

Estates Development & Projects Division

Divisional Safety Code of Practice

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1. INTRODUCTION

This divisional Health & Safety Code of Practice has been produced in two sections.

Section A deals with the activities undertaken by staff within the office on Level 5 Sherfield Building and how those activities are managed to ensure the safety and health of the staff working there.

Section B outlines the organisational arrangements that are in place to ensure that the Division complies fully with the Client's obligations under the Construction (Design and Management) Regulations 2007.

Sections A and B are written to ensure the implementation strategies outlined, will comply with the Imperial College London 2013 Health and Safety policy. The policy statement can be accessed via the address below.

www3.imperial.ac.uk/safety/policies/handspolicystatment

It is the intention of the Division to provide safe and healthy working conditions for its staff and to take all reasonably practicable steps to ensure such conditions are achieved and maintained. In addition, we will endeavour to ensure that our work activities do not adversely affect the health and safety of anyone who may be affected by our work, such as staff, students, visitors, members of the public and contractors.

SECTION A – OFFICE BASED ACTIVITIES

Section A identifies office based hazards and in consultation with divisional staff the agreed control measures to be applied. The outcome of the consultations has been recorded in risk assessments and is discussed in Section A Paragraph 2.

2. HEALTH AND SAFETY RESPONSIBILITIES

i) Management

The Director has overall responsibility for the safe and effective running of the Division and for implementing College policy for all activities associated with the work involved. This includes office based activities, as well as on site construction works.

Day to day operational responsibility is delegated to the Construction Safety Manager and responsibility for producing and implementing the agreed safety management system that all Divisional staff must adhere to.

ii) 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. In particular, employees' duties and responsibilities are:

To understand and comply with the organisation's health and safety policies and procedures and those specific to their team.

To always act in a manner so as to ensure their own health and safety at work and that of others who may be affected by their work activities.

To report accidents, symptoms of work related ill health, damage to the building or equipment, near misses (that might have resulted in injury or damage), and other health and safety hazards, promptly to the Section Head, or their delegate (usually the Section Safety Advisor), as outlined in Section 10 of this Policy.

The Safety Management Structure Diagram for the Division is shown in Appendix 1.

3. RISK ASSESSMENTS

The Director of Estates Projects will ensure that all significant health and safety risks (to both employees and non-employees) arising from the work activities of the team are assessed to a suitable and sufficient standard, as required by the Management of Health and Safety at Work Regulations 1999.

A Register of Risk Assessments will be maintained by the Director of Estates Projects provided to him by the Construction Safety Manager. Copies of the register will be provided to all staff and individual risk assessments will be discussed and agreed with staff members for significant risk tasks identified.

A risk assessment will be used to identify priorities and set objectives for eliminating hazards and reducing risks. Wherever possible, risks will be avoided or eliminated through the appropriate selection and design of facilities, equipment and processes. If risks cannot be eliminated, they will be reduced, as far as is reasonably practicable by the provision of physical controls, training and systems of work or as a last resort with personal protective equipment.

Risk assessments will be reviewed every 12 months, or sooner in the event of a significant legislative change or changes to the work, or workplace to which an assessment relates, or following any accidents or near misses which highlight deficiencies in existing control measures.

4. INFORMATION, INSTRUCTION, TRAINING AND SUPERVISION

Staff will be provided with sufficient health and safety information, instruction and training to ensure they are aware of the hazards in the workplace and know what safe working procedures to follow to reduce the risk of injury or work-related ill health, to themselves and others. Training will take the form of

- a) induction training on recruitment;
- b) training when new tasks and equipment are introduced and
- c) refresher training where necessary to update skills and knowledge.

All divisional Staff are to have completed the College's online Month One Safety Training (MOST).

A Health & Safety Notice board is available and displays safety information as appropriate.

- College Statement of Health & Safety Policy.
- Fire advice/evacuation notice.
- List of area First-Aiders and Life Savers

5. MONITORING HEALTH AND SAFETY

Health and safety performance is monitored on an ongoing basis and reviewed at least annually, through the review of risk assessments, accident, ill health and incident records and the results of workplace and equipment inspections. Any necessary action will then be taken to improve our overall health and safety performance, i.e. health and safety reviews will be used to identify priorities and set objectives. Workplace inspections will be undertaken and recorded every three months by the Director of Estates Projects and the Division Safety Manager.

6. SAFETY SIGNS AND NOTICES

Information on safety signs is available on the Health and Safety Executive website in [Safety Signs and Signals](#). Suitable signs are displayed around the premises:

- To indicate the location of First Aid boxes
- To indicate type and location of fire extinguishers
- To indicate fire escape route and fire exits
- Where Personal Protective Equipment should be worn.
- Wherever Smoking is not allowed.
- Where access is restricted to authorised persons only
- To denote the presence of specific hazards

7. FIRE DRILLS

Fire drills are held at least twice per year, organised by the College Fire Officer. We must participate and support their procedures in all respects. The full co-operation of all building occupants is mandatory.

Fire alarm testing for the Sherfield Building occurs on Wednesday mornings at around 7am.

8. PROCEDURE IN THE EVENT OF A FIRE OR OTHER EMERGENCY

The full fire alarm is characterised by sounders and voice messages will advise what action you should take. If a fire (or bomb threat) should occur in the building, or you observe a fire in other sections of the building, sound the fire alarm at one of the nearest fire alarm call points. These are located along Level 5 and in corridors, or at any of the building exits.

Also summon the fire brigade using a phone in a safe location (i.e. not threatened by the fire) by either:

- **Dialling 4444** to contact the Emergency Control Centre (which is manned for 24 hours a day throughout the year). This is the preferred option; or
- **Dialling 0-999** to contact the emergency services directly.
- **You can also dial Security directly on +44(0)2075891000 using a mobile phone.**

Most office telephones have outside dialling facilities:

An ambulance, or the police, can also be summoned if necessary at the same time. Then leave the building and assemble outside following the evacuation procedure outlined below:

When contacting Imperial College Security or the Emergency Services:

State the service you require, then your location as e.g. *“Imperial College London, Level 5 Sherfield Building, South Kensington Campus”*

Please give your name and telephone number/ mobile number.

Emergency Evacuation Procedure:

- Leave the building by the nearest fire escape route in a calm manner, closing doors and windows behind you. Follow the green Fire Exit/running man signs. **DO NOT RUN.**
- **DO NOT** use the lift.
- Do not delay by collecting your possessions.
- Follow the instructions of your Fire Evacuation Officer/ Fire Warden if you are unsure of what to do
- Proceed to the fire assembly point located on Ayrton Road (West End) which is on the North side of the Sherfield Building or Queen’s lawn if you exit by the central stairs and report to your nominated person and await further instructions.
- If you have to go through a smoke filled room, keep low to avoid inhaling smoke (smoke inhalation is the main cause of death during a fire).
- If you suspect there is a fire the other side of a door (i.e. if it is warm to touch), do not open it unless you have to.
- If someone’s clothes are on fire, wrap them in the blanket (or anything else you can find that is similar) and get them to drop to the ground and roll to extinguish the fire and prevent flames reaching their head.

