Code of Practice 02

2nd Edition, December 2023

THE UNIVERSITY OF READING’S OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM

Document Control

<table>
<thead>
<tr>
<th>Summary</th>
<th>Provides an overview of the University’s Occupational Health &amp; Safety Management System – its separate elements, how they interact – and establishes basic responsibilities and requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document type (CoP / SN)</td>
<td>Code of Practice</td>
</tr>
<tr>
<td>Document owner</td>
<td>Jenny McGrother, Director of H&amp;S Services</td>
</tr>
<tr>
<td>Document status (Draft / Final)</td>
<td>Final for publication</td>
</tr>
<tr>
<td>Version</td>
<td>2nd Edition</td>
</tr>
<tr>
<td>Approved by</td>
<td>University Health, Safety &amp; Wellbeing Committee</td>
</tr>
<tr>
<td>Date checked for accessibility</td>
<td>17/01/24</td>
</tr>
<tr>
<td>Date of publication</td>
<td>17/01/24</td>
</tr>
<tr>
<td>Next review date</td>
<td>January 2027</td>
</tr>
<tr>
<td>Revision frequency</td>
<td>3 years</td>
</tr>
<tr>
<td>Superseded documents</td>
<td>CoP 2</td>
</tr>
<tr>
<td>Related documents</td>
<td>CoP 01, other CoPs</td>
</tr>
</tbody>
</table>
1. OVERVIEW

1.1. Introduction to CoP 2

CoP 2 defines the University’s Occupational Health and Safety Management System (OHSMS). This first chapter provides a summary overview of the OHSMS and describes elements within the system. Later chapters define high-level responsibilities and requirements.

CoP 2 should be considered alongside the overall University Health & Safety Policy and other policy and procedural documents published by Health & Safety Services, Estates, HR / Occupational Health, Technical Services, Student Services, etc.

1.2. Scope of CoP 2

This Safety Code of Practice describes the OHSMS for all University of Reading’s activities, on and off campus.

1.2.1. Subsidiary organisations

The University has subsidiary companies and overseas branches, including Henley Business School (HBS) South Africa and University of Reading Malaysia. They must develop and maintain their own health and safety management arrangements, which should comply with University of Reading policies and procedures, unless these conflict with in-country legislation and standards. If an alternative approach is required this should be agreed between the subsidiary’s governing body, the University Health, Safety and Wellbeing Committee (UHSWC) and the Director Health & Safety Services.

1.3. Context

The University manages health and safety within a diverse set of work environments, including

- classrooms, offices, toilets and corridors
- laboratories, workshops, libraries, museums, archives and specialist storage areas
• catering outlets, bars, kitchens and hotels
• indoor and outdoor sports areas
• vehicles, car parks, roads, pavements, woodlands, bridges, lakes and riversides
• glasshouses, polytunnels, a milking parlour and other farm worksites
• plant rooms, sub-stations, basements, roof spaces and construction sites

Our community undertakes work activities in environments we do not control, including:
• fieldwork and study trips, including in highly urban and remote rural locations across the world
• teaching at partner campuses
• participation at conferences
• research in other institutions, including within highly-specialised, high-hazard facilities

Students also undertake placements in industrial, commercial and healthcare settings, and study abroad at various institutions.

On campus, our community interacts with commercial tenants, their contractors and visitors. Off campus, we are landlord for various premises, including residential properties.

Some of the hazards we manage are obvious, and the risk controls are simple and straightforward. Other hazards are novel, bespoke, invisible, or require sophisticated and specialised risk control arrangements. Some hazards lead to harm only after a long period of exposure or a long time after exposure.

The University is committed to managing risks appropriately, paying particular attention to the health & safety needs of the most vulnerable in our community.

The OHSMS drives continual scrutiny and improvement of itself, undertaken by parties including HSCs, local H&S committees, UHSWC, HSS and, where appropriate, external auditors.
1.4. Communications flows within the OHSMS

1.5. Elements within the OHSMS

The OHSMS features distinct elements intended to work separately and together as a system.

1.5.1. Documents

Key OHSMS documents include the overall corporate H&S Policy, Strategic H&S Objectives, the Fire Safety Management Plan, the Asbestos Management Plan, and the University's Safety Codes of Practice. These documents define policy, strategic objectives, responsibilities and minimum requirements. They are typically maintained by Health and Safety Services (HSS), approved by the UHSWC and available on the HSS website.

Each School and Function is also expected to produce its own Local H&S Code, defining local H&S management arrangements. These documents are typically maintained by HSCs and approved by Heads of Schools or Functions (HoS/F) and the local H&S committee.

