitor and review health and safety performance through quarterly reporting which should include:
  - progress against health and safety action plans
  - accidents and incidents trends, investigations and lessons learned
  - work related ill-health statistics and trends
  - analysis from active monitoring including schedules, responsibilities, training and risk assessments
  - contractors and partners performance
  - key risks and issues
  - health and safety training needs and completion of courses
  - issues to be escalated to other forums

4. SAFETY SUPPORT

4.1 Specialist Safety Roles

4.1.1 Head of Safety

The Head of Safety has responsibility for the development and review of UCL’s safety policy and strategy and the development, management and review of the provision of independent safety advice on behalf of UCL in support of the policy and strategy including:

- development, review and evaluation of the safety management system to ensure it is fit for purpose and promotes continuous improvement;
- review of Departmental organisation and arrangements which support the aims and objectives of this Policy;
- identification, delivery and review of safety training needs for UCL;
- reporting to the HSC and senior management on UCL’s safety performance;
- acting as the professional head for all safety advice and ensuring that adequate arrangements are in place to provide:
  - competent safety advice at all levels within UCL and for all areas of safety risk;
  - focussed operational support to key risk activities;
  - such monitoring, auditing and reviews as are required to give Council assurance that the management of safety at UCL is adequate and that risks are adequately controlled.

4.1.2 Head of Occupational Health Services

The Head of Occupational Health Services is responsible for the development, management, review and provision of objective occupational health advice and
services that enables UCL to meet its statutory requirements and its Strategic, Human Resource and Health and Safety objectives.

4.1.3 UCL Specialist Safety Roles

The Head of Safety, on authority from HSC, is responsible for ensuring the appointment of the following specialist safety roles.

4.1.3.1 Biological Safety Advisor

Responsible for:
- providing advice on the operation of the Control of Substances Hazardous to Health Regulations (biological agents);
- providing advice on the operation of the Genetic Modification (Contained Use) Regulations
- act as Biological Safety Officer with respect to genetic modification work throughout UCL and in particular to co-ordinate:
  a) the drawing up of Local Rules in all departments involved in genetic modification work.
  b) the investigation of accidents, spillages etc and the keeping of appropriate records.
  c) the safe storage of genetic modification material in departments.
  d) local inspections of genetic modification facilities throughout UCL
  e) advice given to departments on the safe storage, transport and disposal of genetically modified organisms, disinfection procedures, the testing, where necessary, for genetically modified organisms outside containment facilities and the physical security of laboratories.
  f) advice and technical support to the Genetic Modification Safety Committee on risk assessment and classification
  g) ensuring all statutory notifications are made to the Health and Safety Executive and that records are maintained as appropriate.

4.1.3.3 Dangerous Goods Safety Adviser

Responsible for:
- advising UCL on the transport of dangerous goods and monitoring UCL’s practices and procedures for the transport of dangerous goods
- ensuring an annual report is prepared on UCL’s activities in respect of the transport of dangerous goods
- investigating serious accidents/incidents involving dangerous goods
- monitoring UCL’s security plan for dangerous goods.

4.1.3.4 Fire Safety Manager

Responsible for:
- advising members of the University on all matters of fire safety, ensuring suitable arrangements are identified to meet the requirements of current fire legislation
- liaising with members of Estates Division and external contractors in all fire precaution matters affecting new building, extensions and alterations to existing buildings
- maintaining the Fire Safety Manual (fire risk assessment, fire strategy, building information and evacuation plans)
- preparing, organising and carrying out fire safety training and fire drills
- investigating incidents involving fire related matters and preparing management reports.
• auditing fire safety provisions in all University buildings and advising on any remedial action
• liaising with the Fire and Rescue Service and the University’s insurers.

4.1.3.5 Radiation Protection Adviser

The RPA is a statutory appointment to enable the University to purchase, store, use and dispose of radioactive materials. They are responsible for advising on all matters of radiation protection, which include:
• the implications of statutory provisions
• the storage, distribution and disposal of radioactive substances according to the registrations and authorisations granted by the statutory authorities
• the control of exposure to radiation, to as low a level as reasonably practicable
• the identification of and restriction of access to controlled and supervised areas

4.1.3.6 Radiation Protection Officer

Responsible for:
• managing radiation protection within the University on a day-to-day basis
• operating a system of personal dosimetry and area monitoring
• drafting written systems of work and Local Rules
• contributing to plans for new plant or premises or alteration to existing ones which may affect radiation protection
• investigating abnormal exposures to radiation
• providing or arranging for the provision of radiation training
• inspecting, monitoring and auditing arrangements for radiation safety in Schools
• liaising with the various statutory authorities and assisting with their inspections
• following a programme of continual professional development so that the standard of professional expertise is maintained
• carrying out any other radiation protection duties as may be assigned by the University
• overseeing the use of ionising radiations at UCL
• ensuring that as a minimum standard the requirements of the Ionising Radiations Regulations 1999, the Environmental Permitting Regulations 2010- and where appropriate, the High-activity Sealed Radioactive Sources and Orphan Sources Regulations 2005 are met.

