Subject:	**Health and Safety Management - Organisational Arrangements: Management of Risks to Safety, Health and Wellbeing**
Date of Issue:	19 May 2014
For Action by:	All University employees

1. Introduction

The Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999 require the employer to identify the organisational arrangements for implementing its health and safety policy.

Under the Management of Health and Safety at Work Regulations 1999, employers have a duty to carry out suitable and sufficient risk assessments of the risks faced by their employees and, where appropriate, by non-employees. Employers have a duty to prevent and control the risks to the health and safety of employees and others identified by their risk assessments. Employees must co-operate with employers to help meet legal requirements. This includes prompt reporting of any perceived health and safety hazards (Ref 1).

It should be noted that other H&S Regulations contain requirements for risk assessments specific to the hazards and risks they cover (refer to Section 5).

The University's Risk Management Policy forms part of the University's internal control and governance arrangements. It explains the University's underlying approach to risk management, outlines the risk management process, and identifies key roles and responsibilities (Ref 2). It should be noted that the University implements risk prevention measures as part of a coherent overall policy rather than reacting to risks in an ad hoc way. The University Risk Register and subsidiary risk registers are used at a strategic level to assess risk, including occupational health and safety (OH&S) risk.

This document is solely concerned with the management of risks regarding OH&S, ie conditions and factors that affect, or could affect, the health and safety of employees or other workers (including temporary workers and contractor personnel), visitors, or any other person in the workplace/affected by the work activity. It must be noted that management of occupational health and safety risk can affect other risks (eg reputation, business interruption/continuity etc), and that the management of other risks can impact upon occupational health and safety risk (eg risk of failure to meet sustainability benchmarks or risk of failure to provide a good social and working environment) (Ref 2).

The University is in agreement with the Health and Safety Executive (HSE) position that *'risk management is about balancing benefits and risks and enabling innovation and learning, not stifling them. Sensible risk management is not about creating a totally risk free society, generating useless paperwork mountains or scaring people*

by exaggerating or publicising trivial risks' (Ref 3).

2. Hazard and Risk

In conducting risk assessments, it is important to appreciate the difference between the terms "hazard" and "risk". A hazard is something (source, situation, or act) with the potential to cause harm, whereas risk is the likelihood the harm will occur (the combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure(s)) (BS OHSAS 18001:2007) (Ref 4).

3. Scope

This document is the procedure for hazard identification, risk assessment, and determination of necessary controls to manage OH&S risk.

Upon approval, it will be implemented and maintained to ensure that it is relevant to the University's needs.

This document is relevant to all University activities, whether they take place on University premises or elsewhere.

Hazard identification, risk assessment, and the determination of controls must be carried out as an integral part of planning, and sufficient time must be allowed to ensure that adequate controls are put in place, and to communicate the results of the risk assessment in advance of the activity taking place.

Consideration should be given to the University's Organisational Arrangements – Capabilities and Training (Ref 5), which specifies training relevant to each role.

The process must be proactive rather than reactive.

Information on the management of common risks is available in the Manager's Toolkit (Ref 6).

The University ensures that all people in the workplace understand what they must do in terms of health and safety (Ref 1**).** It has also ensured the existence of a positive safety culture, where the management of health and safety is seen as an integral part of the organisation's goals and objectives (Ref 1).

The University's H&S policy includes a commitment to prevention of injury and ill health and continual improvement in OH&S management and OH&S performance; and includes a commitment to at least comply with applicable legal requirements and with other requirements to which the University subscribes that relate to its OH&S hazards (eg insurance requirements).

The University ensures that the OH&S risks and determined controls are taken into account when establishing, implementing and maintaining its OH&S management system.

Under Ref 1, Heads of Department/Unit and Academic Members of Staff have a duty to 'ensure that suitable and sufficient risk assessments are undertaken for the areas

and activities for which they are responsible, and that suitable control measures are

identified and implemented.' Furthermore, there is a 'general requirement for line managers to manage the risks to their staff, students and others who may be affected by the University's undertaking'; and all staff, students, visitors and contractors are required to comply with University H&S policy and all arrangements in place under the policy.

The SHW advisors have duties to carry out risk assessments on specific topics on behalf of the University (eg fire, first aid, provision of health and safety advice).