During a Fire Drill, please help with the drill procedure if requested.

Do not:

- Leave the assembly area - if you are not seen leaving the building you may be regarded as missing in the fire and be the cause of an unnecessary building search;
- Attempt to re-enter the building until you have been given the all-clear by the Building Evacuation Officer or the Fire Brigade Incident Officer in charge.

If the fire is small and you are competent to extinguish it - without putting yourself at risk please do so using the appropriate fire extinguisher or fire blanket – see Appendix 3 for further guidance on using fire extinguishers.

Any discharged fire extinguishers must be reported to the Facilities Management and Property for refilling. See Appendix 3 - Types of Fire Extinguishers.

9. FIRST AID

A first aid kit can be found in the Tea Point located at the West end of Level 5, Sherfield Building. Before using it please report your condition to the Divisions First Aider(s), so that the kit can be restocked if necessary and the accident report agreed for forwarding to the Safety Department. To access the Accident Report Pro-forma [click here](#).

The Divisions designated First Aiders

- Denis Murphy +44(0)20 7594 9626
- Dean Trigg +44(0)20 7594 5249

More serious injuries should be dealt with by:

- informing Security (Call extension 4444 (South Kensington)) with the nature of the problem and asking them to summon an ambulance
- summoning an ambulance (as detailed in Paragraph 8 for calling the fire brigade);
- sending another member of staff to obtain the help of one of the Certificated First Aiders listed on the Health & Safety Notice board.

10. REPORTING INCIDENTS

All injuries, work related ill health, near miss incidents and fires, no matter how minor or apparently trivial, must be reported on a College Incident Report pro forma, as noted in Section A Para. 8 and brought to the attention of the Director of Estates Projects and the Construction Safety Manager.

Details of all injuries and work-related ill health that leads to time off work, or requires more than local first aid treatment, i.e. treatment at the Accident and Emergency Unit at a hospital, or treatment by your General Practitioner (GP), must be reported on the same form. If you are unable to return to work after an accident please telephone report details as soon as possible. Enlist the help of a relative or friend if you are unable to do this yourself due to incapacitation.

11. GUIDANCE ON OFFICE HEALTH AND SAFETY

Staff are expected to follow the general guidance on office health and safety and fire safety contained in Appendix 2.

Other Office Rules

- **Cleaning** - any problems should be reported to Cleaning Services (Graham Watson extension 48933).
- Leaving the Office - Carefully check before going home or leaving your office for long periods that everything is safe and secure, i.e. electrical equipment turned off (except the refrigerator and fax machine), the telephone answering machine is set to receive calls, doors locked, windows closed.
- **Smoking** - smoking is not permitted in any building.
- Alcohol, drugs and illness affecting safe work performance – Refer to Imperial College, Human Resources policy on
 - [Alcohol and Substance Misuse](#)
 - [Sickness Absence](#)

In general Staff must not attend work where it may affect safe work performance or the safety of others.

- **Children and pets** - children and pets are not permitted in the Building.

12. REPORTING BUILDING FAULTS

Please report defects such as failed or failing lights, dripping taps, damaged flooring etc, to the Facilities Management Helpdesk, using <mailto:ef.csc@imperial.ac.uk> email address. Urgent faults, such as a suspected gas leak should be immediately reported to the **Facilities Management Helpdesk on +44(0)20 7594 8000.**

13. WORK OUTSIDE NORMAL HOURS

Normal office hours are Monday - Friday 0800-1800 hours excluding Bank Holidays and days when the College is closed. All other times are "outside" normal hours. Members of the College are permitted to work in the Office outside normal hours if necessary on low risk work (reading, writing, PC work). If high risk work is contemplated then it must not be conducted alone. The minimum acceptable requirement is that a risk assessment is conducted prior to the work, and during the work someone known to you is within immediate calling distance, in case of an emergency.

If you are compelled to work late in the office, it would be advisable to email Security and let them know where you are, what you are doing and what time you will be working to. This simple communication will inform Security to your presence and assist them with prioritising security checks.

Outside normal hours, do not admit anyone into the building that you do not personally know to be a responsible member of the College. If anyone that you cannot vouch for should ask you to admit them, contact the Security Control Centre by phone on extension 4444 or externally +44(0)20 7589 1000 to seek advice before permitting entry.

Try to park as close to one of the building entrances when you arrive so that you do not have to walk unnecessarily long distances back to your car when you finish work by which time it may be dark. Be very careful to secure your room and any other doors and windows in general and the main entrance door(s) when you leave. Report any signs of suspicious behaviour or attempted break-ins to the Emergency Control Centre (extension 4444 or externally +44(0)20 7589 1000).

14. ELECTRICAL EQUIPMENT

All mains powered portable electrical equipment should be inspected and tested at regular intervals (as specified in relevant College Safety Guide) by a competent contractor, appointed by Facilities and Property Management Division. Do not use equipment that is not within test date (see label on equipment). Any faults with electrical equipment should be reported to the Head of Section (delegated to the Section Safety Coordinator) as soon as they are noticed. Before using electrical appliances, staff should carry out a visual inspection to identify any obvious deficiencies. Under no circumstances should equipment be used if there are any doubts regarding its electrical safety.

15. COMPUTER EQUIPMENT (DISPLAY SCREEN EQUIPMENT)

All College administrative and office staff are regarded as Display Screen Equipment (DSE) Users as defined by the Health and Safety (Display Screen Equipment) Regulations 1992. As such, staff are entitled to a free eye and eyesight test on request and thereafter at intervals prescribed by their optician. The cost of spectacles for DSE work only will be paid for up to the prevailing College limit. Contact the College Occupational Health Department for advice.

Appropriate Display Screen Equipment will be provided to minimise the risks associated with prolonged DSE work. DSE workstation assessments will be undertaken using the College DSE Workstation Checklist which can be found with other [Guidance on Computer Workstations](#) on the Occupational Health website. The assessments will be reviewed annually or if any significant changes occur. All DSE Users are expected to attend appropriate College DSE training. Contact the College Safety Department to find out when this is next being held.