A H&S Performance Report is sent to Council annually. It is typically prepared by HSS on behalf of the Chair of the UHSWC and is approved by UHSWC and UEB before submission to the Scrutiny & Finance Committee (a sub-committee of Council) and then Council itself.
1.5.2. **H&S Committees**

The overall role of the University Health, Safety & Wellbeing Committee (UHSWC), its sub-committees, and local School and Function H&S Committees, is to monitor performance and drive improvement. Local H&S Committees also facilitate consultation with local staff and students, advise School or Function (S/F) leaders about the effectiveness of local H&S arrangements, and escalate issues to the UHSWC, where appropriate.

Every School and Function is expected to ensure its activities are covered by at least one H&S Committee. Many S/F have their own, single H&S Committee, but there are some hybrid arrangements – See Chapter 2.

1.5.3. **Health & Safety Co-ordinators (HSCs)**

Across the University, over 50 members of staff act as HSC - either part-time, in addition to their main job, or full-time. HSCs are typically the first point of contact for staff and students with routine H&S enquiries. HSCs undertake most incident investigations. They receive training and, in the case of those taking on duties in addition to their substantive role, a responsibility allowance. HSCs can access support and multiple additional resources via their designated Liaison Advisor within HSS.

1.5.4. **Defined Individual Authorities / Dutyholders**

Several roles have been established as corporate or school authorities or dutyholders, empowered to make decisions within a distinctive field of operations or hazards. These include the Biological Safety Officer, the Asbestos Responsible Person, and School Laser Safety Supervisors. Estates appoints Dutyholders for essential areas of maintenance, including pressure and electrical systems. Role holders are appointed by letter or by job description.

In some instances, a legally-required role may be fulfilled via contract with an external specialist, e.g. Radiation Protection Advisor. In these cases the contract is typically managed by HSS.

1.5.5. **H&S Competence Requirements**

H&S Competence requirements for Defined Individual Authority roles will typically be defined within key OHSMS documents or by HSS advice. Schools, Functions and HSS collaborate to ensure these roleholders’ induction and learning needs are met.

HSS provides senior staff with tailored training and coaching in H&S leadership, knowledge and skills. H&S Competence requirements for all other roles, and thus induction and learning needs for each individual student or staff member, are defined by Schools and Functions. These competence requirements, along with associated supervision and authorisation requirements, and the local rules which implement them, will typically be defined within each School’s or Function’s Local H&S Code or associated documents. For example, a School’s local rules may state that students must not undertake any activity within a workshop until they have received a workshop induction. That induction will explain that students must not use the bandsaw unless they have been locally trained in that specific machine, and even then may only use it when under close supervision, until the student demonstrates they are competent, at which time they may be authorised to use the equipment without close supervision, but still only when the workshop overall is being supervised by a responsible technician.
In the case of staff it is their line manager who ensures H&S competence requirements are defined, induction and learning needs are identified and met, and competence is achieved. In the case of students, it will be their tutor or module convenor, as determined by the School Director for Teaching and Learning.

Fulfilling competence requirements is achieved through learning opportunities provided by Schools and Functions directly, or by utilising HSS’s Learning Programme. Consultancy and advice on all above competence matters is available from HSS, via HSC request.

Competence requirements should be identified through risk assessment. For more detail on Competence and Training see Chapter 6

### 1.5.6. Professional H&S Advice

Access to professional H&S advice is available to HSCs from their HSS Liaison Advisor, and is available to HoS/F from the Director of HSS. Access to professional Occupational Health advice is available to managers from the Occupational Health Service. When necessary HSS and OHS will seek external specialist advice. Most advice is reactive, in response to specific requests. However, HSS and OHS may proactively provide advice, especially where evidence suggests a School/Function (S/F) is struggling to achieve required standards of risk assessment, risk control, competence or leadership. See Chapters 3, 6 and 7.

### 1.5.7. Monitoring and Performance Reporting

Local H&S Committees and HSCs decide on their own local monitoring arrangements, and these will typically be defined within Local H&S Codes. Various processes provide corporate H&S Performance Indicators to the UHSWC. A H&S Performance Report is provided annually to Council. See Chapter 7.

Occupational Health Surveillance is provided by OHS.

### 1.5.8. H&S Auditing

H&S auditing is a structured, rigorous means of examining the completeness and effectiveness of H&S management arrangements. It provides those in control of work activities, workplaces and equipment with evidence of non-compliance and good practice. Where performance falls below required standards, the auditing process requires the creation of an improvement action plan and demonstration of actual improvement. H&S auditing provides senior leaders with H&S “assurance” – that is, reliable information on where management arrangements are working well, improving or failing to improve, despite advice.

A programme of formal H&S auditing of selected teams, hazards or risk control measures is organised by HSS, with contributions from across the University, and from external specialists where appropriate. The process is defined and transparent, and includes escalation to University Executive Board (UEB) where deficiencies are severe or where S/F do not demonstrate necessary improvement. See Chapter 7.

### 1.5.9. Incident Preparedness, Response and Investigation Processes

Multiple resources (including procedures, templates and digital systems) combine to ensure that
staff, students and others can promptly notify the University of incidents, injuries, ill-health, near misses and other H&S concerns.

