



**UNIVERSITY
OF LONDON**

Health and Safety Policy



1. Introduction

This policy is approved by the Board of Trustees and overseen by the University Health and Safety Committee. It is reviewed every three years or in response to changes in legislation affecting the statutory health and safety obligations of the University or following any major accident or emergency indicating a shortfall in its suitability or effectiveness.

The University at no time expects anyone acting on its behalf to put themselves into a situation that represents serious or imminent danger to life or health, although recognises that there are risks including health risks associated with some of its activities and seeks to implement controls to remove or mitigate them.

2. Aims and Objectives

The Health and Safety Policy provides an outline of management practices that help facilitate the University's activities while protecting staff, students, visitors and other persons who may be undertaking activities associated with the University and ensuring their wellbeing and safety.

The primary aim of the policy is to comply with Health and Safety Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

3. In Scope

This policy applies to all University activities inside and out our estate inside the United Kingdom. It applies to all University employees and students including when travelling and working abroad in their employment and studies. The policy and duty of care also extends to visitors to our property and buildings.

4. Governance¹

The Board of Trustees has strategic oversight of all health and safety matters throughout the University, and shall ensure that suitable policies are in place for the management of health and safety risks, and that key performance indicators are established for measuring health and safety performance.

A Health and Safety Committee has been established by the Board of Trustees in accordance with [Ordinance 6](#) to provide strategic health and safety leadership to the University and assurance to the Board of Trustees of robust safe working practices across the University.

The Vice-Chancellor is the principal officer of the University and is responsible to the Board of Trustees for the organisation and conduct of the business of the University. The University's Pro Vice-Chancellors, Directors and Senior Managers implement the Health and Safety Policy throughout their operational remits in accordance with the planning arrangements and responsibilities appended to this policy.

Health and Safety is a standing item on the agenda of the Joint Negotiation and Consultation Committee; enabling the University to meet its statutory obligations and the appointed TU Safety representatives to fulfil their statutory functions.

¹ Please read Planning Arrangements, Responsibilities and Risk Assessments Addendum.

5. Management Objectives and Performance Monitoring

The management of Health and Safety will be linked to the University's strategic objectives; and the University will ensure that the management of Health and Safety arrangements reflect the health and safety risk profile of the University.

The University will use both leading and lagging health and safety performance indicators to measure the effectiveness of the health and safety management arrangements.

Leading performance indicators will be based upon:

- Compliance with departmental safety inspection requirements.
- The number of non-conformances identified in the annual health and safety audit.
- Percentage of employees with a health and safety training and development plan.
- Percentage of employees with up-to-date DSE risk assessments.

Lagging performance indicators will be based upon:

- The number of reportable accidents.
- Frequency and severity analysis of reported accidents.
- Loss incurred as a consequence of work-related accidents and ill-health.

Addendums to this Policy:

1. Roles and Responsibilities
2. Planning Arrangements, Responsibilities and Risk Assessments

All health and safety queries should be addressed to the Health and Safety team at healthandsafety@london.ac.uk



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Roles and Responsibilities



1. Roles and Responsibilities

The Board of Trustees of the University of London (hereafter referred to as the Board) fully accepts its responsibilities under all applicable United Kingdom health and safety legislation. The Board is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of its employees, its students and all other persons who may be affected by the activities of the University.

2. Institution

In accordance with the requirements of the Health and Safety at Work Act (1974):

- i. Primary responsibility for the management of health and safety lies with the University.
- ii. The University has a duty of care to all employees (under Section 2 (1) of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999)
- iii. Under the Corporate Manslaughter and Corporate Homicide Act 2007, an organisation is guilty of the offence of corporate manslaughter (corporate homicide in Scotland) if the way in which its activities are managed or organised by its senior management causes a person's death and amounts to a gross breach of a relevant duty of care owed by the organisation to the deceased.

The University is committed to support the implementation of this policy by:

- i. Having clear processes and protocols.
- ii. Ensuring adequate insurance coverage is in place for all of its activities.
- iii. Providing training on the application of the policy and associated arrangements and forms.
- iv. Reviewing the policy every three years.

3. Senior Management

- i. Ensure there is a department risk assessment in place for their activities.
- ii. Senior Managers, for the area under their management control, must:
 - a. Ensure the department takes ownership of the hazards involved in its operations, suitable and sufficient risk assessments are conducted, and the necessary control measures are implemented and maintained.



