Safety Management Update

1. Introduction

- **1.1.** The following report provides an update to Finance and Risk Committee about the plans to be implemented and actions currently being undertaken to develop and maintain a positive safety culture across all our activities, whether centrally coordinated or organised by one of our 375 Clubs and Societies.
- **1.2.** Our record in safety management is strong with a very low incident rate given the frequency and range of activities under our remit. Where deeper investigation has been carried out, there is significant assurance that the systems and controls in place adequately mitigate risks associated with these activities
- **1.3.** We recognise that the breadth of activities we run means that we need to have an overall assurance that the processes and systems we have in place are satisfactory rather than relying upon individual checks which would take an unacceptable time to work through all activities. We therefore wish to improve our ability to demonstrate that appropriate controls are in place and being followed for any given activity.

2. Purpose

- 2.1. There are two primary purposes for the development of a safety management framework:
 - 2.1.1.To develop the safety management awareness and skills of all those involved (student participants, student volunteer organisers and student / permanent staff)
 - 2.1.2.Legal / compliance including to demonstrate appropriate systems and measures to Auditors etc...

3. Vision

- **3.1.** Our vision for a step change in Safety management is, within a year, to:
 - **3.1.1.** Have the ability to pull out safety management records for any area, CSP or team.
 - **3.1.2.** Have appropriate training, delivered by a combination of Union, governing bodies and other external professionals.
 - **3.1.3.** Increased the profile of H&S in a positive way recognition schemes are in place and best practise is celebrated
 - **3.1.4.** Ensure checks are performed and recorded regularly and we can provide assurance that this happens.
 - **3.1.5.** Be able to demonstrate all of the above.
- **3.2.** Our vision for a step change in Safety management within two three years:
 - **3.2.1.** Implement the recommendations from the Safety Audit
 - **3.2.2.** Implement the recommendations the external review (outlined below)

4. Safety Brief

4.1. Following a SMG away day in May 2017 to brainstorm the issue of safety management, it was agreed that an external review be conducted to assess the current status quo and make a series of recommendations to guide us towards best practise and ultimately provide the assurance of solid controls and practises. The full brief is below in **appendix 1**. The notes from the SMG Away Day are in **appendix 2**.

- **4.2.** In the search for an appropriate external partner to conduct the review, the brief has been circulated to three potential partners namely:
 - **4.2.1.** Endsleigh Insurance, specialist insurer to the Student Union market and the preferred insurer for almost all Student Unions. Following the initial contact a date is yet to be set for an initial meeting to confirm what support they can give.
 - **4.2.2.** College Safety Department, who reviewed the brief and suggested that we await the outcome of the safety audit to be conducted by the college safety auditor in September 2017.
 - **4.2.3.** John Huckstepp a safety consultant working with Carter Corson, business psychologists, who are currently working with College leading a management development program. A meeting is being set-up for week commencing 26 June.

5. College Safety Audit

- 5.1. The College safety department have been very supportive providing safety leadership training in January 2017, sending a representative to attend our departmental Health and Safety meetings and have now commissioned a Union health and safety audit to be undertaken 26 September 2017.
- 5.2. A scoping meeting to agree the terms of the audit will take place 22 June. It is expected that the audit will focus on Club activities.
- 5.3. Once the audit has been undertaken, the subsequent report will provide an independent review of our current safety systems and recommendations for improvement.

6. Student Activity Health and Safety Work Programme

- **6.1.** The recently recruited Student Activities Manager has been looking more closely at student safety management and is currently developing a work program with key actions, milestones and timelines over the next three years.
- **6.2.** The program will respond to the recommendations highlighted in the KPMG Internal Audit Report (May 2017).
- **6.3.** I have included the draft work program in **appendix 3** for information.

7. Conclusion

7.1. This paper provides a brief update of the work currently being undertaken and also highlights the general direction of travel. Underpinning this work is a cultural change and we must ensure staff and student buy-in.

