



Health and Safety Policy

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1 Health and Safety Policy Statement

The United Colleges Group (UCG), comprising City of Westminster College (CWC) and the College of North West London (CNWL), is committed to giving the highest priority to the safety, health and welfare of all employees, learners, contractors and visitors.

United Colleges Group provides and administers learning to approximately 20,000 learners aged 16 to 21 and adults. A significant proportion of learners do not have English as their first language, and a small but significant number of students have cognitive and/or physical impairments.

UCG provides learning in desk-based subjects such as Accountancy (many using display screen equipment) and skills-based subjects ranging from Beauty Therapy to Welding (involving a wide variety of chemicals and equipment). Learning takes place in a range of locations including classrooms, salons, laboratories and workshops, and through excursions, trips and visits to other sites.

UCG operates a range of facilities and services across six locations in London including both old and new training facilities and a theatre.

United Colleges Group regards the advancement of programmes, guidelines and procedures that protect the safety, welfare and health of any person engaged in work or employment as one of its foremost responsibilities and sees this as a mutual objective for employees at all levels. Staff & Students are expected to co-operate with UCG's Health and Safety Policy and supporting arrangement and safety management system. United Colleges Group's Health and Safety Policy is to do all that is reasonably practicable to provide secure, safe and healthy working conditions for its employees, learners, visitors, contractors, members of the public and all other users of College facilities.

Signed.....

Date.....

Chief Executive Officer

2 Procedure

- 2.1 The details of the organisation and arrangements for the implementation of this policy are set out in the College's Health and Safety Procedures, copies of which are available to all College Managers and Health and Safety Representatives on the College portal/intranet.
- 2.2 In formulating, implementing and updating its policy and arrangements for the promotion of Health and Safety, the United Colleges Group takes advantage of the support, information and training on Health and Safety provided by the Association of Colleges.
- 2.3 All staff of the College must take reasonable care of their own Health and Safety, and that of others who may be affected by their acts or omissions, and must cooperate with their employers on Health and Safety matters. The various policies and procedures contained in the Manual, which augments this Policy Statement, gives details of the specific responsibilities of members of staff in various situations and activities.
- 2.4 Health and Safety guidance is provided to all our staff and learners as part of their induction. The Manual of Guidance is available to all staff via the College portal/intranet.
- 3.5 Ctrl + Click this staff link for CWC Health and Safety Procedures, Manual and sample forms – http://portal2010.cwc.ac.uk/services/H_and_S/Pages/default.aspx For CNWL - <http://staffsp.cnwl.ac.uk/Health%20and%20safety%20Risk%20Assessment/Forms/summary%20view.aspx>

3 Duties and responsibilities

All employees, learners, contractors and visitors and those using the United Colleges Group facilities have a duty to support the Health and Safety Policy by:

- 3.1 Working safely.
- 3.2 Taking reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work.
- 3.2 Operating equipment which they are authorised to use, in accordance with statutory obligations in the safe use of plant machinery and operations.
- 3.3 Using safety devices and/or protective equipment provided.
- 3.4 Not intentionally or recklessly interfering with or misusing anything provided in the interests of health, safety and welfare.
- 3.5 Promptly reporting in writing all incidents that have led or may lead to injury, damage or the impairment of health.
- 3.6 Assisting in the investigation of accidents and incidents with the object of introducing measures to prevent recurrence.
- 3.7 Adhering to College procedures agreed on their behalf for securing a safe workplace for all.

4 Delivery of Policy

- 4.1 The United Colleges Group has arrangements in place for the management of health and safety risk. These controls include steps to control risk, to react to changing demands and to promote and sustain positive health and safety attitudes and behaviours.
- 4.2 There are established processes for ensuring that risks are assessed and that control measures are implemented. These arrangements are currently documented within Risk Assessment and Risk Management processes which are standard cross-college.
- 4.3 Processes are in place to address accident, incident and emergency reporting; first aid provision; emergency evacuation (including personal emergency evacuation planning); business continuity; safeguarding; and the provision of support for learners with medical conditions.

Policies are in place for organised excursions and trips; college vehicles; no smoking policies; terrorism threat and lockdown procedures.

