



UNIVERSITY OF
CAMBRIDGE

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University Health and Safety Policy

HSD016M



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1. Health and Safety Policy

1.1. Purpose

To state how the University of Cambridge complies with its legal and moral obligations relating to the health and safety of its staff, students and any other person who may be affected by its undertakings.

1.2. Aims

The University is committed to meeting its statutory health and safety responsibilities¹ and to creating a culture that is both proactive and collaborative in supporting the health and safety of all its members.

The principal aims of this Policy are to reduce the risk to people and property to enable the University to operate effectively; to manage the University's work in such a way as to allow staff, students, contractors, visitors and others who might be affected by its undertakings, to carry out their activities without detriment to their health and safety whilst embedding health and safety as a core value in everything we do; to ensure that the University has governance arrangements in place that enables it to demonstrate compliance with health and safety, and fire safety, legislation; and the development of a health and safety management framework.

1.3. Objectives

To achieve these aims the University has the following objectives:

- to assess work activities by identification of hazards and evaluation of risks
- to minimise risk to health through the provision and maintenance of suitable plant, buildings, facilities, equipment and the provision of safe systems of work
- to minimise unavoidable risks by the use of physical control measures and issue of personal protective equipment
- to provide safe arrangements for the use, handling, storage and transport of articles and substances
- to provide necessary information, instruction, training and supervision to ensure the health and safety of staff and others
- to consult with employees' representatives on health and safety matters
- to provide a comprehensive and effective Occupational Health service, including health surveillance where appropriate
- to implement a monitoring, inspection and audit process to ensure effective management of health and safety throughout the University
- to co-ordinate, co-operate and exchange relevant information with organisations providing support and facilities to University employees and students
- to co-ordinate, co-operate and exchange relevant information with contractors and visitors
- to integrate health and safety responsibilities into everyday working practices and managerial responsibilities.

¹ Note that where the term health and safety is used in the University's Policy, it encompasses fire safety. The University Fire Safety Policy can be found at: <https://www.em.admin.cam.ac.uk/what-we-do/estate-operations/health-safety/university-fire-safety>.



1.4. Scope

This policy applies to all staff, students, contractors² and visitors and is intended for implementation in all University of Cambridge constituent academic and administrative departments, institutes, schools, faculties, divisions and Non-School Institutions (NSIs). In this document the term 'Department' is used generically to apply to all University of Cambridge management entities.

This document forms part of the University's Health and Safety management system by:

- defining the health and safety roles and responsibilities of key individuals and groups
- outlining the governance arrangements in place and how statutory consultation on health and safety matters is undertaken
- providing clarity regarding the relationship the University has with its wholly owned subsidiaries and the Cambridge Students' Union (CSU), with regards to health and safety.

As the activities of the University are broad and complex and statutory duties are extensive, each Department must determine and record its own organisation and arrangements to implement this University Policy. These shall describe the responsibilities and mechanisms by which the Department will meet the University objectives and requirements and how the safety management responsibilities cascade within the Department.

Failure to comply with the University's health and safety requirements may lead both to disciplinary action by the University and potential legal action by the enforcement authorities.

This policy will be reviewed at intervals of not more than every 3 years.

1.5. Definitions

For the purposes of this document the terminology, definitions and abbreviations used in this Policy are detailed in Appendix 4.

² Whilst undertaking or engaged in University activities, where specified by contract.



2. University of Cambridge Health and Safety Policy Statement of Intent

The diversity and nature of our work mean that we engage in a wide range of activities, some of which involve risk. We all have the responsibility to uphold the health and safety of all staff, students, apprentices, visitors, and others who may be affected by our activities.

Our statutory requirements do not require us to provide a risk-free environment. Instead, we are expected to undertake risk assessments, make well-informed decisions, take responsibility for our actions and be aware of the potential risks we may encounter while engaged in University business, whether conducted in Cambridge or when working away.

The primary health and safety duty of the University of Cambridge is to provide and maintain a safe and healthy environment for everyone who works, studies, or visits the University. While achieving this objective is mainly the responsibility of managers, everyone who engages with the University, regardless of their role, must take ownership of this responsibility too.

We aspire to the highest standards in everything we do, and health and safety management are no exception. We must aim to keep ourselves and others safe and well at all times. We can achieve this by implementing high standards of health and safety management, by nurturing a culture of continuous improvement, and through effective leadership and collective accountability.

Signed

Prof Deborah Prentice
Vice-Chancellor



3. Health and Safety Roles, Responsibilities and Organisation

3.1. Policy Organisation

The Council and the General Board have adopted this Health and Safety Policy Organisation to implement the policy statement above and to ensure effective management of health and safety issues.

3.2. Duty of Care

To meet our duty of care to staff, students, contractors, visitors and those affected by our undertakings there is a cascade of delegated accountability that runs through the University from the Vice-Chancellor to each individual primarily via the line management framework.

Responsibilities are allocated based on the principle that individuals are responsible for the work under their control, for those working under their control and for the people who are affected by their work. This is accompanied by a system of monitoring, supervision and feedback that ensures that delegated tasks have been adequately implemented and that arrangements are in place to facilitate and support individuals in meeting their responsibilities.

These arrangements and the effective management and control of risks to health and safety require that all parties with an influence on how the University operates must meet their duty of care to those who may be affected by their acts and omissions. The level of assurance required should be commensurate with the risk of the activity.

The committee structure which gives effect to the implementation of the Health and Safety Policy is shown in Appendix 1.

It should be noted that the Colleges have responsibility for the management and application of their own health and safety policies and procedures. However, the University and Colleges liaise on those matters of health and safety which impact on the wider University community.

3.3. General Responsibilities

This Policy sets out general, overarching responsibilities. Other subject specific health and safety policies and arrangements give details of more specific actions employees, managers, Heads of Department and others need to take to meet their responsibilities.

3.3.1. *Employees*

Every employee has a responsibility to ensure their own health and safety, and to ensure others are not put at risk by their acts or omissions at work. Likewise, every employee is empowered to stop their work, or the work of others should they feel the work is being carried out in an unsafe manner.

It is important that all employees understand their legal responsibilities³ and what they must do to meet them.

In particular, all individuals, irrespective of where they work, have the following responsibilities:

³ Section 7 of the Health and Safety at Work *etc.* Act 1974.