4.2 Departmental Specialist Safety Roles

Each Head of Department shall appoint a Departmental Safety Officer to assist him/her in the creation, development, monitoring and review of the Department's arrangements for safe working. In addition the Head of Department shall appoint persons to specialist roles to provide assistance in areas of work involving ionising radiations (Departmental Radiation Protection Supervisor), genetically modified organisms (Departmental Genetic Modification Safety Officer) and lasers (Departmental Laser Safety Supervisor) and any other areas of activity in respect of which the provision of specialist advice may be warranted.
The nominated persons shall be recorded in the Departmental Nominated Responsible Persons Register in RiskNET (http://www.ucl.ac.uk/estates/safetynet/tools/index.htm)

The duties of the Departmental Safety Officer and other specialist roles are set out in SafetyNET http://www.ucl.ac.uk/estates/safetynet/guidance/roles_responsibilities/index.htm

The Departmental Safety Officer must have access to the Head of Department in order to report events, hazards and other circumstances that must be brought to the attention of the Head. They should have sufficient experience and personal qualities to be able to act on behalf of the Head in matters relating both to untoward events and to the business of routine safety monitoring and reporting. They are not expected to be safety professionals and should seek advice on safety law and practice, both national and organisational, where necessary, from Safety Services.

4.3 UCL Safety Services

Administratively, UCL employs within UCL Estates, and in accordance with the Management of Health and Safety at Work Regulations 1999, a number of competent Safety Advisers forming UCL Safety Services.

UCL Safety Services provide an independent source of competent safety advice across UCL and are responsible for the provision of the following services:

- development of UCL Safety Policy, UCL Safety Standards, UCL Safety Guidance and supporting systems and tools
- review of Departmental organisation and arrangements
- competent safety advice at all levels within UCL
- the coaching of UCL management in good safety management practice
- advice on emergency planning
- investigation of serious accidents or high potential incidents
- safety training
- liaison with enforcing authorities
- inspections of hazard areas and risk based safety audits

4.4 Occupational Health Services

Occupational Health Services (OHS) is part of UCL’s Human Resources Division and is staffed by Specialist Occupational Health Practitioners who provide competent and objective advice to UCL students, staff and managers on the impact of work and study placements on health and on the effects of health on work in order to assist UCL in promoting physical and psychological wellbeing and prevent illness and injury arising from UCL activities

OHS provides the following services to UCL:

Primary

- advice to staff, students and managers at all levels to enable them to reduce the risk of adverse health effects related to work and study placements and to assist UCL in meeting its legal duties
- statutory ‘Health Surveillance’ where risk assessments have identified residual risks and where appropriate health surveillance measures are available
• monitoring the effectiveness of health and safety controls through health surveillance
• reports to Heads of Departments through designated departmental contacts to assist with legal compliance under the COSHH Regulations
• immunisation and advice to protect staff and students against work-related infectious disease;

**Secondary**
• preventative programmes to protect staff and students against workplace hazards e.g. infectious disease, musculoskeletal disorders and psychosocial hazards
• objective advice on individual cases to staff, students and managers to enable them to manage health at work effectively

**Tertiary**
• support and assistance programmes to provide students, employees and managers with access to urgent intervention for work-related infectious disease, emotional crises and to provide early intervention for relevant work-related health problems.

### 4.5 Union Appointed Health and Safety Representatives

The following trade unions are recognised by UCL to represent UCL staff:

The University and College Union (UCU) is recognised by UCL to represent its Academic staff, Research staff and Administrative staff in academic-related grades. See the UCL UCU website at [http://www.ucl.ac.uk/unions/UCU/](http://www.ucl.ac.uk/unions/UCU/)

UNISON is recognised by UCL to represent its Clerical, Secretarial, Manual and Ancillary staff. The UCL UNISON website can be found at [http://www.uclunison.org](http://www.uclunison.org)

Unite (formerly Amicus)/MSF is recognised by UCL to represent its Technical staff. The Unite (formerly Amicus) website can be found at [http://www.ucl.ac.uk/~ucyuami/](http://www.ucl.ac.uk/~ucyuami/)

Matters of concern to staff should normally be raised through the established channels, namely the Departmental Safety Officer and/or Trade Union Safety Representative and the Head of Department. The campus trade unions, namely UNISON, Unite and the UCU, have confirmed that they are willing to represent all staff (including non trade union members) in discussing safety related matters at the Health and Safety Committee and to place on the agenda, issues of concern to any member of staff where they fall within the remit of the committee.
5 SAFETY ARRANGEMENTS

The following sections describe the arrangements that the University has in place to carry out its statutory health and safety duties.

5.1 Introduction to UCL’s Safety Management System

The UCL safety management system is based on the HSE publication HS(G)65 which is a Plan-Do-Check-Act process where ownership and responsibilities are integral to the activity owners. The philosophy behind the system is that the people responsible for creating the risk are the people responsible for managing the risk. It is for this reason that a significant amount of effort is now being put into developing relevant IT tools (RiskNET - http://www.ucl.ac.uk/estates/safetynet/tools/index.htm) to help managers fulfil their responsibilities and in so doing, as a minimum, meet legal requirements.

5.1.1 Documentation Structure

The specific requirements together with appropriate guidance to achieve safe systems of work are set and documented within the corporate safety documentation. At a local level these are reflected in local procedures and work instructions. All published corporate health and safety documentation is subject to periodic review managed by the Head of Safety. They are also reviewed specifically as a result of a change, whether an external change e.g. legislation, or an internal change e.g. as a result of an incident, outcome of an audit, etc.

Corporate Documentation:

There are 4 categories of corporate safety management documentation:

- **Policy**
  
  Documents, authorised by the Provost and President, containing statements by the organisation of its intentions, approach and direction in relation to its overall performance. A Policy document provides a framework for action and for the setting of objectives.

- **Organisation and Arrangements**
  
  The UCL Organisation and Arrangements document is authorised by the Provost and President. Changes to this document are the responsibility of the Head of Safety following approval by the HSC or SMT. The document is an accurate record of the current arrangements of UCL for meeting its Safety Policy.

