

Hazardous Working Procedure	
Enabling Policy Statement; Executive Owner; Approval Route:	Our Safety - Chief Operating Officer - Compliance Committee
Associated Policy Statements:	N/A
Authorised Owner:	Director of Health and Safety
Authorised Co-ordinator:	Health and Safety Manager (Professional Services)
Effective date:	13 October 2022.
Due date for full review:	12 October 2025.
Sub documentation:	- Lone Working Guidance - Risk Assessment Guidance

Approval History

Version	Reason for review	Approval Route	Date
1.0	Reviewed and updated (formatted in accordance with the new Policy Framework 2022). Replaces Hazardous Working Policy (Version 4.0, dated 10 October 2018).	Compliance (Health, Safety and Wellbeing) Committee	13 October 2022

1. Purpose

The University of Surrey acknowledges that there may be an increased risk to the health and safety of its employees or students when undertaking hazardous activities or working in hazardous environments. This procedure forms part of the University's commitment to managing these risks in providing a safe place in which to work and study. This procedure details the arrangements and responsibilities that are in place to effectively manage these risks.

2. Scope and Exceptions to the Procedure

This procedure applies to all staff, students, contractors, visitors, and others who engage in hazardous work activities or work in hazardous areas on behalf of the University.

Emphasis is placed on those personnel whose exposure to risk is increased by a requirement to work alone or outside of the usual University core working hours. This procedure also applies to students undertaking practical / experimental projects without direct supervision or to those students who may be carrying out fieldwork outside of the campus and who may be exposed to a significant risk arising from their work activities or work environment.

3. Definitions and Terminology

Hazardous Areas - areas where a worker may be exposed to risks that are considered greater than those normally encountered within a low risk working environments such as offices or teaching rooms. Hazardous areas would typically include laboratories, workshops, or any area where special control measures are necessary to minimise risk.

Hazardous areas may be classified as low, medium, or high and may subsequently have restricted or controlled access. Any such areas will display signage on the outside of the door indicating the access restrictions.

Hazardous Task - a task where the hazards are considered greater than those that would be encountered in normal circumstances. A good example might be a worker using hazardous chemicals or substances or the operation of a hazardous item of work equipment.

Significant Hazard - a hazard, associated with an occupational activity, which has the potential to cause harm.

Safe System of Work - a formal procedure which results from a systematic examination of a task to identify all the hazards. It defines methods to ensure that hazards are eliminated, or risks minimized.

Competent Person - a person who has the skill, knowledge, attitude, training, and experience to undertake the role effectively.

Training and briefing - training is equipping staff, students (and others where the University has a duty of care) with relevant skills to deal appropriately with a given health and safety situation. Briefing is informing such persons of relevant knowledge in relation to health and safety.

4. Procedural Principles

4.1 Commitment

Compliance with the requirements of this procedure will ensure that all hazardous activities are subject to a proper and thorough risk assessment and that all control measures identified by the risk assessment are fully and correctly implemented to reduce risk to a level which is as low as is reasonably practicable.

4.2 Arrangements

In order to meet the above principles, the University will:

- Risk assess all hazardous work activities: This risk assessment must be carried out by a

competent person; trained in the University's risk assessment process. The risk assessment should be formally approved by the supervisor/manager of the work area or delineated work area for EFCS Projects/Maintenance activities. Any risk control measures identified within the risk assessment should be actioned by their due date. The risk assessment should be subject to periodic review to ensure it remains suitable and sufficient.

- Instigate lone working arrangements and controls: the risk profile of any activity can be different if the activity is carried out in an area where others are not present. For this reason, risk assessment arrangements are in place to determine if working alone is acceptable. All personnel should consider lone working as a possible factor associated with any activity and should be aware that lone working scenarios may develop at any time of the day.
- Implement access arrangements for hazardous areas: Only competent persons may enter hazardous areas. Competent persons may include members of the Faculty, Research Postgraduates, technicians, visiting research workers or persons of equivalent status. All other persons entering hazardous areas must be accompanied by a competent person.

Hazardous areas may have access restrictions in any of the following ways:

- Swipe access: contact Faculty gatekeeper for staff card activation.
- Key code access: contact Laboratory Manager for access code.
- Key access: contact Faculty Facilities Manager/Laboratory Manager for key.
- Key access to EFCS controlled spaces e.g., electrical switch rooms or plant rooms.