- 4.4 The United Colleges Group has defined expected behaviours across all levels of the organisation as a part of the staff *UCG Code of Conduct*. All employees are expected to play their part to disseminate to learners, contractors and visitors appropriate conduct and the fulfilment of the health and safety policy.

Additionally, the United Colleges Group relies on the activities of Health & Safety committee members, first aiders, fire wardens and others to execute their activities in a manner which reflects this policy.

Everyone is expected to continually and consistently promote, advance and sustain good health and safety attitudes and behaviours.

The United Colleges Group has deployed a variety of signage, systems and processes to illustrate good health and safety practice across all departments.

- 4.5 The United Colleges Group recognises that it undertakes a wide range of activities across a wide range of environments which, by their very nature, are hazardous.

According to the HSE, the most common risks of workplace injuries relate to:

- Slips, trips and falls on the same level,
- Lifting and handling (Manual Handling),
- Being struck by an object,
- Falls from height,
- Acts of violence,
- Contact with machinery, or
- Striking against something that is fixed or stationary.

Activities across the United Colleges Group introduce other significant risks, which include:

- Building Works (including the management of asbestos)
- Chemical and chemical associated risks (including biocides, chemical labelling, packaging, use, handling, storage and transportation)
- Confined space work
- Construction activities
- Display Screen Equipment

- Electricity
- Emergency Events, including fire, first aid, terrorism
- Flammable and explosive materials, including gas and acetylene in a manner which causes potentially explosive environments
- Infectious Diseases
- Lifting Operations and Lifting Equipment
- Safeguarding
- Work Equipment
- Work at Height
- Maintenance tasks including hot works and air conditioning

Many of these risks are significant not only because they relate to the nature of the premises, but also because they form a part of college delivery to learners who may have little or limited knowledge, skills and experience in handling the risks.

Over time, data from accident, incident and emergency reporting will be analysed to improve the risk profile and ensure that significant risks are adequately controlled.

5 Organising for Health and Safety

5.1 The UCG Corporation is ultimately responsible in law for the regulatory Health and Safety requirements. Governors will demonstrate their health and safety commitment by:

- monitoring the overall health and safety performance and legislation compliance of UCG and ensure all policy and services reflect good standard of health and safety.
- Review annual health and safety reports and this policy
- Ensure that adequate resources are available to discharge UCG's health and safety commitments
- Review and consider overall health and safety trends and issues likely to impact UCG and others
- Help to promote good health and safety culture

The operation of Health and Safety requirements are delegated to the UCG Executive. This policy sets out the responsibilities and accountabilities of the Group Chief Executive Officer, the Senior Leadership Team, the Senior Management Team, the Supervisory team and staff.

5.2 **The Chief Executive Officer (CEO)** plays a key role in leading strategic health and safety, and has strategic oversight of all matters related to health and safety for the Group. The CEO should seek assurance that effective arrangements are in place and are working.

This requires:

- The establishment and maintenance of a health and safety policy which addresses significant health and safety risks and ensures safety in the event of serious and imminent danger.
- The monitoring and oversight of steps to ensure health and safety which include reporting key performance indicators relating to health and safety and discussion of health and safety in management meetings.
- Assurance that arrangements for health and safety are adequate in so far as they relate to emergency events, risk control measures, training and competence, including health and safety committee meetings.
- Management systems and processes are in place to ensure awareness of

significant risks.

Adequate mechanisms to ensure competent health and safety advice, independent health and safety management reviews, audit processes are in place and lessons are learnt from accidents and incidents.

- 5.3 **The Senior Leadership Team (SLT)** have the responsibility for influencing and shaping the strategic direction of the Group. Members of the SLT are expected to demonstrate the same leadership qualities in health and safety as they do in their academic or professional field.

Although the SLT are expected to delegate operational aspects of health and safety management to other managers, accountability remains with them. They must implement a process that provides assurances that responsibilities are being fulfilled.

