University of Brighton

Code of Practice

Health and Safety Training and Competencies
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1.0 Introduction
The University of Brighton is committed to providing appropriate health and safety training to all staff, and also, when relevant to students, visitors, contractors and others. It will ensure that adequate resources are made available for this purpose.

The primary aim of providing training and instruction is to ensure the individual wellbeing of all persons within the University, as well as to enable staff to safely and efficiently undertake their duties.

The aim in the provision of effective health and safety training is to bring about a behavioural change through the adoption of safe working practices and to influence the promotion and development of a safety culture within the University community.

Within the University corporate plan is the aim to ensure the safety and wellbeing of staff and students and the provision of appropriate governance structures to provide statutory compliance. All staff have responsibility to help fulfil and deliver such objectives.

2.0 Scope and application
This Code of Practice on Health and Safety Training and Competencies is implemented under the University Health and Safety Policy.

Senior Managers, Heads of Department and School and Managers hold legal and contractual responsibilities for the implementation and compliance with this Code of Practice.

This Code of Practice applies to both staff and student activities undertaken both on and off-site.

In defining any training and competencies consideration should be given to individual qualifications and/or experience gained both during and prior to employment within the University. It should be noted however that training and qualifications may not always be transportable between employers. In many cases it will be necessary to establish competency within the context to the activity being undertaken within the University of Brighton and in relation to the framework of policies and arrangements operating within our own institution.

Participation in University safety training courses is available to trade union safety representatives and student union staff.
3.0 Legal Framework
The University must ensure that all staff are competent to carry out their work in a safe manner, with the minimum risk to themselves and others. This requirement is required under various aspects of safety legislation.

The Health and Safety at Work Act 1974 requires the University to provide such information, instruction, training and supervision as in necessary to ensure, so far as is reasonably practicable, the health and safety at work of staff, students and visitors.

Management of Health and Safety at Work Regulations 1999 Regulation 13 Capabilities and training
Every employer shall ensure that his employees are provided with adequate health and safety training-
- a) on their being recruited into the employer’s undertaking; and
- b) on their being exposed to new or increased risk because of-
  - i) their being transferred or given a change of responsibility within the employer’s undertaking,
  - ii) the introduction of new work equipment into or a change respecting work equipment already in use within the employer’s undertaking
  - iii) the introduction of new technology into the employer’s undertaking, or
  - iv) the introduction of a new system of work into or a change respecting a system of work already in use within the employer’s undertaking

The training referred to above shall:

- a) be repeated periodically where appropriate
- b) be adapted to take account of any new or changed risk to the health and safety of the employees concerned; and
- c) take place during working hours

Additional guidance regarding safety training requirements can be found in the Management of health and safety at work Approved Code of Practice and Guidance L21 (HSE Books).

4.0 Identifying Training Needs
The identification of health and safety training needs will begin with the recruitment and selection process and the drafting of a job description so as to ensure staff either already possess adequate competencies, skills, qualifications and/or experience to fulfil specific functions or to possess the necessary ability to undertaken further training. All staff must receive an induction training session in relation to both general safety arrangements which reflect their main work location and as well as any specific safety
related training focusing on hazards and control measures that relate to their individual responsibilities and work environment.

In defining training requirements it is necessary to take into consideration the type, format and style of training needs, this may include staff briefings, on the job training and instruction through to more to specific training programmes with defined learning outcomes.

4.1 Training needs analysis (TNA)
TNA is an exercise that can be undertaken at either an individual staff or Departmental/School level to identify a range of training requirements for staff or categories of staff.

Training needs are likely to be greatest for new staff. They should receive basic induction training on health and safety including arrangements for first-aid, fire and emergency evacuation procedures.

Examples of training needs analyses and staff profiles are available on the Health and Safety Department website.

4.2 Staff Development Review (SDR)
The identification of safety training will also form part of the University staff development review process. Managers undertaking the review will need to respond to issues raised by staff where they are undertaking new activities or need to strengthen and build upon existing competencies. This will include both operational and task type training e.g. how to operate equipment in a safe manner as well as reviewing managerial competency in relation to supervisory functions through the provision of safety management and development programmes.

