

WORK AT HEIGHT POLICY

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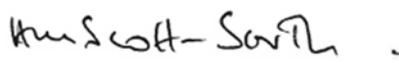
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Heads of Departments
All Employees who work at height**
- Information for: **All other employees**

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Burton Hospitals NHS Foundation Trust

POLICY INDEX SHEET

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WORK AT HEIGHT POLICY

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Burton Hospitals NHS Foundation Trust

WORK AT HEIGHT POLICY

1. INTRODUCTION

1.1 This policy document is not intended as a substitute for the *Work at Height Regulations 2005* but as an introduction to them. Those who manage or undertake work at height should do so in accordance with this policy. This would include any Burton Hospitals NHS Foundation Trust employee who authorises work or contracts on behalf of the Trust.

1.2 Policy Statement

The Trust will take all reasonably practicable measures to ensure that workplaces and care environments under their control are safe and without unnecessary risks of working at height to all persons needing to access them.

1.3 Scope of Policy

This policy describes the procedures which should be followed and the factors, which should be taken into account by all employees when dealing with aspects of working at height in the workplace. The policy also addresses the Trust's legal obligations.

Compliance with this policy and the accompanying Code of Practice for Work at Height at Burton Hospitals NHS Foundation Trust is mandatory for all employees, contractors, self employed persons and visitors who undertake or manage work at height.

1.4 The Health and Safety Executive considers this a priority issue, as falls from height are the biggest cause of fatal accidents at work and the second biggest cause of major injuries.

1.5 The Work at Height Regulations 2005 adopts a risk-based approach so that compliance is proportionate to the risk involved. This approach dovetails into other legislation requiring risk assessments to be carried out.

1.6 **'Work at height' is defined as "work in any place – from which, if no action was taken a person could fall a distance, liable to cause personal injury"; this could be above or below ground level.**

"In short: Any work carried out **Above** or **Below** ground or floor level"

1.7 There are other existing legal provisions that deal with work at height:

- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Construction (Health, Safety and Welfare) Regulations 1996
- Lifting Equipment & Lifting operations Regulations 1998
- Management of Health & Safety at Work Regulations 1999
- Provision and use of Work Equipment Regulations 1998

These provisions generally apply to specific industries; however, this policy has been produced to accommodate the requirements as they affect Burton Hospitals NHS Foundation Trust.

1.8 Where an initial Risk Assessment for the work indicates a personal lack of knowledge, competence or a lack of existing adequate control measures, additional detailed guidance should be attained from the Head of Health & Safety or Estates.

1.9 Should any doubt remain following reference to the recommended guidance, the work should be referred to the HSE office for guidance, **before a contract is made**, for planning, management and execution.

1.10 The schedules of Regulations cover:

	Schedule
• existing places of work and means of access for work at height	1
• collective fall prevention (e.g. guard rails, toe boards, barriers)	2
• working platforms	3
• safeguards for arresting falls	4
• personal fall protection systems (e.g. work restraints, work positioning, fall arrest and rope access)	5
• ladders and step ladders	6
• inspection reports (for working platforms in construction only)	7
• revocation	8

2. AIMS AND OBJECTIVES

The purpose of this document is to enable the Trust to ensure that it provides a safe working environment by:-

- ensuring all potential work at height hazards in the workplace are identified;
- any risk to a person's safety is adequately controlled, and reduced to the lowest level reasonably practicable; and
- where necessary the appropriate risk assessments and risk reduction methods are in place.

3. DUTIES

3.1 Board of Directors

The Board has overall responsibility for the management of Health and Safety. They receive assurance via the Risk Committee which is a formal Committee of the

Board. The Head of Health and Safety and Head of Governance submit regular reports on adverse incidents to the Quality Committee.

3.2 Chief Executive

The Chief Executive has specific responsibility for giving effect to health and safety matters and will ensure that this policy is implemented.

The Chief Executive will monitor the effectiveness of this policy by reviewing accident statistics; trends and patterns considered at the Risk and Compliance Group / Quality Committee and bring these to the attention of the Board of Directors where necessary.