This requires:

- A firm and on-going commitment to the implementation of the health and safety policy including clear demonstration of ownership and active communication of values.
- Agreement to the health and safety risk register, comprising identified significant risks and agreed control measures.
- Support for occupational health and health surveillance programmes.
- Establishment and regular checking of emergency procedures through drills and local relationships with the emergency services.
- Measurement, monitoring, and reporting on steps to improve safety; inspections and investigations; and action plans.
- Regular communications with competent health and safety professionals, health and safety committees, and others on health and safety matters.
- Allocation of sufficient resources for health and safety (time, cost, training, etc.)
- Discussion with direct reports on matters relating to health and safety.
- Support for the internal audit programme.
- Celebration of achievements and corrective actions to address failings.

- 5.4 **The Senior Management Teams (SMT)** shall develop the Health and Safety plan as it relates to their department, implement local safety management arrangements, and manage risks to protect staff, students, visitors and contractors.

Because of their clear understanding and oversight of operations and activities undertaken in their departments, they are well placed to define the most appropriate local safety systems to support the Health and Safety of the Group.

This requires:

- Local health and safety plans aligned with Group Policy, ensuring that local risks are appropriately captured in the health and safety risk register.
- Regular communications with their competent health and safety advisor.
- Produce and communicate an annual safety plan (action plan) for their area. Take steps to implement actions and recommendations, and check that actions and recommendations have been implemented.
- Plan local arrangements for managing health and safety that reflect levels of risk.
- Ensure that induction processes include mandatory Health and Safety Training for new starters and that this is delivered during the first week.

- Routinely inform and consult with staff on matters relating to safety and health.
- Conduct inspections at appropriate intervals, oversee accident and incident investigations, and analyse other relevant safety data to inform the health and safety plan.
- Ensure all activities are appropriately risk assessed and controls are implemented.
- Assess the health and safety impact of new projects, including the health and safety implications associated with new equipment, environment and persons.
- Provide support to local consultation processes including the Health and Safety Committee.

5.5 **Line Managers and Supervisors** are expected to implement local health and safety arrangements, and to monitor and check their effectiveness.

This requires:

- Planning activities relating to risk assessments and control measures, organising resources to achieve health and safety objectives. Check their own progress against the action plan.
- Monitor training plans and inductions. Provide induction and other training in accordance with plans and agreed timescales.
- Ensure risk assessments are undertaken and recorded, that control measures have been implemented, and that staff, contractors and learners are following all safe systems of work and control measures.
- Take appropriate action when health and safety is likely to be compromised.
- Provide staff with health surveillance if identified in risk assessments.
- Lead a programme of inspections and statutory testing within prescribed timescales, lead on accident and incident investigations, and be involved in audits when asked.
- Ensure new processes and equipment are properly assessed and that employees and learners are trained in safe systems and control measures before use.
- Keep up to date with the health and safety requirements for their area of responsibility.
- Analyse safety data to identify emerging trends in their area of responsibility. Report on findings to the SMT, safety committee and health and safety advisor.

5.6 **Health and Safety Officer Duties**

A Health and Safety Officer is appointed and is qualified to ensure the day-to-day running of health and safety management systems and supporting procedures including:

- Monitor the Implementation of UCG's Health and Safety Policy and safety management system
- Carry out safety tours and site inspections
- Investigate incidents, accidents and near misses to ensure lessons are learnt to prevent recurrence
- The first point of contact to liaise with visiting health and safety professionals, including the HSE, local fire brigade and partner requiring health and safety support to deliver UCG's business operations

All employees, learners, contractors and visitors and those using the United Colleges Group facilities are expected to meet the expectations laid down in the Health and Safety Policy.

6 Implementing for Health and Safety

- 6.1 The United Colleges Group will take reasonable steps to ensure that everyone assigned responsibilities through this policy is competent to carry out their work safely, and that there is adequate supervision in place to ensure that arrangements are followed.

Within the United Colleges Group, the policy is implemented through a combination of Safety Arrangements that define how hazards should be managed, through a process of Risk Assessment which identifies significant risks and the measures necessary to control them, and a process of Annual Department Audit.

- 6.2 **Safety Arrangements** define significant risks and provide advice and guidance which has been developed to meet the specific task, environmental and people requirements of the United Colleges Group.

