

ESTATES OPERATIONS

HEALTH & SAFETY DOCUMENT
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CODE of PRACTICE
LONE WORKING
MARCH 2018 v1.1

Please Note – the guidance provided in this Code of Practice pertains only to the Estates Operations Group and its activities. For Imperial College’s Health & Safety policies and Codes of Practice go to: <http://www.imperial.ac.uk/safety>

INTRODUCTION

Imperial College has produced a lone working policy and code of practice. Please see <https://www.imperial.ac.uk/safety/safety-by-topic/lone-working/> these set out the objectives and measures with which Departments are required to comply to ensure the College discharges its duty to manage the risk of lone working.

The purpose of this Code of Practice is to provide Managers and staff within Estates Operations with guidance which will assist them to assess the risk of lone working and put suitable measures in place to eliminate lone working or minimise the risk to a tolerable level.

This Code of Practice sets down the standards of safety practice which will be applied for those employees of the Estates Operations Department who ‘work alone’ during the course of their work at Imperial College.

This Code of Practice provides the following:

- An introduction to Lone Working
- The Law and Lone Working
- Responsibilities of Duty Holders & Employees
- Identifying who can be harmed and how
- Controlling the risks & the methodology for risk assessment in Estates Operations
- Training and competence
- Monitoring

Duties of implementation for this Code of Practice may be delegated to individuals in a manner that accurately reflects their existing levels of competence and responsibility. These individuals must plan, organise, control, monitor and review their health and safety management systems. However, in certain circumstances, the advice and assistance of specialist advisors may be required.

1. An Introduction to Lone Working

When is a Worker a Lone Worker?

A ‘lone worker’ is any person whose work involves either brief or a large portion of their working time in situations where there is no close, frequent or regular involvement with other workers or direct supervision.

Some examples which can be found within the College are:

- A person working on their own in a workshop, plant room or laboratory.
- Persons working in an office or lecture theatre on their own.
- People working outside normal hours on their own.
- Mobile workers who work away from the College on their own.
- Estates Operations Maintenance staff, Grounds Maintenance, and Soft Services staff whose roles require them to operate in multiple locations around the campus.

There is no reason why employees cannot work by themselves providing they are not undertaking hazardous tasks.

1. The Law and Lone Working

The Health & Safety at Work Act 1974 (Regulation 2) places a general duty of care on all employers for the safety and health of their employees.

The Management of Health and Safety at Work Regulations 1999 require employers to identify risk and implement such measures which will eliminate or minimise the risk to an acceptable level.

2. Responsibilities of Duty Holders and Employees

Estates Operations' Heads of Departments

Heads of Departments shall ensure that:

- All staff within their structure who could be considered to be 'lone workers' are identified;
- That a suitable and sufficient risk assessment is carried out in respect of lone working;
- That those charged with managing lone workers are trained and competent;
- That safe systems of work are developed and implemented to control the risk of lone working;
- That the effectiveness of the arrangements for managing lone working are regularly reviewed.

Line Managers / Supervisors

Line managers/supervisors shall ensure;

- That all locations are identified where lone working is not permitted;
- Those tasks which cannot be undertaken by a 'lone worker' are identified;
- That all staff within their team are aware of and been trained in the relevant lone working procedures;
- That the risk of lone working is considered in all risk assessments and that records are maintained for their areas of responsibility;
- That staff are provided with access to the necessary safety equipment e.g. radios, torches and personal protective equipment (PPE) as defined in the lone working procedures;
- That an emergency response procedure is in place and the arrangements are known and tested periodically.

Estates Operations Employees

All employees shall;

- Comply with this code of practice and follow all reasonable instruction provided to them in terms of lone working;
- Report any incidents, breaches of, and non-conformance with, health and safety to their line manager.

3. Identifying who can be harmed and how

Any member of staff who works alone can be at risk if they become unwell or sustain an injury which requires urgent attention and no other person is in the immediate vicinity to provide assistance.

It is impractical for an employer to mitigate all risk associated with lone working, however, there must be consideration given to those tasks which employees may undertake which by their nature introduce a level of risk which cannot be sufficiently mitigated.

The standard methodology for identifying and managing risk is as follows:

- Identify the hazards
- Decide who can be harmed and how
- Evaluate the risks and decide on control measures
- Record your findings and implement them
- Monitor and update them as necessary

The first stage is to identify those work related factors which could be more hazardous to the wellbeing / safety of a person working alone, the following are examples though may not be exhaustive:

- Electric shocks
- Exposure to chemicals, biological agents, steam etc
- Faulty plant or equipment
- Smoke / Fire
- Manual handling of heavy or unwieldy loads
- Noise
- Poor or no communications
- Poor or lack of training
- Young and/or inexperienced workers
- Remoteness or isolation
- Slips, trips, falls, knocks
- Sudden illness rendering the worker unable to summon help
- Working at height e.g. use of scaffolds, MEWP's, ladders
- Working on roofs having unprotected edges and presence of hazardous plant
- Working in confined spaces / service tunnels
- Assault or threat of violence

The Regulations also require particular consideration to be given to vulnerable groups such as those with special needs, young workers and those called upon to rescue or give aid to injured persons.

Having identified who might be harmed and in what circumstances it is necessary to determine to what extent or how severe an injury could be should one or more of the above factors be realised. It will help to use the parameters of minor, major and fatal to assist in determining the control measures required to prevent the injury occurring.