What
everyone
should
know and
do:

Have an awareness of, and comply with both the University Health and Safety Policy and procedures specific to their workplace
Be familiar with all emergency arrangements and all risk assessments and method statements or safe operating procedures applicable to the work they are undertaking
Participate in all training or occupational health requirements identified as necessary by the University and their Department and/or line manager
Maintain competence for their role

How
everyone is
expected to
behave:

Take reasonable care of themselves and all others who may be affected by what they do or don't do
Do not place fellow employees or others in danger by their actions or interfere with or misuse anything, objects, structures or systems of work provided by the University in the interests of health and safety⁴
Set a high personal standard and carry out activities in a manner consistent with University values of mutual respect, excellent service, collaboration, empowerment and innovation
If aware of any unsafe practice or condition, inform their line manager or Departmental Safety Officer (DSO)

When
working
everyone is
expected to:

Understand the risks of their work and comply with and follow risk assessments and method statements/safe operating procedures. Only engage in activities when competent to do so and seek advice if they do not feel competent to carry out their work
As soon as identified, tell their line manager or supervisor of any arising unforeseen risks which do not have control measures in place
Avoid improvising and when identified, report any dangerous condition to their manager, supervisor or DSO immediately
Obtain and use the correct tools/equipment for the work and don't use any that are unsafe or damaged
Where applicable, use and store personal protective equipment properly and, where guarding or other protective mechanisms are in place check they are secure and have not been tampered with before using the equipment
Always consider the safety of others who may be working in the same area or using the same or adjacent equipment
Report any accidents, symptoms of work-related ill health, near misses (that might have resulted in injury or damage), dangerous occurrence or dangerous condition (including inadequacies in health and safety procedures) in a timely manner (e.g. to their DSO) and in accordance with Department and University arrangements and procedures

⁴ Section 8 of the Health and Safety at Work *etc.* Act 1974.



3.3.2. *Students*

Students are not in the legal sense employed persons and hence many of the specific provisions of the Health and Safety at Work *etc.* Act 1974 do not apply to them. Equally they are not bound by the duties of employees as laid down in the Act. Nevertheless, students must comply with health and safety instructions and may be responsible for the consequences should they neglect to carry out a task required for the health and safety of others.

All students⁵ are responsible for:

- looking after their own health and safety and the safety of others who may be affected by their actions whilst on University premises or undertaking activities (e.g. fieldwork, work or study placements) under the supervision of the University and its subsidiary companies
- following the University's Health and Safety Policy and their Department's safety arrangements and procedures
- following any instructions given to them by an employee of the University for their health and safety
- reporting health and safety incidents or concerns pertaining to academic or University premises (including accidents, ill-health, premises hazards) in accordance with their Department and University procedures
- taking part in any health and safety training identified as necessary by the University, their Department or their academic supervisor
- ensuring they do not, without the consent of the member of staff in charge of the areas or activity, introduce any equipment for use on University premises, alter any fixed installations, alter or remove health and safety notices or equipment, or otherwise take any action which may create hazards for persons using the premises or employees of the University.

3.4. Outline of Responsibilities for Role-holders

Responsibility for health and safety within the University may be simply the core legal duty to co-operate with the University. However, any University employee acting in a managerial, professional or supervisory capacity bears additional management responsibilities and the more senior the appointment, the more onerous the responsibility. The level of that responsibility is directly linked to the level of control since responsibilities are allocated based on the principle that you are responsible for the work under your control, for those working under your control and for the people who are affected by your work. The nature of the structure of the University is such that some role holders will have more than one set of responsibilities.

While authority to take necessary actions can be passed on to other role holders, any person delegating in this way will still retain ultimate responsibility for the performance of the actions in question.

This responsibility applies to all University activities wherever they take place (e.g. in Cambridge, during fieldwork, placements, study or research abroad or at a conference).

⁵ Students carrying out work for the University either under contract of employment (such as Graduate Teaching Assistants) or as part of training (e.g. demonstrations/tutorials) will be treated as employees under this Policy.



3.4.1. *Academic Staff, including Principal Investigators⁶, and Staff with Teaching Responsibilities*

Academic staff, including Principal Investigators and staff with teaching responsibilities are responsible for assessing, taking account of, and addressing the risks including health and safety risks associated with research proposals and teaching activities in line with University health and safety policies and requirements.

Academic staff, including Principal Investigators and staff with teaching responsibilities must:

- assess the risks of the work under their control including:
 - ensuring risk assessments are completed and recorded by their staff and students
 - ensuring that any new processes are properly risk assessed before implementation
 - ensuring that all new equipment is checked for hazards, risk assessed and that users are trained on the required safe systems of work and risk control measures
- ensure that where risks cannot be eliminated, they are reduced to the lowest 'reasonably practicable' level
- monitor the implementation, operation and effectiveness of risk control measures through e.g. appropriate supervisory arrangements, inspections etc.
- ensure the provision of suitable information, instruction, training and supervision of staff, students (including visiting students) and academic visitors under their control taking into account their experience and skills
- ensure the safe handling and use of hazardous substances and the maintenance of safe plant, machinery and equipment under their control
- provide staff with access to health surveillance where identified in risk assessments
- ensure co-ordination and communication with co-investigators, research employees and others affected by research and teaching activities to enable health and safety risks to be effectively managed
- ensure all accidents and incidents are reported and investigated in accordance with agreed University arrangements and procedures
- take appropriate action when health and safety is likely to be compromised; if necessary, suspending an activity pending reassessment of the risk
- ensure compliance with the programme for statutory testing of all equipment used by their staff and students, including those statutory inspections (carried out by specialist engineers), user checks and regular weekly/monthly checks (carried out by their own trained staff and students) required for local exhaust ventilation, pressure systems, lifting equipment etc. and maintain records
- ensure that their staff and students comply with any policies or arrangements and procedures produced by the University, in particular those required for statutory compliance purposes
- maintain records of staff competence as they relate to the use of equipment and any hazardous substances in their respective areas of responsibility
- ensure that there are arrangements in place for ensuring the health and safety of students during undergraduate laboratory sessions
- ensure that they have appointed a suitable deputy to maintain appropriate supervision of the work under their control in their absence.

⁶ A Principal Investigator is normally a member of academic or senior research staff who is the recipient of funds provided by the University, a research funding body or other benefactor and as such they are responsible for the health and safety management of research work under their control.



Principal Investigators must ensure that risks are identified and assessed during the planning of research proposals; that the cost of implementing risk control measures are taken account of in the funding received; and that risks are kept under review throughout the project. They must also address in bid submissions whether there are health and safety issues that may impact on the University or Department, such that the University and Head of Department has the necessary information to make an informed decision when accepting funding or supporting other proposals (e.g. travel or working with offenders).

Academics who specify new practical work for undergraduate laboratory sessions are responsible for the risk assessment of the practical work and for the information and identification of key messages that need to be communicated to students.

Academic staff, Principal Investigators and staff with teaching responsibilities must work cooperatively to ensure that all parties understand their respective responsibilities, and that they can reasonably fulfil those responsibilities.