3.3 Heads of Estates

The Head of Estates has responsibility for ensuring that premises owned or leased by the Trust are safe and do not present a hazard to employees and others using Trust premises for approved uses. The Head of Estates will also ensure that where requested, in accordance with this policy, any premises used by the Trust are provided and maintained in accordance with this policy.

The Head of Estates will ensure that by prior arrangements where requested, in accordance with this policy, that all necessary repairs and maintenance are carried out to safety equipment, in particular:

- regular maintenance (including inspection and cleaning) is carried out at suitable intervals;
- any potentially dangerous defects are remedied
- maintenance and remedial work is carried out properly; and
- a suitable record is kept to ensure that the system is properly implemented

3.4 Head of Health and Safety

The Health and Safety Manager has responsibility for helping to ensure that this policy allows the Trust to comply with their legal responsibilities. The Head of Health and Safety will also produce written accident reports showing the effectiveness of this policy and is responsible for RIDDOR reporting.

3.5 Managers/Supervisors

Managers and Supervisors have a responsibility to implement this policy and to ensure that all reasonable steps are taken to maintain and, where necessary, improve health and safety standards within the workplace. Where employees work in premises not owned by the Trust, the manager of those employees will liaise with the landlord to ensure that premises are maintained in accordance with this policy. Managers will also bring this policy to the attention of all employees.

It is a manager's responsibility to ensure that every workplace under their control is adequately maintained and repairs carried out. This may be either in-house (with prior arrangements) or by specialist contractors.

It is also the manager's responsibility to ensure that the necessary risk assessments are carried out for the workplace under his/her control and that appropriate action is taken to resolve the issues identified.

3.6 Employees

All employees have a responsibility to abide by this policy and any decisions arising from the implementation of it. Any work at height hazards that are not covered by an existing risk assessment they become aware of should be reported to their manager. Employees should also take steps to reduce the risks.

4. REQUIREMENTS FOR SAFE WORK AT HEIGHT

The overriding principle for Work at Height is to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury.

4.1 The prescribed hierarchy for safe work at height is as follows:

AVOID the risk by not working at height. Where it is reasonably practicable to carry out the work safely other than at a height, do so.

PREVENT falls - where it is not reasonably practicable to avoid work at height, you should assess the risks and take measures to allow the work to be done whilst preventing as far as reasonably practicable people or objects falling. This might include ensuring the work is carried out safely from an existing place of work or choosing the right work equipment to prevent falls.

MITIGATE the consequences of a fall - where the risk of **people** or **objects** falling still remains you should take steps to minimise the distance and consequences of such falls. This also involves the selection and use of work equipment and preventing those not involved with the work entering the hazardous area.

4.2 At all stages collective protective measures (e.g. guard rails, nets, airbags, etc.), must be given precedence over personal (e.g. safety harnesses) protective measures.

4.3 The *Work at Height Regulations 2005* requires you to:

- Assess the risk to determine a safe way to work.
- Follow the above hierarchy.
- Plan and organise the work taking account of emergency measures, possible weather and environmental conditions.
- Make sure that those working at height are competent to do so, understand the risks and the risk assessments.
- Use appropriate work equipment.
- Manage risks from working round or on fragile surfaces.
- Carry out inspections and assess equipment to be used and the work area itself.

5. PLANNING WORK AT HEIGHT

The *Work at Height Regulations 2005* requires that you plan your work correctly, to ensure it is carried out in a safe manner.

- 5.1 The employee and / or the employee's representatives should be involved at all stages when planning any work at height.

Consulting the employees will encourage them to be more aware of risks from work at height and their duties under health and safety law. It will also help you to comply with your duties.

5.2 Provide supervision

Proportionate to the findings of the risk assessment and the experience and capability of the people involved in the work. A worker may be trained to a nationally accredited standard, but he will still need to be acquainted with the layout and the peculiarities of the site and have the task(s) required of him/her carefully explained.

