



# Health and Safety Policy – Framework: Organisation

*This document details the Organisation of health and safety within the University of Edinburgh. It should be read in conjunction with the Health and Safety Policy – Framework: Arrangements and the Health and Safety Policy document itself.*

## 1. Introduction

The University of Edinburgh believes that there is a strong moral and legal imperative to ensure the implementation of a robust and effective Health and Safety Policy. An educational organisation such as the University should enhance the life experience of its staff, students, work partners and the general public, rather than operate in any way to their detriment. It is also extremely important that all staff, particularly those with managerial or supervisory responsibility, appreciate the business case for strong health and safety management. Every accident, incident and case of occupational ill health has the potential to be an unnecessary drain on the University's finite resources and to diminish its reputation in the general community.

The University Health and Safety Policy provides a transparent and proportionate framework for the organisation of health and safety management within the University. It is expected that those who have responsibilities and duties to implement the Policy will discharge them diligently, and by their own actions and their encouragement, the University will continue to be a safe and healthy place in which to work and study.

The Framework documents detail the organisation and arrangements for implementing the University's Health and Safety Policy in Colleges, Schools and Support Units. The University Health and Safety Policy and Framework documents should be read in parallel.

The University Health and Safety Policy and Framework, and all associated guidance, is issued with the approval of the University Health and Safety Committee, and upon the authority of the University Court.

In accordance with the Health and Safety at Work etc., Act, 1974, it is the policy of the University Court of the University of Edinburgh to ensure, so far as is reasonably practicable, the health and safety while at work of all employees and students and the safety of authorised visitors and members of the public entering the precincts of the University. The successful implementation of this Policy requires the full support and active co-operation of all employees and students of the University.

From time to time, University Health and Safety Codes of Practice and Guidance Notes will also be published. It is the duty of all employees and students to observe those parts of the Health and Safety Policy that are relevant

to their own work, and to take account of information given in the Health and Safety Codes of Practice and Guidance.

Note that where the term “Head of School” is used, this is taken to cover individual members of staff who have been formally appointed to the Head of School role, or to the equivalent role in the Support Groups, and to Heads of other management units, such as Research Institutes, who have been formally allocated the equivalent role. Likewise, the term “School Safety Adviser” is taken to cover individuals who have been appointed to this role by their Head of School (or equivalent), and includes all such College or School (or equivalent) Health and Safety Managers, Officers and Advisers.

## **2. Corporate Organisation**

The Management of Health and Safety at Work Regulations require the University to appoint “competent advice”. This is provided by the professional staff of the Health and Safety Department who also provide a source of independent and objective advice and guidance to the University on the full range of occupational health, safety and welfare matters. They are supported by the professionally qualified health and safety practitioners embedded within specific Colleges and Schools (see Section 11.1). The Health and Safety Department also provides a central co-ordinating role in securing the effective implementation of the University Health and Safety Policy. The Director of the Health and Safety is responsible to the University Court via the Director of Corporate Services, who is also the Convenor of the University Health and Safety Committee.

As well as compliance with occupational health and safety legislation, the Department’s remit extends into the promotion of health and wellbeing within, and some public health aspects potentially affecting, the University community.

Liaison with the various authorities who enforce the statutory requirements for occupational safety and health takes place through the Health and Safety Department.

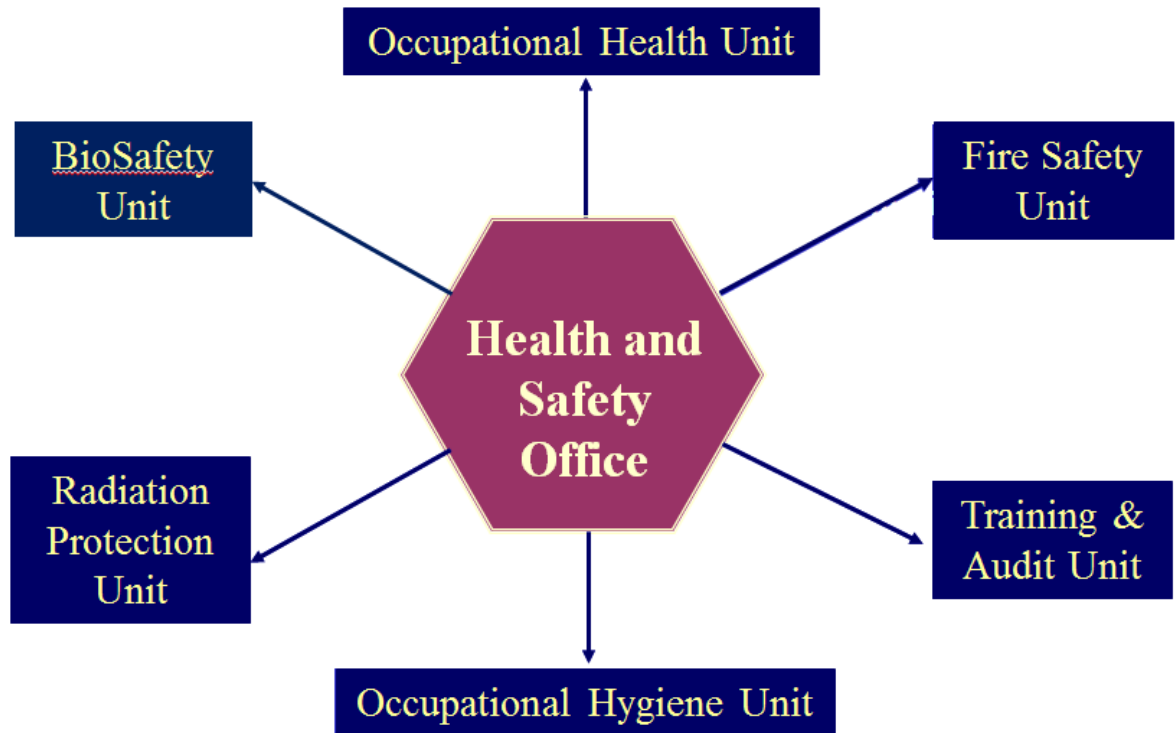
### **2.1 Corporate Health and Safety Department structure**

