

Managing health and safety in shared workplaces

Introduction

The College works closely with many other organisations and there are situations where staff and students, including Honorary Appointees, work in NHS Trust facilities, at other Universities, other organisations, institutions, research councils etc.; often sharing facilities and equipment. In addition, many of the College buildings are shared by different College stakeholders and/or with institutions and commercial companies, each of them with their unique set of hazards, risk profile and safety arrangements. The arrangements outlined in this document are intended to clarify working relationships and responsibilities for health and safety in these circumstances. These guidelines apply to situations where different employers share a workplace, where more than one College department shares a common facility and where staff and students work in areas outside the control of their immediate line management, such as in another academic department.

This document has been divided into three distinct sections for ease of use:

1. Health and Safety elements that apply to any shared space
2. ICL and other employers sharing a building or ICL in leased/embedded space
3. College space shared between different Faculties and/or Departments

Section 1: Health and Safety elements applicable to any shared space: cooperation and co-ordination

The Management of Health and Safety at Work Regulations 1999 require that where two or more employers share a workplace (either on a permanent or temporary basis), all involved co-operate and co-ordinate their activities to ensure that all health and safety obligations are met.

In general, the owner of the premises where more than one employer resides, will take the lead role in developing the arrangements for effective health and safety management of the **shared areas and equipment**, including the communication, planning, and testing of foreseeable emergency situations. However, the other employers must assist the “premises owner” in assessing shared risks and co-ordinating any necessary control measures. To achieve this, the “premise’s owner” may convene a committee involving representatives from all users. Each of the organisations/departments using space within the premises must also ensure their specific activities are appropriately risk assessed, and that suitable and sufficient controls have been implemented to ensure their people, and others who may be impacted by their activities, are kept safe.

As different departments/ faculties or employers are involved, formal documentation needs to be in place which sets out the relationship between the different occupiers and their roles and responsibilities. Although there may be a commercial contract in place, it is recommended that the details of health and safety arrangements are covered

separately, in a memorandum of understanding, with a cross-reference in the main contract

1.1 Definitions

- **Premise's owner:** Is the legal owner of a site and/or a building
- **Building manager** (usually Estates Operations contact) is the individual with ultimate accountability for the infrastructure and general safety controls that are required, by law, within a building. They are neither accountable nor responsible for the way specific activities are managed within the space leased to companies or departments. The Building Manager's primary health and safety role is to ensure that Health and Safety operations associated with the delivery of Facility Services in the building(s) are undertaken; these typically include the fabric of the building, electricity and gas supply, general heating and ventilation, maintenance of corridors, stairs and lifts, traffic routes, communal areas such as tea points and sanitary and washing facilities.
- **Building/Area safety co-ordinator:** (or equivalent local job title(s) which include the responsibilities defined herein):
 - i. Provision of safety training and information related to the building, including emergency arrangements, controlled areas, etc.
 - ii. Triage of work activities undertaken by each of the building occupants, to ensure the space is suitable for the activities proposed. **Note:** the building/area safety coordinator is not responsible for the risk assessments that relate to the activities carried out by the occupants.
 - iii. Facilitate sharing of information related to hazardous activities, particularly when these could have an impact on or require a response from other occupants.
 - iv. Communication of waste routes available within the area/building and associated processes, including collection points and collection date(s) and co-ordination of waste collections for specified areas within the building.
 - v. Co-ordination of contractors brought into the area/building and issuing of access cards to the specific areas they are authorised to enter. This is particularly significant where the Permit-to-Work (PTW) allows for the contractors to be unaccompanied.
 - vi. Management or co-ordination of communal areas such as access corridors, fire routes, post room, goods delivery/receipt areas, etc.
 - vii. Consultation with occupants about planned changes to the building or changes in activities that could impact the existing building/area users and the activities they are undertaking.
 - viii. Routine monitoring and inspection of common shared areas such as fire routes and fire exit
- **Employer:** organisation which has a contract of employment with an individual working in a shared workplace.
- **Host:** is the nominated organisation with overall accountability for the management of the shared workplace; this could refer to an entire building or a section within it.
- **Guest:** staff or students from another employer visiting/occupying the space.