Hazard identification and risk assessment must take into account:

a) routine and non-routine activities;
b) activities of all persons having access to the workplace (including contractors and visitors);
c) human behaviour, capabilities and other human factors;
d) identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of the University within the workplace;
e) hazards created in the vicinity of the workplace by work-related activities under the control of the University;
f) infrastructure, equipment and materials at the workplace, whether provided by the University or others;
g) changes or proposed changes in the University, its activities, or materials;
h) modifications to the OH&S management system, including temporary changes, and their impacts on operations, processes, and activities;
i) any applicable legal obligations relating to risk assessment and implementation of necessary controls;
j) the design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities.

For the management of change, the University shall identify the OH&S hazards and OH&S risks associated with changes in the University, the OH&S management system, or its activities, prior to the introduction of such changes.

The University shall ensure that the results of these assessments are considered when determining controls.

4. Risk Assessment Process

The Health and Safety Executive (HSE) recommends employers follow five basic steps in conducting risk assessments:

- Step 1: look for the hazards
- Step 2: decide who might be harmed and how
- Step 3: evaluate the risks and decide on the adequacy of existing precautions
- Step 4: record your findings
- Step 5: review and revise the assessments as necessary.

Step 1: Look for the hazards
Hazard identification is the process of recognizing that a **hazard** exists and defining

its characteristics. Employers should identify hazards by carrying out an inspection of their workplace, consulting with employees and keeping records of any hazards present. For example, accident statistics might be an indicator of the presence of certain hazards. Information from manufacturers and suppliers may also provide an indication. The range of hazards present will depend on the type of activities undertaken by the employer.

Typically, they can include:

- physical hazards, eg machinery, noise, electricity, fire, vibration, work at height, etc
- ergonomic hazards, eg working space, workstation layout, repetitive movements, etc
- chemical/substance hazards, eg asbestos, cleaning chemicals, paints, thinners, etc
- biological hazards, eg bacteria and viruses.

Step 2: Decide who might be harmed and how
The regulations require the risks to both employees and non-employees to be considered in any risk assessment. Therefore, where appropriate, risks to students and members of the public, contractors, etc need to be noted.

Employers must also appreciate that certain types of people may face an increased risk. New and expectant mothers, as well as young workers, need to be specifically considered in risk assessments.

Step 3: Evaluate the risks and decide on the adequacy of existing precautions
Risk assessment is the process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable.

To assist in the estimation of risk, the following equation is often used:

risk = likelihood x severity.

In other words, risk is a combination of how likely it is that someone may be injured and the severity of the injury likely to be sustained. Qualitative measures for likelihood and frequency can be used, such as high, medium or low.

Alternatively, scoring systems can be used to give a semi-quantitative measure for the risk assessment. The University's templates are available on the Intranet (Ref 7).

Examining Existing Precautions
Existing precautions must be examined in order to determine whether they are both adequate and compliant with any specific legal requirements that might apply. It could be necessary to implement additional or new precautions. The regulations

prescribe a particular approach. This is as follows:

a) elimination;
b) substitution;
c) engineering controls (eg containment of the substance/process, or additional guarding be added to the machinery, or undertake the process within a fume cupboard);
d) signage/warnings and/or administrative controls;
e) personal protective equipment.

The following approaches might be applied to a variety of situations:

- If possible, avoid a risk altogether, eg perform the work in a different way.
- Take advantage of technological and technical progress which often offers opportunities for making the work safer, eg automation of risky work.
- Evaluate risks that cannot be avoided by carrying out a risk assessment.
- Combat risks at the source, rather than taking palliative measures, eg re-routing a cable is a more effective way to prevent tripping than putting up a warning sign.
- Give priority to those measures that protect the whole workforce, rather than measures that only protect employees on an individual basis.
- Adapt work activities to the requirements of the individual. This means consulting with those involved in the work when designing the workplace and selecting protective clothing. Increase the control that individuals have over their work and avoid monotonous work.
- The Equality Act 2010 makes it unlawful for an employer to treat a disabled person less favourably because of a reason relating to their disability, without a justifiable reason. Employers are required to make reasonable adjustments to working conditions or the workplace where that would help to accommodate a particular disabled person.

It is essential that, after the implementation of controls, the level of risk is reduced to ‘acceptable risk’. This is the level of risk that can be tolerated by the organisation having regard to its legal obligations and its own H&S policy (Ref 1) (BS OHSAS 18001:2007) (Ref 4).