3.4.2. *Line Managers and Supervisors*⁷

Line Managers and Supervisors fulfil a similar role to Principal Investigators but may not be academic or research staff. They will have supervisory or management responsibility over other staff or students and as such, they are responsible for the implementation of the University Health and Safety Policy and Department safety arrangements within their area of control. In general, the direct responsibility for health and safety will be determined by the extent to which Managers and Supervisors have the authority to take action or make decisions. Where decisions are made, Managers and Supervisors are responsible for the health and safety implications of those decisions.

They must:

- be fully familiar with the University Health and Safety Policy and Department safety arrangements and understand and apply them within all areas of their responsibility
- make sure that staff under their control are competent and capable to undertake their allotted tasks
- ensure that staff know how to operate in accordance with the University Health and Safety Policy and Department safety arrangements, as relevant to their work and that they carry out their health and safety responsibilities
- effectively communicate relevant health and safety information to staff and others affected by their work activities thereby ensuring staff are aware of the health and safety issues and control measures relevant to their activities and projects
- ensure suitable and sufficient risk assessments are completed, authorised and implemented in their area of control
- ensure that they and their staff are trained in the principles, operations and emergency procedures necessary for health and safety
- ensure that equipment and substances provided for use at work are fit for purpose, used safely and maintained in a safe condition

⁷ An inclusive term to describe all those who have a duty to manage any aspect of work activity, whether carried out by staff or students.



- carry out regular monitoring to ensure that safe working practices are adhered to and a safe working environment is maintained
- as appropriate, inform their manager or DSO of any health and safety concerns that they cannot address
- take account of the effect of work on staff health and the health of the staff member on work when delegating work and assessing health and safety risks.

3.4.3. *Heads of Department*⁸

Heads of Department have overall responsibility for ensuring that their Department complies with the University's health and safety requirements and has effective systems in place for the management of health and safety. They are ultimately responsible for the safe management of all work under their authority.

They must:

- provide leadership on health and safety
- ensure that their areas of control and responsibility meet statutory and University safety policies and arrangements
- ensure the allocation of the necessary resources including the appointment (in writing) of a Departmental Safety Officer (DSO)⁹ and other specialist Officers¹⁰ and competent persons¹¹ as may be necessary to provide advice and/or support on health and safety related matters
- ensure the appointment (in writing) of a Departmental Fire Safety Manager (FSM)¹² and sufficient Fire Wardens to ensure that procedures and controls are developed for the evacuation of their areas in an emergency
- ensure that those appointed in specialist health and safety roles have sufficient authority, competence and resources to undertake the role
- make sure that appropriate arrangements are in place for ensuring the health and safety competence and capability of their employees and the University's minimum requirements for health and safety training are met
- ensure the preparation, annual review and authorisation of the organisation and arrangements specific to the Department for managing health and safety (contained within the Departmental Safety Management System) including confirmation of the Safety Role Register
- ensure the identification of hazards (for which they are the risk owner), assessment and review of significant risks and ensure the planning, implementation, monitoring, recording (e.g. a departmental safety risk register and profile) and review of measures to control those risks arising from the activities of their Department

⁸ Head of Department includes: Heads of academic departments and of other academic institutions, Chairs of Faculty Boards that are not divided into departments, Heads of a Centre, Institute or other body under the supervision of the General Board or Council, such as a Non-School Institution (other than the Unified Administrative Service), and the Heads of Divisions within the Unified Administrative Service, and is the person who has authority for the implementation of University Health and Safety Policy.

⁹ Where no appointment is made the Head of Department will be deemed to be carrying out the role of DSO.

¹⁰ Biological Safety Officer, Laser Safety Officer.

¹¹ Departmental Responsible Person (Water Safety), Departmental Responsible Person (Asbestos), Radiation Protection Supervisor, First Aiders etc.

¹² Where no appointment is made the Head of Department will be deemed to be carrying out the role of FSM.



- have procedures in place to ensure that academic events and courses held outside University premises are subject to proper formal risk assessment and regular review and communicated to those responsible for the premises
- ensure that there are measures in place for managing significant risks arising from the Department's activities that are not covered by the University's health and safety related policies and arrangements
- develop and review local health and safety arrangements and procedures for the management of specific risks and legal requirements that have a significant impact on the Department
- ensure that appropriate arrangements are in place for the communication of health and safety issues to all employees, students, contractors and other visitors to the Department
- ensure the setting and review of Department safety objectives and action plans to manage risks
- ensure the identification of activities critical to business continuity and preparation of plans to minimise the impact of a major incident, in conjunction with the overall University plan, including arrangements for all relevant persons who have restricted mobility, sensory disabilities or who are temporarily incapacitated
- ensure that all persons who may be affected by the Department's activities are aware of the arrangements for health and safety and have access to the necessary information
- establish local consultative health and safety arrangements or, in low-risk departments, placing health and safety as a standing item on the agenda of the department management committee if a health and safety committee is not justified
- put procedures in place which ensure employees (and their Trade Union Safety Representative) are consulted in good time on matters that substantially affect their health and safety at work, and cooperate with trade union safety representatives whilst they are carrying out their functions
- make explicit, document and communicate the health and safety co-operation and co-ordination responsibilities and arrangements where premises or workplaces are shared with other University departments and other employers
- put in place procedures to ensure all new members of staff and postgraduate research students complete the health and safety induction requirements
- put in place procedures to ensure the competence of employees including the maintenance of records e.g. training records
- put in place procedures to ensure all activities undertaken on behalf of the University are carried out by, or supervised by, competent people who have the necessary authority to meet their responsibilities
- have procedures in place to ensure adequate supervision of all students and visitors
- ensure that arrangements are in place to deal with foreseeable emergencies including, in conjunction with the Safety Office, the appointment and training of a sufficient number of First Aiders or First Aid provision to provide cover during operational working hours
- ensure that suitable systems are in place for the regular monitoring and review of health and safety within the Department e.g. via departmental safety inspections, in accordance with the University's minimum requirements
- cooperate with health and safety investigations, monitoring and auditing carried out by the Safety Office and any enforcing authorities
- formally address any breaches of the University Health and Safety Policy or its associated policies, arrangements and procedures as they relate to the Department.



3.4.4. *Building Occupiers*

It is the responsibility of the building occupier to ensure that the space allocated to them is used safely and according to its design and expected use. While authority to take actions necessary to comply with the duties of an occupier can be delegated by a Head of Department to the most senior member of staff based in any particular building/location, the overall responsibility of an occupier will continue to sit with the relevant Head of Department.

In particular, the occupier is responsible for:

- ensuring that they communicate and cooperate with other occupiers/users of the building (including visitors) to ensure that risks to health and safety are effectively managed (this can be achieved through a Building Occupiers forum or group)
- consulting with the Property Section in Estates Division or other landlord (e.g. NHS Trust) when requesting changes to layout, structure or services within the building
- informing Estates Division or other landlord of any building related issues that may impact the health and safety of other occupiers/users or visitors
- co-ordinating and facilitating any required remedial works
- consulting with Estates Division when defining responsibility for managing equipment or services where boundaries may be unclear, e.g. whether they are part of the building or viewed as occupier's equipment and ensuring responsibilities are documented
- organising and managing work, processes and equipment to prevent injury or ill health.