Any member of staff experiencing health problems that may be due to their DSE work should report the matter to the Head of Section and the Projects Safety Advisor, as soon as possible. Staff should

always adjust any workstation they are using to suit their particular seating and comfort requirements and avoid working for excessive periods without a change in work activity or appropriate rest period. Guidance on setting up your DSE workstation is available on the College website and advice is available from Occupational Health staff.

16. MANUAL HANDLING

Staff should take great care when lifting, lowering, pushing or pulling objects. When you order equipment or stationery, inform the company in advance that you would like to have the goods delivered to the point of use, specifying the exact location for delivery and whether or not there is a lift. Whenever practicable have goods left at “work surface height” - not on the floor which will entail bending down to re-lift the object. Trolleys are available and located in the cupboard nearest the West exit door. The building lift should be used when heavy items have to be moved between building floor levels.

If items have to be moved physically consider the task, weight of the load and environment in relation to your physical capabilities and health. Always:

- examine the object to ascertain its weight and check for stability (centre of gravity), sharp edges, etc;
- use any mechanical aids provided (or obtain aids if indicated by the assessment);
- plan the move checking that the:
 - route is free from tripping and slipping hazards and well lit, and
 - the load does not block your vision;
- wear overalls, gloves and foot protection when required;
- get a good grip and hold the load as close as possible to the body;
- lift with your legs whilst:
 - keeping your back as straight as possible,
 - checking that you will not crush your fingers whilst lifting (eg against door frames),
 - keeping your arms tucked in, and
 - avoiding movements that twist your body, and
- take rest stops along the way if necessary;

If in doubt obtain help and perform a two (or more) person lift. When team lifting, it is important that one person co-ordinates the operations involved. Use the Office kick-stool, where appropriate, when placing items at higher levels on shelves. Only lightweight items should be stored above shoulder height, and then only when absolutely necessary. If the manual handling of any heavy or particularly awkward loads is contemplated a formal manual handling operations assessment must be carried out by the Construction Safety Manager, or another competent person.

[Guidance on safe lifting](#) is available on the Occupational Health Department website. Staff who regularly undertake lifting and carrying must attend the relevant “Manual handling” training session arranged by College Safety Department.

17. PERSONAL PROTECTIVE EQUIPMENT (PPE)

If you feel that personal protective equipment is required, such as a dust mask, overalls, gloves or safety spectacles, you should contact the Construction Safety Manager for advice. They shall help you to conduct a PPE risk assessment, or will contact the College Safety Department for further advice if necessary.

18. PERIPATETIC WORK

College members of staff have to visit other campuses or work off-site.

All staff **must** inform the Head of Section of their intended whereabouts and duration of their visit **before** departure; and provide a contact telephone number whenever possible.

Checks will be conducted in the event of staff not returning as scheduled. Always follow local health and safety rules and policies in the area you are visiting and try to arrange to be accompanied by a local member of staff whenever possible.

19. VEHICLE USE & DRIVER SAFETY

College staff using private vehicles on College business must:

- ensure they have a full, valid driving licence
- follow the requirements of the Highway Code and Road Traffic Act;
- ensure their vehicle is road taxed, insured for business use, has a current MOT certificate if applicable and is maintained in a safe and roadworthy condition;
- ensure that the insurance policy covers use "in connection with his/her business or profession excluding commercial travelling;
- never carry radioactive materials;
- not use hand held mobile phones while driving on College business (see below).

Any requirements made by the College Insurance Officer with respect to the use of private vehicles and College vehicles must be followed. Note that special driver training requirements must be met before minibuses can be driven.

The Government introduced new legislation relating to the use of mobile phones while driving in December 2003. It is now illegal to use a hand held phone, or similar device, when driving. Hands free phone equipment is not prohibited by the new regulation, but these are still distracting and drivers still risk prosecution under existing legislation (for failure to have proper control) if they use hands free phones when driving. If your mobile phone rings when you are driving you should let it ring and return the call when safely parked - better still, switch to voicemail before starting your journey.

There is an exemption for calls to 999 (or 112) in genuine emergencies when it is unsafe or impractical to stop. There is also an exemption for 2-way radios, but the same points apply here as to hands free equipment, in that their use while driving can still be distracting.

For further information the Department for Transport has posted the answers to some 'Frequently Asked Questions' relating to the new legislation, on their website at www.dft.gov.uk.

20. WASTE COLLECTION

Recycling points for paper/card, glass, cans/tins/plastic bottles, is collected and removed daily. Landfill waste is also removed daily.

Large items such as old electrical equipment, or bulk items will require special collection. Contact the FM Helpdesk 020 7594 8000, for advice. Please ensure that corridors, which are used as fire escape routes, are never used as way stations for waste.

21. PROTECTION OF NEW OR EXPECTANT MOTHERS

A "New or expectant mother" is defined as an employee who is pregnant, who has given birth in the preceding six months; or who is breast feeding.

Where our employees include women of child bearing age, risk assessments will be reviewed to take account of any factors which might, by reason of her condition, affect a new or expectant mother, i.e. the mother, her unborn child or the child of a woman who is still breast feeding. Such factors include infection risks, heavy lifting and work with ionising radiation e.g. x-ray radiation.

If risks cannot be avoided by other means then we will temporarily adjust the mothers working conditions and/or hours of work, or offer suitable alternative work. Advice is available from Occupational Health, and further information from the Health and Safety Executive website, [New and Expectant Mothers at Work](#).

22. STRESS AND COUNSELLING

A [confidential Counselling Service](#) is available – you can contact the service by dialling 0800 045 3805. General information can be found on the Occupational Health [website](#).

23. CONSULTATION WITH EMPLOYEES

The Director of Estates Projects recognises that employee involvement is essential to successfully managing health and safety at work and as such actively encourages employee participation in health and safety matters that affect them. All members of staff are encouraged to discuss their concerns with the Director of Estates Projects and with the Construction Safety Manager, in the first instance. All staff are fully informed on all health and safety issues as required by law, through regular staff meetings, as well as through day to day involvement in safety matters that affect them.

24. FURTHER INFORMATION & ADVICE

References

Imperial College London

- Occupational Health Department www.imperial.ac.uk/occhealth
- Safety Department www.imperial.ac.uk/safety

Health and Safety Executive (HSE) www.hse.gov.uk

SECTION B – CDM COMPLIANCE

1. INTRODUCTION

In the UK all construction work is subject to the Construction (Design and Management) Regulations 2007 (CDM 2007) which places legal duties and responsibilities on a number of named “Duty Holders”. The Duty Holder list includes Clients, Designers, CDM Coordinators, Principal Contractors and Contractors.

All Regulations are subsidiary and are created under the umbrella of, the Health and Safety at Work etc Act 1974. This ensures that the general principles of safety management enshrined in the Act, flow seamlessly through all subsequent legislation.

