# **The Glasgow School of Art**

# OCCUPATIONAL HEALTH AND SAFETY POLICY: ARRANGEMENTS

February 2019

# **Policy Control**

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# **GLASGOW SCHOOL OF ART**

# **OCCUPATIONAL HEALTH AND SAFETY POLICY: ARRANGEMENTS**

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#### 1. Introduction

#### 1.1. GSA Occupational Health and Safety Policy

GSA's Occupational Health and Safety Policy (OHS Policy) commits GSA to ensuring the health, safety and welfare of its staff, students, visitors, and all others who may be affected by its activities. Occupational health and safety is a core management and operational function.

Under GSA's OHS Policy the Director is the senior manager ultimately responsible for health and safety. The Director is supported by a Senior Leadership Group (SLG). The Senior Leadership Group currently comprises the Director and their direct reports namely the Deputy Director (Academic), Registrar and Secretary, Director of Finance and Resources, Director of Strategy and Marketing, and the Director of Development. The Director of Human Resources is also a member, and reports to the Registrar and Secretary.

The Planning and Management Group (PMG) supports the SLG and incorporates the SLG membership. The core PMG membership also includes Heads of School, the Head of Learning and Teaching and the Head of Research and Enterprise. PMG members are accountable to their respective SLG member.

All Senior Leader Group and Planning and Management Group members are required to embrace the aims and objectives of the OHS Policy and to implement its associated arrangements to ensure the aims and objectives are fulfilled.

This document details the arrangements for health and safety management within GSA. These are general arrangements which will be applicable to most staff and students at GSA and should be read in conjunction with the OHS Policy.

# 1.2. GSA Occupational Health and Safety Management System

GSA has adopted the Occupational Health and Safety Management System (OHSMS) advocated by the Health and Safety Executive Publication Managing for Health and Safety (HSG65), which facilitates the provision of a robust framework enabling GSA to promote a positive occupational health and safety culture and to effect continuous improvement. See Figure 1 below

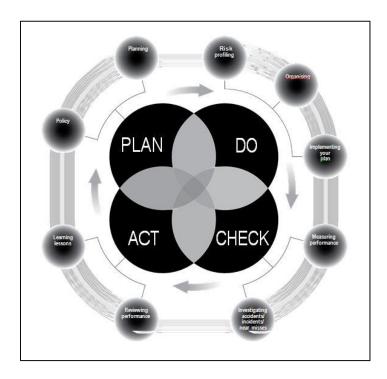


Figure 1: The Plan Do Check Act Cycle (Managing for Health and Safety HSG 65)

The Plan, Do, Check, Act cycle adopted supports a balance between the systems and behavioral aspects of management and ensures that occupational health and safety management is an integral part of GSA's good management generally. Staff at all levels have a clear role in contributing to the successful management of occupational health and safety.

The OHS Policy and this arrangements document are key components of the OHSMS and represent GSA's commitment to, and plan of action for, managing health and safety requirements. The structure of GSA's OHSMS documentation includes three inter-related levels:

**Table 1: GSA OHS Policy Document Structure** 

Level 1	OHS Policy statement incorporating the outline arrangements for implementing and communication of the OHS Policy
Level 2	GSA Policies, Procedures and Guidance detailing
	arrangements on specific subject matter
Level 3	School and/or Departmental Occupational Health and Safety Arrangements (inclusive of risk assessments, safe systems of work and relevant standard operating procedures)

**Level 1** – The Occupational Health and Safety Policy; an outline of the OHSMS adopted; the Leadership, Responsibilities and Organisation for implementing and communicating the OHS Policy; an outline of Occupational Health and Safety Arrangements that exist for a range of GSA work activities and issues.

**Level 2** – Detailed Occupational Health and Safety Arrangements, issued as individual, topic-specific documents, mainly in the form of Procedures, Guidance and related documents.

**Level 3** — Occupational Health and Safety Arrangements developed and issued by individual academic or professional support areas and reflective of their implementation of GSA's Occupational Health and Safety Arrangements. These inform staff of relevant health and safety issues, together with the procedures and systems in place at academic or professional support area level to implement OHS Policy objectives.

A fundamental principle underpinning health and safety law is that those who create risks from work activities are responsible for protecting workers and the public including students and visitors. GSA accepts that in the course of academic or professional support areas' activities, work or research risks to health and safety may arise. However, the academic or professional nature of their undertakings does not exempt academic or professional support areas from statutory duties. Therefore, they are required to manage the risks they create.

#### 1.3. Aim and Scope

This document aims to assist Heads of School and Professional Support Areas in developing and implementing effective health and safety arrangements within their area of responsibility. It applies to all academic and professional support areas.

