**Health and Safety Approach CSP 12/02/2020**

**Context and Purpose**

The Student Experience Directorate delivers a support service for approximately 400 student groups and projects to undertake a broad range of activity.

This paper outlines the main risk areas, where the committee should be aware the gaps are, and the steps being taken to lower/mitigate our risks.

The Committee should note the risks, discuss missing areas and any potential gaps in the approach, and satisfy that the actions presented are adequate to assure the Board that risk is being managed appropriately. Until the committee is satisfied that adequate controls are in place, the approach and progress to CSP Health and Safety should be reported at each meeting.

The Committee should be aware that our risk exposure for CSP activity is extensive and it is the current view of the Head of Student Experience that the approach to risk management in this area has been inadequate and urgent action is required to implement control to mitigate our risks.

**Main Risks** *The Union CSP risk exposure can be defined in 3 broad categories.*

1. CSP Activity- The actual activities our students do, these range from low risk on site/campus activity to higher risk off campus, either in the UK or abroad, physical activity.
2. CSP Travel and the Motor Fleet- The travel to activities, this ranges from low risk on campus to higher risk use of the minibus fleet.
3. Equipment and Storage- Our CSPs store equipment on all our campuses. The storage presents a risk in the way its stored and the amount of equipment.

**Identified Risks, Current approach, Issues** *The current situation by risk area.*

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| Risk Area | Identified Risk | Current Approach | Issue |
| CSP Activity | Core Activity | All clubs/societies are required to complete a risk assessment at the start of the year via an eActivities submission form to cover all of their activity. Completion of this form opens access to finance functions for the CSP. | There is currently no check as to the quality of the risk assessment.  There is no check to whether the CSP is actively using the risk assessment.  There is not a centralised risk register for student activities.  There are no ratings of risk within the risk assessments and no residual risk rating after mitigation has been applied.  There is a lack of awareness of the team of how to access the risk assessment. |
|  | On Campus Activity |  | There are currently no location specific risk assessments for any activity. Many locations will be covered by an RA, possibly completed by an external party and may or may not cover the CSP activity.  There are a number of workshops that are the location of motor clubs. These require specific risk assessments and support from College. |
|  | High risk activity | We have a number of high-risk activities that our students undertake. These are listed in the appendix. | Whilst we are aware of which activities are high-risk, we pay no extra attention to them.  The Union currently has no crisis/incident response plan. |
|  | Sport | The Union has over 80 sports clubs undertaking weekly activity with higher risk of personal injury. | Sport clubs are partly supported for many of their functions by Move Imperial (College department)  Our approach to risk does not include any memorandum of understanding between the Union or Move Imperial. |
|  | Tours | Our CSPs undertake several tours per year. This involves overseas travel.  Tours are approved by DPCS. | There is limited management information on tours, and we do not ask specific enough information e.g. we do not ask for the precise location of the tour/trip.  There is not an automated report generated allowing the Union/College to know where and when students are away.  There is not enough assurance to show that all tours and foreign CSP travel details are provided to the College Insurance team. |
|  | Coached Activity | Most of our clubs involved in sporting or physical activity, or an activity that requires coaching or guided instruction work with coaches and trainers, these will range from qualified instructors to non-qualified peers. There are two ways in which a club can inform the Union of having a coach. They can complete an Instructor Registration Form each year for each coach or input the information on eActivities. | Currently we are not promoting either method and there is a disparity between the two methods. The Instructor Registration Form contains more information and outlines the responsibilities for each party in the agreement. eActivities requires the club to declare whether they have no instruction, use non-formal peer-to-peer instruction or a qualified instructor, and then name the instructor along with their address |
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| CSP Travel and Motor Fleet | Minibus | The minibus fleet is made up of 15 busses, all of which are at the end of their depreciation.  Basic maintenance of the busses is provided by paid students. We have a relationship with a local garage who provides maintenance support.  We provide driving competency training to students. We run tests to ensure all students who drive the minibuses demonstrate the required level of competency. All students who complete this are added to the fleet insurance provided by the College. | The minibus fleet is now at a point where all the minibuses need replacing. This causes an increase in maintenance issues.  Basic maintenance of the vehicles is done by students and there are no controls in place to ensure the students are competent to do this. |
|  | Truck and trailer | The truck will arrive in March. | The truck is new, there is currently no plans on how to manage this. |
|  | Coach Travel | Coach travel is externally booked with a commercial supplier. |  |
|  | Overseas Travel | The College has insurance for all college trips which also covers organised CSP travel. This cover includes the RSA travel app which provides pre travel information as well as pre programmes access to the insurers 24 hour helpline.  For the insurance to be valid CSPs must register their travel with the college. | There is currently no data which proves all overseas travel is registered with college.  There is currently no data which shows the Union is provides with trip attendees.  Our tours process does not ask for the specific location of the tour. |
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| Equipment and Storage | Beit Building | There is extensive storage across the Union building. All CSPs can through eActivities have an equipment list to keep a record of what they own as part of an inventory.  The Union also owns assets that can be more clearly defined as directly owned by the Union but for CSP use. These are stored and asset tagged. | The Union asset list has not been maintained. Not all assets are tagged.  There is no central record for equipment which requires on going maintenance or safety checks. For example, electrical equipment is not PAT tested.  The storage provided by the Union is not adequate. It is not tidy or organised and presents a fire and pest risk. |
|  | Non-Beit Building | CSPs have offsite storage. | The Union has no record of any offsite storage. |
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**Actions to remedy this** *What we need to do now.*

Clearly there are gaps in our approach to managing risks and implementing the necessary controls. We have a large volume of student led activity which makes it challenging to enact the necessary actions. However, ultimately the Union is responsible for the activity it delivers or sponsors to be undertaken in a compliant manner with health and safety best practice and law.

The Union has procured the services of a health and safety consultant, Karl Bott, to support the necessary work that must be completed. The approach (supported by Karl) involves the following (please note that dates for completion of support or additional costs of support cannot be confirmed until the scoping is complete) -

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| Action | Update | Completion date |
| 1. A scoping of the current risks of CSP activity. | Karl Bott mapping of the extent of the risks we are exposed to. | March 2020. |
| 1. A review of the current controls the Union provides including a review of the College Insurance policy. |  | March 2020 |
| 1. Review of any near misses and reported incidents. Subsequent actions to be determined based on the review. |  |  |
| 1. Review of fleet management. Subsequent actions to be determined based on the review. |  |  |
| 1. Review of CSP equipment and storage. Subsequent actions to be determined based on the review. | -storage action plan within the appendix,  -there are a number of urgent actions required regarding storage,  -one waste amnesty has occurred in February 2020  -TN meeting with College and contracted pest control company 13/2/2020,  -Karl Bott walkaround of space occurring in WC 17th) |  |
| 1. Review regarding CSP crisis/incident management. Subsequent actions to be determined based on the review. |  |  |
| 1. Review of workshop practices. | College inspection occurring in March 2020 (provisional date TBC by Matt Moderate, College H&S advisor). Subsequent actions to be determined based on the inspection. | March 2020 completion of recommendation report |
| 1. Review of how we train and communicate with those responsible for Health and Safety at a CSP level. Subsequent actions to be determined based on the review. |  |  |
| 1. Recommendations for controls that should be implemented, and support to operationalise these. |  |  |
| 1. Advice on how to monitor controls and to ensure any new control system/process becomes BAU. |  |  |

**Desired outcomes**

The following outcomes aim to be achieved as a result of the actions being put in place.

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| Outcome | What this looks like |
| 1. The Union has necessary controls in place for activities | * A method for Clubs, Societies & Projects to declare their activity and Health & Safety responsibilities for their core activity * A list of core activities that clubs are undertaking, which would allow us to ensure adequate insurance cover and safety validation is in place for all activity * A categorised list of clubs by their risk rating * An audit/inspection process to allow the Student Activities department to review clubs risk and that risk assessments are being followed * A list of locations where core club activity is taking place and appropriate risk assessments for the location undertaken (particularly workshops) * A list of instructors of core club activity, along with detailed information on each |
| 1. The Union has necessary controls in place for transport it provides to students | * All minibuses maintained to legal standards and this is evidenced * All drivers competent and this is evidenced * Long term plan to ensure vehicles are replaced * All trips made in our vehicles is logged and we have assurance it is appropriately insured, and the driver is competent |
| 1. The Union has necessary controls in place for UK and Overseas tours and trips | * All trips are registered with the Union on eActivities * All trips are registered with College to ensure appropriate insurance is in place |
| 1. The Union has an oversight of equipment management and maintenance | * The Union has an up to date list of all assets with depreciation and maintenance plan * The Union has a list of all CSP owned equipment with relevant safety records and maintenance requirements |
| 1. The Union has adequate storage provision | * The Union has tidy, clean and secure storage locations * The Union has a record of all storage locations * All items in storage are categorised and tagged * A termly inspection occurs. |
| 1. The Union has appropriate monitoring and evaluation system for Health and safety controls | * Appropriate management information to monitor controls * Continual improvement plan in place with an annual report to the Health and Safety Committee. |

**Appendix**

1. High risk activity (list supplied by Student Activities Manager January 2020)

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| **Activity** | **Clubs** |
| Basketball | ACC Basketball, ICSMS Basketball |
| Caving | RCC Caving |
| Canoeing | RCC Canoe |
| Clay Pigeon & Rifle Shooting | ACC Rifle & Pistol |
| Climbing | RCC Outdoor, RCC Exploration |
| Cross Country | ACC Cross Country & Athletics, ACC Triathlon |
| Cycling | ACC Cycling, ACC Triathlon |
| Football | ACC Football, ACC Women’s Football, ICSMSU Football, RSM Football |
| Gliding | RCC Gliding |
| Hill walking | RCC Fellwanders. RCC Outdoor |
| Hockey | ACC Hockey, ICMSU Hockey, RSM Hocket |
| Ice Hockey | RCC Ice Hockey |
| In-line Hockey | RCC Skate |
| Kickboxing | ACC Muay Thai |
| Kite Surfing | RCC Kitesurfing |
| Lacrosse | ICSMSU Lacrosse |
| Martial Arts (all types) | ACC Ju Jitsu (Aiuchi), ACC Ju Jitsu, ACC Judo, ACC Karate Shotokan, ACC Kendo, ACC Kung Fu, ACC Muay Thai, ACC Shaolin Kung Fu, ACC Shorinji Kempo, ACC Taekwondo, ACC Wing Chun, ACC Wushu |
| Motorsport | CGCU Motor |
| Mountaineering | RCC Mountaineering, RCC Exploration, ICSMSU Mountaineering, RCC Outdoor |
| Orienteering | RCC Outdoor |
| Parkour | RCC Parkour, Free Running & Gynmastics |
| Paintballing | RCC Paintballing |
| Parachuting | RCC Parachute |
| Polo | ACC Riding & Polo |
| Riding | ACC Riding & Polo |
| Rugby | ACC Rugby, ICSMSU Rugby. ACC Womens Rugby, RSM Rugby, CGCU Rugby, ACC Rugby League |
| Rowing | ACC Boat, ICSMSU Boat |
| Sailing | ACC Sailing |
| Skiing | ACC Snowsports |
| Snowboarding | ACC Snowsports |
| Squash | ACC Squash, ICSMSU Squash |
| Surfing | RCC Surf |
| Wakeboarding | RCC Wakeboarding |
| Water polo | ACC swimming & Waterpolo, ICSMSU Waterpolo |
| Windsurfing | ACC Windsurfing |
| Yachting | ACC Yacht |

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| **Action** | **Detail** | **Who** | **Cost** | **When** | **Status** |
| Move all immediate risks | Move prayer mats to UDH, communicate change to Islamic Society | IP |  | Dec-19 | Complete |
| Full list of all storage rooms | An inventory of all ICU storage rooms across the College | TFD |  | Jan-20 |  |
| Audit of space from College | College (Martin Benson) to provide building plans including room dimensions of current storage space | MB |  | Jan-20 |  |
| Waste amnesty 1 | First waste amnesty to happen in January 2020 | IP |  | Jan-20 | Complete |
| Meet DramSoc to understand needs | Building tour to be arranged | TN/TFD |  | Jan-20 |  |
| Equipment policy to be written |  | TFD |  | Jan-20 | Complete |
| All clubs and socs kit inventory | All clubs to complete equipment inventory, email to be sent to all committees | IP |  | Feb-20 |  |
| Equipment policy to be approved at CSPB |  | TFD |  | Feb-20 |  |
| eActivities to be updated based on new policy |  | IP |  | Feb-20 |  |
| Clear and clean rooms | External support required | IP |  | Summer 2020 |  |
| Dispose of all waste | External support required | IP |  | Summer 2020 |  |
| Check all equipment being kept is safe | PAT testing to be arranged | IP |  | Summer 2020 |  |
| Purchase necessary shelving and cages | Quote to be sourced once waste amnesty has happened | IP |  | Summer 2020 |  |
| Install shelving and cages |  | IP |  | Summer 2020 |  |
| New storage space identified | Liaise with Nick Roalfe | TN/TFD |  | Summer 2020 |  |
| Assign responsibility | Review staff JD to ensure responsibility for storage | TBC |  |  |  |

1. Action plan for storage solution