The Health and Safety Office is the core of the Health and Safety Department, where the Director and Deputy Director oversee the operation of the six supporting Units. The Director and Deputy Director oversee compliance with the University Health and Safety Policy and the operation of the University Health and Safety Committee, provide information to senior management, input on strategic issues as well as managing the staff in the Units within the Department. The attention of the Director or Deputy Director of Health and Safety should be drawn to any information received, e.g. by School personnel, on health and safety matters which could usefully be brought to the attention of other Schools or management units within the University.

The Director of Health and Safety produces an Annual Health and Safety Plan (which is aligned with the University’s overall Strategic Plan), which contains details of progress against the previous year’s Plan, together with objectives for

the coming year, presented annually to the University Health and Safety Committee, for information and approval, which then passes up to the Central Management Group, Audit and Risk Committee and the University Court.

The professional staff are supported by appropriate administrative staff overseen by the Departmental Administrator.



Further information regarding the functions of each of the Health and Safety Department Units can be found below, as well as on the Health and Safety Department web site at [www.ed.ac.uk/health-safety](http://www.ed.ac.uk/health-safety).

### 2.1.1 BioSafety Unit (BSU)

#### Staff in the Unit

The University has appointed a University Biological Safety Adviser (UBSA) to provide specialist professional guidance, advice and training on all aspects of biological safety.

The Biosafety Training and Development Assistant assists the UBSA with the development of both guidance and training as well as presenting training to the University community.

Further details including contact information can be found at <http://www.ed.ac.uk/schools-departments/health-safety/biosafety/about>

#### Main responsibilities of the Unit

The professional staff of the BSU oversee the policy on work with biological materials as well as producing guidance on such work.

Responsibilities include:

- All contact and liaison with the enforcing authorities (primarily the Health and Safety Executive's Biological Agents Unit, and the Home Office) on matters relating to biological safety and biosecurity should take place via, or in consultation with, the UBSA.
- All statutory notifications for work with dangerous pathogens and for genetic modification work will be undertaken by the University Biological Safety Adviser.
- The UBSA is a member of all local Genetic Modification Safety Committees
- The UBSA provides professional supports and advice to managers and researchers in relation to biological safety management and compliance with relevant legislation which includes the following laws:
  - Genetically Modified Organisms (Contained Use) Regulations
  - Control of Substances Hazardous to Health Regulations (COSHH)
  - Specified Animal Pathogens (Scotland) Order (SAPO)
  - Plant Health Orders
  - Anti-Terrorism Crime and Security Act

### **Training offered**

The Biosafety Unit runs training courses to provide the necessary basic knowledge in biosafety, genetic modification and the transport of biological materials. The Health and Safety Department's Biosafety Training Institute also provides professional training to Biosafety Practitioner Level 1, a SCQF level 11 course approved by the University of Edinburgh. Full details can be found at <http://www.ed.ac.uk/schools-departments/health-safety/biosafety/training>.

### **Further guidance and information**

Guidance on biosafety issues can be found at <http://www.ed.ac.uk/schools-departments/health-safety/biosafety/home>.

COSHH risk assessment template specifically for work involving biological materials and related guidance are available at <http://www.ed.ac.uk/schools-departments/health-safety/biosafety/forms/risk-assessments>.

### **2.1.2 Fire Safety Unit (FSU)**

#### **Staff in the Unit**

The Fire Safety Unit is staffed by professional fire safety personnel and includes:

- University Fire Safety Adviser
- Deputy University Fire Safety Adviser
- Fire Safety Co-ordinators

Further details including contact information can be found at <http://www.ed.ac.uk/schools-departments/health-safety/fire-safety/about>.

## **Main responsibilities of the Unit**

The Fire Safety Unit aims to ensure that:

- Support and advise the Central Management Group (through the University Health and Safety Committee), Heads of School and Director of Estates, to meet, deliver and maintain statutory fire safety obligations
- Support the Fire Coordinators in their role and provide adequate training to maintain competence
- Ensure Fire Risk Assessments are carried out for all new premises on an appropriate timescale
- Ensure a training programme for Fire Coordinators and Fire Stewards is maintained and delivered
- Provide a programme for general staff fire safety training
- Review all fire safety risk assessments as necessary
- Provide liaison and support on all matters relating to fire safety provision within the University estate portfolio
- Liaise with the Scottish Fire and Rescue Service (SFRS) on all statutory fire safety matters
- Ensure all fire incidents are investigated and monitor all calls to the SFRS

## **Training offered**

The Fire Safety Unit offers training in all aspects of fire safety including fire awareness, fire stewards and co-ordinators and fire extinguishers. Full details can be found at <http://www.ed.ac.uk/schools-departments/health-safety/fire-safety/training>.