3.4.5. *Director of Estates Division*

The Director of Estates Division is the Landlord for the University Estate and is responsible for health and safety in relation to building structures, fabric and services as well as general areas of buildings which **are not** the specific responsibility of a department's local Building/Facilities Manager. As such, the post-holder is responsible for the systems and processes that ensure all statutory inspections of systems and equipment notified to the Estates Division are carried out, and for ensuring that the fabric of all University buildings, and fixed installations fitted therein¹³, are safe and suitable for use.

This includes:

- ensuring that the University's responsibilities under the Construction (Design and Management) Regulations 2015 are met and that construction and refurbishment projects meet the health and safety needs of the University
- fulfilling the role of Statutory Duty Holder under the Regulatory Reform (Fire Safety) Order 2005 to both the Responsible Person¹⁴ and to Heads of Department and appointing a suitably competent person to advise on fire safety management across the Estate
- fulfilling the role of Statutory Duty Holder under Regulation 4 of the Control of Asbestos Regulations 2012¹⁵ and appointing a suitably competent person to advise on asbestos management across the Estate

¹³ Excluding departmental equipment.

¹⁴ Article 3 of the Regulatory Reform (Fire Safety) Order defines 'Responsible Person' in relation to a workplace as the employer (i.e. The Chancellor, Master and Scholars).

¹⁵ The Duty Holder is the owner of the non-domestic premises or the person or organisation that has clear responsibility for the maintenance or repair of such premises.



- fulfilling the role of Statutory Duty Holder for the Control of *Legionella* Bacteria¹⁶ and for appointing a suitably competent Responsible Person to make sure the water management programme is successfully carried out and the risks from *Legionella* and Legionnaires' disease and *Pseudomonas aeruginosa* are identified and controlled properly.

3.4.6. *Director of Human Resources*

The Director of Human Resources is responsible for ensuring appropriate measures are in place to monitor workplace sickness levels. Where these monitoring systems indicate work-related ill health issues, the post-holder will bring these to the attention of the Occupational Health service.

3.4.7. *Director of Finance*

The Director of Finance is responsible for ensuring that purchasing systems consider health and safety issues and place responsibility on the purchaser to consider health and safety when planning the purchase of equipment, substances, articles or services.

3.5. Strategic Responsibilities

3.5.1. *The Council and the General Board*

The Council is the principal executive and policy-making body of the University. It has overall responsibility for the administration of the University, for defining its mission and strategic direction, for planning its work and for the management of its resources. The General Board is responsible for matters relating to the University's academic and educational activities and policies. As such, corporate responsibility for health and safety and the health and safety impact of policy decisions rests with both the Council and the General Board and collectively, its members are responsible for:

- demonstrating their commitment to the achievement of high standards of health and safety
- approving the University's Health and Safety Policy
- considering the health and safety implications of strategic decisions
- ensuring that the University has the organisational arrangements, systems in place and resources to enable the effective management of health and safety risks
- ensuring that the University has access to competent health and safety advice and as necessary, seeking competent health and safety advice before making a decision that may affect the health and safety of employees, students and others who may be affected
- ensuring that appropriate arrangements are in place for the effective management of health and safety, for monitoring operational health and safety performance and for ensuring an effective mechanism by which staff are consulted on health and safety including providing facilities for recognised trade unions to appoint safety representatives and enable them to discharge their responsibilities
- receiving reports from the Health and Safety Executive Committee and an Annual Report from the Director of Health, Safety and Regulated Facilities on the health and safety performance of the University, to enable them to monitor and evaluate the implementation and effectiveness of the University's Health and Safety Policy and arrangements for risk control
- regularly reviewing the University health and safety risk profile

¹⁶ As required under The Control of Substances Hazardous to Health Regulations 2002 (as amended) and HSE ACOP L8 - The Control of *Legionella* Bacteria in Water Systems.



- seeking assurance on the effectiveness of risk controls, including emergency planning arrangements, for significant health and safety risks to the University.

To discharge these responsibilities, the Council and the General Board are advised by the Vice-Chancellor and by the professional structure set up to provide expert direction on health and safety. The Audit Committee is responsible for reviewing the effectiveness of the University's systems of financial and internal controls through its internal audit programme, which includes audits commissioned in relation to health and safety. The Audit Committee makes an annual report to the Council on the effectiveness of these systems and would identify any risks relating to the University's approach to health and safety.

The Audit Committee:

- commissions Internal Audit Reports into any aspect of health and safety as part of the Annual Internal Audit Plan or as additional ad hoc pieces of work
- monitors actions related to health and safety as part of the wider internal audit programme, ensuring they are adequate and followed up by management.

3.5.2. *Vice-Chancellor*

The Vice-Chancellor is the principal academic and administrative officer of the University and is its resident head. As chief executive, the Vice-Chancellor has delegated authority for the academic, corporate, financial, estate and personnel management of the University. As such, the Vice-Chancellor has overall accountability for health and safety.

The Vice-Chancellor must:

- ensure that the University has a Policy on the management of health and safety and that this Policy is reviewed on a regular basis and communicated to all staff
- ensure that structures, systems and procedures are in place to secure implementation of this Policy and associated policies and arrangements
- agree how the Policy will be measured, monitored and reported through the development of appropriate key performance indicators
- agree health and safety objectives.

The Vice-Chancellor also has the authority to take whatever executive action is considered necessary to prevent serious harm to individuals or to the University. In exceptional circumstances, this may include summarily closing University buildings, sites, operations or activities.

On a day-to-day basis, the executive authority for health and safety management and any associated executive actions, is entrusted by the Vice-Chancellor to the Registry and the Director of Health, Safety and Regulated Facilities.

3.5.3. *Pro-Vice-Chancellors*

Where appropriate Pro-Vice-Chancellors will provide advice and guidance in relation to good health and safety management as part of their mentoring role. They will also advocate and champion a positive health and safety culture within their individual portfolios, ensuring that health and safety risks are considered and effectively managed through the projects and work-streams they oversee.



3.5.4. *Registry*

The Registry is Head of the Unified Administrative Service, which is responsible for the University's central administrative functions, and which supports the academic faculties, Schools, departments and institutions (including NSIs) in fulfilling the University's mission.

On behalf of the Vice-Chancellor, the Council and the General Board, the Registry, in liaison with those responsible for the operation of the University Safety Office, ensures the compliance, implementation and monitoring of the University's safety management system in line with the University Health and Safety Policy, other University wide safety policies, arrangements and procedures, local arrangements and legislative requirements. The Registry is accountable to the Vice-Chancellor for the effective management of Health and Safety within the University's Professional Services.

