

Imperial College Union Policy Working at Height Policy

Audience: All Staff
Owner(s): Leadership Group
Created Date: December 2020
Review Date: December 2022

1. Policy statement

Imperial College Union is committed to ensuring the health, safety and welfare of its members, staff, customers, suppliers, visitors and all others who may be affected by its activities. Imperial College Union recognises that good management of health, safety and welfare is essential to the success of the organisation and is a sign of a well-managed organisation. Imperial College Union is committed to ensuring that procedures are in place to identify hazards, assess risk and set objectives to improve the management of health, safety and welfare.

Imperial College Union acknowledges its duty to ensure that all relevant legislation regarding health, safety and welfare is adhered to and that resources are made available to ensure health, safety and welfare.

Imperial College Union is committed to developing a positive safety culture, based on the involvement of staff and volunteers in health and safety management. Imperial College Union will therefore use consultative forums and mechanisms to involve staff and volunteers in health and safety management, and will endeavour to provide relevant training to all staff and students.

Imperial College Union commits to reviewing this policy at least every 2 years, or as and when necessary, with approval for the policy to take place at the Board of Trustees.

2. Introduction

The *Work at Height Regulations 2005* came into force on 6 April 2005. The Regulations apply to all work at height where there is a risk of a fall liable to cause personal injury.

To comply with these Regulations, the Union must keep a record detailing the tracking and inspecting of ladders and step ladders (excluding kick-stools). A standard system involves issuing a tag (Scafftag for example) for each ladder, on which the date of next inspection is recorded. Each tag has its own identification number and is attached to the ladder in a position whereby it does not hinder its use.

The record requires basic information to be recorded such as: specific location of the ladder, owner, age, place and type of use. This information should be stored locally (an example excel spreadsheet is included below) with the person trained to inspect the ladders. The checklist used is based on an industry standard. Depending on the frequency of use, inspection will generally be carried out on a 12-monthly basis, but 6 monthly intervals are required for the more frequently used ladders, especially those belonging to the Estates Group

3. Responsibilities

Board of Trustees

The Health and Safety at Work Act 1974 places a statutory duty on organisations to ensure, so far as is reasonably practicable, the safety, health and welfare of its employees at work

and other people who may be affected by their activities, e.g., membership, volunteers, members of the public.

The Board of Trustees, as the governing body of the Union, has overall and final responsibility for Health and Safety matters within the Union and for ensuring that Health and Safety legislation is complied with.

The Managing Director

The Managing Director has delegated responsibility for the implementation, monitoring and review of the Health and Safety Policy and associated policies. As required by the 'Management of Health and Safety at Work Regulations 1993' the Managing Director is named as the 'competent person' who will ensure compliance with Health and Safety. In particular the MD is responsible for:

- The setting of Health and Safety standards and objectives.
- The allocation of the necessary financial resources.
- Identifying and allocating Health and Safety responsibilities to Senior Managers / Departmental Heads.

Leadership Team Lead

The Managing Director will delegate to a membership of the leadership team the following responsibility:

- Ensuring general risk assessments are undertaken and made available to all employees.
- Monitoring and reviewing the effectiveness of Health and Safety activities and the Union's Health and Safety Policy and associated policies and procedures, and for ensuring that, at the strategic level, performance standards and timescales are adhered to.
- Ensuring accidents are investigated and reported to the Board of Trustees.
- Putting in place arrangements to monitor the maintenance of the premises and equipment.
- Chairing the Students' Union's Operational Health and Safety Committee and ensuring it has the time, facilities and resources to carry out its business effectively.
- Keeping under review this Health and Safety Policy and the Health and Safety performance of the Students' Union.

Line Managers

Health and Safety is a delegated line management responsibility requiring managers to undertake operational Health and Safety duties identified in this Policy and individual policies and procedures associated with Health and Safety. All Departmental Heads will be trained in relevant Health & Safety courses (i.e., Risk Assessment, COSHH) and where appropriate (CIEH, NEBOSH) to ensure areas/ teams are managed safely.

Departmental Heads and Line Managers are responsible for:

- Ensuring that departmental activities are conducted in accordance with Union policy, legislative, and other formal standards and that those hazards having the potential to cause harm are risk assessed and identified controls are implemented.
- Ensuring that employees receive sufficient information, training and supervision on Health and Safety matters.
- Producing safe systems of work and the means for complying with this Policy and other individual policies and procedures associated with Health and Safety.
- Where necessary, organising supervision to control the working environment and the maintenance of safe standards.