## **Further guidance and information**

Further guidance and advice can be found at <http://www.ed.ac.uk/schools-departments/health-safety/fire-safety>.

### **2.1.3 Occupational Health Unit (OHU)**

#### **Staff in the Unit**

The Occupational Health Unit is staffed by professional practitioners who are registered with either the Nursing and Midwifery Council, or General Medical Council, according to which part of the registers apply and include:

- Occupational Health Manager
- Senior Occupational Health Adviser
- Occupational Health Adviser
- Occupational Health Technician

The services of a Consultant Occupational Health Physician are contracted in on a regular basis.

Further details including contact information can be found <http://www.ed.ac.uk/schools-departments/health-safety/occupational-health/about>.

### **Main responsibilities of the Unit**

The Occupational Health Unit contributes to protecting the health of the working population, having a specific specialist public health agenda, including reducing health inequalities, social exclusion and sickness absence.

The OHU provides a service that focuses on the promotion of both physical and mental health at work, contributing to the prevention of ill health and supporting staff attendance, performance, wellbeing and employee engagement. The OHU team provides an impartial and confidential advisory service and, through collaborative work with both external and internal agencies and services, helps to provide an integrated service to all University staff.

Effective use of the OHU service enables compliance with many aspects relating to both health and safety and employment legislation, including COSHH and requirements relating to health surveillance and, through early involvement, with attendance management. The OHU has a critical role to play where absence is a concern in helping employees to achieve sustained attendance and contribution at work, thus reducing absence levels, and increasing staff productivity and retention. The OHU advises employees, their managers and Human Resources colleagues in relation to the impact of work on employees' health and welfare, and the effects of employees' health on their ability to attend and perform their work satisfactorily. By provision of a referral system accessible by employees, their managers and Human Resources, the OHU can assist and advise on individual case management. Specific professional advice is provided to employees, managers and Human Resources teams, on a wide range of health issues, such as:

- Ensuring compliance with statutory requirements in relation to health surveillance
- Providing vaccination and immunisation required due to work activities including travel medicine specialties
- Advising on return to work, including phased return and rehabilitation
- Guiding implementation of appropriate workplace adjustments specific to the health needs of the employee
- Advising on health issues affecting attendance or performance at work
- Determining if ill health retirement criteria are met, as set by pensions providers

### **Training offered**

The staff of the OHU contribute to various health related training courses, in collaboration with managers, other Units of the Health and Safety Department and Human Resources colleagues.

### **Further guidance and information**

Guidance on occupational health provision can be found at <http://www.ed.ac.uk/schools-departments/health-safety/occupational-health>.

## 2.1.4 Occupational Hygiene Unit (OccHygU)

### Staff in the Unit

The Occupational Hygiene Unit is staffed by the Health and Safety Adviser who has specific qualifications and experience in occupational hygiene as well as general safety.

Further details including contact information can be found at

<http://www.ed.ac.uk/schools-departments/health-safety/about/units/occupational-hygiene>.

### Main responsibilities of the Unit

Occupational Hygiene is the application of scientific, technological and managerial principles to the protection of the health of persons at work, and those outside the workplace, through the elimination or reduction of risks to health which are presented by chemical, physical or biological hazards.

The Occupational Hygiene Unit oversees and updates policy and guidance relating to the workplace and specifically to hazardous substances, engineering controls and personal protective equipment. Specific guidance on most aspects of the Control of Substances Hazardous to Health (COSHH) Regulations, including guidance on COSHH risk assessments, can also be provided by the Occupational Hygiene Unit (advice on health surveillance and biological safety is available from the Occupational Health Unit and Biosafety Unit respectively).

Specific services include:

- Noise monitoring and advice
- Temperature and humidity monitoring and advice
- Dust monitoring and advice
- Respirator face-fit testing and guidance on wearing of respiratory protective equipment (RPE)
- Other personal protective equipment (PPE) advice
- Accident and incident investigations

### Training offered

General training on occupational hygiene subjects can be offered, if required.

### Further guidance and information

Guidance on occupational hygiene provision can be found at <http://www.ed.ac.uk/schools-departments/health-safety/guidance>.

COSHH risk assessment, and any general risk assessment, templates and guidance are available at <http://www.ed.ac.uk/schools-departments/health-safety/risk-assessments-checklists/risk-assessments>.

## 2.1.5 Radiation Protection Unit (RPU)

### Staff in the Unit

The Radiation Protection Unit comprises the University Radiation Protection Adviser (URPA) and the Assistant Radiation Protection Adviser, who are both accredited by the UK Health Protection Agency.

Further details including contact information can be found at <http://www.ed.ac.uk/schools-departments/health-safety/radiation-protection/about>.

### Main responsibilities of the Unit

Professional advice on ionising, non-ionising and laser radiation safety is available from the RPU and general information on safe work with ionising and non-ionising radiation is available, in the form of a number of Radiation Protection Codes of Practice and Guidance Notes on specific matters.

There is a rigorous system in place for the identification of radiation hazards, assessment of the risk and identification of appropriate control measures. In order to provide the appropriate specialism, the University Radiation Protection Adviser prepares generic radiation risk assessments, which are published on the Radiation Protection Unit's website (see below). These are intended to support the authorisation forms that are completed by the intended radiation user. The two documents together constitute a completed individual user's radiation risk assessment.