The review of safety training requirements should not be limited to a single SDR activity but needs to be supported by an ongoing review of safety training requirements identified through a range of managerial and operational processes. E.g. one to one meetings, tool box talks, accident investigations, risk assessments, team meetings and local safety committees.

4.3 Refresher Training
Competence declines if skills are not used regularly (e.g. in emergency procedures or infrequent use of equipment). Training therefore needs to be repeated periodically to ensure continuing competence. The training needs analysis mentioned above should include reference to refresher and update training cycle.

Information from personal performance monitoring, health and safety checks, accident investigation and near miss incidents can help to establish a suitable period for re-training.
4.4 Risk Assessment
Activities and associated hazards are assessed throughout the University through the undertaking of suitable and sufficient risk assessments (for further guidance refer to the University of Brighton Code of Practice for Risk Assessment).

By undertaking suitable risk assessments and subsequent reviews of the risk assessment this will help determine the level of training and competence needed for each type of work or tasks involved. It may be insufficient to simply state in a risk assessment that a control measure is “training is required”, it may indeed be necessary to specify a specific standard and or qualification and refer to whether the individual has undertaken suitable refresher training so at to ensure their competency and skills level is both current and up to date.

Certain work activities will have prescribed training requirements and standards of competency specified under applicable legislation, this may also relate to the standards set by an external professional body or association.

Examples include:

- Hazardous machinery
- Hazardous chemical and biological agents
- Radioactive materials
- Transport and vehicle operation
- Confined space entry
- Working on or near electricity

In such cases refer to the appropriate legislation and supporting Approved Codes of Practice, industry standards or guidance documents and the continual professional development requirements required by external professional bodies.

5.0 Health and Safety Training in Research
Health and safety training in research activities support and underpin the institutional objectives in expanding the research activities within the University of Brighton. In addition safety competencies in relation to research both protect and enhance institutional reputation, safe research is good research. Staff and students working in ground breaking research with new technologies and novel chemicals have a duty to ensure that safe working practices are integrated into the research methodology.

The identification and provision of safety training is a further requirement within the Research Excellence Framework (REF) which in addition is supported by the Code of Conduct on Research Council UK (RCUK) Code of Conduct on the Governance of Good Research Conduct: INTEGRITY, CLARITY AND GOOD MANAGEMENT. October 2011
Staff and student competencies will also impact upon the validity and scrutiny associated with the assessment and publication of research findings.

Further guidance relating to safety training requirements associated with research activities is also contained in the document;

*Managing health and safety aspects in higher and further education (Education Service Advisory Committee/ Health and Safety Commission)* HSE Books 2000 ISBN 0717613003, copies are available from the Health and Safety Department.

All research staff will need appropriate training to help them understand the health and safety policy and procedures, and additional training will be needed for staff that are expected to carry out risk assessments. Heads of Schools, managers and research supervisors/Principal Investigators will require health and safety management training. Any further requirements for additional specialist training on particular hazards (which may be specified by a research project or sponsor) will also need to be identified.

- Fieldwork activities
- Collection and transportation of samples
- Handling and disposal of hazardous materials
- Authorisation and security processes in relation to hazardous and toxic materials
- Equipment e.g. lasers
- Laboratory safety
- Lone working and out of hours restrictions
- Personal protective equipment
- Emergency procedures
- Ethics and licence authorisations

Postgraduate students should also be trained to carry out risk assessments and to understand the policies and procedures within their School. Post graduate students should be made aware that their work may be scrutinised to ensure that relevant hazards have been identified and risk minimised and that dissertations may need to include descriptions of relevant risk management practices as well as for students to be questioned on these aspects during assessments.

**6.0 Roles and Responsibilities**

**6.1 Board of Governors**
The Board of Governors and Senior Management Team have a responsibility to ensure adequate provision is made to support and develop staff and student competencies in relation to health, safety and wellbeing. Responsibility for implementing these functions is allocated through the organisational arrangements set out in the University Health and Safety Policy and staff development activities.
6.2 Senior Managers, Senior Management Team (SMT) and Deans
Senior Managers within the University have a duty to ensure the implementation of this code of practice within the line management structures for which they hold line management responsibility.

This will include reviewing resources and monitoring of training plans within Schools and Departments so as to ensure activities within Schools and Departments are aligned with corporate aims and strategic objectives.

6.3 Heads of Department and School
At a School, Departmental or Faculty level, health and safety training should be aimed at ensuring that individuals acquire the competence which has been identified as necessary for them to undertake their allocated tasks and functions in a safe manner. In addition the provision of health and safety training should support the wider aims of the institution to enhance a positive student experience and where appropriate assist in the development of knowledge and skills that influence student employability.

Heads also have a responsibility to minimise risk, for which training and competency of staff is integral to the institutional risk management process.

Heads of School are responsible for:

- Implementing mechanisms and processes to identify the competence required for all staff to undertake their duties safely and provide relevant training.
- Ensuring there is a process for which general safety induction training/briefing is made available to all staff, visitors and students.
- Devising an appropriate safety plan, incorporating a training needs analysis component
- Implementing an administrative system in relation to staff training, record keeping and evaluating training requirements.
- Implementing suitable monitoring and auditing processes to support and evaluate training needs.
- Allocating sufficient resources and budget for safety training purposes.
- Making arrangements to secure external training provision where safety courses can not be provided by the Health and Safety Department.
- Implementing and supporting the staff development review process.
- Monitoring the quality of in-house training or on the job training.
- Working in partnership, as necessary with Human Resources and the Health and Safety Department to ensure job descriptions include reference to the required relevant qualifications and competencies required within roles.
• Liaising with safety, union and staff representatives at a local level in relation to health and safety training requirements.
• The authorisation of high risk off-site activities e.g. fieldwork/overseas travel which will include associated competency and training factors
• To ensure the CPD requirements in relation to the standards set by external professional bodies.
• To ensure where required that health and safety training and competencies are included in curriculum design and course delivery.

Heads of Department are responsible for:

• Implementing mechanisms and processes to identify the competence required for all staff to undertake their duties safely and provide relevant training.
• Ensuring there is a process for which general safety induction training/briefing is made available to all staff, visitors and students.
• Devising an appropriate safety plan, incorporating a training needs analysis component
• Implementing an administrative system in relation to staff training, record keeping and evaluating training requirements.
• Implementing suitable monitoring and auditing processes to support and evaluate training needs.
• Allocating sufficient resources and budget for safety training purposes.
• Making arrangements to secure external training provision where safety courses can not be provided by the Health and Safety Department.
• Implementing and supporting the staff development review process.
• Monitoring the quality of in-house training or on the job training.
• Working in partnership, as necessary with Human Resources and the Health and Safety Department to ensure job descriptions include reference to the required relevant qualifications and competencies required within roles.
• Liaising with safety and staff representatives at a local level in relation to health and safety training requirements.
• The authorisation of high risk off-site activities e.g. fieldwork/overseas travel which will include associated competency and training factors
• To ensure the CPD requirements in relation to the standards set by external professional bodies.

Heads of Schools and Departments should refer to the Health and Safety Training checklist (see Appendix 1) in order to benchmark their current provisions within their School/Department and develop the safety training component of their School/Departmental safety plan.

Heads should undertake further discussion with their appropriate SMT members and Deans on issues arising from the inability to complete the checklist.

Version 1.0
Health and Safety Department
6.4 Managers
Managers and supervisors hold responsibility for identifying and implementing safety training requirements at a local level in relation to Departmental or School structures.

Managers are also integral to the risk assessment processes in relation to the identification and implementation of suitable control measures within their area of control. This includes the identification of any safety related training or competency requirements.

Managers will also hold responsibility for undertaking general induction, including safety induction and briefings in relation to new starters. Managers working in close proximity with staff are also better placed to identify any training or refresher training as part of their ongoing day to day supervision of staff and activities within the School/Department.

Managers may also be undertaking staff development reviews where safety training requirements may be raised or identified. This may also include both operational and managerial safety competencies within their own individual development review.

Managers should report to Heads of School/Departments in relation to staff performance and how this can be improved or safe working practices secured through safety training and associated resource requirements so as to support the safety training component of the Departmental/School safety plan.

Managers must ensure they participate in the administrative processes within the School/Department in relation to record keeping and the ability to evidencing training, risk assessments and supporting documentation.

Managers will work in partnership with trade union safety representatives, Health and Safety Department and other stakeholders such as EFM in order to identify suitable staff to support emergency procedures.

Job descriptions should indicate the level of knowledge, experience and training required to undertake work safely (further advice is available from the Health and Safety Department and Human Resources).

6.5 Staff Responsibilities
Staff have legal duties as regards health and safety training. There is a general duty under the Health and Safety at work Act for staff to co-operate with University of Brighton so as to enable the University to fulfil its statutory requirements. Where safety training has been identified it will be compulsory for the member of staff to undertake the training provided. Failure to participate in safety related training could result in disciplinary action.

Staff have a duty to take care of their own health and safety and that of others who may be affected by their actions or omissions at work. Staff must
therefore use all work items provided correctly; in accordance with their training and the instructions they receive to use them safely.

The Management of Health and Safety at Work Regulations 1999 provides additional clarification as to the duties placed upon staff. Staff must also inform their manager or supervisor of any work situation which places themselves or another person in serious or immediate danger and where there are any shortcomings in relation to health and safety training or instruction.

As part of the training identification and nomination process staff will need to have discussed the training need with their line manager/supervisor and have the appropriate approval to proceed.

If staff are unable to attend a course due to illness please inform the Health and Safety Department as early as possible. Where staff are unable to attend for other reasons e.g. urgent work priorities they should discuss this with their line manager. Failure to attend a course may result in an administration fee being charged to your School or Department.

6.6 Health and Safety Department
The Health and Safety Department organises a range of health and safety training courses across the University in support of the corporate plan and operational requirements.

The Health and Safety training programme developed by the Health and Safety Department is identified through a range of inputs and competency drivers.

- Liaising with local safety advisers/forum
- Competency/training surveys
- Accident trends and analysis
- Audit and inspection processes
- Role profiling activities
- Recommendations from staff development group and
- Recommendations for University Safety Committee

6.6.1 Sustainable approach to training
A key approach to a sustainable safety training programme is to develop the ability of Schools and Departments to manage and deliver ongoing training requirements within their own environment. Central to this approach is to facilitate ‘Train the Trainer’ courses and enhance the competencies of staff within Departments. This approach is usually applied in relation to Departments/Schools where there are high volume training requirements relating to generic type courses.

Courses of this nature which would necessitate the nomination of trainers/providers e.g. Manual handling/lifting for life skills for cleaning and support staff
It is also applicable where Schools have a safety training requirement to provide training, briefings, induction and training to large numbers of students as part of professional practice and skills. Staff will require competencies in relation to their ability to provide training and demonstration responsibilities so as to cascade instructions and to support teaching and learning course outcomes.

6.6.2 Course availability and advertising
Courses will be advertised through both the Health and Safety Department website utilising the Health and Safety Information Bulletin system. Courses will also appear in the Staff Development News letter.

6.6.3 Quality assurance
The quality and effectiveness of courses will be monitored utilising course feedback forms and examination where so required.

The Health and Safety Department will monitor safety training provided by Schools and Departments through the assessment of local training plans and auditing activities.

The Health and Safety Department will consult with safety representatives in relation to planning and organisation of health and safety training required for the staff they represent in accordance with the Safety Committees Regulations 1997.

The Health and Safety Department can also support and advise Schools/Departments looking to secure external safety training providers in order to fulfil either generic or specific safety training requirements which are either unavailable through the central safety training programme or arise out of a sense of urgency so as to ensure legal compliance. Support will include the appropriate assessment and competency of the external safety training provider as well as ensure quality control factors and the course design/delivery is aligned with institutional policy and objectives.

6.6.4 Funding
The Health and Safety Department is provided with a limited safety training budget to support the central safety training programme. In certain circumstance the safety training budget is also used to support specific safety training requests from Schools and Departments. In relation to accessing support from the central safety training budget it is advisable to make such a request that has an element of match funding by the School/Department. It would also be expected for the applicant to be able to state why training resources/funding is not currently available within the School or Department and reasons explaining the exclusion of the training requirement within the safety training plan. Situations where unforeseen safety training may arise may include changes in legislation or in relation to staff designated with responsibilities that support safety management across the institution.
6.6.5 Selecting and authorising staff attendance for safety training courses
Attendance on the selected training course relates to a justifiable training need. Staff should not be attending safety training courses.