- **Safety Standard**
  
  Documents, authorised by the HSC, which describe what is required to ensure compliance, by whom, and guidance and tools on how to achieve it. They provide the link between the global policy statements and how these may be achieved in certain risk areas. Standards may contain within them Procedures which describe the methods to be used to achieve an activity and to what criteria. Procedures explain why the activity must be carried out, when, how and where it is to be done, and by whom it is to be carried out.

- **Guidance**
  
  Documents, authorised by the Head of Safety, which are advisory in nature giving advice on how to achieve safe systems of work when dealing with particular hazards or classes of hazard.
Standards and Guidance will provide the source of reference for the vast majority of end-users.

**Local Safety Documentation:**
All local safety documentation must be compliant with the relevant corporate documentation where this exists. There are 2 categories of local safety documentation:

- **Departmental Organisation and Arrangements**
  This document describes the responsibilities, organisation and arrangements by which the department will meet the relevant corporate requirements and how the corporate policy cascades to the Department. It will also describe any Departmental documentation, associated responsibilities and how it relates to corporate documentation.

- **Departmental standards, procedures, work instructions, guidance**
  Documents which describe the way in which the Department will meet the corporate requirements where it is not set out specifically in the corporate documentation or where the Department wishes to set a higher standard. Corporate documentation will be of sufficient detail to meet the needs of the business in the majority of cases.

5.1.2 **Documentation Control**
Health and safety documents are published on the UCL SafetyNET web site and are managed by UCL Safety Services’ editorial process. The editorial process includes the approval steps for the document and is the responsibility of the Head of Safety.

5.1.3 **Information**
Managers and staff have ready access to health and safety information through the UCL SafetyNET Website [http://www.ucl.ac.uk/estates/safetynet/](http://www.ucl.ac.uk/estates/safetynet/)
They can also use the HSE website as a source of free health and safety advice and information. It has a wealth of documents which may be saved or printed.

In addition a database of all current UK Statute Law may be found at: [http://www.statutelaw.gov.uk/Home.aspx](http://www.statutelaw.gov.uk/Home.aspx)

Safety Services use a number of on-line information services for health and safety-related reference material appropriate to UCL activities. The information on these is held by Safety Services. Members of Safety Services may be contacted to advise and inform by phone, email or personal visit.

Trade Union Health and Safety Representatives have a special interest in their members’ working conditions. They provide an invaluable source of health and safety information.

5.1.4 **Record Keeping**
UCL safety documentation and Divisional arrangements specify where records relating to health and safety must be kept. These include the retention of significant findings of risk assessments, health records and accident and investigation reports and records of training.
All records will be satisfactorily stored at all locations in an environment which will protect them from damage, loss and/or deterioration and allow easy retrieval.

5.2 Assessment and Control of Health and Safety Risks

5.2.1 Corporate Health and Safety Risks
The Head of Safety is responsible for the analysis of UCL-wide health and safety risks, and the development of University safety objectives for approval by HSC. Actions are cascaded to UCL Departments as well as Departments performing their own analysis and developing their own health and safety objectives and actions. The analysis is made from a variety of sources:
- Risk Assessments
- Incidents
- Inspection results
- Actions (current and over-run).
- Legal and other requirements.
- Health and safety policy decisions.
- Non-conformances.
- Audit/Assurance findings.
- Typical significant hazards known to be present in the organisation.

From the identified risks, key objectives of the University are set and action plans derived.

5.2.2 Operational Risk Assessments
It is the responsibility of the Head of Department to ensure that formal, systematic assessments are made of all activities, of the equipment and materials used for those activities and of the locations where the activities are carried out in accordance with the UCL requirements and guidance (http://www.ucl.ac.uk/estates/safetynet/) and defined responsibilities.

To facilitate this a risk assessment tool is provided within RiskNET (http://www.ucl.ac.uk/estates/safetynet/tools/index.htm). This tool provides an online approval and authorisation process for Departmental risk assessments as well as central database storage of completed risk assessments with smart search function.

Relevant professional support should be consulted before any high risk or complex activity is undertaken. The essential requirement is that at any time the manager responsible for the work activity is able to demonstrate:
- a suitable and sufficient risk assessment has been carried out, in good time and for every stage, for all risks associated with their work
- the necessary controls identified have been put in place
- the Occupational Health Service have been informed of staff requiring health surveillance and immunisation using the Job Hazard Identification form http://www.ucl.ac.uk/hr/occ_health/forms/job_hazard_form.doc
- effective communication of significant findings to those who may be affected by the activity
- that assessments are recorded and reviewed periodically and especially when the work changes
- that the controls continue to be appropriate and in place.
All those involved in the activity, including the manager responsible for the workplace, will provide relevant information to inform the risk assessment process and will co-operate with those responsible to ensure appropriate controls are successfully implemented.

Monitoring of the completion and sufficiency of risk assessments is a key role of the safety forums as part of the active monitoring process.

5.3 Management of Change
Management of change is an important aspect of safety management. Change can introduce new hazards that could impact the appropriateness and effectiveness of any existing risk mitigation. Whenever a significant change is introduced to an existing system, such as a new operational requirement or a major reorganisation, and it is determined that the change may lead to a risk, the risk must be identified and then the change must be carefully managed in co-operation with the affected stakeholders. UCL’s procedures for hazard identification and risk assessment enable managers to take into account changes or proposed changes in the organization, its activities or materials prior to the introduction of such changes to identify potential hazards that will ensure that there is no adverse effect on safety.