All persons wishing to work with ionising radiation sources or hazardous lasers without immediate supervision must formally request authorisation, which involves the written acknowledgement of the local Radiation Protection Supervisor or local Laser Supervisor, for their area, and the URPA. The application for authorisation requires the applicant to justify the need for the work.

### Training offered

The Radiation Protection Unit runs training courses to provide the necessary basic knowledge in radiation and laser safety. Attendance at the RPU's basic training course for research and teaching, or equivalent, is required before individuals can commence unsupervised work. Similar attendance criteria apply to radiation use in veterinary studies and work involving lasers.

Further details on the training provided can be found at <http://www.ed.ac.uk/schools-departments/health-safety/radiation-protection/training>.

### Further guidance and information

Guidance on radiation protection and safety can be found at <http://www.ed.ac.uk/schools-departments/health-safety/radiation-protection/policy-guidance>.



Generic risk assessments and other tools are available at <http://www.ed.ac.uk/schools-departments/health-safety/radiation-protection/tools-forms>

## 2.1.6 Training and Audit Unit (T&AU)

### Staff in the Unit

The Training and Audit Unit comprises the Training and Audit Co-ordinator, the Health and Safety (First Aid) Trainer and the Commercial and e-Training Administrator.

- The Training and Audit Co-ordinator is a fully qualified and professional health and safety practitioner
- The Health and Safety (First Aid) Trainer has specific qualifications and expertise in first aid training, as well as other health and safety disciplines
- The Commercial and e-Training Administrator focuses on the development and improvement of eLearning packages, and maximisation of commercial training opportunities

Further details including contact information can be found at:

<http://www.ed.ac.uk/schools-departments/health-safety/about/units/training-audit-unit>.

### Main responsibilities of the Unit

The Training and Audit Unit offers a comprehensive range of general and specific health and safety training courses, details of which are below.

In order to maintain its excellent record for health and safety, and to further develop the high standards that we aim to achieve, the University has developed procedures to monitor and audit the systems that have been put in place, to ensure that they are suitable and fit for purpose. This includes comparison against agreed standards, such as the University's central and local health and safety policies, and general and specific health and safety legislation which applies in the workplace.

The T&AU also implements a programme of general and topic based audits around the University. This includes a well-established programme of health and safety management and compliance audits, carried out in partnership with external risk management experts. The Unit also offers help and guidance to University staff who are required to carry out audits and inspections of their own work areas.

### Training offered

Specific courses offered by the T&AU include, but are not restricted to:

- health and safety awareness
- risk assessment
- accident and incident reporting
- IOSH Managing Safely and Working Safely
- first aid

- manual handling
- Principle investigators/supervisors health and safety responsibilities

Specific training requests should be addressed to the Training and Audit Coordinator.

### **Further guidance and information**

Further information on what training courses are available and what these entail is available at <http://www.ed.ac.uk/schools-departments/health-safety/training>.

## **3. Regulation and guidance on health and safety**

### **3.1 University Health and Safety Policy and Framework**

The University Health and Safety Policy, published in two documents, is issued upon the authority of the University Court. The University Health and Safety Policy is supported by a Framework document, which is itself published in two parts (Organisation and Arrangements) which details the University's organisation and arrangements for implementing and monitoring the Policy, and the arrangements Heads of School (and equivalent) need to adopt to meet their responsibilities enshrined in legislation and defined by the University Health and Safety Policy.

### **3.2 Codes of Practice and guidance**

The University itself has in many instances formulated rules and procedures applicable to particular areas. These are contained in Health and Safety Codes of Practice and Guidance which support the University Health and Safety Policy and Framework. At School level, there are in addition the School Health and Safety Policy and, in many instances, other health and safety documentation. Reference should also be made to the written material published by other appropriate bodies and relevant to particular areas.

In every area of activity, the University Health and Safety Policy and Framework must be considered as the minimum standard to be achieved by Colleges and Schools.

These allied Codes of Practice (CoP) must be complied with either in the manner stated, or in some other manner that ensures that an equivalent level of safety and health control is met. Subject specific guidance documents are also published to add further detail and aid compliance with the Policy, Framework and CoPs.

Following the CoPs in the manner stated will ensure that you comply with both health and safety law and the University's Health and Safety Policy. Should you choose an alternative method you may be called upon to justify your actions and prove that such action has resulted in an equivalent level of risk control.

### **3.3 Further guidance available**

The Health and Safety Office maintains access to a library of material on health and safety, which includes all Approved Codes of Practice and Guidance Notes issued by the Health and Safety Executive, as well as guidance and standards

published by other regulatory bodies which can potentially assist members of all parts of the University community.

### **3.4 Enforcement of health and safety legislation**

University Schools and other management units are subject to visits by HM Inspectors from the Health and Safety Executive, and, where appropriate, by inspectors from other relevant enforcing authorities. Comments and recommendations arising from these visits are generally received in the form of a letter sent to the University's senior management.

There is a system of Improvement and Prohibition notices which may be served on the University, which can be used to secure improvements to practices, and/or termination, immediately if necessary, of a dangerous activity.