Make sure that those affected understand the risk assessment and what they must do to comply with it. This may be "tool box" talks or briefings to make sure workers are aware of hazards and when they should ask for further assistance. The activity may also affect others on the site not just your employees; inform and discuss with these people how you plan to carry out the work.

5.3 Plan for emergencies and rescue

If required, have a rescue plan in place before the work starts. This plan should be reviewed throughout the lifetime of the project and update it if there are any substantial changes to the work being carried out (see Appendix 1 for information on Suspension Trauma).

The plan needs to take account of possible risks to rescuers.

You should not assume that the emergency services will be able to affect a rescue in all situations; especially within the necessary time.

6. RISK ASSESSMENT AND PLANNING ARRANGEMENTS

The risk assessment and planning arrangements should take into account the effects that the weather can have on outdoor work at height.

The Provision of Work Equipment Regulations 1998 (PUWER 98) require that work equipment is suitable for the conditions intended and that suitable and sufficient lighting is provided at any place where work equipment is in use.

Lightning, wind, rain, snow, ice, temperature and sun will change the working conditions during the job and may increase the risks that need to be addressed. Protective gloves, sun block or non-slip footwear may help, but your risk

assessment should consider wider aspects such as whether bulky clothing could get caught up in machinery or make access more dangerous. The build-up of mud on ladders, for example, will make them less safe, as would placing ladders on slippery surfaces. Heat exhaustion must also be taken into account if conditions are hot, humid.

7. USE OF APPROPRIATE WORK EQUIPMENT

71 The *Work at Height Regulations 2005* recognises that work at height can be performed safely in a number of different ways, using a wide range of work equipment. The choice of equipment will depend on the risk assessment. Whatever equipment is selected it should be of sound construction in suitable material, be of adequate strength and be free from obvious defects.

7.2 Choosing the right equipment for the task

The choice of equipment involves "reasonable practicability" and must prevent a person falling or, to the extent that cannot be achieved, mitigate the distance and consequences of such falls.

Choices should be thought through!

A *ladder* may reach the workplace but if workers need to climb it for long duration or with heavy or bulky equipment, *scaffolding* is likely to be more appropriate.

On the other hand, the risks of installing *scaffolding* should be considered, especially for work of short duration, where a *Mobile Elevating Work Platform* might be more appropriate.

7.3 Selecting the right equipment for access and egress

Selecting equipment for access or egress will depend on the particular use envisaged. For frequent access, you should consider more permanent arrangements.

For example, if a scaffold is to be in place for some time, the erection of a staircase with handrails would be more appropriate than a ladder tied in place, especially if bulky loads are being carried up a long flight. You should also consider the use of hoists or other methods if this will reduce the risks of falls.

Systems of work or means of access should be designed so that workers do not have to climb over guardrails or other parts of the access structure. If frequent access is required it may be appropriate to use gates, which will allow access when required and also protect those working on the *scaffold* by providing a barrier. For work on high-rise buildings, which may take considerable periods of time to complete, the use of *mast climbing work platforms* or *suspended platforms* may be appropriate. These should only be erected, altered, operated or dismantled by those with the necessary competence and in accordance with the manufacturer's instructions.

Mobile Elevating work platforms should not generally be used as a means of access to or from another structure or surface - climbing out of *Mobile Elevating Work Platforms* in these circumstances has injured several people.

However, *Mobile Elevating Work Platforms* may be used for this purpose if they have been specifically designed for it or as part of a properly planned operation where, in exceptional circumstances, this is the safest way to gain access to a place of work at height. In such cases suitable *fall protection* should be worn and correctly anchored.

8. WORK EQUIPMENT

8.1 Ladders

Ladders, including *fixed ladders* and *stepladders*, are commonplace; however people often seriously underestimate the risks involved in using them. Falls from ladders used at work is one of the biggest cause of causes of fatalities and major injuries (HSE).

There are many types and sizes of *ladders* - portable, suspended, step, interlocking, extension, mobile and fixed *ladders*. They must meet the requirements of the *Work at Height Regulations 2005*. Ladders are classified as work equipment under the Provision and use of Work Equipment Regulations 1998 and therefore should be suitable for the task in hand.