In all cases it is the responsibility of the person granting/approving access to ensure that the requesting individual possesses the requisite competency.

- Taught Undergraduate Students: Undergraduates are required to be adequately supervised by a competent person whilst undertaking classes in a hazardous area.
- Undergraduate Project Students: Undergraduate project students are allowed access to hazardous areas provided they:
 - have demonstrated a suitable level of maturity and competence
 - have received any training prescribed for their particular activity
 - have obtained authorization from their faculty supervisor
 - are familiar with the local safety regulations and emergency procedures for the area
- Post Graduate Students: Either PG/R or PG/T students may be required to work in hazardous areas and are allowed access provided they are judged to be competent by their supervisor or other recognized authority. The Supervisor must ensure that a suitable level of supervision/oversight is provided until they are confident that the Post Graduate Student is competent.
- Implement suitable arrangements for maintenance and emergency works: All work must be subject to a risk assessment and where appropriate a written safe system of work provided (e.g., permit to work).
In all cases where remedial work is to be carried out a suitable authority must approve the work and ensure it is carried out in a safe manner, with all necessary precautions taken to protect the persons carrying out the work or other affected parties.
- Introduce 'Special Procedures', where the risk assessment identifies this as necessary: Some highly controlled areas will be subject to 'Special Procedures', such as when persons wish to work in radiation-controlled areas. When such measures exist, all users must be accredited and have received suitable training and authorisation from a nominated person.

4.3. Roles and Responsibilities

4.3.1 Deans and Director are accountable for the provision of measures to ensure:

- Sufficient resources are made available to enable compliance with this procedure.
- Adequate emergency plans and procedures are in place to deal with foreseeable adverse events.

- Any necessary licenses/permits are up to date and that complete records are maintained pertaining to the use and storage of controlled or dangerous agents.

4.3.2 Managers and Supervisors (including academic supervisors) are responsible for ensuring:

- That a suitable and sufficient risk assessment has been undertaken, approved, and documented prior to carrying out any hazardous activities.
- Any control measures identified by the risk assessment, including those advised by Occupational Health have been fully implemented.
- Staff and students have received sufficient instruction and information and are adequately trained and supervised.
- That suitable arrangements have been made in the event of lone working and that the risk assessment has identified suitable controls to manage risks associated with such activities.

4.3.3 Health and Safety Managers are responsible for:

- Providing competent and informed advice to persons required to carry out hazardous activities or to work in hazardous areas.
- Providing suitable training as necessary in a format that is appropriate and monitor the effectiveness of this training.
- Investigating any adverse incidents arising from hazardous work activities in order to identify root cause.

4.3.4 Director of Health & Safety is responsible for:

- The provision of advice and guidance on the application of legislative requirements.
- Where necessary, liaising with the regulatory authorities on health and safety matters.
- Reporting incidents in accordance with RIDDOR Regulations.
- Auditing compliance with this procedure

4.3.5 Contractors must comply with the requirements of this procedure, and:

- Work in accordance with the findings of any risk assessment, and the requirements of any information, instruction, and training (including induction) provided.
- Ensure that their workforce (including that of any sub-contractor working on their behalf) have the appropriate level of training for the work activities being undertaken.
- Carrying out a risk assessment for any hazardous work before that work commences.
- Ensure that any required access arrangements or Permit to Work is in place and approved prior to commencement of works.
- Complete the contractors 'Green Book' induction training within the last 12 months, before starting work on campus.

4.3.6 Staff and Students (including visiting workers and visiting students) must comply with the following requirements:

- Read and work in accordance with any risk assessment that has been completed in relation to their hazardous activities.
- Comply with all local/university rules and procedures when carrying out hazardous activities or working in hazardous areas.
- Confirm that any measures identified by the risk assessment have been fully implemented and assessed prior to work beginning. With particular reference to the maintenance, examination and testing of control measures as a requirement of the COSHH Regulations.
- Appropriately use and maintain any Personal Protective Equipment (PPE) provided as a control measure, and in accordance with any training and instruction provided.
- Report any accident or near miss that occurs whilst carrying out hazardous activities to their Supervisor/Manager and via the University incident reporting procedure.
- Attend any Occupational Health appointments required for health surveillance and to cooperate with this process.