If an Inspector deems that a material breach has occurred, they are then able to charge the University a fee for their time on the investigation. This is known as Fee for Intervention (FFI). At present, the allocation of the payment of these fees within the University is on a case by case basis.

An Inspector from the Health and Safety Executive can make a report to the Crown Office Procurator Fiscal service who have the power to bring criminal proceedings against the University, or any individual, for a breach of any duty under the Health and Safety at Work, etc., Act 1974 or under any of the associated Regulations.

Schools and other management units must inform the Director of Health and Safety immediately if the Health and Safety Executive make contact with them on any matter relating to University activities. A member of Health and Safety Department staff will accompany HSE representatives on their visits, wherever possible.

### **3.5 Liability Insurance**

The Health and Safety at Work, etc., Act 1974, does not in any way alter the general position regarding civil liability. Employer's liability insurance covers the University for its legal liability to employees for death, injury or disease arising out of the normal business of the University. Public liability insurance covers the University for its legal liability for damages in respect of accidental injury or ill health, and loss or damage to material property, happening in connection with the normal business of the University to non-employees such as students, visitors and other members of the public.

It is not possible to insure against criminal liability arising under the Health and Safety at Work, etc., Act 1974; however, the employer's liability policy cover extends to include liability in connection with, or arising out of, defence costs in respect of the Act. Further information on insurance can be found on the Insurance Office website at <http://www.ed.ac.uk/schools-departments/finance/about/sections/insurance>.

## **4. The University Court**

The University Court has the primary responsibility in terms of the Health and Safety at Work, etc., Act 1974 for the health and safety of the staff and students

of the University and of any members of the general public having access to University premises, and in particular assumes responsibility for:

- keeping under review the University Health and Safety Policy
- allocating resources for health and safety measures
- maintaining the organisation for the successful implementation of, and monitoring of compliance with, the University Health and Safety Policy
- identifying and allocating the health and safety roles and responsibilities of individual members of the University community
- encouraging a culture of health and safety awareness and continuous improvement

The University Court is advised in these matters by the University Health and Safety Committee which includes representatives of recognised Trade Unions and Edinburgh University Students' Association (EUSA), see Section 6.

## **5. Responsibilities of Senior Management**

In accordance with the requirements of the Health and Safety Executive, the University has appointed a member of its senior management team, who attends the University Court, as the institution's "Health and Safety Champion".

This member of the Senior Management Team has a particular interest in, and responsibility for, overseeing the University's health and safety management arrangements, and as such convenes the University Health and Safety Committee.

This role is currently fulfilled by the Director of Corporate Services.

## **6. University Health and Safety Committee**

The University Health and Safety Committee is responsible for advising on all matters concerning health and safety in the University and will draw attention to the University's legal obligations relating to health and safety. The Committee will send forward to the University Court recommendations for such action as is thought necessary to ensure that reasonable steps are being taken to promote the health and safety of employees, students and others entering the precincts of the University. The Health and Safety Committee is the main conduit for consultation on health and safety issues with University Trade Unions in particular and staff in general.

In particular, the University Health and Safety Committee will consider any matter referred to it by a School (or equivalent) Health and Safety Committee. The central Committee will also, where necessary, consider reports from Inspectors of Enforcing Authorities under the Health and Safety at Work, etc., Act 1974, reports from the University's insurers and brokers, and reports from Trade Union Safety Representatives and other representatives on employee safety. The Committee is the forum in which such reports can be shared with employee and student representatives.

The Health and Safety Committee promotes continuous improvement in the University's health and safety management system and encourages the sharing of best practice within the University community with regard to all aspects of health and safety including wellbeing. Minutes and papers from the Health and Safety Committee are available at [www.committee.safety.ed.ac.uk](http://www.committee.safety.ed.ac.uk) where the full Terms of Reference of the University Health and Safety Committee are also published.

## **7. University Radiation Protection Committee**

The University Court has appointed a University Radiation Protection Committee which is responsible for advising on all matters relating to the hazards arising from the use of ionising radiations, ultra-violet radiation and laser and microwave radiations. This Committee reports to the University Health and Safety Committee on all matters relating to the safe transport, use, storage and disposal of materials producing ionising radiations and the use of all equipment which generates x-rays, ultra-violet, laser and microwave radiations.

The Committee oversees compliance with relevant statutory provisions and Approved Codes of Practice relating to these radiations. The executive officer is the University Radiation Protection Adviser. Further information on the committee can be found at <http://www.ed.ac.uk/schools-departments/health-safety/radiation-protection/about/committee>.

## **8. Inspections, Monitoring and Auditing**

### **8.1 Inspections**

Inspections mainly involve observation of facilities and working practices with a view to assessing whether standards are adequate when compared to those required for the particular work activities.

School personnel should carry out regular and systematic local health and safety inspections to scrutinise health and safety standards and the effectiveness of the health and safety management systems in place. The purpose of inspections is to identify any unsafe or unhealthy conditions or work practices that may already be occurring and to prevent any arising in the future. Inspections should be recorded and the report should include identification of any remedial action that may be required, who is to undertake it and on what timescale. Procedures should be in place to follow up and ensure any recommendations made are implemented.

Interested parties, such as Health and Safety Executive Inspectors, the University's insurers or members of the Health and Safety Department, may wish to see these documents and they should be made available on request.

The Health and Safety Department assists Schools to carry out this inspection function effectively via the provision of paper and computer-based tools, such as model checklists, which individual Schools may adapt to their own requirements.