Ladders should only be used as work equipment, either for access and egress or as a place from which to work, where a risk assessment shows that the use of other work equipment is not justified because of the low risk and the short duration of the job or unalterable features of the work site. The risk assessment is essential and should consider not only those using the ladder but others who could be affected, such as passers-by. The safety of sole workers who use ladders, such as window cleaners, depends significantly on their correct use, and adequate **training is essential**. Safety should not be compromised by haste to complete the job. All *ladders* must be used in accordance with the manufacturers' instructions.

If *ladders* are to be used to work from, and not just for access or egress, make sure:

A secure handhold and secure support are available at all times;
e.g. 3 points of contact at all times.

- The work can be reached without stretching;
- The ladder can be secured to prevent slipping.
- It is tempting to try and ensure that all the work is completed without having to go down the ladder and move it, but overreaching while working from a ladder is a major cause of falls even for experienced workers.

8.2 Harness Equipment

Harness equipment should be provided as the result from a risk assessment and it should comply with relevant current standards. Requests **MUST** be made (with prior arrangements) to the Estates Management for routine inspection and testing purposes.

8.3 Additional Equipment

Listed below are other items of equipment that may be used and **MUST** comply with the contents of this policy:

- Kick Stool (elephant's foot)
- Step Ladders (irrespective of size)

NOTE: Chairs are NOT suitable equipment for working at height.

9. WORKING AT HEIGHT COMPETENCY

9.1 **Regulation 5** of the *Work at Height Regulations 2005* requires that any person undertaking work at height should be competent to do so or, if being trained, supervised by a competent person. **Competence is a combination of appropriate practical and theoretical knowledge, training and experience**, which collectively should enable a person to:

- Undertake safely their specified activity at their level of responsibility
- Understand fully any potential risks related to the work activity (tasks and equipment) in which they are engaged; and
- Detect any defects or omissions and recognise any implications for health and safety with the aim of specifying appropriate remedial actions that may be required in relation to their particular work activity

This could include refusing to do a particular task if the potential risk is assessed as being too great, pending reassessment or a risk reduction strategy.

10. FRAGILE SURFACES

10.1 Risks posed by fragile surfaces must be managed i.e. surfaces where there is a risk of a person or object falling through, these surfaces may be either close to or part of the structure on which work is to be done and will include vertical or inclined surfaces.

Any surface from which work at height is carried out must be strong and stable enough so that any foreseeable loads, **persons plus the materials / loads they may be required to carry placed on it**, will not lead to its collapse.

You should consider whether work on a fragile surface could be done in a way which does not expose workers to risk by having to stand on or near the surface, **e.g. can the work be done from below?**

You should consider the whole installation, including the fixings of the surface material.

- 10.2 It is also vital to consider the dynamic forces of the person falling from height onto the surface, and the effect of ageing on the surface material and the deterioration caused by weather, environment, impact and any structural alterations.
- 10.3 Roof lights in non-fragile roofs can be difficult to see. They may have been painted over and in bright sunshine they can blend in with the surrounding sheets. Remember that fragile surfaces can also be vertical, or nearly so, as well as horizontal. For example some, mainly older, skylights may have large vertical glass sections which people can fall through.
- 10.4 If the work requires regular or occasional access where there is a fragile surface, labelling, permanent fencing, guards or other measures to prevent falls should be in place.

*Where a risk of falls remains, fall arrest equipment is required, **so far as is reasonably practicable.***

11. FALLING OBJECTS

- 11.1 If it is determined that a falling object could injure someone, steps need to be taken to ensure that this is prevented.
- 11.2 Ways of preventing objects rolling or being kicked off the edge might include toe boards or solid barriers, or attaching them to people or fixed structures. Any guards used (including brick guards) must be robust and would usually require a mid rail. Personal items, such as mobile phones, can cause serious injury if they hit someone.
- 11.3 High visibility netting may be one way of dealing with this risk, another might be to ensure personal items or other equipment not necessary for the task are left in a safe place before working at height.
- 11.4 Rubbish chutes used to dispose of materials from height need to be properly erected and managed so that the debris does not hit anyone, either as it goes down the structure or when it hits the skip or pile at the bottom.
- 11.5 It is also important to impress on workers the risk of injury to people when using hoists, other ropes or hand-to-hand methods to move work equipment or other goods such as scaffold clip.
- 11.6 Loads and equipment need to be stored correctly so they do not collapse or fall at any time and cause injury. The logistics method of storing material on work surfaces may need to take into account that the workers access smaller amounts at height and those surpluses are stored on the ground. These issues require special

consideration in relation to the duty of any person under an employer's control, to the extent of their control.

12. DANGER AREAS

- 12.1 Where workers are adjacent to an area where there is a danger of falling (for example near to fragile surfaces) or being struck by an object, the employer needs to make sure, **so far as reasonably practicable**, that people whose presence is not necessary are prevented from entering the area.

The Work at Height Regulations 2005 also requires that clear indication of this area is given, for example through physical isolation and / or notices. This will alert those who may need to access the site to recover objects or carry out maintenance work to take suitable precautions, such as attaching themselves to **fall protection systems or wearing head protection**.

13. INSPECTION

- 13.1 Equipment for work at height requires regular inspection to ensure that it is safe to use. Marking the equipment may be required to ensure that it is obvious when the next inspection is due.

- 13.2 **Formal inspection, as required by the Regulations, should not be a substitute for any pre-use checks or routine maintenance.** Inspection does not normally include the checks that are a part of the maintenance activity although certain aspects may be common.

Nor does inspection include a pre-use check that an operator should make before using work equipment for work at height. Also, while inspections need to be recorded, such checks do not.

- 13.3 The *Work at Height Regulations 2005* requires that, where the risk assessment under *Regulation 3 of the Management of Health and Safety at Work Regulations (1999)* identifies a 'significant risk,' suitable inspections should be carried out.

A significant risk is one that could be foreseeable result in a major injury or worse, which is likely for most falls from height.

- 13.4 The purpose of an inspection is to identify whether the equipment is fit for purpose and can be used safely and that any deterioration is detected and remedied before it results in unacceptable risks.

- 13.5 An inspection can vary from a simple visual or tactile check, to a detailed comprehensive inspection, which may include some dismantling/testing. A competent person should determine the nature, frequency and extent of any inspection taking account of such factors as the type of equipment, how and where it is used, its likelihood to deteriorate, etc.

- 13.6 Further information is available in **INDG 367 (HSE Guidance) Inspecting Fall Arrest equipment made from webbing or rope**, for rope positioning systems that

require inspection before use. Lifting equipment covered by the *Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)* will also be subject to thorough examination by a Competent Person (See *Lifting Operations and Lifting Equipment Regulations, ACoP and Guidance*).

13.7 Regulation 12 of the *Work at Height Regulations 2005* requires that a weekly inspection is carried out for *scaffolding*, as previously required by the *Construction (Health, Safety and Welfare) Regulations (1996)*.

13.8 Where work equipment is hired to the user, it is important that both parties agree, in writing, exactly what inspection has been carried out and that information is available and can be passed to the workers. Further details on inspection of work equipment are in *Regulation 6 of Provision and Use of Work Equipment Regulations 1998, Approved Code Of Practice and Guidance*.

14. MAINTENANCE

14.1 Inspection and thorough examination are not a substitute for properly maintaining equipment. The information gained in the maintenance process, inspection and more technical thorough examinations should inform one another; the processes should be complementary.

14.2 **If there is a maintenance log make sure it is kept up to date and accessible to the competent person performing the inspection or thorough examination. The maintenance process also needs proper management:**

Planned preventive maintenance - involves replacing parts or making necessary adjustments at pre-set intervals so that risks do not occur as a result of the deterioration or failure of the equipment; and

Condition-based maintenance - involves monitoring the condition of safety-critical parts and carrying out maintenance whenever necessary to avoid hazards which could otherwise occur. This would include, for example, hydraulic systems in a *mobile elevating work platform* or safety critical parts of *window cleaning cradles*.