Appendix 1

Safety Management Review Brief

Background

Imperial College Union runs a very wide range of activities both centrally and through its 375 Clubs and Societies.

Our record in safety management is strong with a very low incident rate given the frequency and range of activities under our remit. Where deeper investigation has been carried out, there is significant assurance that the systems and controls in place adequately mitigate risks associated with these activities.

We recognise that the breadth of activities we run means that we need to have an overall assurance that the processes and systems we have in place are satisfactory rather than relying upon individual checks which would take an unacceptable time to work through all activities. We therefore wish to improve our ability to demonstrate that appropriate controls are in place and being followed for any given activity.

External review

We intend to instruct an external review to assess the current status quo and make a series of recommendations to guide us towards best practise and ultimately provide the assurance of solid controls and practises.

We recognise that the right person(s) for this review will bring their own experience in terms of what, and how, to review existing practises therefore this brief is indicative rather than prescriptive of the work to be undertaken.

Outline Brief:

- An evaluation of what we do
- Assess a sample of the filed risk assessments
- Understanding the current staff and student culture(s) towards H&S
- Conducting a policy review
- How are things captured and stored what systems / what is best practise?
- Review training provided to CSPs

Desired recommendations:

- Recommend a framework to solve the demonstrability issue
- Recommendations on how to communicate with stakeholders about the topic
- What future resource is needed in terms of staff, systems etc?
- Suggested frequency and level for H&S being formally tabled on agendas
- What is best practise in how things are captured and stored?

<u>Outcome</u>

We are committed to delivering a step change in this area. Specifically, within a year we aim to:

- Have the ability to pull out safety management records for any area, CSP or team.
- Have appropriate training, delivered by a combination of Union, governing bodies and others
- Increased the profile of H&S in a positive way recognition schemes are in place and best practise is celebrated
- Ensure checks are performed and recorded regularly and we can provide assurance that this happens.
- Be able to demonstrate all of the above.

Appendix 2

SMG Health and Safety Day - 12th May 2017

Summary notes from our away day discussing Health and Safety including Jarlath O'Hara, Malcolm Martin, Paul Buckley and Andrew Keenan.

<u>A process mapping exercise to display good practise 'H&S interaction steps' for an activity</u>. (With a focus on a CSP-type model of delivery but adaption for more general steps where appropriate.)

- 1. A Safety Policy
 - a. What is the scope?
 - b. Who has what responsibility?
- 2. Clear definition and boundaries of what we do
- 3. What is the Activity?
- 4. The organisers know their responsibilities
- 5. Selection of a competent supplier / provider
 - a. Licensing / accreditation / training / logs are produced as appropriate
 - b. Due diligence on venue / supplier
- 6. Previous near misses and incidents are logged and understood
- 7. Equipment is checked, maintained and logged
- 8. Staff / instructors are appropriately trained
- 9. Supervision, including appropriate first aid provision
- 10. RAMS is appropriate and complete and hazards that have potential to cause harm are understood
- 11. Pre-Activity checks for participants
 - a. Contra-indicators / barriers to participation
- 12. Logistics are in order and communicated
 - a. Timing / location
 - b. Participant details
 - c. Clothing / Kit required
- 13. Briefing for participants
 - a. Signed participation record as necessary
- 14. Checklist for organisers
- 15. Experience / comfort level of the group assessed by organisers
- 16. Appropriate kit is selected and checked as well-fitting etc
- 17. Activity takes place
- 18. Participants supervised throughout as appropriate
- 19. Incident / near miss reported or all clear given
- 20. Any incident fed back in to review and revise RAMS

Over-arching issues:

- Being able to demonstrate all of the above
 - O Which bits specifically need evidence?

- Designing out risk in the first place
- Routine walk-around being regular, visible and logged

Whilst this applies directly for a specific activity, the same applies but with exclusions for every day activity. Eg supplier or kit may not be relevant.