A few examples of other subsidiary legislation created under the Act that apply to the construction sector include:-

The Work at Height Regulations 2005
The Control of Noise at Work Regulations 2005
The Control of Vibration at Work Regulations 2005
The Control of Asbestos at Work Regulations 2002
The Control of Substances Hazardous to Health Regulations 2002
The Provision and Use of Work Equipment Regulations 1998
The Lifting Operations and Lifting Equipment Regulations 1998 etc

This document will concentrate on the duties required by Estates Projects Division acting as Client under the CDM 2007 Regulations in order to protect those involved, or those who are affected by, the construction works undertaken by Estates Projects Division and ensure the organisation complies with its legal and statutory obligations.

The Safety Code of Practice (SCOP) that follows is intended to ensure that the Estates Projects Division comply with College policy.

2. OVERVIEW OF CDM 2007

The Regulations came into force on 6 April 2007 and apply to all construction work. The Regulations are accompanied by an Approved Code of Practice (ACoP) and this document has been produced to provide guidance for Duty Holders, on how they can comply with their duties.

The ACoP can be likened to the Highway Code and is used by the enforcing agency, the Health and Safety Executive (HSE) as a reference for good practice and compliance, when considering prosecutions, or when issuing “Improvement” and/or “Prohibition Notices”.

The definition of “construction work” is defined in the introduction to the Regulations and applies a very broad brush approach, including everything one would normally expect to be included under this heading and several other activities besides.

For example, construction work as defined includes preparation for an intended structure including site clearance and investigation (but not site survey work) and any excavation or exploratory work incurred, as part of the initial works. It also includes renovation, alterations, conversion, fitting out, commissioning, repair, upkeep, redecoration, or other maintenance work and includes cleaning where use of high pressure water or other abrasive substances may be required.

Furthermore, it applies to the installation, commissioning, maintenance, repair or removal of, mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services, which are normally fixed within, or to, a structure.

Work that does not fall within the scope of the legislation includes:-

- Putting up and taking down marquees
- General maintenance of fixed plant except when this is done as part of other construction work, or it involves substantial dismantling or alterations of fixed plant which is large enough to be considered as a “structure” in its own right. For example structural alterations of a large silo, a complex chemical plant, power station generator, or a large boiler.
- Tree planting and general horticultural work
- Positioning and removal of lightweight partitioning for offices, displays etc.
- Surveying - this includes taking levels, taking measurements and examining structures for faults.

The Regulations are divided into 5 parts;

Part 1 deals with matters of interpretation and application.

Part 2 covers general management duties which apply to all construction work.

Part 3 sets out additional management duties which apply to projects above the notification threshold, that is, projects lasting more than 30 days, or involving more than 500 person days of construction work.

Part 4 applies to ALL construction work carried out on construction sites and covers physical safeguards needed to be provided by the contractors to prevent danger and control risks.

Part 5 covers issues of civil liability and transitional arrangements that apply during the “bedding-in” process for the revised Regulations.

This document will focus mainly on Parts 2 and 3. These cover the main duties for Clients, whereas Part 4 applies to Contractors duties only, or to those Clients responsible for directing site activities themselves.

The legal definition of “construction work” therefore covers a lot of activities that Clients who own, or manage a property portfolio, would have to consider as construction work. Consequently these activities have to be managed in accordance with the provisions of Parts 2 and 3 of the CDM Regulations and these specific Client duties are outlined in the next section.

3. CLIENTS DUTIES

Client’s duties are clearly outlined in the chart shown below, firstly for ALL construction work, as defined in Part 2 of the Regulations and then additionally for construction work that breaches the “over 30 days and/or 500 person days of construction work” threshold, as noted in Part 3.

<u>All Projects-Part 2</u>	<u>Notifiable Projects-Part 3</u>
<ul style="list-style-type: none"> • Check competence and resources of all appointees. • Ensure suitable management arrangements for the project. • Allow sufficient time and resources for all stages. • Provide pre-construction information to designers and contractors. 	<ul style="list-style-type: none"> • Appoint CDM Coordinator. • Appoint Principal Contractor. • Make sure that construction phase does not start unless there are suitable welfare facilities and a construction phase plan is in place. • Advise contractors at tender stage how much time has been allowed for mobilisation. • Retain and provide access to the health and safety file.

For the purposes of this discussion, the document will refer to works under the threshold as “non-notifiable” and subject to Part 2 of the Regulations and for works over the threshold, as “notifiable” works, when both Parts 2 and 3 of the chart above will apply.

The Clients specific duties are noted within the following Regulations;

Regulation 4	Competence
Regulations 5 & 6	Cooperation and Coordination
Regulation 9	Arrangements for managing projects
Regulation 10	Requirements for providing information
Regulation 15	Information required where projects are “notifiable”
Regulation 16	Requirements prior to the start of the construction phase

The main thrust of this document is to demonstrate how the Estates Projects Division comply with the above requirements and how this is achieved in a practical sense, in the day to day managing of its work.

The division manages a significant number of construction projects which are at different stages of development at any one time. The annual spend on these projects for the previous 5 years circa £100m with individual projects ranging in value from £100,000 to £50m.

This indicates a range of projects offering different challenges and levels of risk. This requires individuals and organisations with appropriate levels of knowledge and experience, to manage the pre-construction and construction phases of the project.

The structure of the Division is shown [here](#).

The roles and responsibilities for safety management are outlined in Appendix 1 of this document.

3.1 COMPETENCE (REGULATION 4)

Competence underpins most of how organisations control quality and safety in construction. This also applies to the abilities of organisations and individuals working together to provide processes and outcomes that meet Client and regulatory requirements.

The Division requires training and competence levels that are in accordance with the HSE 2007 CDM ACoP.

All consultants' personnel must hold, or be actively working towards achieving, a relevant professional qualification and an appropriate understanding of the CDM Regulations. CDM training may be undertaken in-house provided the trainer is suitably qualified.

Contractor's site managers are obliged to attend and to successfully complete the 5 day CITB Site Managers Safety Training Scheme (SMSTS)

Anyone requiring access to any of the construction sites must hold an appropriate CSCS card. This will assist contractors when employing supervision and labour as it provides a simple means of identifying minimum levels of competence for both skilled and unskilled labour.

For those College individuals who only access sites occasionally, for example, Project Managers, User Coordinators and Engineering Team staff it is a requirement they have, as a minimum, the "Site Visitors" CSCS card.

All CDM Coordinators must possess the NEBOSH Certificate in Construction Health and Safety and be registered members of The Association for Project Safety.