Regular reviews should be undertaken of the health and safety arrangements (local policies, procedures etc.) in the areas for which they are responsible, to confirm that these arrangements are appropriate and are working effectively. Where it is identified that any improvements to arrangements should be made, then these must be implemented and suitable records kept. Serious consideration should also be given to any other changes that could result in improved or better standards of health and safety management and practice.

## **8.2 Monitoring**

Monitoring involves checking that management systems utilised within the University, to ensure health and safety compliance are fit for purpose and are being followed by staff, students and visitors. Monitoring of the local School health and safety policy, risk assessments, safe schemes of work, local rules etc. should be undertaken regularly by the Schools to ensure all information is still correct and accurate and where this is not the case, Schools must ensure that appropriate corrective action is taken to improve the situation. If staff are aware of any safety-related problem in an area for which they themselves are not responsible, then they must bring this to the attention of the person whose responsibility it is, or to a more senior member of staff and to their School Safety Adviser or Manager.

All members of the University community are directed to take notice of what is going on around them and report to their supervisor, or to a more senior member of staff, any instances where University Health and Safety Policy is not being followed or any other safety-related concern they may have.

### **8.2.1 Accidents**

Monitoring and analysis of any accidents, incidents and instances of occupational ill-health occurring at School level to look for trends is particularly important so that remedial action can be taken to prevent any recurrence. The University Health and Safety Department reviews all reported accidents, incidents and instances of occupational ill health in order to determine those events that are legally Reportable to the relevant enforcing authority under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), and those which require further investigation and possible notification to others within the University, to ensure that appropriate remedial action is implemented.

School personnel are expected to review all accidents and incidents within their own School and, where appropriate, investigate these to ensure appropriate measures are taken to reduce the likelihood of the incident re-occurring. These reports should be shared with the Health and Safety Department when appropriate via the online Accident and Incident reporting system, see Framework: Arrangements, Section 1.

## **8.3 Auditing**

### **8.3.1 Auditing programmes**

The University has developed and evolved a comprehensive programme of management, compliance and topic auditing and review, in partnership with

external risk management professionals, which has provided a strong platform to move forward in the pursuit of continuous improvement in health and safety performance. This on-going programme involves audit visits to Schools and Support Units in order to discuss and evaluate management arrangements, to examine how effectively these arrangements are translated into best practice at School (or equivalent) level and below, and to make recommendations for immediate and/or long term improvements.

### **8.3.2 Annual School Health and Safety Report questionnaire**

In addition, each Head of School is required to report, at least annually, to the Director of Corporate Services, on aspects of the implementation of the Health and Safety Policy within their own area(s) of responsibility. This is achieved by completing the Annual School Health and Safety Report questionnaire, which is circulated by the Director of Corporate Services.

### **8.3.3 Reports to senior management**

The University Health and Safety Committee considers an annual report on the University's accident, incident and occupational ill health experience, which incorporates a review of individual events, statistical trends within this organisation, and benchmarking comparisons within the UK HE sector, where practicable. The Committee also considers formal annual reports from the Radiation Protection and Occupational Health Units, and ad hoc reports from the Biosafety Unit.

Summaries of the issues discussed by the University Health and Safety Committee are passed upwards to the Central Management Group (CMG), and the University Court. Separate reports on the University's health and safety experience, issues and developments are submitted by the Director of Health and Safety monthly to the Director of Corporate Services, and quarterly to CMG, and Audit and Risk Committee. An annual report on the health and safety aspects of the University's risk profile is also submitted to the University Risk Management Committee.

Overviews of the University's actual experience ensure that the University's governing body is made aware of the strengths and weaknesses of health and safety performance throughout the institution, and help to facilitate the targeting of appropriate resources, where required.

## **9. Heads of College and Heads of Support Group**

Heads of College, and their equivalents in the University Administration, are responsible to the University Court, through the Principal, for the management of health and safety matters within the area of the University under their control. Whilst retaining this management responsibility to Court, Heads of College are required to delegate duties to, and place management responsibilities upon, Heads of School (and equivalent), to ensure that local policies and practices for the effective management of health and safety, at School level and below, are in place, published and are adhered to.

Heads of College may wish to consider appointing a College Health and Safety Manager or Adviser, to oversee the individual College's health and safety structure and procedures.

## 10. Heads of School

Heads of School, and managers of other equivalent autonomous units, etc., are responsible, through Heads of College, to the University Court for the management of health and safety matters within the area of the University under their control. Besides the Heads of Academic Schools, the term is taken to include Heads of administrative and service departments, and managers of any premises administered by the University Court.

Heads of Schools (or equivalent), together with senior members of staff and School Safety Advisers, where appointed, are expected to take the initiative in promoting and monitoring the health and safety of all persons liable to be affected by School activities under their control.

