



Health & Safety Policy

Plymouth Marjon University

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Issue Date: August 2024

Revision Status

Revision	Date Issued	Approved by	Signature
1.0	February 2018	Vice Chancellor	
2.0	September 2018	Vice Chancellor	
3.0	September 2019	Vice Chancellor	
4.0	November 2020	Vice Chancellor	
5.0	August 2021	Vice Chancellor	
6.0	January 2022	Vice Chancellor / Finance & Resources Committee	
7.0	August 2024	ELT / Finance & Resources Committee	

On receipt of this document / revision, please destroy all previous and now obsolete copies.
The next review is due: November 2025.

Contents

Section 1.0 Health & Safety Policy Statement Of Intent

Section 2.0 Roles & Responsibilities

- 2.1 Introduction
- 2.2 Marjon H&S Organisation Chart
- 2.3 Governing Body
- 2.4 Vice Chancellor
 - 2.4.1 Duties Under the Construction (Design & Management) Regulations 2015
- 2.5 Executive Leadership Team
- 2.6 Deans and Directors of Schools and Heads of Service
- 2.7 Employees
 - 2.7.1 Teaching Staff
- 2.8 Contractors
- 2.9 Students/Apprentices
- 2.10 Visitors
- 2.11 Health, Safety & Environment Advisor - External
- 2.12 Designated Member of ELT
- 2.13 Head of Estates with responsibility for Health and Safety Management

Section 3.0 General Arrangements for Health and Safety

- 3.1 Advice and Guidance
- 3.2 Review and Update
- 3.3 Communication and Consultation
 - 3.3.1 Non-English Speaking Workers / Low Literacy Levels
 - 3.3.2 Display of Information
- 3.4 Contractor Management
- 3.5 Training and Competence
- 3.6 Risk Assessments, University Code of Practice and Safe Working Procedures
 - 3.6.1 Permit to Work
- 3.7 Personal Protective Equipment
- 3.8 Employment of Young Persons
- 3.9 Employment of New and Expectant Mothers
- 3.10 Employment of Persons with Disabilities
- 3.11 Workplace Monitoring and Safety Inspections
- 3.12 Infectious Diseases / Pandemic
- 3.13 Health and Wellbeing

- 3.13.1 Health Monitoring and Surveillance
- 3.13.2 Health Referrals
- 3.14 First Aid Provision
 - 3.14.1 Medication
- 3.15 Incident Recording, Reporting & Investigation - Injuries, Diseases and Dangerous Occurrences, Near Misses
 - 3.15.1 Accident Records
 - 3.15.2 Incident Reporting (RIDDOR)
 - 3.15.3 Covid-19 Reporting
 - 3.15.4 Incident Investigation
- 3.16 Enforcement Authority Visits
- 3.17 Fire Safety
- 3.18 Smoking Policy
- 3.19 Alcohol and Controlled Substances
 - 3.19.1 Prescribed Drugs & Over the Counter Medicines
- 3.20 Violence and Bullying
- 3.21 Visitors
- 3.22 Lone Workers
- 3.23 Working from Home
- 3.24 Mobile Phones
- 3.25 Environmental Management
- 3.26 Pollution Prevention Measures & Spill Management
- 3.27 Waste Management
 - 3.27.1 Hazardous Waste
 - 3.27.2 Clinical Waste
 - 3.27.3 Safe Disposal of Sharps
- 3.28 Premises Management
 - 3.28.1 Cleaning
 - 3.28.2 Domestic Cleaning Products
- 3.29 Welfare Provision
- 3.30 Safety Signage
- 3.31 Access and Egress
- 3.32 Security

Section 4.0 Workplace Arrangements for Health and Safety

Section 1.0 Health & Safety Policy Statement Of Intent

The Health and Safety Policy will achieve and maintain high standards of health and safety performance throughout Plymouth Marjon University.

All persons conducting activities under the name of Plymouth Marjon University will adhere to this Health & Safety Policy.

Plymouth Marjon University will comply with the Health and Safety at Work etc. Act 1974 and the wide range of related Regulations in order to meet the standards required.

We will identify hazards at the earliest stage possible to effectively manage the risk of injury, disease or dangerous occurrence. High standards of health and safety will be achieved, so far as is reasonably practicable, by:

- Demonstrating a visible management commitment to high standards of health and safety performance and the promotion of a positive health and safety culture throughout Plymouth Marjon University.
- Providing and maintaining a safe working environment that is without risk to health, together with adequate facilities and arrangements for the welfare of employees, students, apprentices, contractors, and visitors.
- Providing and maintaining plant, equipment and systems of work that are safe and without risk to health.
- Providing and maintaining means of access to and egress from the workplace that are safe and without risk.
- Developing and maintaining adequate arrangements for the regular assessment of work activities in order to identify related hazards and to control associated risk.
- Ensuring effective systems to protect employees and other persons affected by Marjon activities.
- Implementing adequate arrangements to ensure safety and the control of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Providing information, instruction, training and supervision to ensure the health and safety of employees of Plymouth Marjon University.
- Obtaining the co-operation of employees in order to meet statutory obligations under health and safety legislation to be met.
- Ensuring a process of continual improvement with respect to health and safety management in all areas of the business, with the active engagement and participation of employees and contractors.

Signed 

Vice Chancellor

Date: 12 July 2024

Review Date: July 2025

Section 2.0 Roles & Responsibilities

2. ROLES & RESPONSIBILITIES

2.1 Introduction

Health & Safety (H&S) management is the responsibility of all personnel of Plymouth Marjon University (Marjon) and is a joint responsibility with contractors. It is the responsibility of the Vice Chancellor (VC), Senior Management Team (ELT), Deans and Directors of schools (DoS) and Heads of Service (HoS) to ensure that all personnel and contractors are properly equipped, trained and motivated in order to ensure high H&S standards at work.

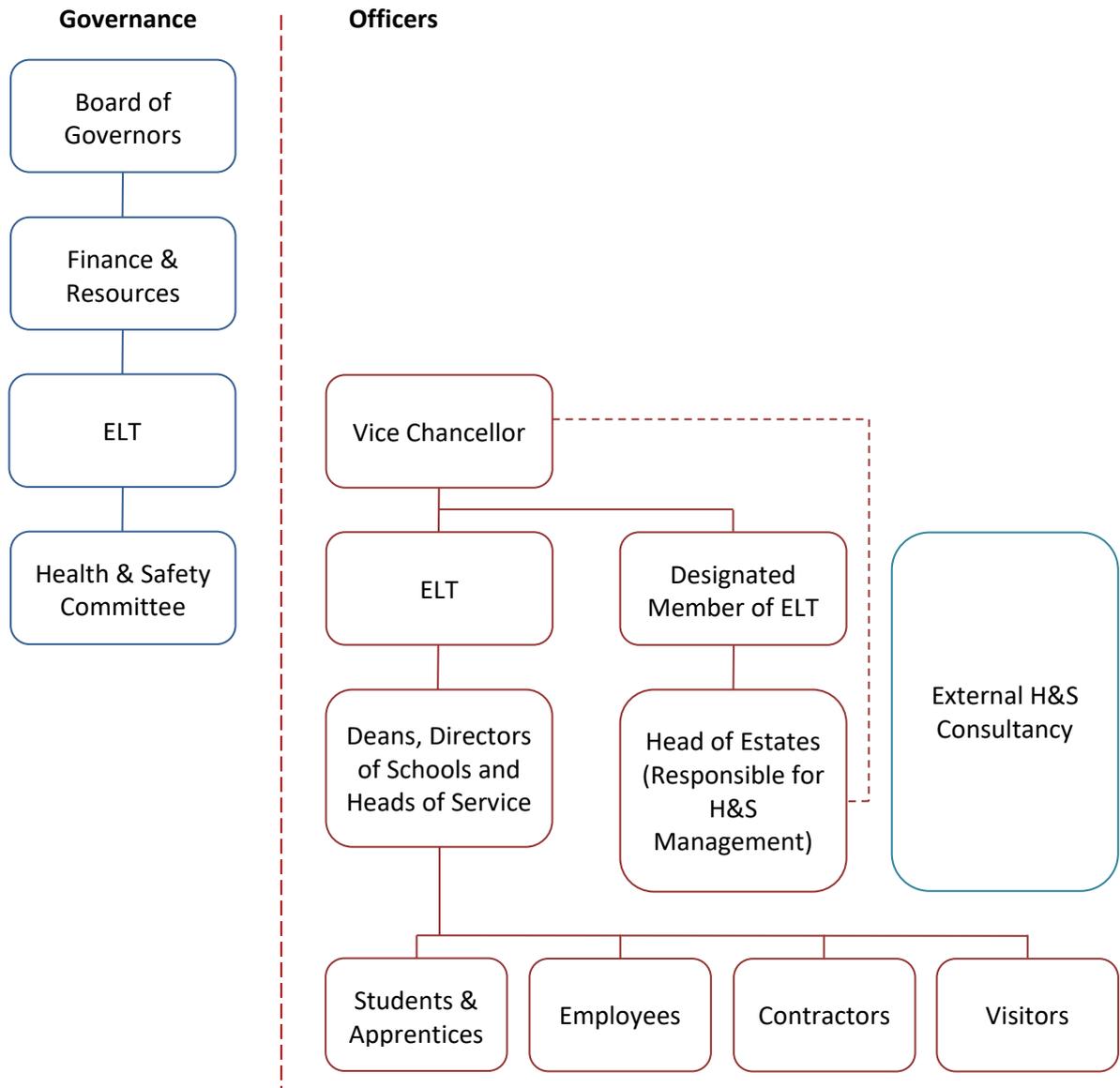
- Employees are deemed to be those persons directly employed, either on a full-time or part-time basis, by Marjon and those self-employed persons who undertake work on behalf of Marjon.
- Contractors are deemed to be those persons who work for Marjon but who are not direct employees. The term 'contractor' is understood to include all associated sub-contractors.
- Suppliers are deemed to be those persons who supply goods and/or services.

Visitors, contractors and temporary workers attending Marjon will be expected to comply with our H&S Policy and associated rules and procedures insofar as these should be relevant and applicable to such persons, given the purpose and likely duration of their visit.

Students, full, part-time or visiting for short courses are also expected to comply with our H&S Policy and associated rules and procedures insofar as these should be relevant and applicable to such persons, given the purpose and likely duration of their studies and if they live on campus and in accordance with the students code of conduct.

The duty to ensure that relevant rules and procedures are brought to the attention of any visitor rests with the person responsible for the visitor, contractor or temporary employee.

2.2 Marjon H&S Organisation Chart



2.3 Governing Body

The Governing Body has overall responsibility for the Health and Safety (H&S) and welfare of all employees, and fulfilment of all legal duties imposed on it, as the employer, by relevant legislation.

The Governing Body as the employer recognises that it has a duty of care towards its staff, both teaching and non-teaching, its students, apprentices, contractors, suppliers and members of the public (such as visitors who may use the premises). This duty which is set out under the Health and Safety at Work Act, etc. 1974 will be discharged through the offices of the Vice Chancellor, the ELT, Designated Member of ELT, DoS and HoS supported by the Head of Estates with responsibility for Health and Safety Management. To meet this duty the Governing Body expects senior members of staff and certain nominated persons to regard H&S as at least as important as any other duty and not as an extra.

The Governors nominate Finance & Resources Committee with monitoring the H&S arrangements.

2.4 Vice Chancellor

The Governing Body has appointed the Vice Chancellor (VC) as the university Accountable Officer (AO) to set the strategic environment of the university regarding Health and Safety. Authority is delegated from the VC for oversee and enforcing the implementation of the Health, Safety and Environment Policy throughout work activities to the Health & Safety committee, whose reports are reviewed by ELT and the Governing Body.

The VC takes responsibility for ensuring that the provisions of the HASAWA 1974, associated regulations and Marjon policies are observed within their area of responsibility, which also extends to use of the University premises out of Marjon hours, either for Marjon functions or other functions, e.g. during holidays.

In recognition of the legal duties imposed upon the post, the VC will:

- Understand the main requirements of the Health and Safety at Work, etc. Act 1974.
- Ensure that every aspect of health, safety and the environment and its implications is given due consideration in all executive decisions.
- Set, monitor and review the effectiveness of the Marjon H&S Policy, ensuring that it meets current legislative requirements and accurately reflects Marjon activities.
- Ensure adequate resources are available to implement the Marjon H&S Policy and to enable legal and moral obligations to be met.
- Seek advice, as and when appropriate, on H&S issues.
- Ensure that all new employees receive adequate induction training as soon as is reasonably practicable after joining Marjon.
- Ensure all employees receive suitable information, instruction, training and where appropriate, supervision to ensure their competence for the work they are to undertake.
- Ensure that all plant, equipment and materials are safe and suitable for the work for which they are to be used.
- Ensure that suitable and sufficient risk assessments of Marjon activities are undertaken to identify and implement effective control measures required to eliminate, reduce or control the risk of harm occurring to employees or others who may be affected by the activity.
- Ensure that the results of the risk assessments are effectively communicated throughout Marjon and to others who may be affected by the activity.
- Ensure employees are provided with PPE as identified by risk assessment.
- Ensure employees are trained in the use and maintenance of PPE.
- In respect of hazardous substances, ensure that appropriate information is available to enable suitable assessment of the process to be conducted.
- Ensure that accidents and near misses are recorded.
- Ensure that all injuries, diseases, dangerous occurrences and significant near misses involving Marjon employees are investigated and, where appropriate, reported as required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- Maintain effective communication routes throughout Marjon and ensure employees are aware of the Marjon H&S Policy and other H&S matters as they arise.

- Take immediate action in respect of:
 - Prohibition and improvement notices;
 - Matters of complaint by Health and Safety Executive Inspectors;
 - Concerns by employees or others, of H&S standards; and
 - Accidents, incidents and near misses involving Marjon employees.
- Ensure maintenance of registers and records as required by current legislation.
- Ensure that H&S management within Marjon is periodically audited to ensure that high standards of H&S performance are being maintained and to identify areas where improvements are to be made.
- Ensure that H&S performance is regularly reviewed.

Whilst the VC is ultimately responsible for all H&S matters, the accountability to deliver safe systems, processes, reporting and continuous reporting is delegated to the Designated Member of ELT who sits on ELT and reports directly to the VC.

2.4.1 Duties Under the Construction (Design & Management) Regulations 2015

Client Responsibilities

In recognition of the legal duties imposed under the Construction (Design & Management) Regulations 2015, for projects where Marjon is the **Client**, or is taking on CDM duties on behalf of a domestic client, the VC Responsible for H&S will ensure that:

- Suitable arrangements are made for managing a project, including the allocation of sufficient time and other resources. Arrangements are suitable if:
 - the construction work can be carried out, so far as is reasonably practicable, without risks to the health or safety of any person affected by the project; and
- Welfare facilities provided from the beginning and throughout the construction phase are in compliance with Schedule 2 of CDM 2015.
- Arrangements identified above are maintained and reviewed throughout the project.
- Where there is more than one contractor on site at any time (or it is foreseeable that there will be) the following are appointed in writing as soon as is practicable before the construction phase begins:
 - A Principal Designer who controls the pre-construction phase
 - A Principal Contractor who controls the Construction Phase
- Reasonable steps are taken to ensure that Designers (including Principal Designer), Contractors (including Principal Contractor), and other team members that are appointed have the skills, knowledge, experience and organisational capability to fulfil their role and secure health and safety of those working on the project.
- Reasonable steps are taken to ensure that the Principal Designer and Principal Contractor comply with their respective duties.
- Pre-construction information is provided as soon as is practicable to every designer and contractor appointed, or being considered for appointment, to the project.
- A Construction Phase Plan is drawn up before the construction phase begins.
- The Principal Designer prepares and maintains a Health and Safety File.
- The HSE are notified in writing when a project is notifiable. A project is notifiable when:

- It lasts longer than 30 working days and has more than 20 persons on site at any one time
- Exceeds 500 person days
- All parties involved with the project cooperate with one another.

2.5 Executive Leadership Team

The Executive Leadership Team (ELT) are responsible for ensuring that the provisions of the Health and Safety at Work, etc. Act 1974, associated regulations and Marjon policies are observed within their area of responsibility. Authority is delegated to ELT to oversee and enforce the implementation of the Marjon H&S Policy throughout Marjon operations. ELT report to the VC.

ELT will:

- Understand the Marjon H&S Policy.
- Ensure that the Marjon H&S Policy is effectively communicated to the personnel under their control.
- Ensure that employees comply with the Marjon H&S Policy.
- Establish and maintain high standards of H&S performance within their area of responsibility.
- Foster a positive health and safety culture amongst all employees.
- Ensure a safe working environment with safe access and egress at all times.
- Ensure safe working practices are observed.
- Develop, implement, record, communicate and monitor the effectiveness of workplace arrangements for H&S specific to their work activities.
- Allocate necessary resources for H&S management within their area of responsibility.
- Ensure that suitable and sufficient risk assessments have been undertaken for work activities within their area of responsibility.
- Ensure that the results of the risk assessments are effectively communicated throughout Marjon and to others who may be affected by the activity.
- Ensure that personnel under their control are adequately inducted, trained, instructed and informed.
- Ensure that appropriate equipment is available and maintained in a safe condition.
- Ensure that accidents and near misses are recorded and investigated.
- Maintain all relevant H&S registers, records and documentation, as required by current legislation.
- Carry out routine documented safety inspections of working areas, plant and equipment to identify shortcomings in H&S standards and to initiate remedial action.
- Immediately bring to the attention of the VC matters relating to H&S standards or performance.
- Advise and support clients, contractors, etc. and their safety officers on matters relating to the Marjon H&S Policy and all prevailing legislation.

- Ensure personnel at all work locations are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- Communicate H&S matters to employees and contractors via induction training or briefings.

2.6 Deans and Directors of Schools and Heads of Service

Deans and Directors of Schools (DoS) and Heads of Service (HoS) are responsible for ensuring that the provisions of the Health and Safety at Work, etc. Act 1974, associated regulations and Marjon policies are observed within their area of responsibility. Authority is delegated to DoS and HoS to oversee and enforce the implementation of the Marjon H&S Policy in the workplace. DoS and HoS report to respective ELT leads.

DoS and HoS will:

- Understand the Marjon H&S Policy.
- Ensure that employees comply with the Marjon H&S Policy.
- Ensure high standards of H&S performance are maintained within their area of responsibility.
- Foster a positive health and safety culture amongst all employees.
- Ensure a safe working environment within their area of responsibility with safe access and egress at all times.
- Ensure safe working practices are observed at all times.
- Immediately bring to the attention of ELT matters relating to H&S standards or performance.
- Advise and support clients, contractors, etc. and their safety officers on matters relating to the Marjon H&S Policy and all prevailing legislation.
- Ensure personnel within their area of responsibility are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- Ensure that accidents and near misses are reported to ELT as soon as practicable.
- Communicate H&S matters to employees via induction training or briefings.

2.7 Employees

All employees of Marjon have legal duties under health, safety and welfare legislation while at work to ensure their personal safety and that of others who may be affected by their acts or omissions.

In recognition of the legal duties imposed upon them, all employees will:

- Co-operate with the VC, ELT, DoS and HoS to enable legal duties to be met.
- Comply with ALL requirements of the Marjon H&S Policy and associated procedures.
- Not intentionally or recklessly interfere with, or misuse anything, provided by Marjon in the interests of H&S.
- Actively promote a positive health and safety culture throughout Marjon.
- Only undertake work for which they have been trained and are authorised, qualified and competent to undertake.

- Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- Follow all Marjon health and safety rules and procedures.
- Use and maintain in a serviceable condition all plant, machinery and equipment in accordance with the training provided.
- Use and maintain in accordance with instructions and training given and report the loss or defect of all personal protective equipment provided by Marjon.
- Make themselves aware of all workplace first aid, fire and emergency procedures.
- Raise all matters of concern relating to H&S as they arise to the appropriate responsible person.
- Ensure all accidents are recorded using the appropriate systems in place.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

All employees are to ensure that Marjon as their employer is made aware of any form of health condition or disablement that is likely to affect their ability to undertake the work they are assigned. Line managers must be made aware at the earliest opportunity of any health condition or physical impediment to an employee so that a risk assessment can be carried out and measures taken to ensure that the employee is able to continue to work safely.

2.7.1 Teaching Staff

In addition to the above, all members of teaching staff are additionally responsible for:

- General supervision of students/apprentices in their charge. and for close supervision of:
 - Potentially hazardous activities such as certain sports, for example rock climbing, canoeing etc.
 - Laboratory activities such as chemical and electrical experiments, especially activities such as the handling of tissue samples, living creatures and micro-biological specimens, etc.
 - Students/apprentices using sharp tools, handling hot liquids etc.
- Ensuring that students/apprentices are dressed in an appropriate manner to protect against the risks they are likely to face.
- Ensuring that students/apprentices follow basic hygiene precautions.
- Safe organisation of field trips and extracurricular activities.

2.8 Contractors

All contractors who undertake work on behalf of Marjon have legal duties under health, safety and welfare legislation while at work to ensure the health and safety of themselves and others that may be affected by their acts or omissions.

In recognition of the legal duties imposed upon them, all contractors who undertake work on behalf of Marjon will:

- Co-operate with the VC Responsible for H&S, ELT, Deans and HODs and their own Employer to enable them to comply with their legal duties.
- Comply with ALL requirements of the Marjon H&S Policy and other rules and procedures in place and notified to them.
- Not intentionally or recklessly interfere with or misuse anything provided by Marjon in the interests of H&S.
- Actively promote a positive health and safety culture.
- Only undertake work for which they have been trained and are qualified and competent to undertake.
- Ensure that risk assessments and method statements relating to their work are presented to the Person Responsible prior to commencement of work, if they are not following the Safe System of Work provided by Marjon.
- Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- When on Marjon premises, follow all Marjon health and safety rules and procedures.
- Use and maintain in a serviceable condition all plant and equipment, in accordance with the training provided.
- Use and maintain in accordance with instructions and training given and report the loss or defect of all personal protective equipment provided by Marjon and their own Employer.
- Make themselves aware of all Marjon first aid, fire and emergency procedures.
- Raise all matters of concern relating to H&S as they arise to the appropriate responsible person.
- Ensure all accidents are reported by using the appropriate Marjon reporting methods and in their Employer's Accident Book.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

2.9 Students/Apprentices

All students/apprentices of Marjon are expected to ensure their personal safety and that of others who may be affected by their acts or omissions.

All students/apprentices are expected to:

- Co-operate with the VC, ELT, DoS and HoS and Marjon employees to enable legal duties to be met.
- Comply with ALL requirements of the Marjon H&S Policy and associated procedures.

- Not intentionally or recklessly interfere with, or misuse anything, provided by Marjon in the interests of H&S.
- Follow all Marjon health and safety rules and procedures.
- Make themselves aware of all workplace first aid, fire and emergency procedures.
- Raise all matters of concern relating to H&S as they arise to the appropriate responsible person.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

Students/apprentices will be subject to the student regulations and misconduct processes if they breach the H&S policy. Where students are also employed by the university they will be required to meet the requirements and responsibilities outlined in section 2.7 as an employee.

2.10 Visitors

All visitors of Marjon are expected to ensure their personal safety and that of others who may be affected by their acts or omissions.

All visitors are expected to:

- Comply with ALL requirements of the Marjon H&S Policy and associated procedures.
- Not intentionally or recklessly interfere with, or misuse anything, provided by Marjon in the interests of H&S.
- Follow all Marjon health and safety rules and procedures.
- Report to the appropriate Reception or authority on-site to record their presence and receive appropriate information to ensure that they are aware of all Marjon safety, first aid, fire and emergency procedures.
- Raise all matters of concern relating to H&S as they arise to the appropriate responsible person.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

2.11 Health, Safety & Environment Advisor - External

Marjon utilises the services of an external Company to fulfil the role of Health, Safety & Environment Advisor (H&S Advisor).

SSG Training and Consultancy is appointed as Competent Persons under the Management of Health & Safety at Work Regulations 1999 to advise Marjon personnel on matters of H&S policy, management, good practice and legislation.

SSG Training and Consultancy provides the following services according to requirements:

- Monitor the Marjon H&S Policy and associated procedures pertaining to H&S and advise on updates as required by legislation and good practice.
- Provide appropriate support for H&S matters to Marjon personnel.
- Advise on H&S training needs.
- Annually audit and review H&S management at Marjon.
- Provide an annual report to the Marjon.
- A copy of the SSG Company CV is made available to Marjon on an annual basis.

2.12 Designated Member of ELT

The Designated Member of ELT is a member of ELT and reports to the VC. The Designated Member of ELT is the ELT lead for H&S matters and line manages the Health Safety & Risk Compliance Manager. The Designated Member of ELT supports the VC, ELT, DoS and HoS to ensure effective design and implementation of the H&S Policy and all associated policies and procedures, by means of regular reviews and monitoring of workplace activities.

The Designated Member of ELT will:

- Annually review the university Health & Safety Policy reporting proposed amendments to ELT and the Finance & Resources Committee and then the Board of Governors.
- Provide guidance notes and H&S briefings to the VC and ELT.
- Ensure H&S is embedded into the university culture, systems and processes.
- Chair the Health & Safety Committee and prepare regular updates and an annual report for the Finance & Resources Committee.
- Ensuring appropriate budgets for proportional H&S risk management, training and improvements.
- Undertake other such related duties as may be directed.

2.13 Head of Estates with responsibility for Health and Safety Management

Marjon have appointed a Head of Estates with responsibility for Health and Safety Management who is responsible for the provision and dissemination of advice and information to Marjon personnel. The Head of Estates with responsibility for Health and Safety Management acts as an internal consultant and reports to the Designated Member of ELT and provides support to the VC, Designated Member of ELT, ELT, DoS and HoS, and line management and ensures effective implementation of the H&S Policy and all associated policies and procedures, by means of regular reviews and monitoring of workplace activities.

The Head of Estates with responsibility for Health and Safety Management will:

- Maintain close contact with the Health and Safety Executive, and any appointed H&S consultants / advisors and other organisations from whom information may be obtained regarding H&S matters.
- Ensure that Marjon is aware of statutory obligations and recommended codes of practice by interpreting and keeping management and employees informed of new and developing legislation and other standards.
- Provide guidance notes and H&S briefings to the VC/ Designated Member of ELT and other employees.
- Assist in identifying appropriate training (in-house or external).
- Attend meetings where H&S advice and input is required. Eg Critical Incident Management Team, Health & Safety Committee, Project meetings etc
- Support key business process where H&S advice and input is required. Eg project business cases, business continuity plans, risk assessments, operational risk registers etc
- Collate and analyse accident information and advise on trends and action areas.
- Carry out accident investigations and report as required.
- Review the University Insurances in line with H&S reporting to ensure adequate cover
- Undertake other such related duties as may be directed.

The Head of Estates with responsibility for Health and Safety Management reports to the Designated Member of ELT but in certain circumstances has the authority to report directly to the VC where H&S may be compromised.

Section 3.0 General Arrangements for Health and Safety

GENERAL ARRANGEMENTS FOR HEALTH AND SAFETY

The attainment and maintenance of high standards of H&S within Plymouth Marjon University will be achieved by the identification of hazards associated with the activities undertaken by Marjon. Effective precautions and control measures to eliminate, reduce or control the risk of harm to ALL persons exposed to the hazards will be identified and implemented.

3.1 Advice and Guidance

The external H&S Advisor to Marjon is **SSG Training and Consultancy** of Plymouth who are available on 01752 201616.

3.2 Review and Update

- The Designated Member of ELT will ensure the Marjon H&S Policy and performance is reviewed annually and any necessary updates will be made.
- No alterations will be made to Marjon's H&S Policy, including the organisational structure and associated arrangements, without the prior consent of the VC and the approval of Governors.

3.3 Communication and Consultation

- The H&S Policy will be actively promoted via internal medium (Induction, Antler, H&S Committee) as well as externally via our public facing website.
- Commitment to the Policy will be encouraged through the development and maintenance of a positive H&S culture. Monitoring of such commitment will be achieved through the H&S Committee.
- H&S information, where it relates to Marjon activities will be communicated throughout Marjon as it becomes available by the quickest possible means.
- Meetings and briefing sessions will be held at all levels in the organisation. At a minimum these will comprise:
 - Plymouth Marjon University induction
 - Site induction for contractors and visitors
 - Safety briefings / toolbox talks
 - Pre-job / project meetings
 - Annual H&S Committee meetings
 - Annual 1:1s / staff appraisals
- Concerns over the standards of H&S within Marjon or issues relating to H&S are to be brought immediately to the attention of management
- Marjon consults with its employees on H&S matters in accordance with the Health and Safety (Consultation with Employees) Regulations 1996.
- In the absence of elected H&S representatives, Marjon will consult staff individually or in groups on matters of H&S.

- The Marjon H&S Committee meets annually and concerns can be raised by any staff member through representative teaching and support staff in attendance at these meetings. Proceedings are to be recorded and key actions minuted.
- Marjon will ensure that all information, instruction and training is provided to all employees in a language and format that the employee can readily understand.
- Each School/Service will designate a H&S key contact who will be the point of contact to liaise on H&S matters. Staff shall route general H&S issues through their H&S key contact.
- Departmental H&S folders will contain the following;
 - Copy of the H&S policy.
 - Departmental introduction and overview.
 - Associated risk assessments, University Codes of Practice (UCOPs) and Safe Work Procedures (SWP).
 - Standard University procedures relating to health and safety and emergency management.
 - COSHH Inventory and associated COSHH assessments and Safety Data Sheets.
 - Department H&S checklists.

3.3.1 Non-English Speaking Workers / Low Literacy Levels

- Marjon will ensure that all information, instruction and training is provided to all employees in a language and format that the employee can readily understand. This may include any translated inductions, safety briefings, signage, works procedures, risk assessments, health and safety updates and all other forms of communication deemed necessary to ensure that the employee is competent to carry out their work activities.
- Adequate time will be allocated to consult with employees where language and/or literacy may be an issue, to enable employees to absorb and respond to information provided.

3.3.2 Display of Information

Relevant health and safety information is displayed in appropriate locations and medium as follows:

- Health and Safety Policy Statement of Intent – signed and dated by the VC – University website.
- Health and Safety Law poster – contact details are filled in
- Employers Liability / Public Liability Insurance Policy - dated

3.4 Contractor Management

- Contractors are formally assessed to ensure that they are competent to conduct required work and to determine whether their systems for managing H&S meet Marjon standards and requirements, including where appropriate, sub-contractor management.
- A list of approved contractors (and their sub-contractors) authorised to work for Marjon is compiled and maintained – this will be the university finance system supplier database.
- The use of contractors who are not on the approved list is prohibited.
- Contractor performance is assessed on completion of work and approved status is reviewed / updated accordingly.

- Where contractor employees are deemed to have breached health and safety standards, Marjon may request that associated works are stopped pending investigation/review. Stopped works may only proceed with permission from the Health Safety & Risk Compliance Manager or the Designated Member of ELT.

Management will ensure that:

- Only contractors on the Approved Contractor List and who are competent to perform the work are sub-contracted to undertake work on behalf of Marjon.
- All contractors receive an induction on arrival at Marjon premises and that the induction is recorded and repeated at appropriate intervals.
- Contractors receive suitable information, instruction and training to ensure their competence for the work they are to undertake.
- An appropriate level of supervision is provided to contractors working on Marjon premises.
- Marjon risk assessments include measures to protect contractors.
- Contractors provide risk assessments and method statements (RAMS) and, where appropriate, Safe Systems of Work (SSoW) and Permits to Work (PtW) for approval or signature prior to commencing work, making certain that their risk assessments have taken into account how their activities may affect Marjon employees and other persons.
- Electrical appliances to be used by contractors have been tested and are safe to use.
- The quality of contractor's work is monitored to ensure that it is being conducted safely.
- All contractors on Marjon premises are accounted for.

3.5 Training and Competence

- All new Marjon employees will receive induction training as soon as reasonably practicable.
- Policy implementation training will be provided by the Health Safety & Risk Compliance Manager through e-learning, workshops, schools and services support and 1 to 1 support.
- A record of the induction process will be maintained via the H&S Induction Pack, which is completed and signed off by both the new staff member and the People and Organisational Development Team.
- Workplace-specific induction training will be given to employees and contractors whenever work commences in a new place of work. A copy of the workplace-specific induction training record will be retained by Marjon.
- Training needs and competence requirements will be analysed to ensure the provision of appropriate training. The risk assessment process is used to identify specific training requirements associated with the use of hazardous machinery and equipment (e.g. telehandlers) and for specific work activities (e.g. working at height).
- Individual training needs are initially identified on induction and are reviewed annually.
- VC, ELT, DoS and HoS and employees all attend health and safety training relevant to their role and work activities.
- Employees will be provided with a suitable level of supervision until deemed competent to undertake tasks unsupervised.

- Employees shall only carry out work for which they hold the appropriate competences.
- Occupational competence will be maintained via continued membership of appropriate trade associations.
- Further training shall be given:
 - For periodic refresher training;
 - When required by current best practice;
 - When being exposed to new or increased risks;
 - When being transferred or given a change in responsibility; and/or
 - When there is a change in work methods, technology, equipment or practices.
- A Training Record will be maintained for all employees.
- All induction and training records and, where issued, certificates of training, qualifications and competence will be held in the People and Organisational Development Team.
- Training standards will be kept under review to ensure that the requirements of current legislation and risk assessments are met.

3.6 Risk Assessments, University Code of Practice and Safe Working Procedures

- Marjon will generate University Code of Practice and Safe Working Procedures as and when required.
- Risk Assessments will follow a standard format.
- Risk Assessments will be reviewed at least annually or:
 - When Marjon operations change;
 - Following an incident / near miss;
 - Following a change in legislation or industry best practice.

Management will ensure:

- Where significant hazards are evident and there is a risk of harm or injury from a work activity, an appropriate Risk Assessment will be undertaken and communicated to all those at risk, in accordance with the Management of Health and Safety at Work Regulations 1999;
- Safe Working Procedures are produced based on the findings of Risk Assessments;
- That all Risk Assessments and Safe Working Procedures are communicated to all who may be affected by the activity;
- That all personnel who may be affected by the activity are made aware, that if any aspect of the activity or the environment in which it is conducted alters then a review of the Risk Assessment must be undertaken and appropriate changes to the safe system of work effected before the work is continued;
- That master copies of all Risk Assessments and Safe Working Procedures are maintained on the server with working copies held on file in the main office.

3.6.1 Permit to Work

High risk work activities are additionally controlled via a Permit to Work system. The range of high risk activities for which a Permit to Work is required includes, but is not limited to:

- Confined space entry

- Digging
- Hot work
- Work on high voltage electrical systems
- Working on roofs

Permits to Work are communicated to and signed off by all workers involved with the activity. Work is immediately stopped if there is any deviation from documented permit controls.

3.7 Personal Protective Equipment

Marjon management will ensure that:

- Personal Protective Equipment (PPE) is provided and used at work wherever risks to health and safety cannot be adequately controlled in other ways, in accordance with the Personal Protective Equipment Regulations 1992 (as amended).
- PPE is provided to employees as required by current legislation and as identified by risk assessment to supplement existing control measures.
- PPE provided is fit for purpose and appropriate to the risk involved.
- Suitable facilities for the storage of PPE are provided and used.
- Contractors provide and wear PPE to required standards.
- Information, instruction and training will be given to all employees on the safe use and maintenance of PPE.
- Employees and contractors will, in accordance with instructions given, make full use of all PPE provided by Marjon and maintain it in a serviceable condition and report its loss or defect immediately.
- On work sites, safety hard hats, safety footwear and hi-visibility jackets to the appropriate standard shall be worn at all times whilst work is being conducted on behalf of Marjon, without exception.
- Gloves, respiratory equipment and protective goggles are worn when using cutting, drilling or grinding equipment.
- Persons responsible will check PPE use and enforce compliance. Disciplinary action may be taken if employees fail to wear PPE as directed.

3.8 Employment of Young Persons

- Risk assessments will be carried out, or reviewed, to identify and address the risks to young persons (i.e. those under the age of 18), when employed by Marjon or when students are placed on work experience.
- Protection will be provided from any risks to the health and safety of young persons associated with their lack of experience, lack of awareness of existing risks or immaturity, in accordance with the Management of Health and Safety at Work Regulations 1999.
- Unless as part of their training, or where the work is carried out under the supervision of a competent person and where the risk has been reduced to the lowest reasonably practicable level, young persons will *not* be employed where the work:
 - Is beyond their physical or psychological capability;

- Involves exposure to toxic or carcinogenic substances or substances which cause heritable genetic damage, harm to unborn children or cause any other chronic health effect;
- Involves an accident risk which they may not reasonably recognise due to their insufficient attention to safety or lack of experience or training; and/or
- Involves a risk to health from extreme temperatures (hot or cold), noise or vibration.
- Young persons will be supervised at all times when performing any task which may put them at risk.

3.9 Employment of New and Expectant Mothers

- Risk assessments of the activities undertaken by Marjon will take into account the needs of pregnant employees and new mothers, in accordance with the Management of Health and Safety at Work Regulations 1999. The assessment will identify and address the risks to the unborn child, a child of a woman who is still breastfeeding and to the mother and will determine which tasks the employee can perform.
- The assessment will ensure that adequate steps are taken to avoid the risk to new and expectant mothers arising from exposure to physical, biological and chemical agents and from working conditions.
- Where the risk cannot be avoided then working hours may be temporarily adjusted or suitable alternative work will be offered. If this is not viable then suspension on full pay will be exercised for as long as is necessary to protect the health and safety of the mother and that of her child.
- Risk assessments are completed by the immediate Line Manager and staff member, copies are kept in staff personnel files.

3.10 Employment of Persons with Disabilities

- Marjon risk assessments take into account the needs of employees with disabilities, in accordance with the Equality Act 2010.
- Employees are to ensure that Marjon, as their employer, is made aware of any form of disablement that is likely to affect their ability to undertake the work they are assigned.
- Where appropriate, employees with disabilities will be monitored at regular intervals (e.g. by routine medical examination) to ensure their suitability for the work on which they are employed.

3.11 Workplace Monitoring and Safety Inspections

- Monitoring systems will be put in place to ensure that the activities of employees and contractors are carried out in a safe manner in compliance with Marjon risk assessments and safe systems of work.
- Monitoring systems will be put in place to ensure that plant, equipment and the general working environment are maintained in a safe condition in line with Marjon risk assessments and safe systems of work and where appropriate, manufacturers' requirements.
- Periodic, documented workplace safety inspections will be conducted by management.

3.12 Infectious Diseases / Pandemic

- Marjon will establish a Business Continuity Plan to include measures to put in place to:

- Partially / fully close-down Marjon sites. Closure / shutdown plans will ensure that any suspension of activities is safe and allows Marjon to recommence operations promptly after any suspension is lifted
- Establish communication channels, internal and external
- Keep staff, students and other stakeholders informed of all ongoing developments and requirements
- Assess each member of staff to determine safety critical roles. If appropriate individuals may be classified via a RAG rating system, based on clinical vulnerability, childcare issues, caring responsibilities, ability to work from home, reasonable adjustments, etc. These and other criteria will be taken into account, on a case by case basis, to determine individual availability for work and to identify a core team and potential support roles to facilitate any required shutdown and subsequent return to work.
- Facilitate re-opening of premises and a safe return to work, taking into account the impact of shutdown e.g. on the water supply, ensuring that any potential issues such as legionella are identified and addressed.
- During a pandemic Marjon will endeavour to keep staff, students and stakeholders informed of all ongoing developments via monitoring government and reputable media information sources. Government advice and guidance with respect to health, safety, hygiene and social distancing / close working measures will be adhered to.
- Marjon will assess the ongoing situation and make any necessary decisions to minimise business impact and balance staff availability with business demand, including adjustments to staffing levels (e.g. via redundancies, contract changes, short term working, lay-off, furlough, etc.). In some cases, this may necessitate changes in roles, responsibilities and potentially a Marjon / team re-structure.
- Marjon understands that the impact on mental health and wellbeing will vary from person to person, dependent on individual circumstances. Marjon will strive to provide appropriate support (e.g. via Mental Health First Aiders) to those employees suffering illness, bereavement or other issues.
- A training needs analysis will be undertaken to identify safety-critical training and extensions to certification, in conjunction with course availability, including online options.
- Marjon shall review, revise and where necessary develop additional risk assessments for work activities, taking into account:
 - Any changes to health and safety regulations and/or guidance as provided by the H&S, PHE, NHS, etc.
 - Revised office / site set-up and capacity, staggered start / finish and break times
 - Resource limitations
 - Changes to work activities, ways of working
 - Safety critical work, including maintenance activities and statutory inspections
 - High risk work - potential reduction
 - Availability of plant, equipment, materials and goods, including existing and additional PPE/RPE and additional stocks of e.g. gel sanitiser

- Adjustments to capacity of workspaces
- Signage
- Personal hygiene measures
- Enhanced cleaning regimes – touchpoints / communal areas and waste management
- Student populations, on-site accommodation and course delivery requirements
- Access to Marjon and public sports and leisure facilities
- Appropriate emergency arrangements will be put in place, including:
 - Procedure for becoming symptomatic / illness in the workplace
 - Adjustments to first aid protocols e.g. no mouth to mouth
 - Adjustments to rescue plans
 - Training emergency responders (First Aid and Fire) in any changes to procedures
 - Allowing for longer response times due to pressure on NHS services
 - Acquiring additional PPE / RPE as necessary
 - A review of first aid / fire warden cover
 - Requirements to seek or receive additional support from security, emergency or Public Health England services

3.13 Health and Wellbeing

- Marjon employees are to declare any aspect relating to their health that may put them at risk while undertaking the work for which they are employed or that may be affected by the environment in which it is to be undertaken.
- Marjon recognises the ill health effects associated with workplace stress and common mental health problems (CMHP) such as anxiety and depression.
- Marjon is committed to the promotion of wellbeing in the organisation and preventing employees from being subject to undue stress whilst at work.
- To the extent that is reasonably practicable, Marjon will endeavour to balance job demands and pressures with individual capabilities, and to support staff suffering from stress or common mental health problems (CMHPs) such as anxiety and depression.
- The following arrangements are in place;
 - To identify all workplace stressors and conduct risk assessments to eliminate and control stress and CMHPs.
 - To consult with Marjon Management, line managers Safety Representatives and Representatives of Employee Safety on all proposed actions relating to the prevention of workplace stress and CMHPs.
 - To provide training for line ELTs to enable them to recognise the signs and symptoms of, and to deal with issues around stress and CMHPs.
 - To provide assistance, advice and support through employee assistance programmes and counselling for those affected by stress and CMHPs caused through both work and external factors.

- To provide support for employees returning to work after periods of absence due to mental health problems.
- A personal risk assessment may be undertaken to identify the extent and causes of employees' stress, together with reasonable adjustments to support staff, including any necessary interventions to prevent and manage stress more effectively. Working hours may be temporarily adjusted or suitable alternative work may be offered to staff.

3.13.1 Health Monitoring and Surveillance

- Employees will be provided with health monitoring / surveillance appropriate to the risks to health and safety resulting from their employment, as identified by risk assessment or legal statute, in accordance with the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health (CoSHH) Regulations 2002 (as amended).

3.13.2 Health Referrals

- Employees will be referred to a medical professional as and when necessary if any concerns are raised with respect to their health or fitness to perform work duties.

3.14 First Aid Provision

- Marjon will provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work, in accordance with the Health and Safety (First-Aid) Regulations 1981.
- Suitably trained persons will be nominated as qualified First Aiders or Emergency First Aiders to ensure adequate provision of first aid. These details are available via the Staff intranet and will be communicated via induction training.
- A qualified First Aider or Emergency First Aider shall be present or immediately contactable for assistance at all times whilst routine work is being undertaken.
- Marjon employees will familiarise themselves with workplace first aid arrangements and facilities.
- First Aid kits shall be held throughout the premises and in all Marjon vehicles with the contents checked on a regular basis and restocked if necessary.
- Automated External Defibrillators (AED) are situated on the main academic campus and in the Sports Centre.

3.14.1 Medication

- Tablets and medicines are not kept in first-aid kits as first aid at work does not include giving tablets or medicines to treat illness. The only exception to this is where aspirin is used when giving first aid to a casualty with a suspected heart attack, in accordance with currently accepted first-aid practice. First aiders keep a small amount of aspirin to hand, separate from first aid kits, for this purpose.
- Employees who have their own medication such as inhalers for asthma or EpiPens for the treatment of severe allergic reactions (e.g. to peanuts, bee stings) are expected to administer this themselves if able to do so and must not use these to treat any other employees. First-aiders should not administer medication to other employees but may assist employees to do so themselves and/ or contact emergency services as appropriate.
- If it is identified that Schedule 19 medication (i.e. adrenalin) may need to be administered in an emergency, First Aiders will be given additional training in its use.

3.15 Incident Recording, Reporting & Investigation - Injuries, Diseases and Dangerous Occurrences, Near Misses

3.15.1 Accident Records

- Accident records compliant with general data protection requirements are generated through an electronic form system that is centrally stored and reviewed through Marjon servers with restricted access. Accident records are maintained and stored for the appropriate amount of time to support Marjon in processing personal liability, injury and damages claims.
- All injuries (no matter how trivial) which involve staff, students and apprentices both on or off campus are to be recorded through the MY Compliance portal. Fatal, life-threatening or life-changing accidents/incidents are to be brought to the attention of ELT at the earliest opportunity. Accidents involving visitors and contractors on the Marjon campus must also be reported through the MY Compliance portal by the person responsible for the visitor/contractor.
- A Near Miss reporting system is available to all staff, through which concerns can be raised and highlighted through the MY Compliance portal.

3.15.2 Incident Reporting (RIDDOR)

- All recordable incidents and near misses are notified to Marjon management.
- All reportable accidents and dangerous occurrences occurring on Marjon premises are to be reported to the VC so that an investigation can be conducted.
- Marjon notifies their insurers of any RIDDOR reportable incident.
- In the event of a written diagnosis of an occupational disease, a specified injury or fatality occurring to a Marjon employee, statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 will be met.
- Accidents involving a member of the public / third party resulting in direct transport from the scene of the accident to hospital for treatment will be reported in accordance with RIDDOR 2013.
- All accidents, dangerous occurrences and near misses occurring on site are to be reported to site management, in the first instance, so that an investigation can be initiated.
- Reports of accidents involving contractors will be forwarded to their Employer to enable statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 to be met.

3.15.3 Covid-19 Reporting

RIDDOR reporting requirements specifically for Covid-19 are adhered to as follows:

- An unintended incident at work which leads to a person's possible or actual exposure to coronavirus is reported as a dangerous occurrence.
- Where there is reasonable evidence that work exposure resulted in a worker being diagnosed as having Covid-19 this is reported as a case of disease.
- If a worker dies as a result of occupational exposure to coronavirus, this is reported as a death due to exposure to a biological agent using the 'case of disease' report form.

3.15.4 Incident Investigation

- All accidents, near misses and dangerous occurrences involving Marjon employees or third parties will be investigated to an appropriate degree in accordance with the actual / potential severity of outcome, in order to determine root causes and identify remedial actions to prevent recurrence.
- Learning outcomes and remedial actions taken are disseminated throughout Marjon following an incident investigation in order to reduce the potential for recurrence.

3.16 Enforcement Authority Visits

- H&S Inspectors, Environmental Health Officers and Fire Officers all have statutory authority to visit Marjon premises and work sites to enforce legislation under their control.
- Management will ensure the fullest co-operation with all visiting enforcement officers and Marjon will always be responsive to recommendations and advice received. The VC Responsible for H&S and Marjon management will liaise with visiting Enforcement Officers and ensure that they are accompanied, as required, during their visits.