- **Shared workplace:** areas occupied by both host and guest staff/students. These can be entire buildings, specific floors, or individual rooms.

1.2 Safety information within shared spaces

All companies/departments sharing workspace must have processes in place to discuss, agree and communicate the following relevant aspects to all their members:

- the agreed workplace risk assessment for the area (signed-off by all parties sharing the space)
- the arrangement for fire and emergencies, including first aid and lone working
- critical controls
- who to contact to report building-related defects
- how to report accidents and incidents that happen in the co-working space
- risks associated with the building, for example, areas with access control restrictions
- process for granting access to shared spaces and regular monitoring
- who (other than their own group) to inform of the risks associated with their work, particularly if this could impact others sharing the same space.
- who and how to inform when they are planning to have contractors on-site to carry out maintenance or repairs that may impact on other occupiers. This would normally form part of the Permit-To-Work process in operation.
- processes for addressing breaches of local health and safety policies and protocols
- local safety etiquette
- conflict resolution

Section 2: ICL and other employers sharing a building or ICL in leased/embedded space

The level of College involvement in the development of safety arrangements of shared space will depend on whether the College is the host organisation or the guest organisation.

2.1 The College, when acting as the host organisation, will have responsibility for:

- Naming a competent individual to co-ordinate health and safety arrangements in the building/ shared space. This means appointing a Building/Area Safety Co-ordinator. This role would have an overall understanding of the hazards and risks within the area/building and would ensure that hazards present within specific parts of the area/building are compatible and that the safety controls (by design) are suitable and sufficient for the hazards being handled by each of the occupants, or that alternative appropriate controls have been implemented

before the relevant company commences work. This could include assigning overall responsibility for safety on each floor/particular space to one academic.

- Ensuring the health and safety management for any premises, equipment and plant owned, operated and/or maintained by the College.
- The safety of all persons within an area that is under the control of the College.
- Providing a copy of the local health and safety policies, including emergency arrangements, to other employers occupying the building.
- Liaison with the building manager (College owned building) or the Facilities company appointed, as applicable, to resolve safety matters related to the communal areas of the building
- Any activity carried out in an area controlled by the College.
- Any services the College provides to other employers as part of the lease: e.g., hazardous waste management
- Ensure the activities conducted by the different employers do not conflict with each other and do not pose a risk to the building occupants.
- Identifying Personal Protective Equipment (PPE) requirements and providing and maintaining such PPE for shared areas, e.g., when leasing CBS space to other companies.
- Arranging and facilitating safety meetings with representatives of each of the organisations sharing the space, so safety matters affecting others can be discussed and changes agreed. This usually takes the form of a local safety committee, Building User Groups (BUGS) or Campus User Groups (CUGS)

2.2 The College, when acting as the guest organisation, is required to ensure that its staff/students adhere to the Host's local health and safety policies, including emergency procedures. The College will attend safety meetings organised by the host organisation and will collaborate and contribute towards the safety goals set by the host organisation. Risk associated to College activities will be shared with the host, as required.

Where College staff or students hold honorary contracts with another organisation, the College will need to confirm that the host organisation has suitable and sufficient arrangements in place for day-to-day health and safety management. These should be documented.

2.3 Health and Safety Arrangements (Memorandum of Understanding)

As a minimum, the following topics need to be covered in the Memorandum of Understanding (MoU) to be developed and shared with each of the building occupants.

2.3.1 Building/workplace services.

Identify who will be responsible for providing and maintaining the following services:

- Provision and maintenance of general utilities (water, electricity, gas)
- Maintenance of general fabric of building/workplace

- Maintenance and management of critical plant & equipment, including general ventilation system.
- Security
- Routine maintenance of equipment, including those requiring statutory checks, such as lifts, gas installations, autoclaves, etc.
- Permit to work provision.
- Fire risk assessment for the building and fire prevention infrastructure and systems
- Management of legionella, including legionella risk assessment.
- Authorisation process for maintenance, change of use or modifications of the facility.

Where Imperial College owns the building, the above will be managed and coordinated by Estates Operations.

Where Imperial College owns the building and the facilities management has been subcontracted, the College still has a duty of care to satisfy and ensure that the subcontractor is fulfilling, as a minimum, contractual and statutory requirements such as the ones listed above.