A proportionate response is mobilised as rapidly as appropriate, to provide first aid and prevent or reduce harm.

Investigation is undertaken by trained personnel, learning is captured and shared, and recommendations for improvement are communicated to those best-placed to act due to their control of workplaces or activities.

These resources include:

- first aid arrangements (including policy, Code of Practice 8, and local First Aid Needs Assessments), First Aider Training and defibrillator maintenance
- the Major Incident Plan
- the Emergency Exercise Programme
- the HSS Incident Notification system
- the Incident Allocation and Write-Up Procedure
- Occupational Health/HSS arrangements for notification and investigation of occupational ill-health cases.

HSS develops and maintains many of these resources, however contributions are required from across the University. See Chapter 5 and CoP 9.

### 1.5.10. Leadership

Senior leaders provide H&S leadership through personal example: by complying with University and local H&S rules and thus setting a good example; by promptly thanking those who raise good-faith H&S concerns and responding effectively; and by ensuring H&S matters are prioritised within management discussions and decision-making.

Senior leaders provide H&S leadership strategically by integrating H&S risk management into wider risk management work, participating in audits, setting objectives for teams and individuals, devising improvement action plans, and monitoring progress. They may provide leadership tactically by participating in incident response. See Chapter 2 and 5.

Senior leaders are also expected to reflect on their teams’ and their own contribution and exploit development opportunities. These include lessons learned activities, one-to-one safety leadership coaching, e-training, in-person training, and tailored workshops available from HSS. See Chapters 2 and 6.

### 1.5.11. Employee Consultation and Communications

Formal employee consultation is conducted corporately through trade union Safety Representatives and Staff Forum representatives on the UHSWC, and within trade union industrial relations work led by Human Resources. Other regular and ad hoc H&S consultation is conducted through discussion between HSS and the UCU and Staff Forum reps, and within local H&S Committees, with both staff and students.
Various communication routes are used to inform and alert selected audiences about H&S matters and changes. These include webpages, UHSWC/local committee communications, MS Teams channels for Major Incident Teams, email group mailing lists for HSCs and first aiders and In Brief articles. See Chapter 4.

### 1.5.12. Statutory Reporting and Permitting Processes

Arrangements are established to comply with legal duties to report specific incidents and occupational ill-health to enforcing authorities, and respond to their subsequent enquiries and investigations.

Arrangements are also established to collate information on specialist University activities (for example radioactive waste disposal or use of security-restricted substances) and submit annual returns to enforcing authorities, where required by UK legislation.

Arrangements are established to apply for permits, submit registrations, notifications and amendments and, where appropriate, surrender them, through official processes. Typically these requirements arise from research using highly-regulated hazards, notably radiation and biological materials.

HSS controls and co-ordinates the above, however contributions are required from across the University. See Chapter 3.

### 1.5.13. Periodic Review of the OHSMS

Every 3-4 years a structured review of the OHSMS will be undertaken by senior leaders and other stakeholders, co-ordinated by the UHSWC, and supported by HSS. The review will be informed by performance data, stakeholder feedback and professional advice on OHSMS design and operation.

The Periodic Review can, where necessary, recommend revisions to the corporate H&S Policy and the corporate Strategic H&S Objectives. It may also recommend significant changes to the elements and structure of the OHSMS, for the UHSWC to consider and approve. See Chapter 7.

### 1.6. Monitoring, review and improvement of the OHSMS

Local H&S Committees, and School and Function senior leaders, are expected to monitor and improve the performance of those elements of the OHSMS which they control directly. Annually S/F are expected to declare to HSS their 3 Top H&S Improvement Priorities (3TP) for the year ahead, and report progress on the previous year’s 3TP. Professional advice on improvement is available from HSS. Local committees, HSCs and HoS/F are encouraged to provide feedback about the effectiveness of the wider OHSMS to HSS and the UHSWC, including through the formal escalation process and the incident notification process.

HSS reviews information available from incidents, H&S audits, H&S Learning Programme participants, Liaison Advisors, HSCs, inspections, etc, to judge the effectiveness of the OHSMS. Where appropriate HSS sets improvement objectives within the HSS Business Plan. These objectives address both elements which HSS controls directly and those controlled by others, which HSS can influence.
HSS reports S/F performance data to the UHSWC termly. UHSWC reviews the effectiveness of the OHSMS and directs others to make improvements. Every 3-4 years the Periodic Review of the OHSMS will generate recommendations about the corporate H&S Policy, the Strategic H&S Objectives, and the structure of the OHSMS for the UHSWC to consider and approve.

1.7. Connections with other arrangements and teams

The OHSMS interacts in important ways with other management arrangements, teams and individuals.

1.7.1. HSS

HSS directly manages several elements within the OHSMS, and provides direct H&S services. HSS’s Director and Scientific Safety Advisor are members of UHSWC.