Discussion on Club versus 3rd party supplier responsibility for providing RAMS

Resolution - CSP role is to ensure due diligence as appropriate on any 3rd party. Guidance should be provided as to what the standard looks like for high / medium / low risk activities.

Discussion on purpose of Health and Safety work with CSPs

Resolution – there are two primary purposes:

- 8. Legal / compliance including to demonstrate appropriate systems and measures to Auditors etc
- 9. To develop the safety management awareness and skills of all those involved (student participants, student volunteer organisers and student / permanent staff)

Need to avoid 'Health and Safety' language where appropriate for students. Safety management or quality activities being preferred terminology.

All welfare aspects are relevant including general wellbeing, physical and mental health

New projects / roles / JDs need an improved, recorded assessment for physical and mental health. This needs to draw together aspects picked up in PDRs and Staff survey etc

The Union is supporting and developing key volunteers for now and for future roles. This doesn't impinge on their autonomy and is in line with our objectives with CSPs.

We should produce a management toolkit which clearly identifies 121s and PDRs as vital to this process. Ties into Mgt standards and culturally we must embed such issues as a priority when raised with us as SMG / Managers.

The policy need to be review and should consider a matrix to display roles and responsibilities for eg:

- Board
- Union MD
- Union Student activities manager
- CSPs
- Individuals (noting subtleties and sensitivities about placing, or being seen to place, responsibility with participants as adults rather than responding to own responsibilities.

Discussion on how do we make, and keep, H&S policy "live"

Resolution – This is a cultural change and we must ensure staff and student buy-in. We can follow the Construction industry example in terms of being public about the record, talking about it and celebrating it.

Discussion on: What does progress look like? Where do we want to be in 1 year?

Clubs, teams and projects have a level of standardisation and are given the green light

We have the ability to pull out safety management records for any area, csp or team.

Training is appropriate and delivered by a combination of Union, governing bodies and others.

The profile of H&S is raised in a positive way - recognition schemes are in place and best practise is celebrated

We have best use of college systems and resources.

Checks are performed and recorded regularly and we can provide assurance that this happens.

Students know where to go when they have H&S questions.

Using the F&R committee example, that when people are asked about their interaction or experience of H&S, that they give positive responses.

College Audit:

22nd June – College Audit scoping meeting

Audit to take place in September – 'student risk' is the theme

Brief:

An evaluation of what we do

Understanding the current staff and student culture(s) towards H&S

Conducting a policy review

Recommend a framework to solve the demonstrability issue

How are things captured and stored – what systems / what is best practise

Suggested frequency and level for H&S being formally tabled on agendas

What future resource is needed in terms of staff, systems etc?

Training and handover opportunity is now to review RA

Pick out some of the 'filed' risk assessments

Recommendations on how to communicate with stakeholders about the topic

<u>Ideas:</u>

Departmental H&S coordinators

Have we positioned H&S committee right? To review.

X activites delivered safely

X student increasing their competency in this area

Specific consulting piece on Dram Soc after the overall piece

Must be a step change by the end of Strategic Cycle

Actions:

JOH to write a draft brief from the notes above

JOH to explore who does this best in college and what support is available to us?

JOH to add H&S to the agenda for staff development day.

Items as preparation for the Consulting piece below:

PB to plan out the journey for a student from 1st year member through to leader.

PB to review training in this area

PB to access the filed RAs

AK to find and circulate Abi's previous paper to board

Appendix 3
Student Activities Health & Safety Work Programme (Draft)

Task	Action	Milestones	Completion date
Create standard Risk Assessment (RA) templates for all CSPs	 Create empty RA template for all CSPs Integrate systems with standard RA Allow clubs to submit RA ICU to come up with a way of 'authorising' RA templates Create a store of updated RA's online 	 Create standardised templates Ensure clubs fill out standardised RA's File standard RA's in logical place on website. ICU to authorise function on systems Functionality tested 	June 17
Identify H&S Staff Training Needs	- Book Student Activities staff to attend Royal Geographical Society (RGS) Off Site Safety Management Course	- Two day Safety Management course completed	June 17