The Registry must:

- provide leadership and governance which supports and strengthens the University's health and safety culture
- seek assurance from the appropriate Unified Administrative Service Divisional Heads that health and safety is being managed effectively across their areas of control and that their health and safety responsibilities are being met. This will include assurance relating to:
 - providing leadership and promoting a positive culture
 - ensuring practices comply with local rules and relevant occupational health and safety policies and procedures
 - ensuring health and safety related risks are effectively identified and managed
 - identifying and seeking opportunities to improve the performance of health and safety management systems.

3.5.5. *Health and Safety Executive Committee*

The Health and Safety Executive Committee (HSEC) is a joint committee of the Council and the General Board set up to oversee effective management of health and safety within the University. It receives reports from the University Consultative Committee for Safety and the Director of Health, Safety and Regulated Facilities.

The Committee:

- ensures the necessary management actions are taken to give effect to University Health and Safety Policy
- reviews the effectiveness of the University Health and Safety Policy at intervals agreed by the Committee, but not exceeding three years
- oversees Safety Office training
- receives reports on health and safety from the Director of Health, Safety and Regulated Facilities
- receives regular summary reports from the Consultative Committee for Safety and the Occupational Health Committee and receives information from other sources where appropriate to health and safety
- oversees and, where appropriate, approves the development of University Health and Safety Plan



3.5.6. *Consultative Committee for Safety*

The University consults with and involves staff and student representatives on health and safety issues. It achieves this formally through the Consultative Committee for Safety which is a sub-committee reporting to the Health and Safety Executive Committee.

The University recognises health and safety representatives appointed by UNITE and UNISON. It encourages the Cambridge Students' Union to represent the student body on health and safety issues. In addition, the University retains the right to consult with staff or students as appropriate on relevant issues related to health and safety performance.

3.6. Advice and Assistance

3.6.1. *Director of Health, Safety and Regulated Facilities*

The Director of Health, Safety and Regulated Facilities has responsibility for the development and review of the University's Health and Safety Policy and strategy and the development, management and review of the provision of independent safety advice on behalf of the University in support of the policy and strategy including:

- development, review and evaluation of the safety management system to ensure it is fit for purpose and promotes continuous improvement
- acting as the professional head for all safety advice and ensuring that adequate arrangements are in place to provide:
 - competent safety advice at all levels within the University and for all areas of safety risk
 - focussed operational support to key risk activities
- monitoring, auditing and reviews as are required to give the Council and the General Board assurance that the management of safety at the University is adequate and that risks are adequately controlled.

The Director of Health, Safety and Regulated Facilities, on authority from the Council, is responsible for ensuring the appointment of specialist safety roles.

3.6.2. *Safety Office*

The University employs, in accordance with the Management of Health and Safety at Work Regulations 1999, a number of competent Safety Advisers which form the Safety Office.

The Safety Office is responsible for writing, consulting and gaining approval of the Health and Safety Policy and underpinning policies, arrangements and procedures as well as for the continuous development of good practice within health and safety across the University. The Safety Office is also responsible for delivering training and monitoring and evidencing the application of all relevant safety policies, arrangements and procedures across the University.

Competent fire safety, water safety and asbestos safety advice is provided by the relevant team in the Estates Division.

The Head of the Safety Office will lead and develop the Safety Office team to ensure integrated service delivery for health and safety at the University. This will include:



- ensuring a rolling programme of health and safety audits across the University and the production of reports thereon containing recommendations for improvement agreed with Departments/Services
- ensuring the provision of regular assurance statements to the University Health and Safety Executive Committee in respect of the system of internal control
- ensuring that reviews of this Policy and other health and safety policies, arrangements and procedures are carried out regularly
- ensuring the provision of competent advice on interpretation of health and safety legislation and good practice to the University
- maintaining a resource of information on the University's Safety webpages
- collating and reporting upon key performance indicators to the Council and the General Board and associated health and safety committees
- administering the accident and incident reporting system and reviewing incident data to identify trends and any lessons that can be learned including RIDDOR reporting on behalf of the University
- providing contextual information about comparisons with sector norms and statistical information, e.g. HESA data
- supporting the University and Departments and advising in response to emergency situations or major incidents
- (in conjunction with the Director of Health, Safety and Regulated Facilities) acting as the representative of the University to all external enforcement agencies and being the principal contact for these bodies
- delivering a continuous health and safety improvement programme through internal monitoring, inspection and audit
- the identification and delivery, where appropriate, of health and safety training
- ensuring involvement of employee representatives as equal partners in delivering and implementing the University's health and safety objectives
- supporting University research goals by providing a regulatory service for specialist licences and permits that are allied to health and safety legislation
- supporting University teaching and research activities by providing a Hazardous Waste and Radioactive Waste collection service
- (in conjunction with the Director of Health, Safety and Regulated Facilities) acting on behalf of the Vice-Chancellor, with delegated authority, develop processes and procedures designed to prevent serious harm to individuals or the University.

3.6.3. *Occupational Health*

The Occupational Health (OH) service contributes to protecting the health of staff and students¹⁷, by providing a service that focuses on the promotion and preservation of both physical and mental wellbeing at work, contributing to the prevention of ill health and supporting staff attendance, performance and wellbeing. The service has an advisory role in assisting the University meet its general duty of care under the Health and Safety at Work *etc.* Act 1974 by working alongside management to ensure that the working environment is safe and that a person's health is not adversely affected by their work activities.

¹⁷ Applies to Veterinary, medical and PGCE students as well as those undergraduates and taught post-graduate students selecting a project for which vaccination is recommended.



The OH team provides an impartial and confidential advisory service. Through collaborative work with the Safety Office and the University Staff Counselling Service as well as Human Resource Advisers and the Disability Resource Centre, and in conjunction with external agencies and services, OH provides an integrated service to the University.

OH is responsible for:

- assisting in fulfilling statutory (e.g. health surveillance) and regulatory requirements (e.g. guidance on food safety, the application of the Equality Act 2010) to ensure that the health of staff and others is not adversely affected by their work
- advising on fitness for work, vocational placement, return to work after illness, rehabilitation, ill health retirement, work-related illness and the control of occupational hazards
- ensuring that work health issues are appropriately managed
- advising on health issues affecting attendance or performance at work
- providing vaccination and immunisation dictated by work activities including travel medicine specialties
- guiding implementation of appropriate workplace adjustments specific to the health needs of the employee
- promoting health and wellbeing at work.

3.6.4. *School Safety Officers*

A Head of School or a Divisional Head within the Unified Administrative Service may appoint a School Safety Officer (or appoint a team to fulfil the role dependent on the size and risk associated with the operational activities of the School or Division) to further support the management of health and safety within their respective School or Division.