1.7.2. Occupational Health Service

The University’s in-house Occupational Health Service, under the responsibility of HR, fulfils several functions contributing to the OHSMS. It provides professional advice to managers, staff and research students, and conducts pre-employment health assessment, health surveillance and proactive health education. OHS, HR and HSS operate a tripartite approach to tackling work-related stress. OHS and HSS undertake rapid liaison in response to cases of occupational ill-health.

The OHS Manager is a member of the UHSWC.

1.7.3. Heads of Schools and Functions

HoS/F hold substantial H&S responsibilities within the OHSMS. Much of the OHSMS is designed to support HoS/F to understand, directly fulfil and, where appropriate, delegate these responsibilities. Four Heads of School are members of UHSWC.

1.7.4. MIP, Risk Management and Business Continuity

The University’s risk management and business continuity concerns extend beyond H&S, to financial, operational, reputational, environmental, personnel and legal risks. Governance is provided by Risk Management Group (RMG). H&S risks may be included on S/F Risk Registers and H&S arrangements may make up part of business continuity planning. The University’s Risk Management & Business Continuity Officer is based within HSS, and that postholder, along with the Director of HSS, provide a link between RMG and UHSWC.

1.7.5. Estates Services

Estates teams provide many services relevant to H&S and the OHSMS. These teams include Building Support Officers, Security, Cleaning, Portering, Maintenance and capital Projects.
The Director of HSS is a member of Estates Committee and Estates’ senior management team provides one member of UHSWC.

### 1.7.6. Student Services

Student Services provides specialist services direct to students and liaises with disabled students and their families, RUSU, UPP, Hall Wardens, HSS and local medical services. SS supports the functioning of the OHSMS, particularly by responding when students are experiencing crisis and identifying lessons from incidents, and signposting students to specialist H&S services (eg to HSS to create Personal Emergency Evacuation Plans).

SS’s senior management team provides one member of UHSWC.

### 1.7.7. Technical Services

TS provide multiple services to 9 Schools, including supporting the management of specialist equipment and hazardous waste. Many of its staff are important to the operation of the OHSMS. The University’s 5 full-time HSCs are managed within TS – they fulfil important defined individual authority roles and are members of the UHSWC’s sub-committees.

The Director of TS is a member of UHSWC.

### 1.7.8. RSU

RSU oversees student societies, including those occupying University premises and organising events on University land.

RSU’s Chief Executive is a member of UHSWC.

### 1.8. The following are not covered by the OHSMS

#### 1.8.1. Wellbeing

Non-work-related welfare, and other matters which impact health but are not relevant to UK occupational health and safety legislation, are typically not addressed by the OHSMS. Where the University sets itself wellbeing objectives, HR leads on staff wellbeing and Student Services lead on student wellbeing.

#### 1.8.2. Public health

The OHSMS is not primarily designed to address non-occupational, public health concerns, where the University has limited legal duties. However, where public health issues manifest on University premises or within the University community, the OHSMS may be utilised to help people to protect their own and others’ health. For example: staff and students are welcome to utilise the incident notification system to alert the University to concerns about communicable diseases, contaminated drugs, etc; the HSS and HSCs support leaders when they rapidly adjust operations in response to outbreaks; professional H&S advice is available to Major Incident Teams responding to public health crises and such advice supports corporate risk horizon scanning analysis.
1.8.3. Security

The OHSMS does address violence and aggression where this is an occupational H&S hazard arising from work activities or exacerbated by workplace environments. However, wider security from non-occupationally-related violence, aggression and harassment, and other criminal acts such as theft and fraud, are addressed by security arrangements led by Estates and DTS.
2. ORGANISATION AND MANAGEMENT

2.1. Introduction

This chapter defines the University’s high-level organisation and management of occupational health and safety.

“Manager(s)” refers to those in a managerial or supervisory capacity who organise and control work activities. This includes senior members of School/Function, Principal Investigators, teaching staff, researchers, and technical staff.

2.2. Responsibilities

Every employee and student at the University, and every person working on its premises, is responsible for taking reasonable care for their own health and safety, and that of persons who may be affected by them. They are responsible for consulting their manager/supervisor on the precautions relevant to their activities. They are responsible for complying with rules and emergency arrangements. They must not interfere with or misuse anything provided in the interests of health, safety or welfare.

Anyone who is aware of an accident, near miss, unsafe activity or condition or a case of occupational disease or ill-health should report this to their manager/supervisor, Health & Safety Co-ordinator and/or to Health & Safety Services, so that measures can be taken to make safe and prevent recurrence.

University Council is responsible for seeking assurance on H&S performance and approving the Annual H&S Performance Report.

The University Executive Board has overall strategic responsibility for health, safety and risk management within the University. It agrees strategic aims and objectives of the University; ensures adequate resources are allocated; and monitors and reviews performance by means of periodic reports from the Officers of the University.

