

HEALTH & SAFETY REGULATION: SAFETY POLICY

INTRODUCTION

Edinburgh College of Art has three main sites; one in Lauriston Place, one in the Grassmarket, and the third at Inverleith. The College employs some 300 staff and has approximately, at any one time, some 1,500 students in attendance.

The College is administered by a Board of Governors and this Policy Statement sets out the Occupational Health, Safety & Welfare arrangements for all the employees and applies to students and all other persons i.e. contractors, visitors and members of the public who may be affected by the College's acts, work activities and / or services.

In addition to the provision of a College Safety policy, there is also a requirement under the provisions of the Health & Safety at Work Act 1974, and the Management of Health & Safety at Work Regulations 1999 and any subsequent amendments, to provide Departmental Policy Statements and Health & Safety Arrangements which are specific to the Department's area of work activity.

For the purpose of this Statement, a Department is also to be interpreted as a School.

1 GENERAL STATEMENT OF SAFETY POLICY

It is the policy of the College Board of Governors to ensure, so far as is reasonably practicable, the Health, Safety & Welfare at Work of all College employees and students and the safety of others who may be affected by the undertakings of the College.

i) Objectives of the Safety Policy

Expanding on the General Statement of Safety Policy, the College is committed to:

- a) the prevention of injury and impairment of health of all persons affected by the undertakings of the College;
- b) the observance of the requirements of the Health & Safety at Work Act 1974 and all other Acts, Regulations and Approved Codes of Practice applicable to the operation of the College;
- c) the adoption of safe working practices and standards.

ii) Statement of Intent

Edinburgh College of Art is committed to the belief that:

- a) Health & Safety measures can contribute to the improvement of the efficient and effective performance of all of the College's undertakings;
- b) the only effective approach to the prevention of ill-health, injury and

loss, is one based on the systematic identification and control of risks;
c) there is a need to develop appropriate organisational structures and a culture which supports risk control and secures the full participation of all members of the College;
d) there is a need to scrutinise and review performance so as to learn from experience.

iii) Involvement of Individual Members

The College requires all individuals affected by the activities of the College to take reasonable care for the safety of themselves and of others who may be affected by their acts or omissions and to co-operate with the College in the achievement of the above objectives.

iv) Consultation

The College will co-operate fully with appointed Safety Representatives and will provide them with sufficient facilities and training to carry out their function. The College will co-operate fully in the setting up of Safety Committees as appropriate.

2 ORGANISATION

The organisational structure for the implementation of the College's Health & Safety policy is shown schematically in Figure 1.

i) The Board of Governors

The Board as employer, has ultimate responsibility for compliance with the Health & Safety at Work etc. Act 1974 and all other relevant statutory requirements.

ii) The Principal

The Principal has overall responsibility for the administration and implementation of the College's Safety Policy.

iii) The Buildings Officer

The Buildings Officer has been nominated by the Principal as the member of the College management with responsibility for overseeing the implementation of the Safety Policy.

In addition to these general responsibilities, the Buildings Officer is responsible for the safe condition of all campus grounds, roads, paths, structures, the supply of power and water and other services within and integral to those structures and for their maintenance and repair.

iv) The Health & Safety Officer

The Health & Safety Officer shall be responsible to the Buildings Officer for the development and operation of monitoring arrangements covering all the undertakings of the College. In carrying out his/her own monitoring duties, the Health & Safety Officer and his assistants shall have authority to enter College premises and take such action as may be deemed

necessary to ensure compliance with this Policy, which could include the recommendation to the Buildings Officer for closure of the activity.

As well as monitoring Health & Safety performance, the Health & Safety Officer shall:

- Assist in the Management of Safety
- Provide Safety Advice
- Monitor Safety
- Carry out and assist with Safety Inspections
- Promote a Positive Safety Culture
- Formulate Safety Training requirements
- Investigate, record and analyse accidents and dangerous occurrences
- Support the work of the Health & Safety Committee
- Ensure the College meets its first aid requirements
- Maintain the College's Fire Assessments and Procedures
- Liaise with other appropriate Health & Safety bodies

as detailed in his job description.

v) Heads of Department

The nature of the College's activities are such that, from an operational point of view, the work is carried out by separate departments. Essential activities and priorities will vary from department to department, thus each Head of Department, as nominated, will retain executive authority for the safety of all persons affected by the undertakings of his/her department, and it is his/her responsibility to define the organisation and arrangements within his or her department for ensuring compliance with the General Statement of Safety Policy.

Note: The title 'Head of Department' is used to describe one who is directly responsible to the Principal, Vice Principal or College Secretary for part of the undertakings of the College.

vi) College Occupational Health Service

The Occupational Health Service provides a medical consultation service to all members of staff of the College Community. It also provides general health promotion/education activities through the provision of information, instruction and training in matters relating to occupational health.