3.6.5. *Departmental Safety Officers*

Departmental Safety Officers (DSOs) support their Heads of Department with implementation of the Health and Safety Policy and arrangements at a local level within their Department. Where Departments are split over multiple sites or buildings, it may be more appropriate for there to be multiple DSOs. Further information on the role is given in Appendix 2.

3.6.6. *Departmental Fire Safety Managers*

Departmental Fire Safety Managers (DFSMs) support their Heads of Department with the implementation of the University Fire Safety Policy and arrangements at a local level within their Department.

3.6.7. *Other Safety Support Roles*

Other safety support roles within departments, depending upon the risk profile of the Department, may include:

- *Biological Safety Officer (BSO)* where activities involve work with biological materials and Genetically Modified Organisms
- *Laser Safety Officer (LSO)* where activities involve the use of Class 3 and Class 4 lasers
- *Radiation Protection Supervisor (RPS)* where activities involve work with ionising radiation.



3.7. Specialist Safety Roles¹⁸

The University has appointed one or more competent persons to fulfil specialist safety roles to assist the University in complying with specific statutory requirements.

3.7.1. *Radiation Protection Adviser (RPA)*

The role of the RPA is to advise in accordance with Schedule 4 and Regulation 14 of the Ionising Radiation Regulations 2017.

3.7.2. *Radioactive Waste Adviser (RWA)*

The RWA advises in accordance with Permits issued under the Environmental Permitting Regulations 2016 (amended 2018).

3.7.3. *University Fire Safety Manager (UFSM)*

The UFSM acts as 'Competent Person' under the Regulatory Reform (Fire Safety) Order 2005. They support the Director of Estates Division in their role as Duty Holder for the University Estate in maintaining compliance with statutory fire safety regulations including advising the wider University.

3.7.4. *University Asbestos Safety Manager (UASM)*

The UASM supports the Director of Estates Division in their role as Duty Holder for the University Estate and the wider University in accordance with the Control of Asbestos Regulations 2012.

3.7.5. *University Water Safety Manager (UWSM)*

The UWSM supports the Director of Estates Division in their role as Responsible Person for the control of *Legionella* Bacteria in water systems in accordance with the Approved Code of Practice and guidance, L8 and HSG274, and provides advice to the wider University as required.

3.7.6. *Dangerous Goods Safety Adviser (DGSA)*

The DGSA provides guidance and advice on all aspects of the transport of dangerous goods by road, sea and air to ensure compliance with the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended).

3.8. Subsidiaries

The University will treat each of its wholly owned subsidiaries as autonomous and expect them to properly manage health and safety themselves and have an effective management system in place which is aligned to its undertaking and risk profile. However, the University recognises that it should seek assurances that such systems are in place and how effectively they are working. Consequently, each subsidiary is required to:

- align with the University's Health and Safety Policy
- provide the University on an annual basis evidence that they have a Health and Safety Management System in place
- provide the University on an annual basis evidence of how effectively their Health and Safety Management System is operating

¹⁸ These roles may be supported by retained independent competent specialist individuals or outsourced to specialist advisers or companies.



- obtain their own competent health and safety knowledge and advice, details of which should be included within their management system
- explain how they will address any issues highlighted as a significant concern or reputational risk
- monitor and review any programme of statutory inspections of subsidiary owned plant and equipment undertaken through the University's insurers. This will not be carried out by the University
- address any defects or issues concerning subsidiary owned assets highlighted through statutory inspection undertaken through the University's insurers. This will not be carried out by the University.

3.9. Students' Union

The Cambridge Students' Union (CSU) is autonomous and as such, the University expects them to properly manage their own health and safety and have an effective management system in place which is aligned to its undertaking and risk profile. However, the University recognises that it should seek assurances that such systems are in place and how effectively they are working.

Consequently, CSU is required to:

- align with the University's Health and Safety Policy
- provide the University on an annual basis evidence that they have a Health and Safety Management System in place
- provide the University on an annual basis evidence of how effectively their Health and Safety Management System is operating
- obtain their own competent health and safety knowledge and advice, details of which should be included within their management system
- explain how they will address any issues of significant concern or reputational risk.

HSEC and the University Safety Office will provide the CSU with whatever institutional support they need to ensure the safety of students in carrying-out academic and related activities.

3.10. Trade Union and Safety Representatives

The University recognises the legal requirement to consult with Trade Union appointed safety representatives and appreciates the benefits that these representatives bring to the organisation.

Trade Union appointed safety representatives are a key element of the advisory and committee structures, whilst also being free to undertake in full their statutory rights as laid down in legislation.

Formal consultation on health and safety matters will be through the Consultative Committee for Safety (see Section 3.5.6).

All Departments must have their own health and safety arrangements which provide opportunities for staff and managers to work together on improving health and safety within their respective areas and which provide opportunity for consultation with Trade Union and Safety Representatives and contribution to the management of health and safety within their Department.

4. Arrangements

The arrangements for implementing this Policy are detailed in relevant University safety policies and published safety documents covering a range of activities.

4.1. Health and Safety Management System

The University health and safety management system is based on a Plan-Do-Check-Act process¹⁹ (see Figure 1 below) where ownership and responsibilities are integral to the activity owners. The philosophy behind the system is that the people responsible for creating the risk have a duty of care and are thus the people responsible for managing the risk. It is for this reason that a significant amount of effort is directed at developing our people, processes and enabling technology to help managers fulfil their responsibilities and in so doing, as a minimum, meet legal requirements.



Figure 1: Plan-Do-Check-Act cycle

¹⁹**Plan** – refers to the process of setting direction for effective health and safety management that is an integral part of the University’s culture, values and performance standards.

Do – refers to the delivery of an effective health and safety management system that aims to protect people by ensuring that risks are dealt with sensibly, responsibly and proportionately.

Check – refers to regularly monitoring health and safety performance and reporting relevant information to senior management.

Act – refers to 1) reviewing health and safety performance to establish if arrangements are embedded and effective in managing risks and protecting people, and 2) improving performance, as necessary.



4.2. Health and Safety Policies

This Policy is supported by a range of university-wide health and safety policies and publications to ensure we meet our legal obligations for health and safety. These policies etc. provide detail in relation to specific aspects of health and safety management within the University and the arrangements for ensuring that activities are undertaken safely.

All university-wide health and safety policies are subject to consultation with key stakeholders, then approval through the relevant University approval process. Because of their legal status, it is important that all University employees follow them and therefore, they are mandatory. There are no exceptions.

All health and safety policies etc. will be reviewed whenever there is a change to legislation or if new information comes to light (e.g. accident/incident data, health surveillance data, exposure limits) that affects a policy. Otherwise, they will be kept under regular review.

All the supporting policies and publications are available via the Safety Office website:
<https://www.safety.admin.cam.ac.uk/policies-and-guidance>.