The Vice-Chancellor has overall executive responsibility for health and safety at the University. In this the Vice-Chancellor is supported by the Deputy Vice-Chancellor who chairs the UHSWC, to whom day-to-day responsibility is delegated.

The Deputy Vice-Chancellor, Pro-Vice-Chancellors, University Executive Board and other relevant University Committees are responsible for ensuring that

- Adequate resources are available to meet specific health and safety duties
- Management decisions reflect the intentions of the health and safety policy
- Decisions of Council, the University Executive Board, and relevant Committees are communicated and implemented in their areas of responsibility
- Health and safety leadership is provided throughout the University.

University Health, Safety and Wellbeing Committee (UHSWC) has responsibilities as defined in its Terms of Reference. It is responsible for establishing sub-committees to consider and advise on specialist matters and/or to meet legal requirements. Currently there are two Sub-Committees:
- Sub-Committee for Biological Safety
- Radiation Safety Sub-Committee

**UHSWC Sub-Committees** have authority to instruct work to stop or to withdraw project approvals if they are not satisfied with the health and safety management arrangements or risk controls.

**The Chair of UHSWC** has governance responsibility for health and safety. The Chair is responsible for reporting to the Scrutiny and Finance Committee (via the University Executive Board) and subsequently to the University Council on health and safety performance. This includes:

- information about any significant failures
- outcomes of relevant investigations and audits
- issues of concern or legislative compliance
- recommendations for improvement

The UHSWC Chair has the authority to stop or suspend any University activity, or prohibit the use of any articles, substances, plant, machinery or equipment on the campus or during University activities elsewhere, if they should consider it necessary to prevent accidents, ill-health or breach of regulations. This authority is delegated to Health and Safety Services.

**Schools/Functions and other Units** are responsible for operational health and safety management of all work activities carried out by staff and students.

**Heads of School/Function and Unit Managers, including Heads of Department** are responsible for ensuring that all activities under the control of their School/Function/Department/Unit are carried out in accordance with the University Health and Safety policy and procedures.

**Research leaders** (Principal Investigators) are responsible for the health and safety management of research projects. They are responsible for the safety of staff and students engaged in the research activity, and for any other persons who may be affected by the research activity, including during fieldwork.

**Teaching Leaders** (Tutors and Module Convenors) are responsible for the health and safety management of teaching sessions. They are responsible for the safety of staff and students engaged in the teaching activity, and for any other persons who may be affected by it, including during study trips.

**Line Managers** are responsible for ensuring staff and students receive induction, training, instruction and discipline, where necessary.

**Health and Safety Co-ordinator(s) (HSCs)** are responsible for providing advice and co-ordinating day-to-day local health and safety matters. They have authority to instruct work to stop if they are not satisfied with the health and safety management arrangements or risk controls (excludes tenanted areas and construction sites). Where the HSC is a member of Technical Services, partnered to support a School, the HSC is responsible for advising and assisting in the setting up local systems to enable the School to comply with University requirements. The School is responsible for ensuring that all staff and students adhere to these requirements. The duties of HSCs are set out in Safety Note 1.

**The Director of Technical Services** is responsible for ensuring that:

- Health & Safety Co-ordinators who support the higher hazard Schools and who are members of Technical Services, are fully competent to provide an effective service to the Schools.
• Where School-owned facilities are operated and/or maintained by Technical Services, any non-compliances with legislation with regard to equipment and management are reported to the responsible Head of School.

**Campus Services' Building Support Officers** are responsible for the co-ordination of fire safety evacuation arrangements and first aid within buildings, and for liaison with Estates & Facilities on general building safety, security, maintenance and infrastructure issues. See Safety Note 48.

**The Health & Safety Services Director** is responsible to the Chair of the University Health and Safety Committee for the maintenance and development of the OHSMS. The Health & Safety Services Director also has direct access to the Vice-Chancellor if required.

By delegation from the Vice-Chancellor and Chair of the Health and Safety Committee, Health & Safety Services staff have authority to stop work or suspend any University activity, if they should consider it necessary to prevent danger or ill-health.

**The Occupational Health Service** is responsible for providing professional advice on the medical aspects of occupational health.

**Estates** is responsible for maintaining the built estate, grounds and utilities infrastructure, excluding School/Function-owned equipment (unless by agreement).

**Duty Holders** within Estates are named individuals responsible for developing, maintaining and reviewing arrangements to ensure maintenance and operation of key equipment.

### 2.3. Requirements

The **UHSWC** is required to develop and maintain

- a corporate University Health & Safety Policy
- Strategic H&S Objectives
- H&S performance indicators and/or metrics

The **Vice-Chancellor** is required to agree and sign the H&S Policy annually.