All contractors applying must be registered with the Contractors Health and Safety Assessment Scheme (CHAS) and Constructionline. CHAS registration demonstrates that the qualifying organisations meet minimum standards of awareness and organisational ability to manage works safely.

All Project Managers and those responsible for managing project team selection are required to request evidence of competence from those contractors they select for construction work. Each project may require different skill sets and present risk levels and challenges that need to be adequately managed, even on small works.

Constructionline registration provides baseline evidence that the organisation's financial structure is sound.

And finally-

Regulation 4 (1) (b) states-"no person on whom these Regulations place a duty, shall accept such an appointment, or engagement, unless he is competent".

Clients must still ask the appropriate questions and make reasonable enquiries from their intended appointees and receive an appropriate response, as part of the Client's CDM audit trail.

Should the appointee subsequently fail to live up to their responsibilities, the liability for lack of competence falls on them and not with the Client.

3.2 DIVISIONAL - COMPETENCE

All College Project Managers and staff employed by the Estates Projects Division are provided with construction safety training as follows:-

- CDM Regulations 2007 Review - An in-house presentation by the Construction Safety Manager.
- All staff are required to complete the College Month One Safety Training programme (MOST) every two years.
- Divisional Project Managers are required to undertake a two day CITB training course “Health and Safety for Site Supervisors” National Construction College Ref: MT208 and a suitable refresher course every two years.
- All Divisional staff must attend a Display Screen Equipment (DSE) workshop.

Further safety training is available as requested through discussion with the individual’s line manager.

The Head of Health & Safety – Estates Development & Projects is available for advice and assistance and can be contacted at d.murphy@imperial.ac.uk telephone +44(0)20 7594 9626.

3.3 ARRANGEMENTS FOR MANAGING PROJECTS (REGULATION 9)

The Division comply with Regulation 9 by selecting suitably qualified and resourced Project Managers who are required to implement the Project Procedures.

These Project Procedures have been developed by the Division, assisted by reviews undertaken by external consultants, to ensure they meet the highest standards for project management.

The Project Procedures is a key quality control and safety management control document that provides a road map for Project Managers to comply with the College’s policies throughout the life of the project. The Project Procedures are available on the divisional [website](#).

Clients also have a duty under Regulation 9 to ensure Contractors provide adequate welfare facilities for site staff and operatives, in accordance with CDM Schedule 2 and that these are maintained throughout the construction period. Where Clients impose restrictions on available space, Clients must assist the contractor to meet his legal duties.

The College provides and maintains welfare facilities at both South Kensington and Hammersmith campuses. The current facilities however have limitations regarding the numbers of personnel they can support and consequently each project is reviewed with regards to its specific needs, with additional arrangements being agreed locally with the Building Managers.

Additionally, Estates Development & Projects employs a Construction Safety Team (CST) comprising a Construction Safety Manager and a Construction Safety Advisor. The CST’s function is to ensure the Division complies with current legislation and best practice, develops policy and standards and undertakes proportionate monitoring of contractors activities.

3.4 SUFFICIENT TIME AND RESOURCES FOR ALL STAGES (REGULATION 9)

The Regulations require Clients to provide sufficient time and adequate resources and the mobilisation period for the contractor must be stated in the HSE Document initial “F10 Notification of construction project”.

In general, the Estates Development & Projects Division provide a three week lead-in time for contractors, to provide an opportunity for the contractors to adequately plan and prepare for the

commencement of the construction work. On larger, or on complex projects, additional mobilisation times are considered and agreed by the Project Team.

3.5 PROVISION OF INFORMATION (REGULATION 10)

Appendix 2 of the Regulations provides guidance to Clients on the type of information that is required to be made available to designers and contractors, with Project Managers also aware of the requirements.

For all projects, regardless of status, the Project Manager is expected to produce, a “pre-construction information” schedule that details any hazards identified for the Project Team members during the survey and early design stages of the work.

For example, the schedule should note the location of Asbestos Containing Materials (ACM) and advise team members about the College Asbestos Management procedure and any specific precautions they need to take when working in the vicinity of ACMs.

Contractors and Consultants are advised to attend an Asbestos Awareness workshop that is organised through the Safety Training Section at the College. All Framework companies are viewed as internal candidates for any safety training course run by the College. Course details and how to book a place can be found on the [Safety Training web pages](#).

A copy of the pre-construction information schedule can be found on the [division's web pages](#).

The schedule should note locations where Permits to Work (PTW) are required prior to entry. For example, a PTW is required for access to roofs, riser cupboards and plant rooms. In buildings that are wholly owned, or controlled by Imperial College London, these permits are usually issued by the appropriate College [Maintenance Team Leader](#).

Permits are also required for access to laboratories and chemical stores and these permits will be issued by the Departmental Safety Advisor and/or the laboratory manager.

Access to radiation stores is arranged through contacting the Radiation Protection Team, on +44(0)20 7594 9423.

Where Imperial College have embedded workspace, for example within the MRC building at Hammersmith campus, permits and access arrangements will be through the Building Manager, or the appropriate Departmental Representative.

Access arrangements to the service tunnels at South Kensington, must comply with the 2002/03 Tunnel Safety Protocol. It is essential that Security are informed by email regarding entry for any reason to the tunnels. Details required include the names of those persons requiring entry, the date and time of entry and anticipated exit time and the reasons why entry to the service tunnels is required. The individual making the request must be directly employed by Imperial College London and must have knowledge and experience of this environment.

All hot works activity must be discussed and agreed in advance with the College's Fire Officer, in accordance with the latest Fire Officer's Safety Code of Practice for Contractors.

The Pre-Construction Information Schedule incorporates the requirement for the issue of standard documents and information including;

- Safety Code of Practice (Construction)
- The building health and safety file(s)
- Asbestos Register (specific locations)

- Building Risk Register (where available)
- Access requirements to service tunnels (South Kensington campus)
- Departmental Safety Documents and
- Induction/briefing meetings with the Building, Asbestos and Construction Safety Managers.

The Pre-construction Information Schedule applies to all construction work, but the details and the meetings focus on the significant risks and this would include identifying the potential for disrupting normal College activities.

Project Managers are obliged to continue to develop the pre-construction information schedule and provide the information to designers and contractors, as they are appointed to the project. The provision of significant information continues throughout the project life and must be provided in good time, to anyone directly appointed by the Client. At Imperial College that for example could include specialist contractors employed later in the programme to install plant or equipment, including BMS and security installations, fire alarms and suspended ceilings systems.

3.6 PROJECTS NOTIFIABLE TO THE HSE – CDM 2007 PART 3 REQUIREMENTS

The following requirements are additional duties for Clients when the project requires more than 30 working days or 500 person days of construction work. Projects that meet this criteria are notifiable to the HSE. Imperial College London compliance is outlined below.