As the activities of the University are broad and complex and statutory duties are extensive, Heads of Department are required to produce and keep under review a safety management system which includes a Health and Safety Statement of Intent, details of local health and safety responsibilities and arrangements covering risks arising from the work undertaken by the Department.

4.3. University Health and Safety Plan

The University will agree a set of health and safety objectives giving consideration to the University's safety risk profile and its wider strategic plans. At the start of each Michaelmas term, the Health and Safety Executive Committee will review the health and safety objectives and agree key health and safety objectives for the coming academic year. These will be developed into a more detailed plan which will be kept under review by the Health and Safety Executive Committee.

A set of key health and safety performance indicators will also be agreed to aid measurement of progress with implementation of the Health and Safety Plan. These will be monitored during the year and reported upon as part of the annual health and safety reporting process.

4.4. The Assessment of Risks to Health and Safety

The process of risk assessment is fundamental to successful health and safety management. There is a statutory requirement for 'suitable and sufficient' assessment of the identifiable risks to health and safety to be carried out in order that Safe Systems of Work and Safe Operating Procedures containing appropriate control measures can be formulated.

Each Head of Department is ultimately responsible for ensuring that risk assessments are being competently completed; that they relate to actual working practices and that they are reviewed as necessary and at least annually. However, on a day-to-day basis, those managing research or other work, i.e. Principal Investigators, Line Managers and Supervisors, must ensure that risk



assessments are completed in their area of control before work commences and in some cases during an activity.

4.5. Monitoring Implementation of the Policy

The monitoring and review of safety procedures and compliance with the University's health and safety arrangements is an everyday responsibility which follows the line management structure. However, managers and supervisors hold a higher duty of responsibility to monitor and ensure compliance.

In addition to daily supervision, monitoring includes ensuring that inspections are undertaken at the required frequency to verify that all significant hazards are identified and controlled. Monitoring also ensures that any deficiencies in health and safety performance are identified, and that remedial action is recommended and pursued, with the process recorded/documentated.

Heads of Department are required to implement suitable and sufficient internal safety inspections. The frequency and detail of such activities must be commensurate with the size of the department, level of risk, and nature of the hazards within each location. All departments should undertake as a minimum an annual inspection exercise.

Additional monitoring activities will occur during accident investigations, complaints and feedback.

4.6. Auditing Compliance with the Policy

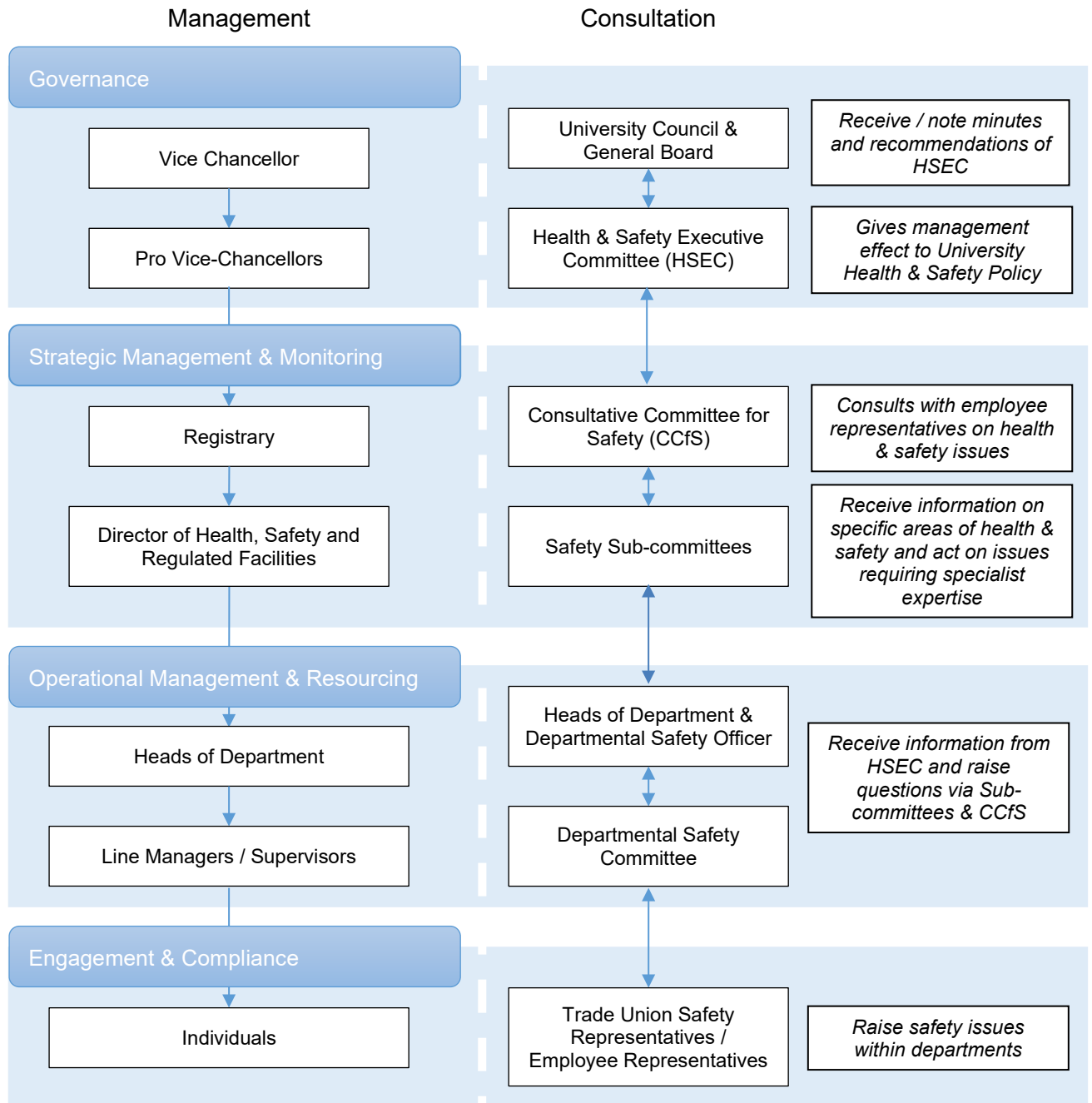
Auditing is an essential element of the Health and Safety Management System of the University. Auditing the policies, arrangements and procedures put in place by the University to achieve and sustain high standards of health and safety performance verifies that the management procedures and operational practices are successful in meeting the appropriate performance standards. This requires a structured approach to collecting independent information on the efficiency, effectiveness and, importantly, the reliability of the Health and Safety Management System within departments of the University.