**HSS** is required to

- Develop and maintain University Codes of Practice which establish policies and define key responsibilities and requirements related to specific hazards, control measures to ensure that the University meets its statutory obligations
- Recommend health and safety objectives, priorities and performance indicators
- Monitor and audit health and safety performance
- Report on health and safety matters to the UHSWC and other committees, as required
- Provide health and safety advice and support to members of the University
- Provide general health and safety training for staff, and students where appropriate
- Co-ordinate incident investigations, the provision of advice on remedial actions, and the analysis of incident data in order to advise on preventative intervention strategies
- Liaise with the Health and Safety Executive (HSE) and other enforcement agencies on all matters relating to health and safety at the University.
Schools and Functions are required to set themselves local H&S improvement objectives, monitor progress and report on these to HSS/UHSC when requested.

Heads of Schools /Functions are required to ensure that:

- They set a clear leadership example and promote a high degree of health and safety awareness
- Responsibilities and safety management organisation within the School/Function/Department/Unit are clearly defined
- There are effective local arrangements for consulting and communicating with staff and students on health and safety matters
- Risk assessments are developed and maintained, and control measures identified in the assessments are implemented
- There are effective emergency response procedures and staff and students are made aware of the actions required of them in the event of an emergency
- Staff understand their individual responsibilities for health and safety
- Staff are trained and competent to perform their duties safely
- Students have sufficient information and understanding to work safely and are appropriately supervised
- Work areas are inspected frequently and deficiencies are remedied or reported to the responsible person
- Contractors the School/Function selects and controls are will meet University health and safety standards, and that the work of Schools’ contractors is monitored to ensure these standards are met
- All incidents involving, or having potential to cause, injury or impaired health to persons, or damage to property are notified and investigated in accordance with University procedures, and that investigation recommendations are understood and corrective actions are taken
- H&S objectives are set including 3 Top H&S Improvement Priorities annually
- Appropriate records are maintained
- Gaps in existing provisions under their control are identified and corrected or communicated to those in control
- Effective communication is maintained with Health & Safety Services and professional H&S advice is sought when required.

Heads of School/Functions are expected to utilise their local H&S committee to fulfil the above.

2.4. Records Retention

HSS maintains the current UoR H&S Policy (signed by the VC) and the current Strategic H&S Objectives.
3. PLANNING & IMPLEMENTING RISK CONTROL

3.1. Introduction

This chapter defines the University’s high-level responsibilities and requirements for planning and implementing risk control.

3.2. Responsibilities

Heads of Schools and Functions are responsible for ensuring a Local H&S Code is developed, fulfilling the requirements detailed below, and reviewed at least annually.

Senior Leadership Teams, within Schools and Functions, are responsible for agreeing H&S objectives and monitoring progress.

Deans of Research are responsible for reminding the research community about the general requirement to undertake risk assessment within research.

Deans of Teaching & Learning are responsible for reminding the T&L community about the general requirement to undertake risk assessment within teaching and learning activities.

Student Services is responsible for informing Schools about processes related to student welfare.

Estates Space Manager is responsible for maintaining a register of spaces and S/F owners.

Property Services is responsible for leasing and management of tenancies to fulfil tenancy requirements detailed below.

3.3. Requirements

Every School & Function is required to produce a Local H&S Code, based on the template provided by HSS. The Local H&S Code is required to establish and detail:

- How the S/F will determine its H&S objectives, including its annually-declared 3 top H&S improvement priorities, integrate these objectives into wider management arrangements, and monitor progress on these objectives
- How progress on actions and recommendations arising from incident investigations, major incident lessons learned reviews, H&S audits, and staff and student feedback will be monitored by senior leaders within the S/F (for other communications requirements see section 4.3 below)
- Management arrangements to ensure work activities are risk assessed before being undertaken, detailing who is required to review and approve risk assessments within the S/F and arrangements to ensure risk assessments are periodically reviewed, including when academic programmes are formally reviewed
- How risk assessments will be stored and labelled/titled, to allow retrieval and unique identification.
- How the S/F’s emergency preparedness is trained and exercised
• How H&S learning needs are identified and met, and training records stored
• Management arrangements to ensure new students and staff receive adequate induction
• How many HSCs are required and how they are to be appointed/nominated, ie is the role included in job descriptions or filled by volunteers
• How many fire wardens, evac officers, and evac chair/mat operators are required and who is responsible for ensuring adequate coverage
• Who is responsible for ensuring completion of S/F First Aid Needs Assessment(s) and reviewing them at least annually (see CoP 8)
• How the S/F will be covered by a local H&S committee compliant with Safety Note 79, ie by dedicated S/F committee or by participation in a joint (Edith Morley, Whiteknights House, etc) committee.
• Local arrangements for chairing and providing secretariat support to the local H&S cttee
• Which areas, if any, are designated Containment Level 2 laboratories, radiation laboratories, workshops, welding areas, hazardous materials stores, hearing protection zones, areas requiring a DSEAR assessment, and any other special designations of areas based on hazards present
• Who is responsible for the above spaces – as a minimum this must include designation of:
  1. Laboratory Manager and Laboratory Co-ordinator for each laboratory
  2. Workshop Manager and Workshop Co-ordinator for each workshop
  3. Responsible person for each hazardous waste store
• A person or persons responsible for maintenance, servicing, calibration, and retention of records for the following
  1. Any water system not directly managed by Estates, which pose a legionella hazard (see CoP 58)
  2. Any high pressure or vacuum system not directly managed by Estates, to which PSSR applies (see CoP 46, Part 2)
  3. Any lifting equipment not directly managed by Estates, to which LOLER applies (see CoP 41)
  4. Any S/F-owned or leased vehicle (See CoP 52)
  5. Any portable equipment capable of generating an Xray or electro-magnetic field relevant to the EMF Regs (consult HSS if in doubt)
• How disabled people will be encouraged to declare and signposted to PEEP if needed
• Arrangements for periodic H&S inspection of all spaces under S/F control
• Management arrangements for managing major changes in S/F operations or use of spaces or equipment
• Management arrangements to ensure the S/F does not enter into international or UK partnerships without adequate H&S due diligence and authorisation