Managers, through the risk assessment process, are required to:
- Identify any significant hazards associated with "change"
- Assess any risks associated with "change"
- Consider the hazards and risks where identified prior to the introduction of the "change"
- Implement the controls needed to address the identified hazards and risks associated with the "change"
- Monitor the change as a way to collect and analyze feedback, identify gaps and lessons learned.

5.4 Safety Improvement
5.4.1 UCL Safety Objectives
Health and safety is integral to the planning of all our business and work activities to ensure adequate resources are provided to implement health and safety requirements. University health and safety objectives are developed annually by the Head of Safety for review and endorsement by HSC. Progress against the UCL Safety Objectives is reviewed quarterly by the HSC.

5.4.2 Departmental Safety Improvement
As part of the departmental planning and review processes specific improvement objectives and actions relating to safety are developed. These are based on Departmental needs but also take into account the actions deriving from the UCL Safety Objectives. The objectives and actions should be reviewed at the relevant management body or safety committee.
5.5 Training, Awareness and Competence

5.5.1 Instruction

Instruction is specific practical information on how to carry out a process safely, i.e. the communication of a safe system of work. The University has a core of highly skilled, experienced and knowledgeable supervisory staff and it relies upon the transfer of their skill, experience and knowledge to its support staff. Instruction can be both verbal and written.

5.5.2 Training

Health and safety training is managed across UCL by the Safety Training Manager, Safety Services and is delivered by the Safety Advisors as well as external training providers. Safety Services also develop and deliver bespoke safety training and/or will identify third party training organisations who can meet the criteria identified with the area requiring the training.

Safety Services committed to providing UCL departments with pragmatic solutions to meet their training needs by collaborating with departmental staff in tailoring the training based on a mutual understanding of safety risks of their academic, research and/or business activities.

However the specific role and individual responsibilities will determine what training is appropriate and Departments are responsible for identifying the training needs which should reflect the hazards and associated risks.

To help individuals and their manager decide on an appropriate training and development programme, there is a "one stop shop" for information on all health and safety training courses given throughout the year on the UCL SafetyNET website:
http://www.ucl.ac.uk/estates/safetynet/training/
Training must be booked using the Single Training Booking System (STBS)
https://www.ucl.ac.uk/hr/UCLTrainingBookingSystem/ .

All training provided by UCL Safety Services will be recorded in the UCL corporate training record system within Resource Link and, related training conducted by the department such as, the local safety induction should be recorded by the individual using the Learning Event Recording System
http://www.ucl.ac.uk/hr/od/recording/index.php

Training requirements of individuals are identified by the line manager, taking into account differing levels of responsibility, ability and risk. Managers should ensure that plans are produced and implemented to meet the training needs including any identified specifications. Managers should review training needs on a regular basis, as well as upon recruitment, at activity/job change and on identification of new hazards or change in risks, and revise if necessary.

Induction

It is a mandatory requirement for new staff and graduate research students, undertaking work at UCL to receive the UCL safety Induction. This is comprised of a local safety induction followed by a corporate induction. It is the responsibility of the line manager to ensure they receive both components. The completion of the local safety induction is a prerequisite for the new starter to undertake the UCL Corporate Safety Induction provided via UCL Moodle,
https://moodle.ucl.ac.uk/ which, when completed concludes formally the UCL Safety Induction Training.

Contractors and visitors must receive a local induction relevant to their work or visit but do not have to complete the corporate induction. This is the responsibility of the person in control of the contractor or visitor.

**Refresher training**
Because of the importance of updating competencies and keeping track of legislative changes etc., refresher training has been set for some specific health and safety courses. The description of each individual training module provides details of the refresher training requirements.

**Evaluation of Training Effectiveness**
Evaluation is done in several ways using the following methods:

- close monitoring of the percentage of people who have completed core safety courses
- completion of qualitative feedback forms by course participants on stand alone courses
- some form of quantitative monitoring, e.g. short question set to establish what candidates have learnt from the course for stand alone courses (the interactive course already has quantitative monitoring).
- monitoring of staff's work activity, in terms of safety competence, on completion of training
- Inclusion as part of assurance monitoring schemes

5.6 Communication, Consultation and Co-operation

5.6.1 Internal communication
Health and safety communications are distributed using a number of routes:
- the UCL SafetyNET website [http://www.ucl.ac.uk/estates/safetynet/](http://www.ucl.ac.uk/estates/safetynet/)
- Occupational Health Services: [http://www.ucl.ac.uk/hr/occ_health/](http://www.ucl.ac.uk/hr/occ_health/)
- Occupational health advice given by Occupational health advisors on individual or group basis
- health and safety briefings given by the safety advisors to the appropriate targeted audience.
- management and safety forum meetings
- departmental nominated safety persons
- notice boards
- e-mails

5.6.2 External Communication
UCL plays an active role in a number of Higher Education (HE) and professional forums such as USHA, HEBCoN, EPC, BCI, IRM, CBI Health and Safety Panel, RoSPA, IOSH, ISTR, HEOPs, HSE working groups etc.

5.6.3 Action to take if you have a health and safety problem
If you or your colleagues think there is a health and safety concern the steps you should consider in ranked priority order are:

- discuss the matter with your line manager
• In the case of work-related health matters request a referral to the Occupational Health Service
  http://www.ucl.ac.uk/hr/occ_health/what_do_we_do/self_referral.php
• contact your nominated Departmental Safety Specialist relevant to the topic area;
• contact your health and safety representative

and at any time you can
• discuss the matter with Safety Advisers in Safety Services.