Where a project is deemed to be “Notifiable” then it will require the appointment of a CDM Coordinator (CDM-C). The pre-construction information schedule is then passed to the CDM-C, who subsequently takes on the responsibility to continue with this function.

The Client has a responsibility to provide all information relating to the project location to the CDM-C to assist them with the production of the pre-construction information schedule. This will include for example, the College estate Archive which holds any health and safety files and drawings that have relevance to the projects area.

In developing the pre-construction information schedule, the CDM-C may require additional pre-construction surveys prior to the tendering process, so that tendering contractors can provide accurate

- Certainty of costs,
- Programme times
- Sufficient and appropriate resources for safety management.

Along with appointing the CDM-C, the following additional duties apply to Clients under Part 3;

- Appoint a Principal Contractor
- Ensure construction work does not commence unless and until;
 - Suitable welfare facilities are in place
 - An adequate construction phase health and safety plan has been agreed with the Client, or Client’s representative
 - Access to the existing health and safety file is readily available.

CDM Coordinators are appointed in consultation with the Project Manager and the Construction Safety Manager generally at the end of RIBA Design Stage B. This is in line with the CDM Regulations and at a point in the process when the Client can usually confirm that funds are available to proceed with the project.

Principal Contractors are selected from the Framework list and are appointed on the basis of experience and available resources, assuming the costs fall within accepted parameters.

Project Commencement - All projects must undertake the following safety checks before the contractor is permitted to start work on site;

- A safety induction meeting prior to works commencing on site. This allows the PM and the Contractor to ensure adequate safety precautions are in place, e.g.; the Contractor has been issued with a copy of the Asbestos Report and Decontamination Certificates, where appropriate.
- A hand-over meeting must be arranged by the Project Manager and include the Building Manager, the building maintenance team and the contractor. This meeting will be used to identify the location of services that must remain live during the course of the project, to agree the arrangements for temporary services and be sure all hazards have been identified, prior to the contractor taking control of the works area.
- Contractors must receive approval from the Fire Officer for their emergency evacuation plan and from the Building Manager for site security.
- For non-Notifiable projects, a comprehensive method statement is required to be available for comment and agreement by the Client's team
- For Notifiable projects the CDM-C must approve the contractor's construction phase health and safety plan and advise the PM in writing of its suitability. This covers the Client's liability noted within Regulation 16 (a).
- The above mentioned health and safety plan should also confirm the availability of suitable welfare facilities which the Client must agree meets the requirements outlined in Schedule 2 of the Regulations. This covers the Client's liability noted within Regulation 16 (b)

Health and Safety Files - Existing files are available, either through the relevant Building Manager, or by request through the Archives Assistant (Projects), Estates Projects Division.

Health and Safety Files for projects are produced in accordance with the College requirements which are available on the division's website.

4. COMMUNICATIONS

The Division organises regular staff meetings. These meetings are used to discuss current workload and to inform staff of developments within the Division and the College.

These meetings provide an opportunity for staff to raise issues of concern. The Head of Health & Safety also relays information on health and safety issues that may affect team members, or to discuss any changes to legislation and their implications for working practices.

A Divisional Health & Safety notice board is used to display the College's Health & Safety Policy Statement and other useful and current safety information.

5. COOPERATION AND CONTROL

Project Managers complete a weekly progress report for each project they are managing and issue this to the Director of Estates Development & Projects.

The Head of Health & Safety – Estates Development & Projects is alerted to the commencement of a project, through the receipt of the Project Response Letter and the CDM Notification pro-forma then responds accordingly to requests for assistance and/or information.

See Appendix 5 for a copy of the CDM Notification pro-forma.

A CDM-C is appointed at the end of RIBA Stage B for all notifiable projects. The CDM-C acts as an external auditor reviewing safety in design issues and reviewing logistics as an integral part of the Client's projects team.

A project cannot commence unless a safety induction meeting is undertaken and chaired by the Construction Safety Team. A comprehensive review of all safety and logistics takes place at this meeting and provides an opportunity for all parties to discuss safety matters and resolve any outstanding issues.

The safety induction agenda and certificate are referenced in Appendix 5.

Prior to work starting on site a Client organised site handover meeting must take place that reviews existing services and provides an opportunity for the contractor to identify services that must remain live during the course of the works and to ensure that all decontamination certificates have been received.

A reference to the Site Handover Form (Pre-construction) is included in Appendix 5.

When the contractor takes control of the area, they are responsible for ensuring safe access for anyone who needs to work, or visit the site. All personnel must attend the contractor's safety induction and sign off confirming they agree to abide by the site rules.

Project Managers and other members of the Client's team will generally be accompanied around the site. All personnel working, or visiting the site, must be in possession of an appropriate CSCS card.

6. RISK ASSESSMENTS

The following risk assessments have been developed in collaboration with the Project Managers and set out the control measures to be adopted for the hazards identified;

- Undertaking pre-construction surveys
- Entry to Service Tunnels in South Kensington Campus
- Undertaking site visits

7. ACCIDENT AND INCIDENT REPORTING

If an accident or incident occurs on site the contractor is obliged to inform the Project Manager as soon as is practically possible. This initial report will need to be followed up by an interim written report within 24 hours of the accident or incident and then by a detailed report within two weeks.

Additionally contractors are obliged to forward a separate monthly report, to the Construction Safety Team. Contractors are requested to provide statistical data on minor accidents, near misses and "reportable" accidents and incidents.

See Appendix 5 for a link to the reporting pro-forma.

The monthly reports also require information on the average number of personnel employed on the project for the reporting period and the total number of man hours worked.

This information is used to monitor the occurrence of different accident or incident types and to permit a local or framework wide intervention to determine underlying causes and then agree control measures to reduce the likelihood of reoccurrence.

The data collated regarding total number of hours worked will permit an analysis of overall trends for "RIDDOR reportable" injury incidents, using an "injury frequency rate" based on an industry wide formula. The calculation is based on the number of reportable injury incidents recorded in a given time period, divided by the total number of hours worked by site personnel (including managers and supervisors) and multiplying by 100,000.

In summary, the rate is based on the reportable injury incidents per 100,000 hours worked, across all College sites.

It is intended to agree a common benchmark with Framework Contractors for the year ending 31 December 2010 and for subsequent years to measure success, or failure, against this benchmark.

In the event of a serious incident on site an investigation to determine the immediate and underlying causes will be undertaken by the Construction Safety Manager. A report will be forwarded to the Directors of the Estates Projects Division and the Safety Department, which will include advice on measures to be taken in order to avoid a reoccurrence.