2.3.2 Identification and communication of hazards and risks.

Each of the employers occupying the building are responsible for the safe management of the operations within the area they occupy. The MoU will indicate how hazards and risks associated to the activities conducted by the employers occupying the building will be shared with the building/area safety coordinator.

2.3.3 Regulatory compliance

Identify who will be responsible for addressing specific statutory requirements, such as:

- Biological/GM agent notification to HSE
- Radiation licensing
- COSHH/Chemical safety, including DSEAR
- Provision of first aiders and first aid equipment
- Provision of fire wardens
- Asbestos Register
- Statutory equipment maintenance and inspections (e.g., pressure equipment fume cupboards, lifts, etc.)
- Occupational health advice and surveillance
- Managing visits and actions from enforcement authorities
- Other regulatory compliance, e.g., SAPO, APHA, ABP, HTA
- Compliance monitoring and audit arrangements

2.3.4 Dealing with emergencies

- Describe procedures for dealing with fire evacuations and with non-fire related emergencies e.g., spillages.
- Display details of key contacts within a building and/or neighbouring buildings areas; identify key individuals who may benefit from being informed of emergency situations in other areas.

2.3.5 Accident, Incident, and near-miss reporting

- Describe procedures for reporting accidents and near misses and any safety concerns.
- Detail which systems to use and how lessons learnt will be shared.

2.3.6 Communication of emergency situations

- Identify means of communication e.g., Joint safety committees, Local management meetings etc. Detail frequency of meetings, who should attend etc.
- Define key contacts and keep the list up to date (review regularly). Include contact details for each of the areas, ensuring the name, organisation, role, and specific contact details are identified for all. The list should be widely available to all relevant parties within the area/building.

2.4 Examples of different scenarios

The following are examples of potential situations that may arise. For illustrative purposes, these have been discussed in terms of Trust partnerships, however, the general principles apply to all types of partnerships and collaborations.

Scenario 1: Trust employee with College honorary contract working in College controlled facilities

Here, the statutory duty remains with the Trust as the employer, and this cannot be delegated to the College. Trust employee is expected to follow College safety management arrangements. The honorary contract should indicate that the post holder is expected to follow College policies whilst working on College premises. The Trust employee should have a College supervisor who must be named in the appointment letter. In this situation the College has day to day responsibility for the health and safety of the honorary appointee and the Trust should take reasonable steps to ensure that effective local safety management arrangements are in place.

Scenario 2: Trust employee with College honorary contract working in an area controlled by the College within a Trust building

Here, the statutory duty remains with the Trust as the employer, and this cannot be delegated to the College. The Trust employee should have a College supervisor who must be named in the appointment letter. In this situation the appointee is expected to follow College safety arrangements as well as Trust

arrangements for operational and maintenance systems e.g., waste disposal, ventilation etc. Specific mandatory training should be identified and documented. Local arrangements need to address any statutory duties and how they would be communicated and made available to the Trust. In this situation the College has day to day responsibility for the health and safety of the honorary appointee.

Scenario 3: Trust employee with College honorary contract working in Trust controlled facility.

Here, the statutory duty remains with the Trust as the employer, and this cannot be delegated to the College. The Trust would be expected to have suitable arrangements in place for the nature of the work being undertaken by this individual. However, the College may need to provide specialist support/advice to the Trust where there are statutory obligations requiring specialised competent advice. College and Trust arrangements will need to clarify the lines of responsibility and accountability. The Trust and College need to independently take reasonable steps to ensure that effective local health and safety arrangements are in place, evaluate how well they operate and communicate findings to respective partners.

Scenario 4: College employee working in Trust controlled premises.

Here, the statutory duty remains with the College as the employer, and this cannot be delegated to the Trust. Appointee would be expected to follow Trust safety arrangements, including induction and mandatory training. However, the College may need to provide specialist support/advice to the Trust where there are statutory obligations. College and Trust arrangement will need to clarify the lines of responsibility and accountability.

Scenario 5: Undergraduate/Postgraduate student with a Trust supervisor working in Trust controlled premises.