Step 4: Record your findings

As the University has five or more employees, it is required by law to record, in writing, the findings of its risk assessments. No specific statutory form has to be used. However, the regulations require that “significant findings” of the risk assessment be recorded. These will include records of the precautions in place to control the risks and what further action (if any) was taken to reduce the risk.

The findings must also provide enough detail to prove that a “suitable and sufficient” risk assessment has been carried out. This will include:

- details of the work
- equipment or process being assessed
- the people at risk
- the hazards involved and the level of risk.

It is important to ensure that the findings of the risk assessment are communicated to all those who are affected by the activity. This can be done locally, but should also be shared with those who are not affected by that activity, but manage similar activities.

Risk assessments should be stored in a location which is accessible to all who are affected, and where the most up to date edition is available. Networked systems such as the Hub, or the Intranet may be used.

It is important that risk assessments and proposed actions are discussed with staff representatives – this can be done locally, and also as part of the Safety, Health and Wellbeing Committee structure.

Where a high risk to safety of University staff/students or others has been identified and escalated to senior members of staff, the SHW Team should be notified and kept informed (whatever the cause). They will provide a view on whether the risk assessment prepared is 'suitable and sufficient' and advice regarding the implementation of further controls, and could provide an overview to the HR Director and the Registrar and Secretary (when appropriate).

The senior manager of the area responsible (with specialist, professional advice from their reports etc) would take the decision as to whether the risk to safety had been appropriately managed and therefore whether the activity should proceed - but the SHW Team retains, under the Organisational Arrangements – Responsibilities (Ref 1) the ability to prevent the specified activity from going ahead and also to alert the HR Director/Registrar and Secretary to concerns, if appropriate.

Step 5: Review and revise the assessments as necessary
The duty to carry out risk assessments is not once-off. If a risk assessment is going to be worthwhile, then the assessments need to be kept under review to ensure that they are applicable, valid and up-to-date. A review might be necessary as a result of any of the following situations:

- an accident has occurred during an activity that has already been assessed for risk
- a workplace is reorganised
- a new process or new technology has been introduced
- there is a significant change in the law.

It is therefore prudent to review risk assessments on a regular basis.

5. Specific duty to risk assess

As well as the general duty to assess risks, more specific risk assessments are required under several Regulations including the Control of Substances Hazardous to Health Regulations 2002, the Dangerous Substances and Explosive Atmospheres Regulations 2002, the Control of Asbestos Regulations 2012, the Health and Safety (Display Screen Equipment) Regulations 1992 and the Manual Handling Operations Regulations 1992. Further information is available (Ref 7, Ref 6).

6. Further information

Contact the Safety, Health and Wellbeing Team at shw@westminster.ac.uk for further information.

7. References

Ref 1: University Health and Safety Policy
Statement of Intent
Organisational Arrangements – Responsibilities
Organisational arrangements: Capabilities and Training for Health and Safety (intranet link)
https://myintranet.westminster.ac.uk/my-journey/health-and-wellbeing/health-and-safety-policies-and-guidance

Ref 2: University Risk Management Framework and Risk Register (intranet link)
https://myintranet.westminster.ac.uk/about-us/corporate-services/planning-office/university-strategy-planning-and-risk/university-risk-management-framework-and-risk-register

Ref 3: HSE – Risk Management guidance, case studies:
http://www.hse.gov.uk/risk/index.htm

Ref 4: BS OHSAS 18001:2007 Occupational health and safety management systems. Requirements. ISBN 978 0 580 59404 5
http://www.westminster.ac.uk/library-and-it/home (available via British Standards Online in e-Resources)

Ref 5: Health and Safety Management - Organisational Arrangements: Capabilities and Training for Health and Safety (intranet link)
https://myintranet.westminster.ac.uk/my-journey/health-and-wellbeing/health-and-safety-policies-and-guidance

Ref 6: Manager's Toolkit (intranet link):
https://myintranet.westminster.ac.uk/my-tools/managers-toolkit/managers-toolkit-health-and-safety

Ref 7: University Risk Assessment guidance, template risk assessment forms guidance on specific risks (intranet link):
https://myintranet.westminster.ac.uk/my-journey/health-and-wellbeing/health-and-safety-policies-and-guidance/safety-health-and-wellbeing-policies-and-guidance-list