- b. Ensure that health and safety concerns can be raised by any member of staff and will be dealt with in an open, fair and transparent way.
- c. Ensure that accidents are investigated promptly and where preventative precautions are necessary, they are allocated and implemented within appropriate timeframes.
- d. Ensure that sufficient numbers of first aiders and fire marshals are designated and trained to comply with the University emergency response arrangements.
- e. Consult with the Health and Safety team to agree on the health and safety competency and development needs for all staff within the department and liaise with Human Resources to ensure the necessary training is available to support these requirements.
- f. Ensure that all new employees complete their mandatory health and safety induction training within the required timeframe and receive any necessary additional departmental or role-specific health and safety information and training.
- g. Assess the health and safety impact of changes to the department at the initial planning stages.
- h. Consider the health and safety requirements/implications when purchasing new equipment, e.g. statutory obligations to carry out inspections, maintenance, user training, use PPE etc.
- i. Establish a programme of safety inspections with frequency based on risk, but at least annually, with inspection reports made available to all staff in the department and ensure any safety deficiencies are addressed promptly.
- j. Participate in an annual safety audit and cooperate with the University Health and Safety Manager to complete any corrective actions promptly.
- k. Cooperate with the recognised trade union safety representatives and elected representatives of employee safety so that they can carry out their legally prescribed duties.



4. The Director of Human Resources

The Director of Human Resources is the member of the Vice-Chancellor's Executive Group (VCEG) designated to oversee the health and safety arrangements at the University and shall:

- a. Take the lead to ensure health and safety management is given equal consideration to other management duties, and sufficient resources are allocated to meet University's statutory health and safety obligations.
- b. Keep the VCEG informed on the status of significant health and safety risks and progress with the health and safety improvement plan.
- c. Provide liaison between VCEG and the University Health and Safety Committee.

5. Line Managers

- i. Identify work-related hazards to health and safety and ensure suitable and sufficient risk assessments are carried out to determine safe ways of working.
- ii. Ensure any new work processes are properly risk assessed before implementation.
- iii. Ensure their staff comply with University and departmental induction and training requirements, including DSE training and workstation self-assessment.
- iv. Ensure work-related accidents and ill-health are reported and investigated per University procedures, with support from the University Health and Safety Manager where necessary.
- v. Ensure that the control measures from risk assessments and preventative actions determined by accident investigations are allocated and carried out within the appropriate timeframe.
- vi. Seek advice from the University occupational health service when there is a risk that an employee's health is specifically at risk from their work, working patterns or the working environment; this includes referrals where an employee is returning to work while recuperating from injury, ill health or medical treatment (including treatment for stress and mental health conditions).
- vii. Participate in departmental safety inspections and health and safety audits and ensure corrective actions are allocated and completed promptly.
- viii. Take appropriate action when health and safety is likely to be compromised; if necessary, suspending an activity pending a reassessment of the risk



- ix. Ensure that work equipment under their control is maintained in safe working condition, complies with any statutory examination and testing requirements and that operators receive the necessary information, instruction and training to use the equipment safely.
- x. Keep the relevant director informed about the management of health and safety risks within their sphere of operations and any barriers preventing them from achieving the level of control required by University policies and procedures.

6. Head of Health and Safety

- i. Provide advice on the interpretation of health and safety legislation and best practice.
- ii. Ensure that all University health and safety policies reflect the organisation and operations of the University, its statutory health and safety compliance obligations and the health and safety commitments of the Board.
- iii. Facilitate and advise on the development of a health and safety risk register and advise the Director of Human Resources on risks to be escalated into the University's strategic risk register.
- iv. Liaise with Human Resources Department to ensure that Occupational Health services support the health and safety management system.
- v. Produce regular reports to the University Health & Safety Committee and compile an annual health and safety report to the Board.
- vi. Advise the University Safety Committee and VCEG on the impacts of changes to Health and Safety legislation affecting University operations.
- vii. Develop a set of health and safety KPIs for the University, containing leading and lagging performance indicators.
- viii. Establish a programme of internal health and safety audits.
- ix. Attend departmental safety committees and assist departments with risk assessments and accident investigations.
- x. Assist departments in developing the health and safety competency and training requirements for their staff.
- xi. Monitor progress with corrective actions from audits, preventative precautions from accident investigations and control measures from risk assessments and keep the director updated.