- Report any health concerns they may have regarding their involvement in hazardous activities to their Supervisor/Manager.

5. Governance Requirements

5.1. Implementation: Communication Plan

This procedure will be available via the University procedures webpages.

Relevant Health and Safety Committees and EFCS Committees will be notified, and information disseminated through line management. Faculty Health and Safety Committees will also be informed, as required.

Relevant information is also published on the University Health and Safety intranet site and Health and Safety Handbook, as appropriate.

This procedure and associated supporting documentation will be communicated as part of specific risk assessment training given to staff and students involved in hazardous working.

5.2. Implementation: Training Plan

All persons engaged in hazardous work activities or who work in hazardous areas are required to have a clear understanding of the University emergency procedures and be competent in their response to any foreseeable incident.

All persons should be competent (through training and experience) in the University risk assessment process and have a clear understanding of the hazards and risks posed by the work they are undertaking.

5.3. Review

This procedure will be monitored for changes and updates by the Director of Health and Safety; and the Health and Safety Managers for each of the respective Faculties. Minor changes will be reviewed at Health and Safety Managers Co-ordination Group and approved by the Compliance (Health, Safety and Wellbeing) Committee. Significant changes to the procedure would follow the same review and approval process but may be noted at Executive Board, where appropriate.

This procedure will be reviewed every three years or in line with relevant changes in legislation, if sooner. The Health and Safety Consultative Committee will be consulted during the review process, as required.

5.4. Legislative Context and Higher Education Sector Guidance or Requirements

5.4.1. Applicable Legislation

This Procedure complies with the requirements of:

- The Health and Safety at Work Act 1974.
- The Management of Health and Safety at Work Regulations 1999 – specific duties require the University to provide a safe environment and safe systems of work for its employees and those working on its premises. The University has a duty to undertake risk assessments to identify significant risks and to implement suitable control measures to minimise the risks. These requirements are equally applicable to work situations and activities where staff and students are working alone or outside normal working hours in hazardous environments.
- Control of Substances Hazardous to Health (COSHH) regulations which also have significant bearing over the control of hazardous working activities.

5.4.2 Legislative context

This procedure complies with the required 'duty of care' placed upon the University. Under health and Safety Law a 'duty of care' is generated between organisations and individuals

when carrying out activities that could foreseeably cause harm.

The primary duty of care is owed through the employer-employee relationship in which the employer owes a duty of care to ensure that work activities that could result in harm to the employee are assessed and controlled. The duty of care is put into practice by the line management responsibilities as set out in the hierarchy of the organisation.

This duty of care cannot be delegated away; instead, the act of delegation must be accompanied by a realistic and workable system of monitoring or supervision to ensure that the delegated task has been adequately implemented (i.e., the responsibility is not met by giving directions; it is met when those directions have been confirmed as carried out). The result is a cascade of delegated accountability that runs through the organisation via the line management network, accompanied by a system of monitoring, supervision, and feedback.

The duty of care extends to assurance that services provided by others (be they another department of the University or contractors) are undertaken safely. The level of assurance required should be commensurate with the risk of the activity. In addition, anyone carrying out an activity owes a duty of care to anyone who may be put at risk by the activity, such as students, staff, and visitors.

5.5. Sustainability

This Procedure has no impact on carbon emissions or on energy consumption.

6. Stakeholder Engagement and Equality Impact Assessment

An Equality Impact Assessment was completed on **05/10/2022** and is held by the Authorised Coordinator.

Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Date	Name of Contact
Governance	Development and creation of this Procedure v1.0.	22/08/2022	Ros Allen, Head of Governance Services.
Health and Safety Manager	Development and creation of this Procedure v1.0.	02/08/2022	Paul Daniell Health and Safety Manager (Professional Services).
Equality, Diversity & Inclusion	Development and creation of this Procedure v1.0.	22/08/2022	Jo McCarthy-Holland, Equality & Diversity Advisor.
Health and Safety Consultative Committee	Development and creation of this Procedure v1.0.	22/08/2022	Members of this Committee.