In the event that the Construction Safety Manager is unavailable, the Construction Safety Advisor will initiate the investigation and agree the final report with the Construction Safety Manager, prior to the report being delivered to the Estates Projects Director.

8. CONCLUSIONS

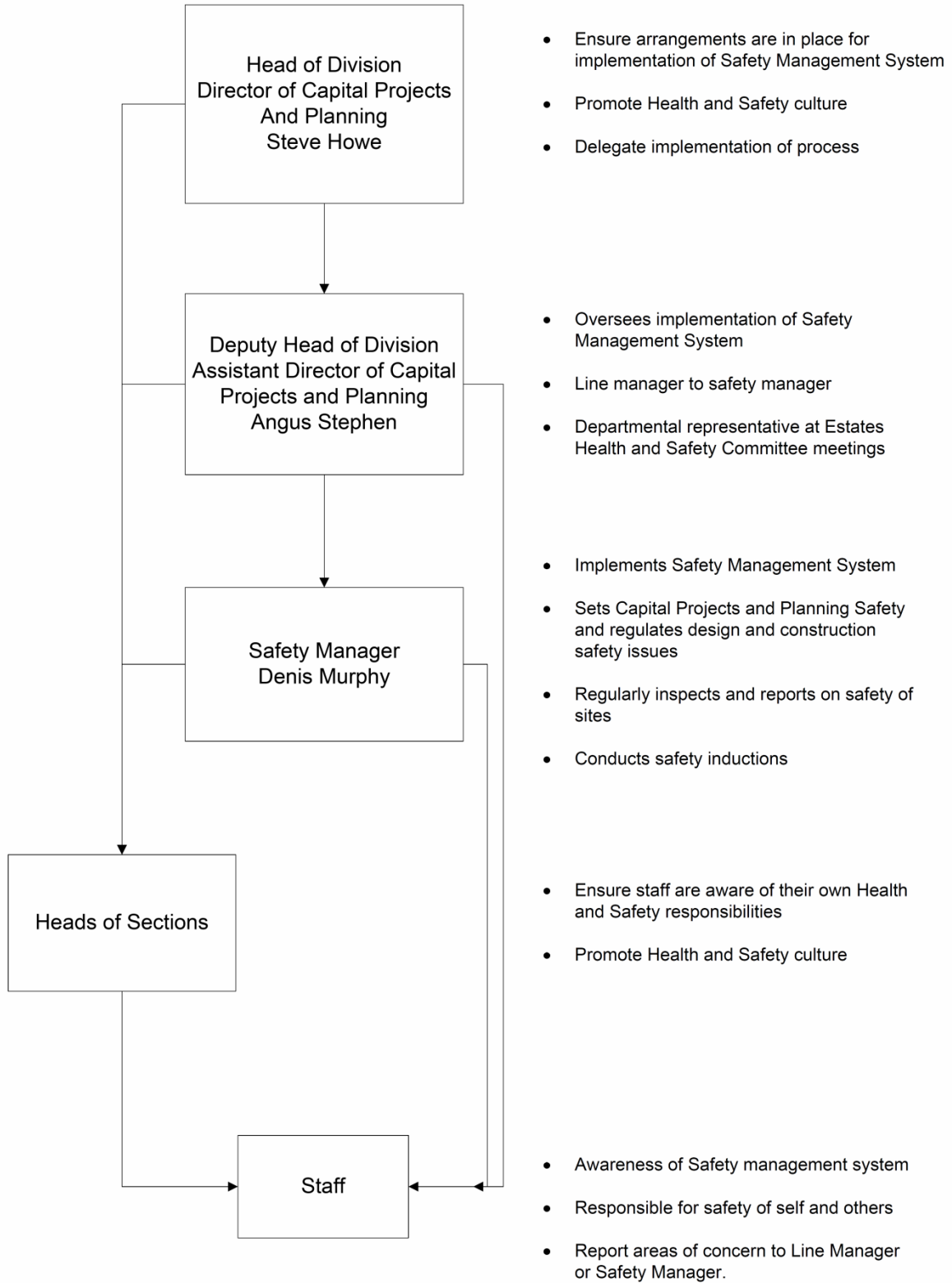
The procedures and standards set by the Division are designed to ensure that the organisations employed to deliver the capital works, are sufficiently experienced and suitably qualified. Also that the individuals employed are well motivated and committed to good standards of health and safety risk management.

The risk assessments referred to in this document will be reviewed every six months to ensure they remain current.

The Safety Code of Practice outlined above will be reviewed annually by the Head of Health & Safety – Estates Development & Projects and the senior managers within the Division. The review process will assist in meeting the operational needs of the Division and ensuring continued compliance with College policy and all current construction related legislation.

APPENDIX 1: SAFETY MANAGEMENT DIAGRAM

Capital Projects and Planning Safety Management Structure Diagram



APPENDIX 2: OFFICE RISK REGISTER AND RISK ARRANGEMENTS

Health & Safety Code of Practice.

Section A-Office based Activities

Office Risk Register— 13th September 2010

No	Risk Assessed Activity and current status	Risk Level
1.	Working on an office based desk top computer RA being developed-19/03/2010.	Low/Medium
2.	Handling and storage of office paperwork RA being developed-19/03/2010.	Low/Medium
3.	Out of hours working in the Projects office. RA being developed-19/03/2010.	Low
4.	Lone working outside of the Projects office.	Low/Medium
5.	Using portable electric equipment. RA signed off by DM-19/03/2010	Low
6.	Replacing colour and toner in photocopy machines	Low

Risk Assessments can be found [here](#).

APPENDIX 3: TYPES OF FIRE EXTINGUISHERS AND THEIR USES

How to use a fire extinguisher:

Instructions for use should be clearly marked on each extinguisher, but in general:

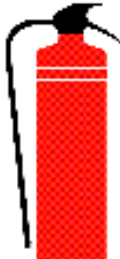
- remove the safety pin from the handle
- keep the extinguisher upright, (place it on the ground if it is heavy)
- aim the nozzle or horn at the base of the fire
- squeeze the handles together
- sweep the jet across the area of the fire, keep it moving away from you
- do not get trapped between the fire and the exit, plan your escape in advance

When to use an extinguisher:

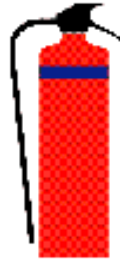
- Only tackle a fire after the alarm has been raised and it is safe to do so
- Ensure you are accompanied when you fight a fire or go to investigate, don't do it alone
- Only tackle a fire in it's very early stages
- Put your safety and that of others first, no heroics!
- Only use an extinguisher if you are sure of how to use it correctly.
- Do not hold the horn on a CO₂ extinguisher – it will be very cold
- If the fire is still burning after discharging one extinguisher do not continue to fight the fire but proceed to the assembly area immediately.
- If electrical appliances are involved, switch off the power before dealing with the fire.
- Do not fight any fire involving hazardous materials for example oxidising agents, pesticides, fuels or gas containers.