A specialist Occupational Health Service is provided, encompassing:

- a) pre-employment medical screening;
- b) pre-planning medical assessment;
- c) the monitoring of health at work through various mechanisms;
- d) the control of recognised hazards at work, eg, by specialist medical examinations;
- e) health surveillance activities, aimed at identification of hazards at work;
- f) general health promotion/health education activities through the

provision of information, instruction and training in matters relating to occupational health.

vii) College Health & Safety sub-Committee

This Committee is appointed by the Board of Governors to consider all matters relative to Health & Safety in the College. It includes representatives of management, trades unions and students.

The Committee:

- a) serves as a consultative forum on Health & Safety matters for representatives of all sectors of the College;
- b) advises the Board of Governors on the effectiveness and the implementation of the Safety Policy;
- c) provides advice and guidance on major issues affecting more than one department of the College;
- d) submits recommendations for the promotion of Health & Safety initiatives;
- e) monitors the Health & Safety performance of the College;
- f) produces an Annual Report.

3 ARRANGEMENTS

The Board of Governors accepts ultimate responsibility to provide and maintain standards required by Health & Safety legislation and will provide reasonable resources and services for this purpose.

The Board of Governors' duties in respect of the legislation are carried out by the Principal and by Heads of Departments of the College. Under their direction, other persons are given responsibilities for particular aspects of those duties.

i) Specialist Advice

Throughout the College, there is a considerable amount of expertise and experience. Persons having such expertise and experience should, within reason, be willing to provide assistance when it is required for the improvement of the Health & Safety performance of the College. All members of the College are encouraged to seek the advice of departments or personnel who can be of assistance.

The Health & Safety Officer will provide the advice and assistance necessary to enable Heads of Departments to deal with the matters detailed in 3(ii) of this document.

ii) Departmental Safety

The Head of Department is responsible to the Principal for the Health & Safety of everyone in, or affected by, that Department. Each Head of Department shall, in the light of the hazards present in his/her department, supplement the College Policy with a departmental policy

statement and where necessary, departmental codes relevant to his/her department's needs.

Departmental statements will specify the organisation and arrangements for carrying out the policy at all work places in the department, and will:

- a) nominate a person to act as department safety officer/co-ordinator;
- b) define the duties and responsibilities of key personnel who are accountable for ensuring that detailed arrangements for safe working are drawn up, implemented and maintained, and specify the adequate arrangements for the absence of such key personnel.

Departmental statements will also detail the arrangements for:

- a) obtaining a safe place of work, including the procedures for maintenance and repair of such places, for dealing with any special risks relating to particular work locations and work activities, and the provision and use of such personal protection as is necessary;
- b) achieving safe systems and methods of work, especially during maintenance activities and the cleaning of plant and machinery;
- c) achieving a safe working environment with procedures for monitoring commensurate with the risks involved;
- d) procedures for introducing new machinery, substances or processes;
- e) emergency procedures;
- f) complying with all statutory requirements for testing, examination and inspection, together with the keeping of records related to same;
- g) the provision, maintenance and revision of training to comply with the needs of employees to ensure their competency to carry out their individual tasks safely and without risk to health;
- h) consultation procedures between Management and Safety Representatives; where applicable, the composition, frequency and location of safety committees.

iii) Risk Assessment

The most effective method of achieving Health & Safety at work is to anticipate the effect of that work on people and places prior to work commencing.

IT IS THE RESPONSIBILITY OF EACH HEAD OF DEPARTMENT TO ENSURE THAT RISK ASSESSMENTS ARE CARRIED OUT.

Such assessments, covering every activity and place within the department, will result in the significant risks being identified and the appropriate means of controlling those risks to be effected.

When risks to Health & Safety have been identified as significant, then the assessments must be made in writing.

Notwithstanding the need for general risk assessments, specific Regulations require assessment to be made with regard to:

- a) hazardous substances;
- b) manual handling;
- c) work with asbestos;
- d) display screen equipment;
- e) use of personal protective equipment;
- f) noise.

iv) Information, Instruction, Training

The College recognises the importance of having well-informed competent staff to achieve a safe working environment. The safety training needs of all staff will be regularly assessed, and where appropriate, training and instruction provided. Ongoing consideration will be given to the requirements of new legislation.

The principal means of achieving Health & Safety standards will be by the preparation and adoption of Safety Guidance Notes. The requirements prescribed in the Safety Guidance Notes must be followed so far as is reasonably practicable.

v) Procedures for Dealing with Safety Problems

Any member of staff or student with a complaint about safety should initially refer the matter to his/her immediate supervisor or course leader. If satisfaction is not achieved at that level, it is up to him/her to raise it with his/her departmental Safety Officer, Head of Department, or the Health & Safety Officer (preferably in that order).

vi) Fire Safety

All members of staff and students will be provided with adequate information on fire safety. Suitable arrangements relative to the risks will be made with regard to fire drills, fire alarms and fire precautions. Details will be provided in departmental statements.

vii) First Aid

Trained First Aiders, as required by the appropriate Regulations, are appointed throughout the College. They are primarily the Janitorial and Night Security Staff with designated Technicians also being First Aiders. Notices with this information are displayed throughout the College.

viii) Safety of Students

Each member of staff shall assume that initially all students are untrained in matters of safety. Members of the academic staff, and where appropriate members of the non-academic staff, have a duty to inform and instruct students so far as is reasonably practicable in all matters necessary to ensure their Health & Safety whilst working on College premises and on approved field studies.