5.6.4 Enforcing Authority Contact & Liaison
Contact, including correspondence from any enforcing authority relevant to health and safety, eg from the Health and Safety Executive (HSE), Environment Agency (for radiation), Fire Authorities and Police (Counter Terrorism Security Advisor in respect of chemicals, radiation and biological agents), must be notified to Safety Services by the quickest possible means. Safety Services will provide the appropriate support and advice to the managers.

Any person needing to contact any of the enforcement authorities listed above, on other than on-going business, must liaise with Safety Services to facilitate the approach and monitor the outcomes from any contact.

5.6.5 Consultation
The arrangements for consultation on health and safety issues are set out in Section 4.5.
The recognised unions represent all UCL employees for the purposes of formal consultation on matters of health and safety. Local arrangements to ensure compliance are identified in the Department’s organisation and arrangements.

5.6.6 Co-Operation
UCL will ensure:
• that third parties appointed by UCL to carry out work on its behalf are competent for the activity they are to carry out
• there are arrangements for the co-ordination by those in control of the activities,
• arrangements are in place for the exchange of information on risks, responsibilities and controls
• there are suitable arrangements for supervision, reporting and monitoring
• The UCL manager in charge of an activity for which any contractor is engaged is responsible for co-ordinating the contractors work with the activities of UCL, and the exchange of information on risks and controls.
• That there are suitable arrangements for shared workplaces (guidance is available on the UCL website at:
  http://www.ucl.ac.uk/estates/safetynet/guidance/management/index.htm

5.7 Operational Safety

5.7.1 Safe Systems of Work
Departments are responsible for ensuring that any work procedures which expose the individual to a significant hazard are assessed for risk and appropriate control measures are applied. One of the control measures is to use a safe system of work which is a work procedure specifically designed to reduce exposure of the operator to health and safety risks. They may be verbal or, preferably, in the form of a written scheme.
5.7.2 Permit to Work and Control of Contractor Arrangements
The responsibilities for the permit to work system for activities on or in UCL premises rest with the Director of UCL Estates. Arrangements for the Control of Contractors and permits to works are detailed in documents held with UCL Estates and local Permit to Work offices on UCL sites.

Local control for the administration of the Permit to Work arrangements is carried out by the UCL Estates managers.

5.7.3 Safe Place of Work
The responsibility for providing the University with buildings of sound construction with safe means of access and egress rests with the Director of UCL Estates. UCL Estates are responsible for the construction, maintenance, refurbishment and demolition of all University buildings. They are also responsible for the care and maintenance of the University estate (except for public roads and pathways). No staff other than those in the above Services may engage in any of these activities. The Head of Safety has appointed a Construction Safety Advisor for specialist advice in this area.

5.7.4 Safety of plant and equipment
All plant and equipment which is an integral part of the University infrastructure is the responsibility of UCL Estates. This includes such items as large power generators, lifts, boilers, access barriers, fixed installation fume hoods, etc.

All other items are the responsibility of the owning Department and in some cases these may be shared between more than one Department. Where this is the case responsibilities are defined and recorded in the Departmental Organisation and Arrangements.

5.8 Emergency Preparedness and Response

5.8.1 Business Continuity and Emergency Planning
The arrangements for emergency response are published on the UCL website (http://www.ucl.ac.uk/emergency-planning/). They identify the potential for accidents and emergency situations, address the prevention of health and safety risks associated with them and include:

- defined lines of communication, escalation and associated responsibilities
- ensuring the procedures, instructions, equipment and associated data contained within the Business Continuity and Emergency Plan (BCEP) are maintained or amended regularly to ensure accuracy
- carrying out exercises to test the effectiveness of the BCEP
- agreeing the provision of services in their Plan with the appropriate service providers
- briefing/training staff on the BCEP, particularly those with a role to play
- ensuring relevant staff/contractors are provided with a copy of the BCEP
- having a nominated person to maintain the Plan and distribute amendments
- exercising the BCEP to ensure its continued effectiveness by learning from experience.

The arrangements for the following areas incident reporting, investigation and management, first aid and fire can be found on the Safety Services web site “SafetyNet” http://www.ucl.ac.uk/estates/safetynet/guidance/management/index.htm.
Departments are responsible for:

- ensuring development and maintenance of emergency and business continuity plans
- ensuring their own staff are aware of the BCEP and are suitably trained and co-operate fully in their implementation
- ensuring their visitors and contractors follow any instructions regarding evacuation and emergency relocation
- identifying the need for and establishing emergency teams to take action in emergencies and ensure that responsibilities are assigned to team members.

5.8.2 Incident Reporting and Investigation
The arrangements for incident reporting and investigation are published on the UCL website [http://www.ucl.ac.uk/estates/safetynet/guidance/accidents/index.htm](http://www.ucl.ac.uk/estates/safetynet/guidance/accidents/index.htm)
All incidents must be reported on the on-line system "RiskNET":
[http://www.ucl.ac.uk/estates/safetynet/](http://www.ucl.ac.uk/estates/safetynet/)

5.8.3 First Aid
UCL has two groups of qualified first aiders, those who have completed the 3-day First Aid at Work course (FAW) or the 1-day Emergency First Aid at Work course (EFAW).

Departments are responsible for reviewing their first aid needs assessments to ensure that the existing level of first aid cover is appropriate and adequate for the level of risk in the work areas. The assessment takes account of how many first aiders there are in a building, the type of work undertaken and the number of building occupants. The results of the Department’s first-aid needs assessment will help to determine the number required and whether the first aiders be trained in EFAW or FAW.