Heads of Schools (or equivalent) are responsible for the management of all aspects of health and safety in the work of their Schools and, must:

- i. Ensure the existence of a local School Health and Safety Policy
- ii. Monitor the local Health and Safety Policy on a regular basis including regular audits
- iii. Ensure adequate provision of information, instruction and training is available and that appropriate staff attend, in order that work can be carried out competently and safely
- iv. Ensure all instances of fires, instances of occupational ill health, accidents and dangerous occurrences within the School are reported to the Director of Health and Safety, as soon as possible, and that this record is regularly reviewed for prompt corrective action
- v. Appoint a School (Area) Safety Adviser, or Health and Safety Manager as appropriate
- vi. Appoint a School Health and Safety Committee
- vii. Ensure all fire safety protocols/rules are implemented in their School
- viii. Ensure that all School equipment is maintained in a safe condition and that proper steps are taken to repair faults in equipment and to remedy any defects which occur in the services and fabric of the School
- ix. Establish a (joint) health and safety policy for University employees and students when occupying premises in joint ownership with another institution, or occupying a University building in which workers from another institution are employed
- x. Report at least annually, to the Director of Corporate Services, on aspects of the implementation of the health and safety policy within their area of responsibility
- xi. Ensure that there are suitable arrangements in place if bringing contractors into the University. All contractors carrying out construction work as defined in the Construction (Design and Management) Regulations must be under the control of the Estates Department
- xii. Ensure a Multi-Occupancy Building User Group (MOBUG) is established in any building shared with other Schools/departments

Further guidance is available online at <http://www.ed.ac.uk/health-safety/safety-responsibilities/heads-school>



## 11. School (Area) Safety Advisers

Heads of Schools are required to appoint a School (Area) Safety Adviser. There is no legal requirement for this appointment to be made, unlike that of School Radiation Supervisor. It is, however, a University Court requirement that all Schools must appoint, or arrange access to, a School Safety Adviser. No formal qualifications or standards of training for Health and Safety Advisers have yet been set down in any of the relevant legislation. Appropriate training, to assist School Safety Advisers to understand and perform their role and functions within their own Schools, is available from the Health and Safety Department. If no School Safety Adviser is appointed, the Head of School fulfils that role.

The School Safety Adviser is concerned with the day-to-day safety organisation within his or her School or building. Primary tasks are to advise and assist the Head of School in the management of all health and safety matters and liaise between the School and the Health and Safety Department. The School Safety Adviser will normally be a senior member of the academic or technical staff who has gained a wide experience and a sound understanding of the work carried out in his or her School/area. School Safety Advisers will require sufficient time to discharge their duties efficiently and should have the expertise necessary and the authority to perform these duties. The School Safety Adviser has no statutory obligations specifically laid upon him or her, but should act as a focus for the flow of health and safety information to, from and within their School or area.

In large Schools/areas the duties may be carried out by a number of employees, nominated by the Head of School (or equivalent) and these are referred to as Local Safety Advisers.

### 11.1 Professional Health and Safety Managers/Advisers

Many areas with high risks have appointed professional Health and Safety Managers/Advisers. Their main responsibility is to oversee the health and safety of their particular College, School or campus, as applicable. Their duties, therefore, will extend beyond the 'voluntary' School Safety Adviser role and this will be communicated within each particular College, School or work area by the Head of College, School or work area.

Professionally qualified health and safety practitioners embedded within Colleges, Schools or other management units also provide a valuable source of independent and objective advice in terms of regulation 7 of the Management of Health and Safety at Work Regulations.

Further guidance is available online at <http://www.ed.ac.uk/health-safety/safety-responsibilities/school-area-advisers>

## 12. School Health and Safety Policy

Schools must identify hazards and risks within the areas under their control which should feed into the formulation of a School Health and Safety Policy, which will complement and dovetail with the University Health and Safety Policy. This School Health and Safety Policy will comprise of the policy

statement and instructions specific to any such particular hazards as may be identified and may lead to the formulation of School Codes of Practice and / or guidance documents.

The School Health and Safety Policy document should be signed by the Head of School and bear its date of issue, and a review date.

A model template for a School Health and Safety Policy can be accessed on the Health and Safety Department website at <http://www.ed.ac.uk/schools-departments/health-safety/risk-assessments-checklists/checklists>.

## **12.1 Monitoring the School/Area Health and Safety Policy**

The implementation and effectiveness of the School Health and Safety Policy can be most usefully monitored by regular inspection at School level and below. A record of each inspection and subsequent remedial action should be kept, and should be available for scrutiny by the Director of Health and Safety, Trade Union Safety Representatives and Health and Safety Executive Inspectors.

The Health and Safety Department assists Schools to carry out this monitoring function effectively via the provision of paper and online monitoring tools, such as model checklists, which individual Schools may adapt to their own requirements.

Guidance and template self-inspection forms are available on the University Health and Safety Website at <http://www.ed.ac.uk/schools-departments/health-safety/risk-assessments-checklists/checklists>

## **13. Principal Investigators (PIs), supervisors or managers**

The Principal Investigator (PI) is normally a member of academic staff who is the recipient of funds provided by the University, a research funding body or other benefactor. PIs are responsible for the planning, organisation and successful outcome of their particular research project, and as such, they bear the day to day responsibility for the health and safety management relating to the project.

Supervisors or managers fulfil a similar role to PIs, and may not be academic or research staff but will have supervisory or management responsibility over other staff or students.

The PI, supervisor or manager must know and understand the requirements of the University Health and Safety Policy as well as the School Health and Safety Policy and procedures.