Potentially hazardous equipment and substances shall be used by students only if adequate control measures have been taken.

Written instructions to students in their practical work shall draw attention to potential hazards of the material and equipment to be used.

Hazardous or potentially hazardous substances shall only be introduced into practical work for undergraduate students where there is no suitable less hazardous substitute.

If hazardous substances must be used, a risk assessment should be undertaken in accordance with the requirements of the Control of Substances Hazardous to Health Regulations 1999 and any subsequent amendments.

ix) Access Outwith Normal Working Hours

Normal working hours for a Department shall be defined by the Head of that Department in accordance with College Policy. Access to an Area outwith normal working hours shall be at the discretion of the person nominated by the Head of Department, and subject to such conditions as may be imposed by him/her. No person shall work alone in conditions where there is any reasonable possibility of an accident occurring. Any person in College premises outwith normal opening hours for those premises shall sign the appropriate After Hours Book when s/he enters and leaves.

x) Accident Reporting

Major accidents, incidents or dangerous occurrences (as defined in the Reporting of Injuries, Diseases and Dangerous occurrences Regulations) must be reported to the Health & Safety Office as soon as they occur for onward transmission to the HSE. All other events must be reported within seven days. Details of all such incidents must be recorded on the appropriate forms or in Minor Injury Books. The Health & Safety Officer shall keep a central record of all such accidents and incidents.

xi) Joint Consultation

The College fully recognises the advantages gained from consultation between the management and staff on Health & Safety matters.

The appointment of Safety Representatives will be encouraged. Assistance will be provided to safety representatives in the form of facilities and time to enable them to discharge this function effectively.

Where it is appropriate to have Departmental Safety Committees, they should meet at intervals relative to the needs of that department. Copies of Minutes of all Departmental Safety Committees should be forwarded to the Health & Safety Officer.

xii) Smoking

Smoking is prohibited throughout College premises apart from areas such

as lounges and common rooms within non-departmental areas which are specifically designated for smoking by the College Secretary.

xiii) Contracts

To ensure fairness and equity in all contracts, the College requires all contractors to comply with the standards stipulated in the Health & Safety Policy Statements and the College Contractors' General Code of Safety Practice.

Prior to the placing of any contract by the College, sufficient investigation will be made to ensure that the contractor has the competence necessary to perform the contract without risk, so far as is reasonably practicable, to the health or safety of any person who may be affected by the contract.

Contracts will be monitored and those contractors not complying with such Health & Safety standards will be dealt with in an appropriate manner, including where appropriate, termination of contract.

4 MONITORING HEALTH & SAFETY

i) Monitoring

The primary aim of monitoring Health & Safety is to ensure that the standards achieved at the workplace conform to the objectives of the safety policy.

The College recognises that accident statistics, whilst undoubtedly of value, are alone not suitable criteria for measuring safety performance. Some correlation of working conditions, injury potential, the incidence of minor and severe injury accidents, as well as the incidence of damage to plant and property must be considered when making an evaluation.

The main areas of evaluation, therefore, will be:

- a) accident/incident experience;
- b) evidence obtained from the regular inspection of the workplace;
- c) regular evaluation of the effect of the safety policy and supplementary safety policy statements in the light of (a) and (b) above;
- d) identification of long-term objectives.

Each department should continuously monitor its performance in the above areas, clearly defining its arrangements for collecting and evaluating accident statistics and also stating the frequency and method of safety inspection.

ii) Health & Safety Auditing

The purpose of Health & Safety auditing is to enable the senior management of the College to:

- a) ensure that the College is satisfying its legal requirements;
- b) identify any need for improved performance standards;
- c) promote greater awareness of safety throughout the College; and
- d) assist in the appropriate review of the College Safety Policy.

The Health & Safety Officer shall be responsible for auditing the safety performance of all the undertakings of the College assisted by representatives of management and staff. They should be varied in their approach, although in the initial stages, they should concentrate on the management systems for achieving safety.

The results of all audits shall be considered by the Health & Safety Sub-Committee then by the Board of Governors.

5 ANNUAL REPORT

The Health & Safety Officer, in consultation with the Health & Safety Committee, will produce a report annually for presentation by the Committee Convener to the Board of Governors.

This report will contain factual information about:

- a) accident experience;
- b) a summary of information obtained from inspection and investigation;
- c) a report on the organisation for safety and standards compliance with the safety policy;
- d) identification of long term objectives, together with an indication of the extent to which they are being met.

6 ISSUE AND REVIEW

A copy of this statement shall be brought to the attention of all members of staff. It will be reviewed, added to, or modified from time to time, and may be supplemented in appropriate cases by further statements relating to the work of particular departments or groups of employees.

1 July 1996 (Affirmed)
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