The Trust needs to have suitable health and safety arrangement in place to meet statutory requirements. The duty of care remains with the College and the College needs to determine and document in local departmental arrangements exactly how reassurance would be sought from the Trust to ensure the health and safety of the student is being managed (see Appendix 1)

Scenario 6: Employees with College/Trust honorary contract in a mixed working area.

Where there is no clear demarcation between College and Trust controlled space, there would have to be an agreed local arrangement document between both partners that describes how lines of responsibility and accountability would be maintained and how the co-workers would co-operate and co-ordinate their various activities.

The six situations described above are particularly relevant to the Faculty of Medicine, but the same principles apply in all other circumstances across the College e.g., collaborations with industry.

Academics/line managers must assure themselves and provide evidence that effective local health and safety management arrangements are in place. A check list is given in Appendix 1 to aid this process. Note that the responsibility for ensuring that an individual has the required skills and knowledge to carry out their role safely lies with their specific line manager.

SECTION 3: College space shared between different Faculties and/or Departments

The responsibilities held by the Faculty/Department are dependent upon the specific situation as per the examples provided below:

3.1 Where a department has guest staff/students, the Head of Department (HoD) must ensure that there are suitable and sufficient arrangements in place to address the safety of any guests working in the department. Training must be provided to the guests to ensure they are aware of the safety arrangements applicable. HoDs are responsible and accountable for ALL staff/students for whom they have line management responsibility, wherever they are located. They also have a duty of care for all individuals who may work or enter their areas of responsibility.

HoDs cannot devolve or delegate accountability for the health and safety of their staff/students to a third party, however, it may be possible to reach agreements with the relevant academic to share or take on responsibilities for certain day-to-day tasks. This must be done in writing. In all cases, line management responsibility for College staff and students must always remain clear.

3.2 Where a department has staff working in other departments, the Head of Department (HoD) must ensure that the host department has suitable and sufficient arrangements in place to address the safety of their staff.

3.3 In situations where there is no controlling Department, systems for safety communication between Departments and Faculties must be in place to ensure the provisions listed in 3.4 below are communicated to all in the shared building or area. This includes situations where two or more Faculties or Departments are sharing space, whether it is a building or a laboratory space.

Where there is no controlling department, a joint health and safety policy should be developed and agreed, and a joint code of practice prepared for use by all those working in the shared area. This documentation should be signed-off by the relevant line managers of the resident workers. All arrangements detailing the agreed procedures for managing health and safety must be documented.

3.4 Safety arrangements

A memorandum of understanding may not be the most practical way to record safety arrangements within departments sharing common space; the departments may choose to document safety practices related to the space shared in the form of a code of practice. How the safety arrangements are documented will depend on the extent of the space being shared. Key aspects to be considered when developing the shared safety arrangements include:

- Induction training before access to the shared space is granted
- Emergency arrangements e.g., dealing with spills

- Maintenance and servicing of shared equipment and provision of training
- Coordination of statutory equipment maintenance and inspections (e.g., pressure equipment, autoclaves, local exhaust ventilation)
- Provision and maintenance of PPE
- Provision of first aid and fire wardens
- Out of hours work and lone working management
- Preparation, communication and review of local safe working practices and documentation e.g.: spill procedures, chemical store, use of freezers for sample storage, use of liquid nitrogen dewers, etc.
- Provision of supervision
- Monitoring and inspection arrangements
- Reporting of faults and issues within the shared space
- Management of contractors and issuing of permits to work
- Identification of means of communication e.g., joint safety management meetings, detailing the frequency of these, chair, attendees, etc.
- Key contacts, including who is responsible for reviewing and amending the list. The list should be made available to all relevant parties within the area and kept up to date.

3.5 Examples of different scenarios

Scenario 1: Staff and students from different College Faculties and departments working in the same area.

Where there are multi-occupancy buildings/areas shared by different College Faculties and Departments, a building/area co-ordinator must be appointed. This individual would have overall responsibility for the management of the building/area and allocation of space to existing or new occupants. They will also be responsible for facilitating and coordinating health and safety arrangements amongst building/area occupants. In addition, the appointed person should:

- seek regular feedback from occupants (frequency will be dependent upon risks etc.) on how health and safety is managed in their designated areas, ensure that there is an exchange of all relevant information and co-operation about risk assessments, and issues of mutual concern and interest.
- agree a means of monitoring to ensure that all relevant measures are in place and working well.