3.17 Fire Safety

- The VC is the designated Responsible Person tasked with ensuring that Marjon fulfils its duties under the Regulatory Reform (Fire Safety) Order 2005. The Responsible Person will be trained in Fire Safety Management.
- In accordance with Article 8(1) of the RRFSO, the Responsible Person ensures that General Fire Precautions are in place, as set out below.
- Marjon has an established Fire Safety Policy and Fire Risk Management Strategy in place to set out fire safety management in all Marjon premises to include, but not limited to, the main Marjon campus, lettings and hired premises, on-site student accommodation and houses of multiple occupancy (HMOs) and properties utilised for Homestay programmes.
- A Fire Risk Assessment to identify fire and explosion risks for Marjon premises will be undertaken prior to commencement of work, in accordance with the Regulatory Reform (Fire Safety) Order 2005 and the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).
- Where the Marjon office is part of a multi-tenanted building, Marjon management will coordinate and co-operate with the landlord and other Responsible Persons within the building to ensure that fire safety regulations are met.
- Based on the results of the Fire Risk Assessment, adequate means of raising the alarm, fighting the fire and means of escape will be provided to ensure the safe evacuation of personnel in the event that a fire occurs on Marjon premises.
- Fire precautions and prevention measures will be taken appropriate to the level of risk throughout Marjon premises.
- An adequate Fire Plan will be in place, prominently displayed in offices and throughout the workplace, and communicated to all employees, contractors and visitors on induction.
- In the event of a fire on Marjon premises, the priority will be to raise the alarm and ensure all personnel are evacuated safely. The alarm is to be raised and the local fire authorities summoned.

- The person discovering the fire may attempt to extinguish the fire using portable appliances if the fire is of a small nature, personnel are not put at risk and they are confident and competent to do so. The person should remain available to brief the fire authorities on arrival. Under no circumstances should a person attempt to extinguish a larger fire. The primary aim should be to evacuate from the building.
- A designated Fire Warden and deputy are appointed for the office premises, tasked with maintaining the Fire Log, ensuring that checks of systems and appliances are conducted as specified in the Fire Log and conducting fire drills and workplace inspections.
- The designated Fire Warden and deputy (and other employees as considered necessary) will be trained in basic fire safety and the use of portable fire-fighting appliances, as found on the premises and in Marjon vehicles.
- Emergency procedures and evacuation routes will be communicated to all employees as part of their induction training.
- Maintenance of the fire detection and alarm system will be conducted by a competent, specialist authority under contract.
- Stores or materials shall not be left along access or egress routes where they may hinder escape in an emergency.
- Consideration will be given to neighbours who may be affected by a fire to ensure that they are made aware of the fire and evacuate safely.
- Whilst working on sites or carrying out works within Client's premises as a contractor, the fire arrangements of the Client are to be adhered to and communicated to Marjon employees by site-specific induction training prior to commencement of any work.
- Whilst working on Marjon premises, contractors are to familiarise themselves with emergency procedures and evacuation routes.

3.18 Smoking Policy

- In compliance with the Smoke-free Regulations 2006, Marjon premises and workplaces are smoke-free with the exception of designated smoking shelter areas. Smoke free also applies to e-cigarettes. Disciplinary action will be exercised if employees smoke outside those areas designated, or in Marjon vehicles.
- Smoking is not permitted inside Marjon buildings.
- "No Smoking" signage is clearly displayed on Marjon premises.
- Smoking is only permitted in those external areas designated by management. Designated areas will be advised to employees on induction.
- Smoking is strictly prohibited in areas where flammable liquids are stored or used.

3.19 Alcohol and Controlled Substances

- Disciplinary action will be exercised if, while under the influence of alcohol or controlled substances (drugs), employees or contractors enter Marjon premises, work sites or drive Marjon vehicles.
- Marjon employees and contractors shall not have alcohol or controlled substances in their possession whilst working on Marjon premises, work sites or driving Marjon vehicles.

- Any person known or strongly suspected of being under the influence of alcohol or controlled substances will be removed from Marjon premises / work site immediately.
- The term “drugs” should be understood to include not only illegal drugs but also legal over the counter medication.
- Staff, students and contractors shall not have drugs, other than prescription medication, in their possession whilst on Marjon premises or driving Marjon vehicles.
- Students are strictly prohibited from supplying, possessing and/or using drugs under any circumstances.

3.19.1 Prescribed Drugs & Over the Counter Medicines

- Staff must disclose to management / HR the use of either prescribed drugs or over the counter medicines that may adversely affect their work (e.g. some antihistamines can cause drowsiness, a particular risk while driving or using machinery). Such disclosure will be treated in accordance with statutory data protection requirements.
- Staff must notify their Dean or HOD if using prescribed drugs or over the counter medicines where contraindications could affect their capacity to discharge their role.

3.20 Violence and Bullying

- Incidents of violence, threatening and/or abusive behaviour by employees whilst at work will result in disciplinary action.
- In the event that Marjon employees are faced with aggression or threat of violence, a non-confrontational position is to be adopted.
- Marjon takes all forms of bullying very seriously and strives to ensure that everyone can operate in a supportive, caring and safe environment without fear of being bullied.
- The aim of the Harassment and Dignity at Work Policy is to help members of the Marjon community to deal with bullying when it occurs and to help prevent it.
- Violence or threatening behaviour to staff by students, visitors or colleagues is not acceptable under any circumstances.
- All such incidents are to be reported immediately to Deans & HODs.

3.21 Visitors

- Visitors to Marjon premises are to remain the responsibility of their host during fire, evacuation or other unusual, or unplanned, circumstances.

3.22 Lone Workers

- Wherever practicable, Marjon employees are not to work alone in high-risk activities or areas.
- Lone working is not permitted where there is a reasonably foreseeable risk that the work may result in an accident, violence or harm. A log is maintained of sites where there has been an incident involving threatening, intimidating and/or violent behaviour.
- Staff are not permitted to return to a site on their own where a previous incident of threatening, intimidating and/or violent behaviour has occurred.
- Where it is unavoidable, the lone worker will ensure that management is aware of their whereabouts and the nature of the work being undertaken. The lone worker will make

contact with nominated personnel at pre-arranged times throughout, and on completion of, the activity. Such arrangements will be documented in a specific risk assessment or Marjon procedure which will be communicated to all persons potentially involved.

- Lone workers are included in the Marjon Liability insurance cover, in accordance with the Employer's' Liability (Compulsory Insurance) Act 1969.
- Staff who wish to come onto campus outside of normal working hours should ensure Campus Security Staff are informed prior to arrival. Once on campus staff are to ensure the Campus Security Staff are aware of their location and anticipated time on site. If necessary, arrangements should be made between the staff member & Security Staff for regular communication.

3.23 Working from Home

- A risk assessment is carried out in conjunction with line managers for each home-worker to identify any potential risks.
- Home visits are undertaken as and when required depending on the outcome of the risk assessment.

3.24 Mobile Phones

- It is an offence under the Road Vehicles (Construction and Use) Regulations 2003 (as amended) to use a hand-held phone or similar device when driving.
- No calls are to be made or received by the driver of a moving vehicle unless the vehicle is fitted with a working 'hands free' kit and it is considered that it is safe to do so.
- Calls dealt with in this way are to be short duration calls only. Longer duration calls are to be dealt with by pulling over to the side of the road into a suitable parking area when it is safe to do so to continue the conversation.
- No calls are to be made / received on mobile phones while operating any plant, machinery or equipment unless the plant, machinery or equipment has been safely stopped, switched off or made safe.
- Mobile phones must not be used whilst employees carry out hazardous work activities.
- Mobile phones must not be used in the vicinity of gas storage areas, chemical and oil storage areas or in the vicinity of other flammable substances.

3.25 Environmental Management

- Marjon will ensure that all staff are trained in the Environmental Policy and are given information, instruction and training to ensure its implementation in all Marjon operations.
- Any complaints in connection with environmental issues shall be investigated and action taken accordingly.
- Current UK environmental legislation will be regarded as the minimum standard of acceptable environmental performance for Marjon.
- Marjon will implement measures to ensure that the business makes the most economic use of transport. Sharing of Marjon vehicles will be optimised and travel to the Marjon premises will be minimised to reduce use of fuel.