They set down the significant risks associated with relevant hazards and provide standards, define responsibilities, risk assessment considerations, relevant legislation and related policies and procedures.

Where appropriate, they also include a specific risk assessment for use when considering related risks.

They are intended to provide support to the Senior Leadership Team to help them to understand what is expected, to provide guidance to the Senior Management Team to help them to identify the steps that need to be taken to comply with the law, and to explain the actions that need to be taken by line managers and supervisors to ensure that the United Colleges Group fulfils its legal obligations.

Collectively, they form the basis for managing safety across the United Colleges Group.

- 6.3 The United Colleges Group has a statutory duty to undertake suitable and sufficient risk assessments of all significant hazards including those for Covid 19. These risk assessments are available for review.

The Risk Assessment process is intended to ensure that risks at a local level are addressed appropriately, consistently and proportionately, in a manner that reflects the specific circumstances of each department and the statutory obligations of the United Colleges Group.

The United Colleges Group undertakes a significant proportion of its work with learners with limited knowledge, skills and experience in their chosen subjects. Teaching is intended to prepare learners for life in real working environments. It is important that the risks that are likely to be faced in work beyond college are accurately represented, and that learners understand the control measures necessary to protect their health and safety later in life.

Risk Assessments should ensure that this fine balance between knowledge, skills and experience and control measures is carefully managed in a way that reflects the growing capabilities of learners as they progress.

Monitoring the Health and Safety Performance of Contractors & partners

In order to ensure health and safety awareness and compliance outside contractors will supply proof of their employee's competence, relevant risk assessment, method statements and company health and safety policy statement. The contractor / Partners is also expected to observe all Health and Safety policy, arrangements and site rules UCG will observe and work in accordance with Construction (Design and Management) Regulations 2015 (CDM 2015)

- 6.4 **Annual Department Audit.** Every year each department/facility shall undertake an annual health and safety audit. This audit should review performance – looking at factors like accidents, incidents and emergencies, as well as training records, inspection records, changes to working environments, equipment, or processes, and re-evaluate defined control measures.

Where appropriate changes to control measures, including training, should be defined in an annual department Action Plan that sets out Health and Safety goals for the next twelve months.

These processes are underpinned by a process of external audit and review.

- 6.5 **Investigating Incidents and Accidents.** The United Colleges Group investigates accidents, fire safety events, first aid reports, and a variety of incident data. Investigations seek to ensure that events do not happen again, and that the risks that led to those events are adequately controlled to prevent, reduce or mitigate the risk of harm.

Where appropriate, events are reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (as amended).

Near miss: an event not causing harm, but has the potential to cause injury or ill health. The reporting of near misses is a vital and key tool in proactive health and safety culture. UCG's aim is to reduce incidents and accidents by encouraging and promotion of near miss reporting, investigation and analysis.

- 6.6 **Measuring Health and Safety Performance.** Effectively measuring health and safety performance helps to identify what is working and how the United Colleges Group can do things better in future. The United Colleges Group uses a combination of active and reactive measures to monitor performance. The balance between collating and reporting data needs to be proportionate to the risks.

Active measures examine those factors that are intended to reduce the likelihood of incidents, such as numbers of persons trained, risk assessments reviewed/completed, etc., whilst reactive measures examine health and safety outcomes such as numbers of incidents, accidents and emergencies recorded.

Annual and seasonal health and safety reports detail such factors as:

- Health and Safety Committee activity
- Health and Safety Advisor oversight
- Training Records
- Risk Assessment performance
- Fire Safety Events, First Aid and Fire Warden staff, facilities and equipment

- Accident data (including RIDDOR Reports where appropriate) – by location, type of injury, who was injured, accident cause
- First Aid reports
- Incident data (including theft, fight, damage, anti-social behaviour, near miss, off-site incidents, trespass, and other)

This information is issued to senior leaders at least annually.

Occupational Health Services

UCG has an appropriate Occupational Health Service to assist it in meeting its health, safety and wellbeing duties

- 6.7 Reviewing Health and Safety Performance and Learning Lessons.** Data on health and safety performance is considered at a strategic level, as well as at regular Health and Safety Committee meetings. Information is shared with Department Managers as part of the Annual Department Audit process.