Academics/line managers must assure themselves and provide evidence that effective local health and safety management arrangements are in place. A check list is given in [Appendix 1](#) to aid this process. **Note** that the responsibility for ensuring that an individual has the required skills and knowledge to carry out their role safely lies with their specific line manager.

For illustration two specific examples are discussed below.

Example 1: Molecular Sciences Research Hub

The Molecular Sciences Research Hub (MSRH) is majority occupied by the Department of Chemistry. However, research groups from other faculties, such as the Department of Materials, also work in the labs.

All those working in the labs at MSRH are required to follow the safety procedures that the Department of Chemistry have in place, regardless of which department they are from. Such as:

- New staff and students must complete lab inductions before being given swipe card access. This includes the MSRH laboratory e-learning, which is managed by the Department of Chemistry technical team, and the FoNS local hazardous area induction form.
- All research groups must follow Department of Chemistry procedures, such as chemical storage guidance, standard operating procedures, and reaction risk assessments.
- The Faculty of Natural Sciences safety team carry out inspections of all lab areas and investigate any incidents that occur in the building, including shared areas.

Example 2: Facility for Imaging by Light Microscopy (FILM)

This facility is part of the National Heart & Lung Institute (NHLI) and managed by a NHLI staff member. It is available to staff and students from Faculty of Medicine, other Imperial College faculties, and external users. The microscope facilities are located at South Kensington and Hammersmith campuses.

All users must register and receive training from FILM staff before they are allowed to use the microscopes. Access to the facility is controlled by the FILM manager. FILM staff also assist users with experimental design and selecting the most suitable microscope. Usage is chargeable and must be booked online.

The FILM user guide includes the safety rules, which must be followed by all users regardless of their affiliation. These include the Faculty of Medicine rules on lone and out of hours working, which may differ from those in the user's own organisation.

Appendix 1: Health & Safety check list

The following check list can be used to ensure that effective health & safety management systems are in place prior to College staff and students starting work in shared areas. This is not an exhaustive list, it should be amended to reflect the operations carried out within the shared area/building, as appropriate.

Process	Checked
Are all groups sharing the building/space aware of the Memorandum of Understanding for the building/space shared?	<input type="checkbox"/>
Are there defined processes and forums for consulting and sharing information about any forthcoming changes with occupants?	<input type="checkbox"/>
Have staff/students received a copy of the local health & safety policy?	<input type="checkbox"/>
Have staff/students received a safety induction to explain local safety arrangements?	<input type="checkbox"/>
Have staff/students received an explanation of their health and safety roles and responsibilities?	<input type="checkbox"/>
Have staff/students received training on fire exits, emergency evacuation and assembly points?	<input type="checkbox"/>
Are staff/students aware of the procedure to follow if an accident or near miss occurs?	<input type="checkbox"/>
Have staff/students been informed of the location and contact details of first aiders?	<input type="checkbox"/>
Have risk assessments for the activities to be undertaken by the staff/students been produced and approved? e.g., Biological, COSHH, Radiological etc.	<input type="checkbox"/>
Have staff/students completed any training identified by the risk assessments?	<input type="checkbox"/>
For those sharing the same lab area, have they been made aware of each other's hazards, controls, and risks?	<input type="checkbox"/>
Have staff/students been made aware of any high-risk areas/restricted areas?	<input type="checkbox"/>
Have staff/students completed the relevant induction training before being granted access to high-risk/restricted areas?	<input type="checkbox"/>
Have staff/students been introduced to the local Safety Advisor/Officer/Coordinator?	<input type="checkbox"/>
Have staff/students enrolled with Occupational Health, where relevant?	<input type="checkbox"/>
Have DSE assessments been undertaken for the staff/students?	<input type="checkbox"/>
Have all relevant records for transferred equipment been forwarded, including any insurance inspection details?	<input type="checkbox"/>
Are the work activities being undertaken covered by suitable insurance?	<input type="checkbox"/>
Are the work activities being undertaken covered by relevant licences or permits?	<input type="checkbox"/>
Has the process for managing permits to work been discussed, agreed, and communicated to relevant parties?	<input type="checkbox"/>

Actions arising:

Name and date: