

Imperial College Union Policy Working in Confined Spaces Policy

Audience: All Staff
Owner(s): Leadership Group
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Approving body:

1. Policy statement

Imperial College Union is committed to ensuring the health, safety and welfare of its members, staff, customers, suppliers, visitors and all others who may be affected by its activities.

Imperial College Union recognises that good management of health, safety and welfare is essential to the success of the organisation and is a sign of a well-managed organisation.

Imperial College Union is committed to ensuring that procedures are in place to identify hazards, assess risk and set objectives to improve the management of health, safety and welfare.

Imperial College Union acknowledges its duty to ensure that all relevant legislation regarding health, safety and welfare is adhered to and that resources are made available to ensure health, safety and welfare.

Imperial College Union is committed to developing a positive safety culture, based on the involvement of staff and volunteers in health and safety management. Imperial College Union will therefore use consultative forums and mechanisms to involve staff and volunteers in health and safety management, and will endeavour to provide relevant training to all staff and students.

Imperial College Union commits to reviewing this policy at least every 2 years, or as and when necessary, with approval for the policy to take place at the Board of Trustees.

2. Introduction

A confined space is one which is both enclosed, or largely enclosed, and which also has a reasonably foreseeable risk to workers of fire, explosion, loss of consciousness, asphyxiation or drowning.

It may be small and restrictive for the worker or it could be far larger such as a grain storage silo with hundreds of cubic metre capacity.

What are the hazards?

Working in a confined space is dangerous because of the risks from noxious fumes, reduced oxygen levels, or a risk of fire. Other dangers may include flooding/drowning or asphyxiation from some other source such as dust, grain or other contaminant.

What do I have to do?

Wherever possible, you should avoid carrying out tasks in confined spaces. Where this is not possible, you must assess the risks of the particular confined space and plan how you will control those risks. For example:

- if a confined space has noxious fumes, you should consider how these can be ventilated or removed
- if there is a risk of liquids or gases flooding in, you should establish whether the valves can be locked shut
- if someone is going into a confined space and there is not enough oxygen to breathe properly, you must provide breathing apparatus or ventilate the space to increase oxygen levels before entering

You should have emergency arrangements where necessary. If someone is working in a confined space, think about the following:

- How will you know they are okay and haven't been overcome by fumes?
- How will you get them out if they are overcome? (It is not enough to rely on the emergency services.)

Dos and Don'ts of working in confined spaces

Do...

- be aware of the risks that may occur within a confined space
- make sure the person doing the work is capable and trained in both the work and the use of any emergency equipment

Don't...

- work in confined spaces unless it's essential to do so
- ignore the risks – just because a confined space is safe one day doesn't mean it will always be
- let others enter a confined space until you are sure it's safe to do so

3. Responsibilities

Board of Trustees

The Health and Safety at Work Act 1974 places a statutory duty on organisations to ensure, so far as is reasonably practicable, the safety, health and welfare of its employees at work and other people who may be affected by their activities, e.g., membership, volunteers, members of the public.

The Board of Trustees, as the governing body of the Union, has overall and final responsibility for Health and Safety matters within the Union and for ensuring that Health and Safety legislation is complied with.

The Managing Director

The Managing Director has delegated responsibility for the implementation, monitoring and review of the Health and Safety Policy and associated policies. As required by the 'Management of Health and Safety at Work Regulations 1993' the Managing Director is named as the 'competent person' who will ensure compliance with Health and Safety. In particular the MD is responsible for:

- The setting of Health and Safety standards and objectives.
- The allocation of the necessary financial resources.
- Identifying and allocating Health and Safety responsibilities to Senior Managers / Departmental Heads.

Leadership Team Lead

The Managing Director will delegate to a membership of the leadership team the following responsibility:

- Ensuring general risk assessments are undertaken and made available to all employees.
- Monitoring and reviewing the effectiveness of Health and Safety activities and the Union's Health and Safety Policy and associated policies and procedures, and for ensuring that, at the strategic level, performance standards and timescales are adhered to.
- Ensuring accidents are investigated and reported to the Board of Trustees.
- Putting in place arrangements to monitor the maintenance of the premises and equipment.
- Chairing the Students' Union's Operational Health and Safety Committee and ensuring it has the time, facilities and resources to carry out its business effectively.
- Keeping under review this Health and Safety Policy and the Health and Safety performance of the Students' Union.

Line Managers

Health and Safety is a delegated line management responsibility requiring managers to undertake operational Health and Safety duties identified in this Policy and individual policies and procedures associated with Health and Safety. All Departmental Heads will be trained in relevant Health & Safety courses (i.e., Risk Assessment, COSHH) and where appropriate (IOSH, NEBOSH) to ensure areas/ teams are managed safely.

Line Managers are responsible for:

- Ensuring that departmental activities are conducted in accordance with Union policy, legislative, and other formal standards and that those hazards having the potential to cause harm are risk assessed and identified controls are implemented.
- Ensuring that employees receive sufficient information, training and supervision on Health and Safety matters.
- Producing safe systems of work and the means for complying with this Policy and other individual policies and procedures associated with Health and Safety.
- Where necessary, organising supervision to control the working environment and the maintenance of safe standards.
- Investigating accidents, or near misses, to establish causes and prevent recurrence.
- The Health and Safety induction of new staff, volunteers and students and ensuring that
- information, instruction and training are provided to meet individually identified needs.
- Identifying and monitoring the adequacy of the specific Health and Safety responsibilities of staff and students.
- Reviewing the above arrangements at regular intervals, making adjustments as necessary.

4. Individual Members of Staff, Volunteers, Students and Visitors

Individual members of staff, students and visitors have a legal duty to co-operate and comply at all times with the Health and Safety information, instruction and training provided. They must bring to the attention of their line manager or duty manager, without delay, any hazards identified, or improvements identified as necessary. If a hazard is seen, it should be removed or dealt with as soon as possible if it is safe to do so. It should also be reported using the Unions incident reporting system as a matter of priority.

Individual members of staff and students have a duty to take reasonable care for the Health and Safety of themselves and for other persons whom their actions or omissions may affect. Specifically, no person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare. Serious breaches of the Health and Safety

Policy (e.g., misusing equipment, deliberately putting someone else's safety in danger) will be dealt with through the Union's Disciplinary Procedure.

Individuals must take responsibility for being aware of fire hazards, knowing the location of fire exits, the assembly point and the fire drill instructions. All new employees to the organisation will be inducted in Fire Safety and the Evacuation Procedure immediately upon commencing employment.

Health and Safety matters may also be raised by any employee at 1-2-1 meetings, team meetings and at Town Hall meetings, which occur regularly.

Operational Health and Safety Committee

The Operational Health and Safety Committee will meet at least once per term, although additional meetings may be called by the Managing Director, Officer Trustees, or the Board of Trustees should the need arise. Membership of the committee will be determined by the Managing Director.

The Committee will have the following terms of reference:

- To maintain and review the measures necessary to ensure the Health and Safety of Union employees, students and others engaged in legitimate activities on its premises.
- To set and review H&S performance and objectives to improve H&S management and maintain a positive H&S culture.
- To monitor the management processes employed within the Students' Union to mitigate risk, notably the implementation and annual review of risk assessments.
- To monitor and review H&S related incidents, implement investigations and complete corrective action (where appropriate and necessary) in a timely manner not to exceed 6 months.
- To monitor and review the H&S audit and inspection process, both internal and external, and implement recommendations where appropriate.
- To monitor and review the adequacy and implementation of H&S related training, awareness and competency standards.
- To enable complaints and reports from employees to be investigated, remedial action to be implemented, and response provided.
- To submit an annual report to the Board of Trustees summarizing the committee's output and effectiveness.

In addition to the Operational Health and Safety Committee, the Board of Trustees may from time to time determine the need for a sub group of the Board to take on specific governance oversight of the Union's Health and Safety activity to ensure sufficient scrutiny and consideration is given to this area of work.

5. Arrangements

Where working in a confined space must be undergone, a risk assessment should be carried out prior to work starting. A supervisor should be recognised in the relevant risk assessment, and based on the work being undertaken, the supervisor may be required to remain present whilst the work is completed.

The following should be assessed in the risk assessment, if they apply:

- Relevant isolations – where works on mechanical or electronic equipment is being undertaken the relevant isolations should be completed. Where gas, fumes or vapours may enter the confined space, the relevant pipework should be isolated. In all cases, a check should be made to ensure isolation is effective.
- Relevant cleaning – Cleaning may be necessary to ensure fumes do not develop from residues while work is being completed.

- Entrance clearance – Checks should be done to ensure that the worker (including all necessary equipment) has enough clearance to enter and leave the space effectively.
- Provision of ventilation – You may be able to increase the number of openings and, therefore, improve ventilation. Mechanical ventilation may be needed to make sure there is an adequate supply of fresh air.
- Emergency Arrangements – Effective emergency arrangements should be included, and should cover the necessary equipment, training and practice drills.
- Communication – An adequate communications system is needed to ensure communication between workers inside and outside the confined space, and to summon help in an emergency.
- Permit to Work – Where required, a permit to work should be approved by the College before work is undertaken.

The risk assessment for the work being undertaken, should be approved by the line manager of the person undergoing the work.

6. Review

The Policy Owner is responsible for conducting a comprehensive review of their policies at a minimum of every 3 years or as required to stay current with applicable laws and/or Imperial College Policies.

The purpose of the review is to determine:

- if the policy is still necessary and accurate;
- if the policy should be combined with another policy or if it should be rescinded;
- if the policy is up to date with current laws and regulations and Imperial College policies;
- if changes are required to improve the effectiveness or clarity of the policy.

7. Training

Health and safety legislation requires employers to provide adequate health and safety training. The College provides a comprehensive training programme that is available to all staff and postgraduate students, mostly without charge. Undergraduate training is dealt with in departments.

Training enables staff to acquire the skills and knowledge that, with experience, make them competent in the health and safety aspects of their work. The College has a general duty to provide information, instruction and training and to provide a safe place of work under Section 2 of the Health and Safety at Work Act 1974.

Regulation 13 of the Management of Health and Safety at Work Regulations 1999 also specifies a duty to ensure adequate health and safety training on recruitment, on being exposed to new risks because of a change of responsibilities, or because of the introduction of new equipment, new technology or changed systems of work.

The quality of the sessions is maintained through the use of in-house expertise and the use of outside consultants where appropriate. Certain courses lead to nationally recognised certification, for example, on successful completion of the National Examination Board Occupational Safety and Health Certificate.

Courses in the programme can also be tailored to meet the requirements of individual departments. Some courses are repeated throughout the year to enable as many people as possible to take part. External participants are welcomed on most courses; fees are indicated in the programme.

Safety induction

Building safety inductions are needed for all persons entering College premises, so that they have access to basic safety information.