College H&S Audit scoping meeting	 Meet with College H&S team to agree scope of H&S Audit in September 	- Scoping brief agreed	June 17
Clubs to be allocated level of risk category and reallocate clubs risk category if necessary	 Design risk matrix in order to categorise clubs In high, medium and low themes Apply risk matrix to clubs 	 Risk matrix agreed upon Clubs separated into high, medium and low risk based on core eActivities. 	July 2017
	- Clubs categorised	 Online register of CSPBs to show CSPBs which category of risk they fall under 	
	- Clubs put into groups online		
Train high risk clubs and societies in risk assessment process and how to assess and report risks	 Create a risk assessment training that is both easy and effective. Finalise training format Identify which clubs require it training based on risk ratings. 	 Create program that is ready for delivery Clubs sorted into risk categories of high medium and low All clubs identified are signed up for mandatory training Deliver training 	Jul/Aug 2017

	- Invite clubs to training	 Upload template onto website CSPBs to register and submit their annual risk assessment online Union staff to sign off risk assessments in conjunction with CSPBs 	
Ensure reporting system is online for CSPBs to reports incidents.	 Research components of accident reporting system Create reporting system Test standard reporting system for incidents within CSPBs is fit for purpose and easily accessible to CSPB's. Finalise reporting system Consult with I.T to launch system for new academic year. 	 Draft template complete Tests standard reporting system for incidents within CSPBs is fit for purpose and easily accessible to CSPB's. Reporting system tested Final form agreed upon 	Sep 17
High risk clubs, doing high risk activities, will be asked to submit risk assessments for most of their events and activities, not just annual risk assessments. Trips won't be authorised unless risk assessed and signed off by union staff member.	 Create deadline(s) for high risk activities risk assessment submissions Communications drafted to high risk clubs about creating risk assessments for activities and trips Choose date for briefing 	 Deadline created for submissions Communications sent out High risk clubs briefed on risk assessments needed for high risk activity Risk assessments submitted for trips to deadline 	Sep 17

College Health & Safety Audit of ICU	- Assist with College H&S Audit	 Initial Audit completed Audit Response submitted Action plan agreed and implemented 	Sep 17
Provide training on risk assessments to all clubs throughout the year.	 Training sessions planned for all CSPs with how to asses risk and report incidents Resend invites to all clubs to sign up to training workshops 	 All clubs have partaken in risk assessment training Large number of clubs trained in 2nd term 	Start of every term completed by end of academic yea
High risk clubs start to be audited as to whether they are following their risk assessments and that they know how to assess risk.	 Organise timetable in order to audit clubs Sample group selected for audit 	 Half or more of sample number audited by mid-November Number of Audits carried out each week 	Nov 17
Update operational plan and risk registers.	 Start review process for risk registers and operational plan Implement changes and updates 	 Register and operational plan reviewed Any changes and updates made 	Jan 18
Health and Safety Audit	Set date for AuditInvite Auditors	- Auditors confirm date of audit	Apr18
Review operational risk registers against operational plan.	 Update both operational plan and risk register to align with each other, ensure this activity is done annually. 	- Risk register and Operational plan updated.	June 18

Mid - Long Term Strategic Aim	 Year 1 raise awareness of H&S compliance and culture and target X % compliance Year 2 target X % compliance Year 3 target X % compliance 	 Year 1- 3 ICU will provide an annual H&S report evaluating progress and success of the programme. Aim - Report will be able to evidence and demonstrate a step change in H&S support, training and compliance and a positive culture and recognition of safety management at ICU 	2017 – 2019
Health & Safety Award	 Seek guidance on criteria and process for application for Imperial College Excellence in Health and Safety Award 	 Understand criteria and application process Create a work plan and strategy to achieve an award Submit an application for Imperial College Health and Safety Award 	2019