TYPES OF FIRE EXTINGUISHERS


their uses and their colour coding according to BS EN 3: 1996




WATER



POWDER



FOAM



**CARBON DIOXIDE
(CO₂)**

For wood, paper, textile and solid material fires	For liquid and electrical fires	For use on liquid fires	For liquid and electrical fires
DO NOT USE on liquid, electrical or metal fires	DO NOT USE on metal fires	DO NOT USE on electrical or metal fires	DO NOT USE on metal fires

The contents of an extinguisher is indicated by a zone of colour on the red body of the extinguisher

APPENDIX 4: GUIDANCE ON OFFICE HEALTH AND SAFETY

Some of the most common types of workplace accidents are trips, slips and falls; these are also the easiest to prevent, through maintaining good housekeeping standards. Staff are expected to observe the following basic rules:

1. Adequate floor space and storage space should be maintained to enable staff to move around their work areas and access stored materials, easily and safely. Floor areas, especially pedestrian routes, fire escape routes and areas around machinery and equipment must be kept clear of obstructions and tripping hazards, including employee's own bags and coats. Fire doors and fire exits must not be propped open.
2. Staff should keep the area around their own desks clear and are encouraged to have a 'clear out' on a regular basis to prevent the build up of papers, files etc.
3. Floors and traffic routes should be of sound construction and free of hazards like holes, frayed carpets or damaged and loose tiles. Spilt liquids should be cleared up immediately.
4. Adequate lighting and ventilation must be maintained at all times.
5. All waste must be cleared away regularly, and disposed of appropriately; waste materials should not be allowed to accumulate. Broken glass or other sharp objects must be disposed of carefully and not placed exposed in waste bins.
6. Care should be taken not to overload cupboards, cabinets or shelves. Where necessary, units must be fixed securely to the wall: there should always be enough weight at the bottom to minimise any tendency for the unit to overbalance. To gain access to high shelves use a 'kick stool' or secure stepladder, never climb on boxes and chairs. Never store heavy items above shoulder height. Materials should not be stacked on the floor where people may fall over them.
7. Only one drawer in a filing cabinet should be open at any one time, whether or not a safety interlock is fitted. Cupboard doors and drawers which have been left open can easily cause injury, when not in use they should be kept shut.
8. Care should be taken in lifting and moving materials and equipment. Where the handling operation is other than trivial, a job appraisal and where necessary, a risk assessment, must be performed first. It is especially important to obtain help when heavy, or bulky objects, which may restrict vision, are to be moved.
9. Office machinery must be operated according to the manufacturer's instructions, and guards and covers must be kept in position unless removed by authorised personnel carrying out essential maintenance. Hair, clothing, jewellery etc must be kept clear of moving machinery, even when guards or interlocks are in use. Never start a machine unless you know how to stop it in an emergency.
10. The potential risks associated with electrical equipment in use in offices should be appreciated. Electrical circuits should not be overloaded by the use of adapters to serve a number of appliances. Plugs must be correctly fused for the power rating of the appliance and plug cables should be securely fixed by cable clamps. Amateur repairs on electrical equipment should on no account be attempted and only maintenance engineers should remove service panels from such equipment.
11. All items of portable electrical equipment must be regularly inspected and tested for electrical safety in order to comply with the Electricity At Work Regulations, 1989. Such inspection and testing is carried out by Facilities Management.
12. Appliances should be switched off and unplugged after use and at night (unless the equipment concerned is designed to run continuously). Electrical and telephone leads must be protected from heat and abrasion. Avoid placing trailing cables in a walkway or access route. Where this is unavoidable, cable protectors should be used.
13. Heaters and hot-running equipment must be kept clear of combustible materials. The use of open bar radiant fires is not permitted.
14. Kettles must never be placed on the floor or in precarious positions on shelves or desks.
15. Any unsafe conditions, e.g. faulty lifts, faulty fire doors, missing fire extinguishers, missing Fire Notices, defective equipment, poor lighting, damaged floor coverings, unsafe furniture and so on, should be reported at once to your Line Manager and/or the Section Safety Advisor, so that remedial action can be taken.

General rules for preventing fires at work

All staff are responsible for fire safety. These notes are designed to raise your awareness of the causes of fire at work and provide guidance on what we can do to prevent a fire from starting and spreading.

- Ensure equipment and machinery is regularly inspected and maintained.
- Report faulty electrical equipment and wiring to the manager
- Do not overload electrical sockets or extension leads
- Avoid using portable heaters of any kind, if at all possible
- Use, store and dispose of flammable liquids and LPG cylinders safely
- Follow the 'no smoking' policy
- Do not place liquids on electrical equipment
- Switch off equipment at the end of the day
- Do not obstruct ventilation outlets, keep ducts and flues clean
- Take precautions to minimise the risk of arson
- Monitor the work of contractors on site
- Carry out regular inspections of the workplace to check for fire hazards

Good standards of housekeeping should be observed by all staff. Waste materials should not be allowed to accumulate. The amount of paper, boxes etc. stored should be kept to a minimum unless these can be stored in metal cabinets or similar which provide a degree of fire protection.

APPENDIX 5: Pro forma, forms and templates

1. DAY ONE SAFETY INDUCTION <http://www3.imperial.ac.uk/pls/portallive/docs/1/50117697.PDF>
2. PRECONSRUCTION INFORMATION SCHEDULE
<http://www.imperial.ac.uk/workspace/capitalprojects/Public/FormsTemplates/CSM01Preconstinfo.doc>
3. CDM NOTIFICATION
http://www8.imperial.ac.uk/content/dam/ad/workspaces/buildingprojects/Procedure_Forms/f03cdmnotification.doc
4. Safety Induction Agenda
<http://www.imperial.ac.uk/workspace/capitalprojects/Public/FormsTemplates/CSM03AgendaSafety.doc>
5. SAFETY INDUCTION CERTIFICATE
http://www.imperial.ac.uk/workspace/capitalprojects/Public/Procedure_Forms/f17safetyinductioncert.doc
6. SITE HANDOVER FORM
http://www.imperial.ac.uk/workspace/capitalprojects/Public/Procedure_Forms/f04sitehandover.doc
7. CONTRACTOR'S MONTHLY ACCIDENT REPORT FORM
<http://www.imperial.ac.uk/workspace/capitalprojects/Public/FormsTemplates/CSM06AccidentReporting.docx>