Every S/F is required to review its Local H&S Code at least annually.

When ceasing to use any space for its previous use, or vacating any space, every S/F is required to ensure all hazards not installed in the structure are removed and properly disposed of. In the case of laboratories and chemical stores this must be done in accordance with the procedure detailed in Safety Note 65. In other spaces this must be done to a standard agreed with the S/F HSC and the HSS Liaison Advisor, and to the satisfaction of the Estates Space Manager.

Property Services is required to ensure tenants use of UoR premises is restricted to exclude radioactive materials, contamination of services, or use of fume cupboards and LEVs, unless arrangements have been agreed, and approved by HSS, for clearance and handback of premises at end of lease.
Property Services is required to make arrangements for control of risk in the event of surrender of lease by tenants or insolvency of tenants, to include safe reoccupation of UoR premises and disposal of equipment, etc.

### 3.4. Records Retention

Local H&S Codes should be stored for 4 years.

Other record retention requirements are detailed in separate CoPs. Notably, for risk assessment see Cop 4, for First Aid Needs Assessments and other requirements around first aid see CoP 8.
4. COMMUNICATION, CONSULTATION & PARTICIPATION

4.1. Introduction
This chapter defines the University’s high-level responsibilities and requirements for communicating, consulting and encouraging participation with staff and students.

4.2. Responsibilities
The University Health, Safety and Wellbeing Committee is responsible for formally communicating and consulting with staff on health and safety matters. This is a requirement established by the Safety Representatives and Safety Committees Regulations 1977 (as amended) and Health and Safety (Consultation with Employees) Regulations 1996 (as amended). The UHSWCs membership includes Safety Representatives appointed by the Universities and Colleges Union (UCU) and Staff Forum.

Trade Union Safety Representatives
By UK law, trade union-appointed Safety Representatives have defined functions and rights, including:

- The right to undertake workplace inspections and accident investigations
- The right to investigate complaints and to raise issues relating to health, safety and welfare of employees
- The right to have paid time off for specified safety representatives training provided by the Union.

Representatives for Employee Safety
By UK law, Representatives of Employee Safety have different but similar functions and rights as Trade Union Safety Representatives (see Safety Note 26). The University recognises Staff Forum members on the UHSWC as Representatives of Employee Safety for staff in grades 1 to 5, who are not eligible to be members of UCU.

Other Functions and Schools are responsible for providing members to serve on UHSWC, as specified by the Committee’s Terms of Reference.

Heads of Schools and Functions are responsible for ensuring local H&S Committee include local staff and student representatives, where possible.
4.3. **Requirements**

Schools/Functions are required to establish management arrangements to facilitate local communication and consultation with staff and students on H&S matters. These arrangements should be detailed in the S/F’s Local H&S Code of Practice.

Among other arrangements, each School and Function must be covered by a local H&S committee. These may be formed either on School/ Function/ Department lines, or across units on a geographical basis e.g. where several S/F share a building. Such committees should be chaired by a HoS/F. Membership should include representatives of staff and students, where possible. Local H&S Committees are required to meet at least once per term (see Safety Note 79).

Schools are required to establish means to consult student representatives on H&S issues that may affect them. Communication with students can be facilitated by local induction at the start of course/module; School or module meetings and messages; and by online and in-person training.

4.4. **Records Retention**

Agendas, minutes and papers of local H&S committees to be retained for 10 years, by means of the S/F’s senior management team making arrangements for reliable storage and retrieval, to be detailed in the Local H&S Code.

Where a local H&S committee has been organised to cover multiple schools or functions then each S/F should retain their own copy – with arrangements for reliable storage and retrieval to be detailed in the Local H&S Code.
5. EMERGENCY PREPAREDNESS AND RESPONSE

5.1. Introduction

This chapter defines the University’s high-level responsibilities and requirements for emergency preparedness and response.