As a guide, first aiders with a FAW certificate will be required in workplaces with higher hazards or, where there are more than fifty people. Low-hazard workplaces may require only EFAW trained staff, but this will depend on other factors that a risk assessment should identify. For regulatory purposes, the EFAW certificate holder can act as a first aider in the workplace but not the First Aid Appointed Person (FAAP), whose role is to take charge of the first aid arrangements, including looking after the first aid equipment and facilities and calling the emergency services when required.

The UCL FAAP can provide emergency cover, within their role and competence, where a first-aider is absent due to unforeseen circumstance.

Both the UCL First Aid at Work (FAW) and the Emergency First Aid at Work certificate (EFAW) are valid for three years.

All qualified First Aiders are strongly advised to attend annual refresher training during their three year FAW/ EFAW certification period to help maintain their basic skills and keep up to date with any changes to first-aid procedures.

Guidance on UCL arrangements for the provision of first aid is obtainable from the UCL SafetyNET.
5.9 Management of Fire Safety

5.9.1 Fire Safety Information and Advice
Competent fire safety advice is provided by UCL Safety Services through the Fire Safety Manager and his team. The activities of the fire safety team are organized and arranged under a documented management system which provides assurance of quality of work and deliverables carried out by the team. The system is subject to internal and external audit as part of UCL Safety Services’ third-party certification under the British Approvals for Fire Equipment (BAFE) SP205-1 Scheme and National Security Inspectorate (NSI) Silver.

The fire safety team produce and maintain UCL Fire Safety Technical Notes and guidance which are available by using the following link: http://www.ucl.ac.uk/estates/maintenance/fire/ . As well as the routine tasks undertaken by the team, ad hoc advice is often required by department and Estates staff in respect of specific activities. This advice is, again, subject to quality control and audit under the management system.

Fire brigade information packs are produced for each building and placed in the building for use by the emergency services. Additionally, fire strategies and emergency plans are prepared, which provide information on the buildings for use by Estates and departmental staff.

Fire statistics relating to incidents and automatic fire alarms, such as false alarms, are maintained by the team and monthly reports are prepared. A key part of this process is the monitoring of trends, particularly in respect of false alarms, that can inform approaches to reduce and minimize such occurrences.

5.9.2 Fire Safety Management

The foundation of fire safety management at UCL is a risk-based approach. An annual review of the UCL Estate is carried out by the fire safety team, during which risks are considered on a building-by-building basis. Each building is given a ‘Category’, between 1 and 3, which reflects the experience of the UCL fire safety team in terms of assessment of the local fire management standards, process or storage hazards and the general standard of the building and the fire precautions therein. The review is qualitative as opposed to quantitative.

5.9.3 Fire Risk Assessment
Fire risk assessment is a core part of the fire safety management process. A fire risk assessment of each building is carried out using the PAS 79 methodology and documented using a bespoke pro-forma, looking at the building itself, the fire precautions and the activities and management of all departments within the building. Action plans will be created detailing remedial work required by departments to reduce or maintain the risk. The frequency of fire risk assessments is determined by the building Category.

- Category 1 buildings will be fully fire risk assessed every four years, being of a perceived lower risk. (These buildings will generally be small, with low numbers of people present, generally with office-type occupancy and good means of escape available.)
- Category 2 buildings will be fully fire risk assessed every three years, being of a perceived ‘standard’ risk. (These buildings will range from small to very large, with numbers of occupants also ranging greatly, as will type of
occupancy. However, hazards will be considered to be generally well managed, and means of escape will be considered reasonable.)

• Category 3 buildings will be fully fire risk assessed every two years, being of a perceived higher risk (relative to other UCL buildings). (These buildings will generally have higher fire loads, more flammable materials and/or other process hazards. There may be lower standards of management than at other UCL buildings, or lower staff numbers, and a combination of these factors may lead to the decision to class a building as Category 3.)

All fire risk assessment work carried out by UCL will be subject to external review under the BAFE SP205-1 Scheme.

Interim reviews of fire risk assessments are needed to ensure that actions are being completed and that significant change has not occurred since the existing fire risk assessment was completed. The fire safety team will carry out two types of review: Interim A Reviews and Interim B Reviews. All buildings will receive an Interim A Review prior to the fire evacuation drill at the building. Interim B Reviews will only apply to Category 3 buildings, in order that these buildings are subject to two inspections as a minimum per year.

5.9.4 Fire Evacuation Drills
All fire evacuation drills are carried out in UCL buildings during late September/October each year. Fire drills serve a legal compliance function, although offer additional opportunities for advancing fire safety standards at UCL (see Fire Safety Training section).

5.9.5 Fire Safety Training
There are three main training requirement categorisations for staff. These are induction training, refresher training and training for those with additional responsibilities.

• **Fire safety induction training** comprises completion of Basic Fire Safety e-learning available on UCL Moodle, coupled with a local walk of escape routes within their work area(s) by their departmental manager, Departmental Safety Officer (DSO), or Fire Evacuation Marshal (FEM).

• **Refresher training** - Staff working in Category 1 buildings should receive a full refresher training as per induction training every four years, staff working in Category 2 buildings should receive full refresher training every three years, staff working in Category 3 buildings should receive full refresher training every two years. Where an individual staff member works in numerous buildings, they should repeat the training in the frequency defined by the highest Category of building in which they work.

• **Fire Evacuation Marshals (FEMs)**, as general members of staff, will receive the UCL induction / refresher training as per the information detailed above. In addition, they will receive FEM e-learning through UCL Moodle. This qualifies them, on a basic level, to perform FEM duties.