The University employs a range of audit types to measure compliance with this Policy:

- Safety Management Audits: a vertical safety audit reviewing the arrangements and procedures in place within departments to ensure safety in the workplace
- Subject Specific Audits: horizontal safety audits which concentrate on a specific subject or topic area within departments, e.g. biological safety, chemical safety, chemical waste, pressurised gas safety, electrical safety, work-related upper limb disorders, noise, vibration, radioactivity and laser safety.

The University also employs the services of independent auditing consultants to perform regular audits of the policies, arrangements and procedures that are in place throughout the University. Reports to the Audit Committee allow progress to be determined in relation to areas for improvement that may be identified by such audits, with resources allocated as necessary to achieve compliance.

Appendix 1 Health and Safety Governance and Organisation





Appendix 2 Typical Duties of Departmental Safety Officers

The Departmental Safety Officer (DSO) is appointed by the Head of Department (HoD) to assist them in the creation, development, monitoring and review of the Department's arrangements for safe working. Since the HoD is responsible for safety management it is important that the DSO keeps them informed of hazards and circumstances that must be brought to their attention. This can be achieved by regularly providing information about the current state of safety in the Department, particularly where matters are unresolved. The DSO is not expected to be a safety professional and should seek advice on safety law and practice, both national and organisational, where necessary, from the Safety Office.

Duties include:

- undertaking health and safety training to an appropriate level of competence, to enable the discharge of their duties
- assisting the Head of Department to develop, implement and periodically review local health and safety arrangements and procedures to ensure the risks arising from the Department's activities are controlled
- providing proactive strategic and operational health and safety advice and support to the Head of Department and other members of staff
- monitoring the Department's organisation and arrangements for safe working to determine how effectively risk control measures are implemented and working through regular health and safety inspections (with Trades Union Safety Representatives, as necessary) and report findings
- ensuring that occupational ill-health issues, accidents/incidents and near misses are reported to the Safety Office in a timely fashion and investigated fully. Communicate findings of investigations to the Safety Office and ensure that recommended action is carried out
- ensuring the necessary provision of health and safety training (including induction) to staff within the Department either by direct involvement or by monitoring provision
- acting as a point of contact for receiving and disseminating changes and updates from the Safety Office in relation to Legislation or University Policy, objectives and guidance
- disseminating health and safety information and reports to appropriate staff and students
- monitoring that safe working practices based on risk assessment are adopted, especially for postgraduate work (in view of the fact that postgraduate students generally work without direct supervision)
- monitoring that adequate precautions are taken in relation to any special hazard in or about to be introduced into the Department, with advice from the Safety Office where appropriate
- monitoring that all plant, equipment and processes within their area are maintained in a safe condition and in compliance with appropriate statutory requirements
- maintaining adequate health and safety records where appropriate (e.g. training records, inspection and audit records)
- ensuring that systems are in place to provide and maintain adequate first aid facilities
- bringing to the attention of the HoD or department management, at an appropriate level, any non-compliance with Department arrangements for safe working
- participating in audits carried out by the Safety Office as necessary



- acting with the delegated authority of the HoD on health and safety matters of urgency to prevent or prohibit activities or situations that may lead to imminent harm.



Appendix 3 Insurance

The University holds a range of insurance policies, including employers²⁰ and public liability²¹, professional negligence, personal accident and overseas travel, as well as insurance for its buildings and assets. Its insurers are also responsible for statutory inspections of its plant.

The University insurers have an interest in how the University manages health and safety risks. They carry out periodic surveys of university buildings and may issue recommendations for improvements, both in terms of the physical construction of the premises and how they are operated, and the activities undertaken at the University.

Insurers will expect that the circumstances surrounding accidents and incidents are investigated by the University as soon as possible after the event and that the investigation findings, and any other relevant information, are made available to them should a claim for compensation be brought against the University.

²⁰ 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.

²¹ 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.



Appendix 4 Abbreviations and Definitions used in this Policy

Terms used in this Policy are defined as follows:

Audits: formal, systematic, independent process for checking the implementation and effectiveness of the systems for managing health and safety

BSO: Biological Safety Officer

CCfS: Consultative Committee for Safety

Contractors: Persons or companies who are under contract with the University to provide materials or labour to perform a service or to do a job (these can include those persons/companies contracted through the Estates Division or through the Temporary Employment Service)

CSU: Cambridge Student's Union.

DGSA: Dangerous Goods Safety Adviser

Department: This term is used generically to apply to all University of Cambridge management entities

DOFRA: Departmental Operations Fire Risk self-assessment Audit

DSO: Departmental Safety Officer

FRA: Fire Risk Assessment

FRS: Fire and Rescue Service

FSM: Departmental Fire Safety Manager

Head of Department (HoD): This term includes Heads of academic departments and of other academic institutions, Chairs of Faculty Boards that are not divided into departments, Heads of a Centre, Institute or other body under the supervision of the General Board or Council, such as a Non-School Institution (other than the Unified Administrative Service), and the Heads of Divisions within the Unified Administrative Service, and is the person who has authority for the implementation of University Health and Safety Policy

Health and Safety: This term will be used in its widest possible sense, where a duty of care is established by the Health and Safety at Work *etc.* Act 1974 and associated legislation and will include mental as well as physical health (as defined within the Act)

HESA: Higher Education Statistics Association - A sector wide body that gathers information including accident data



HSEC: Health and Safety Executive Committee

OH: Occupational Health

PEEP: Personal Emergency Evacuation Plan

PGCE: Post-graduate Certificate in Education

RIDDOR: The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

Risk Profile: Identifies the nature and level of threats faced by the University, including the likelihood of these threats occurring and the level of disruption/cost they would cause. The risk profile should also consider the effectiveness of control measures in place to manage the risks

Risk Register: Details all identified risks, including description, category, cause, likelihood, impact, responses, owners, and status

RPA: Radiation Protection Adviser

RPO: Radiation Protection Officer

RWA: Radioactive Waste Adviser

Safety culture: Refers to the ways that safety issues are addressed in a workplace. It often reflects the attitudes, beliefs, perceptions and values that employees share in relation to safety

Safety Management System (SMS): A documented process designed to assess and manage safety risks in the workplace. A SMS will include the following elements:

- Health and Safety Statement of Intent
- the organisation for managing risk, including roles and responsibilities
- a process for the identification of workplace risks and the implementation of suitable controls to manage those risks
- effective communication methods across all levels
- processes to identify and correct non-conformity and non-compliance issues
- a continual improvement process.

Staff: Anyone, whether based in the UK or overseas, who has a contract of employment and will include emeritus staff, affiliated title holders, those employed through the Temporary Employment Service, apprentices and vacation internships

Student: Any individual registered as a student with the University

Subsidiaries: Defined as a company wholly owned or controlled by the University

UASM: University Asbestos Safety Manager

UFSM: University Fire Safety Manager



UWSM: University Water Safety Manager

Visitors: Guests, visiting academics, including fellows and others with honorary or associate status, visiting students, work experience and members of the public