# 1.4. Terminology

In terms of the OHS Policy, arrangements for managing occupational health and safety are taken to mean the organisation, procedures and systems that the GSA as a whole, and constituent academic and professional

support areas, are required to establish and maintain for ensuring the health, safety and welfare of staff and others who could be affected by its undertaking.

# 2. Key Role of Heads of School and Professional Support Areas

Heads of School and Professional Support Areas have operational responsibility for ensuring that, so far as is reasonably practicable, occupational health and safety standards are adhered to within their areas of responsibility and that staff and students are informed and kept updated about occupational health and safety issues and good practice.

GSA's OHS Policy (a Level 1 document) provides more detail on the allocation of OHS responsibilities within GSA.

# 3. Organising for Effective Management

## 3.1. Understanding GSA's Undertaking

Heads of School and Professional Support Areas are required to have an appreciation of the extent of their responsibilities for their academic and professional support areas, in terms of the space occupied, the facilities and services used and the nature of academic/work/research activities, whether on- or off-campus, in order to establish and maintain control of risks. Where necessary, they should ensure that their area of responsibility is divided into smaller areas or sections, for the purposes of managing occupational health and safety. Those who undertake casual work, or are volunteers should be covered by one of these areas, so that health, safety and welfare provision can be made for all concerned.

It should be noted that the Director of Finance and Resource through the Head of Estates is responsible for ensuring the suitable and sufficient risk assessment of the operation of the estate, which includes buildings, communal areas, teaching rooms, gardens or grounds and all activities associated with the construction, maintenance and refurbishment of such areas.

# 3.2. Understanding GSA's Risk Profile

Heads of School and Professional Support Areas are required to ensure that the hazards associated with each area or section of their undertaking are identified under broad categories. For example, chemical hazards; electrical hazards; general fire hazards; fire or explosion hazards from compressed gases including aerosols or other materials; health hazards arising from the production of dusts or fumes; mechanical hazards from work equipment; office hazards from trailing cables or layout of furniture; work at height. This should all be established within a risk assessment programme covering their areas of responsibility. This programme will also inform the allocation of health and safety responsibilities and whether any specialist advice or training is required.

# 3.3. Allocating Health and Safety Functions

Each academic and professional support area needs an effective management structure for delivering OHS Policy aims and objectives and implementing arrangements. This can be enhanced by pooling the knowledge and experience within it and promoting co-operation between individuals and groups.

Heads of School and Professional Support Areas should ensure that any key health and safety functions and responsibilities are allocated to line-managers, individuals or groups, based on their job descriptions, areas or sections under their control, risk profile, or in view of proposed changes to this profile.

All duties and functions should be clearly defined. Individuals should be given the appropriate level of authority to carry out their health and safety duties and functions bearing in mind that while authority may be delegated responsibility cannot.

# 3.4. Ensuring Competence and Supervision

### 3.4.1. Competence of Staff and Postgraduates

Everyone in GSA has a part to play in improving health and safety standards and requires awareness of relevant hazards, risks, and health and safety arrangements. They should be capable of applying experience, knowledge and skills thereby demonstrating competence to carry out their work in a healthy and safe manner.

A thorough health and safety induction programme is essential to ensuring that new personnel (including postgraduate students) receive appropriate awareness training. Where necessary this programme should include a schedule of competency training, based on work activities and responsibilities.

Those with specific health and safety roles should also receive the necessary training focusing on both awareness and competency requirements, commensurate with their duties and functions and based on an analysis of needs. Line managers in academic and professional support areas should provide adequate supervision and discuss additional health and safety development needs and/or training during regular meetings with staff and at career reviews.

All records associated with health and safety training should be retained in accordance with the General Data Protection Regulations, GSA's Records Management Policy and any specific health and safety statutory requirements.

# 3.4.2. Undergraduates and Postgraduates

GSA has a duty to ensure the health, safety and welfare of students, which includes the provision of adequate information, instruction, training and supervision whilst undertaking coursework. This covers a wide range of activities including fieldwork, practical classes, project work, use of studios and workshops, and activities outside normal hours.

It is the responsibility of each Head of School and Professional Support Areas to ensure there are adequate arrangements for the provision of appropriate health and safety induction to students and subsequent supervision. Heads of School and Professional Support Areas must also ensure that heads of department, programme leaders, tutors, line-managers, and supervisors, have a clear understanding of their responsibilities and are actively discharging them.

Those in charge of particular aspects of coursework should decide on the extent of the information, instruction, training and supervision required based on suitable and sufficient risk assessment. With regard to the provision of adequate health and safety information, instruction, training and supervision of postgraduate work, the member of academic staff responsible should satisfy themselves that each stage of the work is based on a suitable and sufficient risk assessment before it proceeds.