7. Trade Union Safety Representatives.

Trades Union Safety Representatives shall be entitled to exercise the full range of their legal duties, including:

- i. To investigate potential hazards and dangerous occurrences at the workplace and to investigate the causes of accidents at the workplace.
- ii. To investigate complaints from any employee they represent, relating to their health, safety or welfare at work
- iii. Make representations to the University on matters affecting the health, safety or welfare at work of the employees at the workplace.
- iv. To carry out inspections of the workplace:
 1. after providing reasonable notice in writing; or
 2. to determine the causes of a reportable accident or dangerous occurrence, or an over three-day injury, where it is safe to do so
- v. To inspect and take copies of any document, Safety Representatives and Safety Committee meetings.
- vi. To attend JNCC meetings and monthly H&S catch-ups in their capacity as safety representatives.

8. Employees

All University employees are required by Section 7 of the Health and Safety at Work Act (1974) to take reasonable care of themselves, and others affected by their acts or omissions. Employees are further required to cooperate with their employer concerning health and safety matters, to work following information, training and equipment provided and to report any hazardous defects in plant and equipment or shortcomings in the existing health and safety arrangements to a responsible person without delay.

All health and safety queries should be addressed to the Health and Safety team at healthandsafety@london.ac.uk.



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Planning Arrangements

1. Organisation for Health and Safety Management.

The Vice-Chancellor is the principal officer of the University and is responsible to the Board of Trustees for the organisation and conduct of the business of the University. The University's Pro Vice-Chancellors, Directors and Senior Managers implement the Health and Safety Policy throughout their operational remits in accordance with the planning arrangements and responsibilities appended to this policy.

2. Special Arrangements under the Building Safety Act

The University is required to register as 'higher risk buildings' any of its residential buildings that have 8 floors or more (including ground floor) or that are over 18 metres in height. Under this legislation certain roles and responsibilities are required to be fulfilled and notified to the building safety regulator. The University has allocated the following roles to the relevant buildings that require registration under this Act:

Building	Accountable Person	Responsible Person
Eleanor Rosa House	UPP (Duncan House) Ltd	UPP Estates
Garden Halls	UPP (Cartwright Gardens) Ltd	UPP Estates
Bonham Carter and Warwickshire House	University of London	Exec Director of Estates
College Hall	University of London	Exec Director of Estates

3. Management objectives and performance monitoring

The objectives of the University health and safety management arrangements are to:

- i. Link health and safety management to the University's strategic objectives
- ii. Ensure the management arrangements reflect the health and safety risk profile of the University.
- iii. Clearly define the responsibilities and accountabilities of all University employees
- iv. Establish effective communication and consultation on health and safety.
- v. Develop health and safety competency across the University to support effective delivery of health and safety management.
- vi. Integrate health and safety management into the University's planning processes.
- vii. Ensure sufficient resources are allocated for the effective management of health and safety risks.



4. Performance Monitoring arrangements

The University will use both leading and lagging health and safety performance indicators to measure the effectiveness of the health and safety management arrangements.

Leading performance indicators will be based upon:

- Compliance with departmental safety inspection requirements.
- The number of non-conformances identified in the annual health and safety audit.
- Percentage of employees with a health and safety training and development plan.
- Percentage of employees with up to date DSE risk assessments.

Lagging performance indicators will be based upon:

- The number of reportable accidents.
- Frequency and severity analysis of reported accidents.
- Loss incurred as a consequence of work-related accidents and ill-health.

5. Access to Competent Advice

The University shall ensure it has access to competent advice regarding its statutory health and safety duties, the organisation for effective health and safety management, the development of health and safety policies and procedures, training and the provision of information, and support staff levels of the organisation.

The University shall appoint a qualified and suitably experienced occupational Health and Safety practitioner to fulfil this statutory obligation and support the business of the University Health and Safety Committee.

The appointed person must report to a senior member of the University management (director or head of department) and have authority to make reports directly to the University Vice-Chancellor and suspend any activity creating a severe and imminent risk of death, serious injury, or severe disease.

6. Communication and Consultation with Staff

- The primary method of consultation with employees will be through the University Joint Negotiation and Consultation Committee (JNCC). The Head of Health and Safety will sit on this committee.