### **Risk assessment**

It is imperative that, at the planning stage of a project or sequence of tasks, a suitable and sufficient risk assessment is completed to ensure all health and safety issues involved in the project or tasks are identified and appropriate controls introduced. This initial risk assessment must include a training needs analysis for all staff and students involved, as well as an assessment of safety equipment required e.g. appropriate fume cupboards or biological safety

cabinets, suitable personal protective equipment, requirement for health surveillance etc. It is more than likely that other risk assessments will be required from time to time. Although these may be carried out by other members of the project team, it is the responsibility of the PI, supervisor or manager to ensure that these are of a satisfactory standard.

### **Supervision, instruction and training**

The PI, supervisor or manager must also ensure the competence of all people involved in the project, in particular junior or inexperienced research staff and students, not only to carry out risk assessments but to be proficient in the technical aspects of their particular areas of the project. This will also involve providing, or ensuring the provision of, suitable supervision, instruction and training.

### **Mandatory training – laboratory animal allergens**

On 20th August 2014, the Central Management Group (CMG) gave its full backing to the creation and delivery of 3 mandatory training courses for all Research Group Leaders, Principal Investigators and other relevant managers and supervisors who themselves are potentially exposed to animal allergens, and/or whose group members, or other relevant colleagues, would expect to have a similar potential for exposure, and all their staff/researchers in their groups. These courses were formally launched by the Director of Health and Safety in November 2016 via a letter to all applicable Heads of School. Details of these courses are available on the Health and Safety Department website, see link below.

Further guidance is available online at <http://www.ed.ac.uk/health-safety/safety-responsibilities/pi-supervisors>

## **14. Trade Union safety representatives / Representatives of employee safety**

In accordance with the Safety Representatives and Safety Committees Regulations, safety representatives have been appointed by a number of Trade Unions recognised by the University. Further details on the recognised Trade Unions within the University are available from Human Resources.

These safety representatives have clearly defined legal rights and responsibilities in matters of health and safety at work and the University Court offers them all reasonable facilities for the discharge of these functions. Recognised Trade Unions wishing to nominate safety representatives should, in writing, advise the Director of Human Resources and the Director of Health and Safety.

Further guidance on employee representatives can be found at <http://www.hse.gov.uk/involvement/hsrepresentatives.htm>.

## **15. Individual responsibility**

As already mentioned in the University Health and Safety Policy, it is a duty under the Health and Safety at Work, etc., Act 1974, for everyone engaged in University activities to exercise personal responsibility and care in the

prevention of injury and ill health to themselves and to others who may be affected by acts and omissions at work, or during the course of study. All those who supervise work, particularly those who supervise work in laboratories, workshops, practical classrooms and fieldwork, at whatever level, have a responsibility to ensure that they do not endanger the health and safety of students, technical, academic, cleaning/maintenance staff, and others, including visitors.

No person shall intentionally interfere with, or misuse anything provided by the University in the interests of health, safety or welfare. Individuals are required to comply with any procedures or arrangements formulated under the authority of the Policy. Breaching health and safety law or the University Health and Safety Policy may lead to disciplinary action under University procedures.

## **16. Health and safety of postgraduate students, junior research staff and post doctoral workers**

Staff who supervise experimental work carried out by postgraduate students, research assistants, post doctoral workers and technical staff, are required to give careful attention to the health and safety of those under their supervision. This applies not only to work on University premises but also to supervised fieldwork and to University work carried out elsewhere. To fulfil its function, the degree of supervision must have reasonable regard to the level of experience, training and expertise of the staff or students being supervised. The standards of health and safety in University research should not be inferior to those in good commercial or other professional practice.

## **17. Health and safety of undergraduate students**

Undergraduates should be assumed to be initially untrained in all matters of health and safety. Academic and, where appropriate, non-academic (for example, technical) staff therefore have a duty to instruct students, so far as is reasonably practicable, in all matters necessary to ensure their health and safety while working in University premises, on supervised fieldwork exercises, and during University work elsewhere. Hazardous equipment should not be used by undergraduates unless adequate protective devices are in operation and undergraduates have been trained in the specific use of the equipment. In addition, where such safeguards are not practicable, adequate specific training must be given and their competence assessed before unsupervised operation of such equipment is allowed.

No substance shall be introduced into practical work for undergraduates unless the hazards associated with it have been assessed. Where reliable information is not available, the substance should be regarded as potentially hazardous and treated with appropriate precautions. Written instructions to undergraduates in their practical work must draw attention to the risks of using hazardous substances and equipment and the precautions which must be taken.

## **18. Estates Department responsibilities including outside contractors**

The Estates Department takes the lead on and publishes guidance on a number of key health and safety issues, including, but not restricted to;

- construction safety, including the Construction (Design and Management) Regulations (CDM Regs)
- management of contractors
- asbestos management
- control of Legionella risk
- gas safety
- electrical safety
- lift and lifting equipment installation and maintenance
- some aspects of pressure vessel safety
- transport issues
- environmental matters with close liaison with the Radiation Protection, Occupational Hygiene and Biosafety Units on hazardous waste issues
- fire safety infrastructure in liaison with the Fire Safety Unit, further information at <https://www.ed.ac.uk/health-safety/fire-safety/management-resp>

The Director of Estates is the 'client' for all construction work carried out in terms of the CDM Regs at the University.

The Health and Safety Department works in close partnership with the Estates Department on all of the above areas.

Further information may be accessed on the Estates and Buildings web site, <http://www.ed.ac.uk/schools-departments/estates-buildings> or by contacting the Estates and Buildings Health and Safety Adviser.