Data is reviewed to establish:

- The validity of the health and safety policy statement,
- The achievement of measures defined in the health and safety policy, and
- The effectiveness of implemented measures in reducing risk and harm.

Performance on each of these measures helps to identify gaps and support the development of action plans to address shortfalls in performance.

Reviews enable leaders to consider what improvements need to be made and to celebrate achievements, and to ensure that risks are as low as reasonably practicable (a statutory obligation).

Reviews enable managers to ensure that the system is working, that they are compliant with the law, and help to improve performance by helping to set goals, ensuring responsiveness to change, and that opportunities to learn from experience are captured.

Discussing results at Health and Safety Committee Meetings help the United Colleges Group to better understand the causes and circumstances that led to incidents or accidents, and enable better investment decisions to prevent, reduce or mitigate the consequences of events in future.

The United Colleges Group will review this Policy at least annually, or following any significant changes.

7 Related internal policies/procedures

Health and Safety Audit Policy; First Aid Policy; Manual Handling Arrangement; Control of Substances Hazardous to Health Arrangement; Personal Emergency Evacuation Plan Policy; Visits Trips and Excursions Arrangement; Safeguarding Policy;; Support for Learners with Medical Conditions Arrangement. New and Expectant Mother at Work Policy; No Smoking Policy; College Vehicle Policy; Lone-Offsite Working Arrangement; Code of Conduct; Working at Height Policy; Lock Down Procedure; Display Screen Equipment Policy; Capability Procedure; Disciplinary Procedure.

8 References/source information

The Health and Safety at Work Act 1974; the Management of Health and Safety at Work Regulations 1999; Control of Substances Hazardous to Health Regulations 2002; Consortium of Local Education Authorities for the Provision of Science Services (CLEAPSS); Reporting of Injuries Diseases & Dangerous Occurrences Regulations (RIDDOR); the Electricity at Work Regulations 1989; Manual Handling Operations Regulations 1992; The Provision and Use of Work Equipment Regulations 1998; Workplace (Health, Safety and Welfare) Regulations 1992; Safeguarding Vulnerable Groups Act 2006; The Equality Act 2010; Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) UK Data Protection Act 2018; Counter Terrorism and Security Act 2015; The Health and Safety Executive (HSE); the Association of Colleges (AoC).

9 Equality impact statement

United Colleges Group is committed to eliminate unlawful discrimination, harassment and victimization, advance equality of opportunity and foster good relations by equality impact assessment in accordance with the Equality Act 2010.

10 Monitoring compliance

- 15.1 This policy will be kept up to date for UK health and safety legislation changes and where the College's activities change in nature and volume. The Policy, and the way in which it is operated will be reviewed annually or following a significant incident or change.
- 15.2 Measures of safety performance will be captured and monitored in accordance with the *Health and Safety Audit Policy* as amended to inform the Executive Team / Senior Management Team and the Health and Safety Committee.

11 Definitions used in this policy

This amount of terminology definitions is not exhaustive or prescriptive, should further definition of terminology in this policy be required contact the Health and Safety Advisor:

Accident – An accident is a separate, identifiable, unintended incident, which causes physical injury. This includes acts of non- consensual violence to people at work.

Hazard – A hazard is anything that may cause harm, such as chemicals, electricity, working from ladders or an open draw.

Health – Health is defined as a state of physical, mental, and social well-being.

Incident – An incident is an unintended event that disturbs normal operations, incidents range in severity from near misses to fatal incidents.

Near miss – A near miss is an unplanned event that did not result in injury, illness, or damage – but had the potential to do so. Near miss incidents often precede loss producing events but may be overlooked as there is no harm (no injury, damage or loss).

Report in writing – A report in writing is a signed written account or electronic written statement that describes in detail an event, situation or occurrence, usually as the result of observation or inquiry.

Risk – A risk is a chance, high or low, that someone could be harmed by hazards, together with an indication of how serious the harm could be.

Safety – Safety is defined as the control of recognised hazards in order to achieve an acceptable level of risk.