- Consultation and Communication will also take place at monthly catchups with the H&S team and Safety representatives and through the H&S working group which is held quarterly.
- Trade Union safety representatives are entitled to attend the part of a meeting that deals with a health and safety matter affecting any employees that they represent, and a member of the University Health and Safety team can also be invited to attend if required.
- Information on health and safety management arrangements will be provided to employees via the staff intranet pages, and queries can be submitted via a dedicated health and safety email account, healthandsafety@london.ac.uk

7. Emergency Situations

The University shall establish robust plans for responding to emergencies, including:

- i. Injury or ill health in the workplace.
- ii. Outbreak of fire.
- iii. An unexpected loss of essential services, including power, lighting, heating and water supply.
- iv. Civil unrest and terrorist actions.
- v. An outbreak of a contagious disease in a hall of residence.
- vi. An emergency involving a University employee or student whilst working abroad.

8. Accident Reporting and Investigations

- i. An accident is an unexpected event that causes injury or damage to property or could easily have done so (near-miss events). All accidents should be reported, including near-miss events, as this will help the University identify shortfalls in health and safety management and avoid repetitions.
- ii. Information and guidance on reporting accidents and the procedure for investigating accidents are provided on the staff intranet pages. All reports should be made on the Mirashare system and initially investigated by the department that occupies the building or part of a building where the accident occurred or employs the staff involved in the accident.
- iii. Students and other visitors' accidents on University premises are investigated by their host department, hall manager or Institution building manager.
- iv. Subcontractors' working on University premises are responsible for investigating accidents involving their staff: They must notify the University Health and Safety Team of any accident on UoL



premises and this will be added to the Mirashare reporting system.

9. Provision of First Aid

- i. The University shall ensure first aid can be provided promptly to any employee, student or visitor who is injured or becomes unwell at the University premises.
- ii. Where all or a significant part of University premises is occupied by a tenant, e.g. a whole floor, the tenant shall make their arrangements for providing first aid to the occupants of the area they control.
- iii. The University shall ensure enough workers are trained and appointed as first aiders, based upon the risk profile of the activities undertaken in the premises, the size of the premises and the number of occupants.
- iv. The planning for activities and events outside regular working hours, e.g. weekends that involve large numbers of people or involve additional risk of injury, must consider the level of first aid provision necessary and augment the provision that is known to be available under normal operating conditions.
- v. Consideration will be given as to whether the University department risk profile requires HSE approved first aid qualification and will be appointed in writing for a period not exceeding the expiry date of their qualification certificate. They will receive a payment for their services, determined by the Human Resources Department, for the duration of their appointment period, or until they notify their head of department that they wish to terminate their appointment.
- vi. Heads of the department are responsible for recruiting sufficient first aiders within their department, in consultation with the University Health and Safety Manager to determine the number and distribution required.
- vii. First aid training will be provided through the Learning & development team.
- viii. The procedures for obtaining first aid are provided on the staff intranet pages and notices placed throughout each University premises.

10. Provision of Information and Training

- i. All staff must complete the mandatory health and safety induction training within the prescribed period after joining the University and every three years after that.
- ii. The University Health and Safety Manager will assist department heads in identifying any additional departmental or role-specific health and safety competencies for their staff and advising on any training required.



- iii. Additional health and safety training needs may also be identified through risk assessment and accident investigations. Developing knowledge and competency can be a necessary risk control measure or preventative action.
- iv. It is recommended that health and safety risk profile based competency requirements are developed for each employee within a department and develop a health and safety training and development plan that can feed into the employee appraisal process.
- v. Developing this methodology will ensure that each employee will have the necessary health and safety competencies to perform their role safely and provide the University with a practical leading health and safety performance indicator.

11. Risk Assessments

- i. Heads of the department are responsible for ensuring the hazards associated with the department's work are identified, and risk assessments are carried out to determine safe ways of working.
- ii. The procedures for undertaking risk assessments are provided on the staff intranet pages and forms for recording task, equipment, and space risk assessments.
- iii. Employees required to undertake risk assessments must be provided with suitable training to conduct a risk assessment correctly.
- iv. Risk assessments must be reviewed whenever there is a significant change to the work to ensure they remain valid and any control measures continue to be effective. They should also be reviewed following any accident associated with the assessed work.

Issue Number	Date	Changes Made	Author	Approved By
2	23/06/2021	Second issue	TF360	GZ
3	10/8/2023	Third Issue includes responsibilities under BSA and reflects safety's move to HR team	FH	SC Approved by Board of Trustees 11.10.23
4	18/12/2023	Minor amends to clarify application to visitors	FH	SC