Managers are requested to ensure that staff nominated to attend a Train the Trainer course meet the following criteria:

- That staff are of suitable seniority or standing to influence and if necessary enforce change in accordance with training.
- If applying for a key trainer’s role, that they have experience in training, they are of suitable seniority and have the confidence to train others.
- That the member of staff is suitably qualified and experienced to be able to deal with the potential requirements following the training.
- Staff nominated to attend moving, manual handling or life lifting skills courses should be in good health and not suffering from injury which may impact on their ability to complete the course.

7.0 Administration

7.1 Training Records
Departments and Schools are required implement and manage an administrative system so as to include the recording and retention of staff undertaking health and safety training. Where appropriate safety training records and qualifications may also be needed to be forwarded to Human Resources for inclusion in individual personnel records.

Training record should be kept to verify attendance at relevant training courses. During an accident investigation, prosecution or civil claim, training records may be required for examination and inspection.

Where appropriate, training records should specify any refresher course requirements as well any restrictions or limitations.

A training record pro-forma is available at the Health and Safety Department website.

8.0 Health and Safety passport to training schemes
The Health and Safety Executive and the Environment Agency encourage organisations to provide ‘Passport Training Schemes’. This approach can be beneficial in supporting both a staff behavioural change and engagement through a positive marketing approach for groups of staff e.g. Principal investigators, laboratory technicians, caretakers. Such schemes ensure staff have basic Health and Safety awareness training and provide a way of
improving health and safety performance. They also provide good practice and can help reduce accidents and ill health caused by work.

The use of a bespoke health and safety passport scheme approach may also be applicable to enhancing student employability outcomes, and supporting the student experience as well as evidencing professional practice and skills.

Further advice regarding designing and implementing a training passport scheme is available for the Health and Safety Department.

9.0 Designing School/Departmental Safety Courses
Any manager who would like one of the courses that are available through the central safety training programme delivered within their own Department/School should contact the Health and Safety Department.

In addition to the current safety training courses portfolio the Health and Safety Department can assist in the design and delivery of bespoke and tailored training courses applicable to staff/groups within the School or Department.

10.0 Further information
Further information and course booking details are available on the Health and Safety Department website at http://staffcentral.brighton.ac.uk/safety
Appendix 1 - Health and Safety Training and Competencies Checklist

1. Do new job descriptions include health and safety training and competency criteria? YES/NO

2. Are current job descriptions updated and amended to include safety training requirements and competencies? YES/NO

3. Is there a School/Departmental safety plan? Does the safety plan include a safety training component? YES/NO

4. Have staff groups within the School/Department undertaken suitable safety training needs analyses? YES/NO

5. Have refresher training needs been identified? YES/NO

6. As a Head are you able to evidence and confirm the inclusion of safety training and competencies within School/Departmental risk assessment processes? YES/NO

7. Is there an administrative system to record and retain staff training records? YES/NO

8. Does the audit and inspection process within the School/Department include a review of safety training and competency? YES/NO

9. Have safety training requirements and resources been identified within the School/Department budget? YES/NO

10. Do managers understand their responsibilities in relation to identifying and monitoring safety training needs? YES/NO

11. Have Trade Union Safety Representatives and other stakeholders been consulted in relation to identifying and implementing safety training requirements? YES/NO

12. Is there a School/Departmental committee or forum responsible for overseeing the resourcing and monitoring of safety training requirements? YES/NO

13. Have safety training and competencies been included developing and supporting student professional skills and practice requirements? YES/NO

14. Do safety training requirements support research aims within the School? YES/NO

15. Have you examined how safety training and competencies can support the student experience and enhance employability? YES/NO
Answer YES!
Where have you answered yes, you may be required as part of a health and safety audit, inspection or investigation by the Health and Safety Executive, criminal prosecution or civil claim or insurance assessment to provide documentation and evidence to support your assertions.

Answer NO!
Where you have answered no to any of the above questions there is an implied action arising in relation to deficiencies in the management and implementation of the Code of Practice Health and Safety Training.