• **Face-to-face instruction and guidance.** This takes the form of Toolbox Talks which are short discussions between a member of the fire safety team and UCL FEMs. The main points from Toolbox Talks will be documented, and a record provided to FEMs in order that they can pass on relevant information to colleagues in the general staff population. It also offers an opportunity for FEMs to discuss any concerns or queries with the fire safety team. FEMs will be asked to attend a Toolbox Talk after each drill and after each fire risk assessment.
5.9.6 Management of Fire Equipment

Fire safety signage and extinguishers are managed by the fire safety team. This includes the locations for signage and other equipment, organizing placement of equipment and maintenance of condition and location of equipment, including reactive maintenance. The team also provide specialist input into active fire equipment contract management, where those contracts are managed by others, such as UCL Estates, Facilities and Infrastructure (F&I). The UCL GMSC (see 3.4) provides advice on risk assessments of GM activities as

5.10 Management of Biosafety

5.10.1 Genetic modification

The UCL GMSC (see 3.4) provides advice on risk assessments of GM activities as required under the Contained Use Regulations. Because of the scale of the work carried out at UCL, only a proportion of assessments are formally reviewed by the committee when they meet once a term. However the University Biological Safety Adviser, on behalf of the GMSC, reviews and advises on all assessments as they are submitted to Safety Services; assessments of higher risk activities (Class 2 and 3) are also peer reviewed by at least 2 members of the UCL GM advisory pool. The GMSC formally ratifies all assessments when they meet. This ensures that GM work is not delayed, but allows both the UBSA and GMSC to maintain oversight of the activities across UCL.

5.10.2 Containment Level 3 activities

Containment Level 3 (CL3) laboratories are deemed by the Health and Safety Executive Biological Agents Unit to be high hazard facilities and as such need to be subject to high standards of management; both in term of the facility and the staff who work in them. Safety Services carry out a regular programme of inspection and audit of UCL’s CL3 laboratories (4 currently operational; one under derogation in accordance with the Contained Use Regulations), and also facilitate a UCL CL3 user group (includes representatives of managers and staff who work in the laboratories) to promote consistency of approach and sharing of good practice.

5.11 Management of Radiation

Radiation protection at UCL is coordinated by the Radiation Protection Officer (RPO) and Assistant RPO in Safety Services. The RPO works closely with the RPSs from the different departments and the RPA to ensure compliance with the legislative requirements of HSE, Environment Agency and other organisations, and includes internal auditing. The RPO and Licence Coordinator manage all aspects of UCL’s Environment Agency (Radioactive Substances Regulation) Permits including new applications, variations and revocations, and provision to the Environment Agency of Annual Pollution Inventory Returns. Departmental allocations and usage/ waste returns are managed by Safety Services through RSS, UCL’s dedicated radiation management database. Disposal of radioactive waste is managed by the Hazardous Waste Services Technician. The organisational and reporting structures for UCL management of radiation are shown in Section 3.2.
5.12 Monitoring of Performance

5.12.1 Responsibilities for Monitoring
Responsibility follows the line management structure so that checking of local controls will usually be done by local managers whilst checking of strategic control measures will be done by senior managers.

Checks which look at UCL as a whole will usually be done by senior management through the SMT and HSC and independently through UCL’s appointed auditors (KPMG) and the Safety Services audit function.

Management teams and/or the appropriate safety forums should monitor on a quarterly basis and where applicable the following:

- Accidents/Incidents (headline trends, investigation and closure analysis),
- progress against action plans
- analysis from active monitoring including management arrangements, inspections, assurance monitoring, responsibilities, training and risk assessments
- suspected work-related ill health
- third party performance, eg contractors, suppliers
- key risks and issues including significant projects and legal and other changes
- Issues from other forums (ie actions)
- Issues to be escalated to other forums (recommendations)
- key audit items

The amount of monitoring that needs to be done, i.e. the frequency and depth of measurement will depend on several different factors, including:

- mandatory monitoring requirements with defined maximum intervals
- the degree of risk associated with the particular location/activity
- the likelihood of accidents/incidents occurring
- individual UCL requirements.

Key monitoring arrangements should be specified in the Departmental Arrangements.

5.12.2 Proactive Monitoring
Proactive monitoring includes:

(a) monitoring of the achievement of specific plans
(b) achievement against agreed performance targets and objectives
(c) performance against identified actions, eg number outstanding/ number complete/ effectiveness
(d) the systematic inspection of work systems, premises, plant and equipment, including for example, the number of inspections carried out against plan/ number of non-conformances found per inspection
(e) surveillance of workers' health, where appropriate, through suitable screening methods for early detection of signs and symptoms of harm to health in order to make appropriate adjustments to work and to determine the effectiveness of prevention and control measures

Proactive monitoring should be proportional to the hazard profile and include activities undertaken by third parties on UCL’s behalf. Activity should concentrate on areas where it is likely to produce the greatest benefit and lead to the greatest control of risk. Key risk control systems and related workplace precautions should
therefore be monitored in more detail or more often (or both) than low-risk systems or management arrangements.

5.12.3 *Reactive Monitoring*

Reactive monitoring includes the identification, reporting and investigation of:
(a) work-related injuries, ill health (including monitoring of aggregate sickness absence records), diseases and incidents
(b) other losses, such as damage to property
(c) deficient safety and health performance
(d) health and safety management system failures
(e) adverse publicity, prosecution

Departmental arrangements should ensure that a follow-up procedure is established and operated to track the progress of actions arising out of the monitoring processes.