- Marjon will attempt to eliminate or reduce the use of ozone depleting chemicals and timber sourced from forests that have not been independently certified as sustainable.
- Marjon will attempt to reduce energy and water consumption and to minimise carbon dioxide emissions. Marjon will also promote the use of energy efficient products and source its energy from safe and sustainable sources.
- Marjon will ensure that its operations do not cause a nuisance to the community through the generation of dust, noise or odour.
- Paper will be used sensibly with increased use of electronic communication to reduce the need for paper consumption.
- Marjon will check work sites for endangered species, protected plant species, trees subject to a tree preservation order and protected archaeology, before work starts.
- Control measures will be introduced to reduce the environmental impact of Marjon work activities to a minimum and to comply with all required environmental safeguards.
- Sub-contractors will be selected on the basis that they comply with these environmental commitments and agree to be bound by the Marjon Environmental Policy
- Procedures and facilities shall be put in place to manage any foreseeable spillages of liquids related to Marjon work activities.

3.26 Pollution Prevention Measures & Spill Management

- Site activities will be undertaken in accordance with the essential pollution prevention requirements and further best practices. Maintenance of site plant will be conducted so as to minimise environmental risk, with appropriate control measures in place.
- Marjon will engage with local Environment Agency Enforcement Officers to make use of their local knowledge and expertise when planning and undertaking works in or near to watercourses or other environmentally sensitive sites.
- Before starting works, Marjon will identify site drainage, other pathways, watercourses and groundwater source protection zones. This information, together with site specific measures to prevent spread of pollution (e.g. suitable arrangements for wash out of equipment), will be included in site-specific risk assessments and environmental emergency plans. This will include actions to be taken in the event of silt, cement / concrete and other chemical incidents where these risks exist.
- All operatives will be trained in the use of spill kits. Where there is a risk of significant environmental impact, a mock exercise will be undertaken within two weeks of site start-up.
- Spill kits will be appropriate to the level of risk and the amount of fuel and oils, etc. on site. Consideration will be given to the provision of suitable PPE (such as impermeable gloves), maintenance of spill kits and the location of spill kits on site.
- Suitable pollution prevention measures (e.g. drip trays, absorbent mats) will be placed under attachments, static plant or other items where there is a risk of leaks or spillages.
- All on-site plant with hydraulic systems working in, over, or within 10 metres of watercourses, vulnerable groundwater zones and sensitive areas such as SSSI's, will use biodegradable hydraulic oil.

- Plant and hydraulic hoses will be inspected regularly for any damage or wear and tear that may result in leaks of fuel and hydraulic fluid. Any damaged hoses will be immediately replaced.

3.27 Waste Management

- Waste shall be managed in accordance with the Environmental Protection Act 1990, Part 2 and the Waste (England and Wales) Regulations 2011.
- Marjon shall comply with the Waste Duty of Care Code of Practice 2016 at all times.
- Staff are given information, instruction and training to ensure waste materials are managed in a compliant manner.
- The Waste Hierarchy of Control shall be applied to all waste materials with the highest option selected first where practicable.
- Products and processes are carefully designed to eliminate the production of waste materials wherever possible.
- Waste materials are segregated wherever possible and stored securely in appropriate facilities to prevent their release.
- A Waste Transfer Note or similar documented information is produced for each shipment of waste, based on the Environment Agency's template. Records are retained for at least two years.
- The appropriate six-digit EWC code is selected and clearly identified on all waste transfer and consignment notes.
- All third-party waste contractors shall be checked using the Environment Agency Public Registers to ensure they hold a valid Carrier's License and Environmental Permit for the wastes involved.

3.27.1 Hazardous Waste

- In addition to the general requirements outlined above, hazardous waste shall be managed according to the Hazardous Waste Regulations 2005 and the subsequent Hazardous Waste (England & Wales) (Amendment) Regulations 2016, as well as relevant Environment Agency and H&S Guidance.
- Provision will be made on all sites for the disposal of hazardous waste (e.g. following spills).
- Consignment notes and all movements of hazardous waste and shall be retained for at least three years.
- A unique Consignment Code is produced for each shipment of hazardous waste using the first six digits of Marjon's name, plus a further five digits selected by Marjon, and is recorded on all consignment notes.
- Marjon shall ensure that the correct SIC 2007 code is entered on every consignment note.

3.27.2 Clinical Waste

- All clinical waste will be managed in accordance with Regulation 12 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010.

- Good practice will be observed at all times as specified in the Code of Practice for Health and Adult Social care on the Prevention and Control of Infections and Related Guidance (Department of Health).

3.27.3 Safe Disposal of Sharps

- Where Departments routinely handle 'Sharps' the HOD is responsible for ensuring a 'Sharps Procedure' is established, staff within that Dept are informed of the procedure (including what PPE is required) and that there are suitable clinical containers provided for the disposal of sharps.

3.28 Premises Management

- A Buildings & Facilities Log will be maintained for Marjon premises, that identifies statutory inspections and tests and establishes a calendar schedule for these. All services / maintenance carried out on facilities will be logged.
- Service agreements are in place for larger items of office equipment (e.g. photocopier).

3.28.1 Cleaning

- The premises, including welfare facilities are cleaned on a regular basis by Marjon estates staff and contract cleaning providers, utilising a range of light industrial / heavy domestic hoovers and floor cleaners.
- The estates department are responsible for ensuring cleaning staff (both Marjon staff and contract cleaners) and activities are appropriately managed including, but not limited to, the documentation of risk assessments, CoSHH assessments and training records for cleaning staff.
- In conjunction with the service level agreement, Marjon is responsible for ensuring the health, safety and welfare of non-employees and the provision of a safe working environment, as stated in Sections 2 and 3 of the Health and Safety at Work Act 1974.
- Bins are emptied regularly, and waste is disposed of.
- Periodic inspections of the premises are conducted to ensure that this is being kept in a suitably clean and hygienic condition.

3.28.2 Domestic Cleaning Products

- Where possible, non-hazardous domestic cleaning products will be used in office premises.
- All domestic cleaning products are to be securely stored when not in immediate use.

3.29 Welfare Provision

- Marjon is committed to providing a safe and healthy work environment that takes into account the welfare needs of all its employees and students, including those with disabilities.
- Welfare provision will be in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992.
- Ventilation will be adequate to ensure the comfort of employees. Where mechanical ventilation or air conditioning is provided, regular cleaning, maintenance and inspection will be conducted.

- In offices, temperature will be maintained not less than 16°C but whenever practicable will be maintained in the range 19.4° C – 22.8° C. Windows, skylights or glass partitions will not allow excessive temperatures to be reached in the offices during hot weather.
- Lighting will be suitable and sufficient and, so far as is reasonably practicable be from natural light to enable people to work, use facilities and move from place to place safely and without experiencing eye strain.
- Eating and rest facilities with adequate access to boiling water and a means to heat food will be provided.
- Welfare facilities will be adequate with sufficient toilets, hand washing and drying facilities. A wholesome supply of drinking water will be available.
- Suitable storage and drying facilities for clothing will be provided, as required.
- Workstations will be comfortable, with safe and suitable chairs and sufficient space.

3.30 Safety Signage

- Appropriate safety signs and notices will be posted throughout Marjon premises, as identified via risk assessment and in accordance with the Health and Safety (Safety Signs and Signals) Regulations 1996.

3.31 Access and Egress

- All workplace access and egress routes are kept clear at all times.
- Emergency escape routes are unobstructed. Stores or materials shall not be left along access or egress routes where they may hinder escape in an emergency.
- If employees are unable to access their working area safely, they must inform their Line ELT and not take personal risks.

3.32 Security

- Selected areas of Marjon premises are monitored by CCTV and the system is operated in accordance with Marjon's CCTV Policy. With regards to operation of a surveillance system, Marjon remains committed to full compliance with the Information Commissioner's Office (ICO) Code of Practice.
- Irregular patrols of the campus are conducted within a 24-hour time period.

Section 4.0 Workplace Arrangements for Health and Safety

WORKPLACE ARRANGEMENTS FOR HEALTH AND SAFETY

Specific Workplace Arrangements are subject to University Codes of Practice (UCOP) and are available upon request.