# 3.5. Ensuring Communication

Heads of School and Professional Support Areas should develop procedures for effectively communicating information concerning GSA's OHS Policy, departmental roles and responsibilities, including arrangements and revisions of them to those involved or affected. This can be achieved in a number of ways, for example, through departmental, programme, section or team briefings, standing agenda items, emails and newsletters, management reports, notice boards, occupational health and safety inductions, safe systems of work, and dissemination of findings of risk assessments and health and safety inspection or investigation reports.

# 4. Planning and Implementing Arrangements

#### 4.1. Implementing GSA-wide Arrangements

As an employer, GSA's undertaking is subject to statutory health and safety duties, which drive health and safety arrangements for managing risks associated with GSA work activities, hazards and other issues.

These arrangements represent Level 2 of GSA's OHS Policy documentation, principally procedures, guidance and associated supporting documents. This element of the OHS Policy sets out the standards of management required by GSA that, if adhered to, can demonstrate compliance with legal duties and/or good practice. They normally include roles and responsibilities of various individuals and groups, along with practical advice on managing the associated risks. The procedural and guidance documentation represents the standards against which academic and professional support areas will be monitored and audited. This documentation will usually relate to specific legislation or subject matter and, depending on the subject matter, is approved by the Senior Leadership Group, Planning and Management Group or the GSA Occupational Health and Safety Committee.

Heads of School and Professional Support Areas should therefore make any necessary provision to integrate these management standards into their area of responsibility.

# 4.2. Developing a Programme of Risk Assessments and Safe Systems of Work

Current health and safety legislation requires GSA and, consequently, its academic and professional support areas to complete suitable and sufficient assessments of the risks to the health and safety of employees to which they are exposed whilst at work, and of the risks to other persons arising out of, or in connection with its undertaking. The purpose of risk assessment is to determine if adequate controls have been implemented to prevent harm to people, or if more are needed.

It is also a legal requirement to provide safe systems of work to ensure the health, safety and welfare of employees whilst at work. The written GSA-wide and any academic and professional support area arrangements (Level 3) contribute to compliance with this duty, since they will set out relevant preventive and protective measures.

Very specific work and research activities are unlikely to be covered by general arrangements, so separate arrangements will need to be made. These may be in the form of recorded significant findings of risk assessments (for lower risk activities), or safe systems of work (for higher risk activities) developed from the significant findings of relevant risk assessments.

Heads of School and Professional Support Areas must ensure that an adequate programme of risk assessment and, where necessary, safe systems of work is implemented to cover the full range of specific work and research activities. This may require that sufficient staff members are trained in risk assessment techniques and that the process is integrated into their normal work. Those affected need to be provided with comprehensible and relevant information on the risks to their health and safety and the preventive and protective measures in place or precautions required.

The process that ensures the programme of risk assessments and/or the associated safe systems of work is implemented is an important part of the documentation that supports the academic and professional support area arrangements.

# 5. Measuring Performance

The primary purpose of measuring health and safety performance is for GSA and its academic and professional support area management teams to judge the implementation and effectiveness of the arrangements for controlling risk. Measurement information can be used to identify areas where corrective action is necessary and to determine how well a positive health and safety culture is being developed among staff and students, all with a view to continual improvement. Various means of monitoring can be employed as outlined below:

### 5.1. Health and Safety Inspections

GSA's Active Monitoring Inspection Programme is delivered by the Health and Safety Team in accordance with the current GSA Occupational Health and Safety Plan. To complement this Heads of School and Professional Support Areas should ensure that, within their area of responsibility, academic or professional support departments have made arrangements for regular inspections of areas and work activities.

# 5.2. Reports of Accidents, Incidents and Near Miss events

The findings of investigations into the causes of accidents, incidents and near miss events (Re-active Monitoring), within academic and professional support areas, are important. They provide useful information on health and safety management arrangements that may have failed, along with recommendations to improve future performance. It is advised that Heads of School and Professional Support Areas ensure they are kept informed of all incidents, they monitor the progress of necessary actions to prevent a similar incident and that relevant information is communicated to those who could be affected.

Heads of School and Professional Support areas should also ensure that their respective SLG/ P&MG Member is kept informed about incidents within their area of responsibility and progress with any preventive and/or remedial actions.

#### 6. Reviewing Performance

Reviewing is the process of using performance findings to make judgments about the adequacy of GSA's Occupational Health and Safety Management System at all levels, including academic and professional support area, department or even more specific level, and to take decisions about the nature and timing of actions to remedy deficiencies.

Heads of School and Professional Support Areas are, therefore, required to develop an Occupational Health and Safety Action Plan (OHSAP) to present, prioritise and track the medium to longer term health and safety objectives of the academic and professional support area, with a view to continuously improving the Occupational Health and Safety Management System and using resources efficiently. The OHSAP may include risk-reducing actions identified by risk assessments or health and safety inspections, or items highlighted from the GSA Annual Health and Safety Report, which require significant planning, lead-time and financial resources.