14.3 Frequency of maintenance will depend on the equipment, the conditions in which it is used and the manufacturer's instructions.

14.4 Where work equipment is hired to the user, it is important that both the hire company and the person responsible for hiring the equipment establish **which party** will carry out safety-related inspection and maintenance. This is important for equipment on long-term hire and the terms of the agreement between the hirer and the user **should record** this responsibility. Both parties should agree, in writing, exactly what they are responsible for and that information should be passed to the workers.

14.5 All those performing maintenance work should be **competent** to do so. They should have the skills, experience and knowledge of the **relevant equipment**. Therefore, they should be able to identify defects / potential defects and be aware of their significance know what action to take as a result.

15. RECORD KEEPING

- 15.1 **Regulation 12** of the *Work at Height Regulations 2005* requires employers to record inspections that relate to the site safety or to the work equipment so that in the event of an accident they can provide useful information.

A health and safety inspector may legally ask to see these records; therefore they must be stored in a way that is accessible but is tamper proof. Records may be kept on a PC or laptop as long as it is capable of being printed out.

16. INSPECTION FOR WORK AT HEIGHT

- 16.1 **Regulation 13** of *The Work at Height Regulations 2005* requires that the surface conditions and other permanent features where work at height will be taking place are checked on each occasion before work starts in order to identify whether there are any obvious defects.

- 16.2 Thorough examination under the Lifting Operations and Lifting Equipment Regulations (1998):

Lifting equipment used for people or loads, which is subject to *Regulation 9 of Lifting Operations and Lifting equipment Regulations (1998)*, requires a more detailed comprehensive inspection - called a thorough examination - which may include some dismantling and/or testing.

- 16.3 However it is important to remember that some items of equipment for work at height, for example a mast climbing platform, will have some parts which are subject to thorough examination under *Lifting Operations and Lifting equipment Regulations (1998)*, but also others such as floors and guardrails which will not be subject to *Lifting Operations and Lifting equipment Regulations (1998)* and may need to be inspected more often.

17. EFFECTIVE MONITORING

- 17.1 The table at Appendix 2 highlights the minimum requirement as evidence of compliance for the NHSLA Standards.