5.2. Responsibilities

The Risk Management & Business Continuity Officer is responsible for maintaining and developing UoR’s Major Incident Plan (MIP) and the corporate exercise programme, and providing appropriate training.

The Major Incident Team (MIT) is responsible for the management of a major incident or emergency. See the MIP.

HSS is responsible for preparing and maintaining emergency evacuation plans. (See CoP 6 for generic emergency evacuation arrangements for University premises.) HSS is also responsible for co-ordinating and maintaining the system for incident notification, allocating incidents to investigators. HSS supports investigators to communicate lessons to those best placed to make improvements and it centrally records investigation report findings.

Schools/Functions are responsible for providing staff to fulfil emergency responder roles such as Evacuation Officers; Fire Wardens; Evacuation Chair Operatives; and First Aiders. They are responsible for ensuring that staff are appointed and trained as necessary to implement the plan.

Schools/Functions are responsible for ensuring that foreseeable emergencies, such as needlestick injuries or chemical spills in a laboratory, are identified in local risk assessments and local emergency plans are developed and maintained. They are responsible for providing and maintaining equipment and materials needed to respond to emergencies. Schools/Functions are responsible for ensuring staff are trained in emergency response procedures and understand when and how to seek specialist advice.

Schools/Functions are responsible for emergency plans to manage foreseeable emergencies off campus, while complying with relevant University procedures. This may include fieldwork or overseas travel. (See Codes of Practice 32 and 38).

Schools/Functions’ senior leaders are responsible for managing the local response to emergencies. They are responsible for requesting initiation of the University’s Major Incident Plan, where they judge this appropriate in addition to local response.

Schools/Functions Executive Support staff are responsible for maintaining local copies of selected staff contact details for emergency call-out.

Security Services are responsible for seeking and securely storing call-out cards for each S/F, detailing selected staff contact details for use in emergency.
Other functions, including Security Services, Maintenance Services, Student Services and HR are responsible for providing appropriate support for emergencies, as far as reasonably practicable.

Governance and VC’s Office are responsible for providing, on a best endeavours basis, MITSOs (Major Incident Team Support Officers) to support MITs.

5.3. Requirements

Schools/Functions are required to periodically exercise their emergency plans and co-operate in corporate emergency exercises.

Schools/Functions are required to assess their first aid needs, see Code of Practice 8.

S/F are required to review their call-out card details at least annually, and share with Security Services.

Student Services are required to develop and maintain a Deceased Student procedure, to include notification to HSS when appropriate.

HR are required to develop and maintain a Deceased Staff Member procedure, to include notification to HSS when appropriate.

HSS is required to maintain an MIP Contacts List.

5.4. Records Retention

Copies of the MIP to be retained by HSS.
6. COMPETENCE, INDUCTION & TRAINING

This chapter is under development, pending approval of other chapters.
7. MONITORING, AUDITING, REVIEW & IMPROVEMENT

7.1. Introduction

This chapter defines the University’s high-level responsibilities and requirements for monitoring, auditing, reviewing and continually improving corporate UoR H&S arrangements.

7.2. Responsibilities

University Council is responsible for monitoring overall H&S performance and ensuring the design and effectiveness of the OHSMS is periodically reviewed.

The Vice Chancellor and the UEB is responsible for monitoring performance relating to the University H&S Policy, the Strategic H&S Objectives and any corporate-level H&S improvement action plans it has agreed.

UHSWC is responsible for reviewing and revising the University H&S Policy and Strategic Objectives. It ensures that corporate H&S processes and performance are monitored, deficiencies are identified and improvement action plans are devised. It also oversees Periodic Review of the OHSMS.

Schools and Functions are responsible for ensuring that their H&S processes and performance are monitored, deficiencies are identified and improvement priorities and action plans are devised.

HSS are responsible for developing and providing H&S performance indicators to UEB/UHSWC. It manages the H&S Audit Programme and reports on the effectiveness of the OHSMS. HSS also organises the Periodic Review of the OHSMS.

Internal Audit is responsible for reporting suspected significant H&S deficiencies it identifies through its Audit Programme to HSS for further evaluation.

7.3. Requirements

Schools and functions are required to devise, monitor progress on and report on their Top 3 H&S Improvement Priorities annually.

The University will undertake Periodic Review of the OHSMS every 3-4 years, to

- Review the University H&S Policy and the University’s Strategic H&S Objectives
- Consider H&S data and stakeholder feedback on the system
- Examine the completeness and effectiveness of the system
- Report deficiencies and good practice
- Formulate recommendations for improvement and modifications to the system
The process for Periodic Review will be determined by UHSWC and organised by HSS. Improvement recommendations from the Periodic Review of the OHSMS will be reported by UHSWC to UEB.

### 7.4. Records Retention

Copies of Reports arising from Periodic Review of the OHSMS should be retained permanently by Governance.