- Investigating accidents, or near misses, to establish causes and prevent recurrence.
- The Health and Safety induction of new staff, volunteers and students and ensuring that information, instruction and training are provided to meet individually identified needs.
- Identifying and monitoring the adequacy of the specific Health and Safety responsibilities of staff and students.
- Reviewing the above arrangements at regular intervals, making adjustments as necessary.

Individual Members of Staff, Volunteers, Students and Visitors

Individual members of staff, students and visitors have a legal duty to co-operate and comply at all times with the Health and Safety information, instruction and training provided. They must bring to the attention of their line manager or duty manager, without delay, any hazards identified, or improvements identified as necessary. If a hazard is seen, it should be removed or dealt with as soon as possible if it is safe to do so. It should also be reported using the Unions incident reporting system as a matter of priority.

Individual members of staff and students have a duty to take reasonable care for the Health and Safety of themselves and for other persons whom their actions or omissions may affect. Specifically, no person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare. Serious breaches of the Health and Safety Policy (e.g., misusing equipment, deliberately putting someone else's safety in danger) will be dealt with through the Union's Disciplinary Procedure.

Health and Safety matters may also be raised by any employee at 1-2-1 meetings, team meetings and at Town Hall meetings, which occur regularly.

Operational Health and Safety Committee

The Operational Health and Safety Committee will meet at least once per term, although additional meetings may be called by the Managing Director, Officer Trustees, or the Board of Trustees should the need arise. Membership of the committee will be determined by the Managing Director.

The Committee will have the following terms of reference:

- To maintain and review the measures necessary to ensure the Health and Safety of Union employees, students and others engaged in legitimate activities on its premises.
- To set and review H&S performance and objectives to improve H&S management and maintain a positive H&S culture.
- To monitor the management processes employed within the Union to mitigate risk, notably the implementation and annual review of risk assessments.
- To monitor and review H&S related incidents, implement investigations and complete corrective action (where appropriate and necessary) in a timely manner not to exceed 6 months.
- To monitor and review the H&S audit and inspection process, both internal and external, and implement recommendations where appropriate.
- To monitor and review the adequacy and implementation of H&S related training, awareness and competency standards.
- To enable complaints and reports from employees to be investigated, remedial action to be implemented, and response provided.
- To submit an annual report to the Board of Trustees summarizing the committee's output and effectiveness.

In addition to the Operational Health and Safety Committee, the Board of Trustees may from time to time determine the need for a sub group of the Board to take on specific governance

oversight of the Union's Health and Safety activity to ensure sufficient scrutiny and consideration is given to this area of work.

4. Arrangements

Testing & Inspection

The Union requires certain control measures to undergo routine testing to help ensure they continue to function as intended. Without such tests controls may not protect the users as intended.

All Ladders and lifting equipment such as ropes, pulleys, cranes are to be registered with the Union, College Estates and inspected by the College Insurance Inspector at the appropriate intervals.

A comprehensive table of requirements for inspection and maintenance of equipment for working at height is detailed in the [College Testing and Inspection Requirements](#) which the Union also adheres to.

Student Led Groups

All student groups must register all equipment with the Union. CSPs are to provide an updated inventory of equipment and trained students to the Union on an annual basis. Without an updated inventory the equipment will not be approved to be used.

Student groups must have prior approval from the Union before use of any equipment used for working from height and equipment must be registered with the Union. For use of certain equipment, an appropriate risk assessment must be provided to the Union and reasonable notice provided to the College security and estates departments, and subsequent college approval received, prior to any work taking place.

5. Review

The Policy Owner is responsible for conducting a comprehensive review of their policies at a minimum of every 3 years or as required to stay current with applicable laws and/or Imperial College Policies.

The purpose of the review is to determine:

- if the policy is still necessary and accurate;
- if the policy should be combined with another policy or if it should be rescinded;
- if the policy is up to date with current laws and regulations and Imperial College policies;
- if changes are required to improve the effectiveness or clarity of the policy;

6. Training

Health and safety legislation requires employers to provide adequate health and safety training. The College provides a comprehensive training programme that is available to all staff and postgraduate students, mostly without charge. Undergraduate training is dealt with in departments.

All staff and volunteers must undergo relevant induction and training before they can undertake working at height. The Union are to keep a central record of those signed off to work from height.