5.12.4 *Reporting and Investigation of Accidents & Incidents*

All accidents, including near misses, that occur during the course of UCL work must be reported promptly and investigated to determine lessons learned. The reporting and investigation procedure is mandatory and provides essential information to:
- ensure action is taken to prevent recurrence
- meet statutory requirements
- help monitor and improve health and safety performance
- provide information for responding to claims made against UCL
- enable UCL to respond quickly and accurately to external enquiries
- The reporting of incidents is the responsibility of the individual or individual’s line manager and must be done through the riskNET on line reporting system: [http://www.ucl.ac.uk/estates/safetynet/](http://www.ucl.ac.uk/estates/safetynet/)

Under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR, 1995) the University has a statutory obligation to report certain types of incidents and accidents to the HSE. This includes fatalities, certain types of major injury, injury which results in an individual not being able to work for more than 7 days, certain diseases and certain events, which although may have not resulted in any injury, have the potential to do significant harm.

All reports to HSE are made by UCL Safety Services. The HSE may investigate any incident / accident which is reported to them.

5.12.5 *Monitoring of Third Party Performance and Compliance*

The frequency and extent of monitoring will vary from contract to contract depending on the nature of the goods or services being supplied, and for shared workplaces, on the agreed responsibilities between the two parties. Projects being undertaken on behalf of UCL Estates are monitored by UCL Estates. For shared workplaces further information is provided at: [http://www.ucl.ac.uk/estates/safetynet/guidance/management/index.htm](http://www.ucl.ac.uk/estates/safetynet/guidance/management/index.htm)

5.13 *Reporting Of Performance*

5.13.1 *Preparation of Executive Level Reports*

The Head of Safety is responsible for the monitoring of UCL-wide issues on behalf of HSC. Safety Services collects measurement information which is pertinent to
UCL as a whole including accident figures, progress against plans and achievement of UCL wide actions. Safety Services is responsible for the management and development of the necessary tools for the collection of the relevant UCL-wide health and safety data.

5.13.2 Annual Report to Council
The Head of Safety, on behalf of the HSC, is responsible for providing health and safety performance information for the annual report to Council.

5.13.3 UCL Safety Performance Report
The Head of Safety is responsible for the preparation of a safety performance report which is submitted to HSC each quarter. The report provides the source of the majority of information provided to the SMT.

5.13.4 Departmental Safety Performance Reports
Departments are responsible for the collection and consideration of Information on the safety performance and the arrangements should be documented in the Departmental Organisation and Arrangements. Where a Department has a safety committee this information will form part of their considerations. The Head of Department, through the established reporting mechanisms in place, must seek assurance that there is evidence to demonstrate that the department’s activities are being undertaken safely and that key safety responsibilities, objectives and plans are being met.

Specific reports, as well as a query function capability, are held within RiskNET.

5.14 Audit

5.14.1 Audit Responsibility and Audit Programme
Safety Audits are carried out principally by UCL Safety Services. Additional independent audits can also be undertaken by UCL’s auditors, KPMG. The safety audit programme is risk based and the results of the audits are reported to the HSC. The overall plan is subject to amendment in light of continuing discussions within UCL to highlight priorities for gaining assurance and the changing risk profile of UCL. All Departments are required to afford proper co-operation.

Recommendations resulting from the audit exercise are referred to the relevant department and actions agreed. A review of the implementation of recommended remedial action is carried out by Safety Services as part of its assurance activities.

Topics or work-areas are selected for audit based on the following criteria:
- Where a high level of risk is associated with an area, project, process or system which may be safety-critical
- To follow up on previous control recommendations
- It is recognised as a significant area for which no review has been recently conducted
- The area is undergoing significant change
- Where a possible control weakness has been identified, for example, following a serious accident investigation
- A request from HSC or executive management
- Specific interest by an enforcement agency
5.15 Review of Performance and Continuous Improvement

5.15.1 Management Review

The adequacy of health and safety performance and the suitability, adequacy and effectiveness of arrangements for the management of health and safety need to be assessed and actions necessary to remedy deficiencies and effect improvements need to be taken.

Review is carried out at all levels of management of UCL. Reviewing includes responses to:

- actions taken by first-line supervisors or other managers to remedy failures to implement workplace precautions which they observe in the course of routine activities
- remedy sub-standard performance identified by active and reactive monitoring
- the assessment of plans at individual, departmental, site, group or organisational level
- the results of audits

Departments should decide on the frequency of the reviews and include and document in their Departmental Organisation and Arrangements suitable reviewing activities. Where improvement is required specific remedial actions which establish who is responsible for implementation and the deadlines for completion should be determined.

The SMT receives a Quarterly safety review report of UCL’s performance and the Council will receive an annual report summarising key activities and performance for safety from the HSC. This is designed to help answer two questions:

- Is UCL getting the basics right?
- Is it making and sustaining progress and continual improvement?

These results and other internal and external influences including reorganisation, new legislation or changes in current good practice, can result in redesign or amendment of any parts of the health and safety management system or a change in overall direction or objectives.

5.15.2 Continuous Improvement

The management review processes, outcomes and actions should feed into the continuous improvement cycle for the management system as a whole and should take into account the following:

(a) health and safety objectives of UCL
(b) results of hazard and risk identifications and assessments
(c) results of performance monitoring and measurements
(d) investigation of work-related injuries, diseases, ill health and incidents, and the results and recommendations of audits
(e) recommendations for improvement from all members of the organization, including the relevant committees
(f) changes in national laws and regulations, voluntary programmes and collective agreements
(g) new relevant information
(h) results of health protection and promotion programmes.