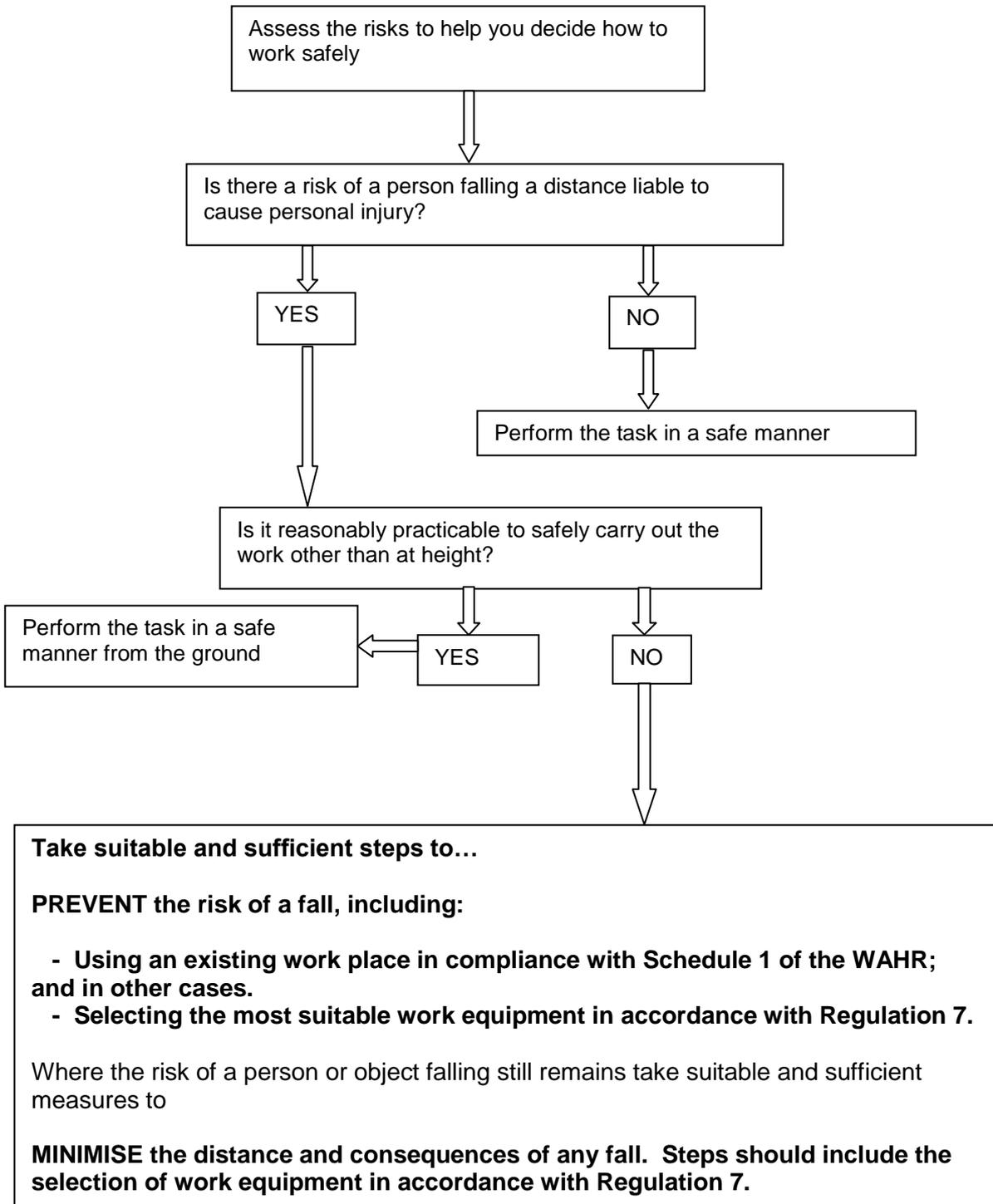
18. SUPPORT, HELP AND FURTHER ADVICE

Further help and information is available in the first instance from any suitably qualified manager, this may include Departmental Managers, Head of Health and Safety or Estates Officers.

Health and Safety information and supporting policies are available on the intranet site.

Further advice can also be obtained from the Health and Safety Executive website at www.hse.gov.uk

A flowchart covering Work at Height is given below:



Definition of Suspension Trauma

First, the worker is suspended in an upright position, legs dangling.

Second, the safety harness straps exert pressure on leg veins compressing them and reducing blood flow back to the heart.

Third, the harness keeps the worker in an upright position, regardless of loss of consciousness which can kill workers.

APPENDIX 2

Monitoring Matrix

Minimum policy requirements to be monitored	Process for monitoring e.g. audit	Responsible Individual/ Committee/Group	Frequency	Responsible Individual/ Committee/Group for review of results	Responsible Individual/ Committee/Group for development of the action plan	Responsible Individual/ Committee/Group for monitoring of the action plan
How the Trust assesses the risk of working at height (including falls from height)	Every department completes a working at height risk assessment where applicable H&S Self Assessment Process with policy and risk assessment compliance procedure	Estates Manager/ Head of H&S	Initial compliance audit followed by a 6 month review then annual reviews. HSG quarterly	Health and Safety Group (HSG)	Head of H&S HSG Quarterly	Head of H&S HSG Quarterly

How action plans are developed as a result of risk assessments	Every department manager is responsible for completing an action plan following the risk assessment process (where applicable) H&S Compliance Process	Estates manager / Head of H&S	Initial compliance audit then annual reviews. HSG quarterly	Health and Safety Group (HSG)	Department Managers	Department Managers
How action plans are followed up	All action plans (where applicable) are managed by department managers. H&S Compliance Process	Estates Manager/ Head of H&S	Initial compliance audit then annual reviews. HSG quarterly	Health and Safety Group (HSG)	Department Managers	Department Managers