The definition of minor is... "an injury requiring only treatment by an approved first aider"; In terms of major this would be an injury requiring hospital treatment or time lost from work;

'fatal' is self-explanatory. These factors also determine the actions required in terms of accident reporting and investigation.

4. Managing Risk

Prime responsibility for managing the risk presented by lone working rests with line / operational managers who are required to fulfil the role as at 2, above. First line managers should therefore ensure they are entirely familiar with the tasks their staff are undertaking and in what locations. They are required to reach a judgement as to the inherent risk involved and then determine what control measures should be applied to remove or sufficiently mitigate the risk.

This Code of Practice cannot be definitive as to when it is or isn't safe to lone-work and therefore the judgement must rest with the operational manager who may wish to use the College risk scoring system to aid them in reaching a decision, this can be found at:

<http://www.imperial.ac.uk/admin-services/risk-management-and-business-continuity/risk-management/guidance/procedures/>

4. i) Identified Hazards

Following consultation with Managers within Estates Operations, it has been determined that lone working will **not be permitted** to take place where staff are required to undertake any of the following:

- Entering confined spaces;
- Working near live exposed electrical equipment;
- Where there is a danger of entrapment in moving machinery;
- Working with any machinery or plant which could result in an acute life threatening injury;
- Work on roofs not having fully compliant edge protection or when using fall restraint/arrest equipment;
- Working at height on ladders, tower scaffolds, Mobile Elevated Work Platforms (MEWPs);
- Where there is a known personal health problem e.g. epilepsy;

A number of the risk scenarios listed above are addressed in individual Codes of Practice available on the [Estates Operations website](#) which will advise on the measures and controls to be put in place to minimise the risk.

4. ii) Lone Working Control Measures

The schedule at **4 i)** above sets out a range of situations where lone working will not be allowed but this does not mean it is not safe for any lone working to be undertaken. Where it is considered suitable and necessary for staff to work alone, measures which are 'reasonably practicable' must be applied which reduce any risk to its lowest level. These include:

- Maintaining communications via use of the College radio system or a mobile phone;
- Using a diary system to register the location of workers and start / finish times;
- Instruct staff to regularly check-in with their Supervisor;
- Providing torches as a means of emergency lighting;
- Providing PPE to protect against hazards e.g. safety shoes, bump caps, weather proof clothing;
- Operate a 'buddy system' whereby two members of staff look after each other;
- Provide staff with training on the hazards of lone working and the control measures / safe systems of work designed to mitigate the risk;

5 Risk Assessment Methodology

In keeping with the [Operations Group Risk Assessment Code of Practice](#). The Estates Operations Department will use a three tier approach including the:

- Development of generic risk assessments;
- Preparation of task / location specific risk assessments; and
- Application of dynamic risk assessment.

5 i) Generic Risk Assessments

In order to assist Managers to implement this Code of Practice in a consistent manner across College, the following Generic Risk Assessments have been developed, where suitable the 'controls' as listed should be applied to minimise the risk associated with lone working.

The following matrix provides some illustrations of control measures which can be applied to a range of tasks undertaken by staff in Estates Operations:

Maintenance staff:

Task	Risks	Controls
Service Tunnel Access & Inspections	<ul style="list-style-type: none"> • Personal injury • Communication black spot • Low level of supervision 	<ul style="list-style-type: none"> • Always gain consent from the line manager before entering a tunnel • Sign in and out with Security • Use torch • Means of communication e.g. College radio • Inform someone where you are going and how long you will be • PPE – e.g. use of bump cap, safety footwear • Check-in once task is completed
Service Tunnels – Working on Plant / Services	<ul style="list-style-type: none"> • Major injury 	<ul style="list-style-type: none"> • Strictly no lone working without permission of appropriate Manager •
Roof Work (Full edge protection and no fume extract stacks)	<ul style="list-style-type: none"> • Slips, Trips & Falls • Musculoskeletal injury • Adverse weather conditions 	<ul style="list-style-type: none"> • Means of communication • Wear PPE e.g. high-vis, safety footwear, warm clothing • No work at height e.g. use of steps within 2 metres of roof edge • Inform someone where you are going and how long you will be • Check in once task completed
Roof Work - Partial or no edge protection and / or fume extract stacks	<ul style="list-style-type: none"> • Major / fatal injury 	<ul style="list-style-type: none"> • No lone working within 2 metres of an unprotected roof edge • No lone working where staff need to use fall restraint/arrest equipment • No lone working within 3 metres of fume stack
Work in 'walk-in' risers	<ul style="list-style-type: none"> • Falls from height • Major injury 	<ul style="list-style-type: none"> • No lone working unless approved by Manager

	<ul style="list-style-type: none"> • Low level of supervision • Confined space 	<ul style="list-style-type: none"> • Provide suitable method of communication • Inform someone where you are going and how long you will be • Check in at frequent periods during and once task completed
Work in plant rooms	<ul style="list-style-type: none"> • Slips, trips, falls, knocks • Possible confined spaces and height restrictions • Excessive heat • Hazardous machinery • Limited communication 	<ul style="list-style-type: none"> • No lone working unless approved by Manager • Provide suitable method of communication • Wear suitable PPE e.g. safety foot wear, bump cap • Take suitable breaks to rehydrate / cool down • Inform someone where you are going and how long you will be • Check in at frequent points during and once task completed
Grounds Maintenance (Silwood Park campus)		
Task	Risks	Controls
Operating Chain Saw	<ul style="list-style-type: none"> • Loss of life, major injury 	<ul style="list-style-type: none"> • No lone working is permitted
Using machinery where entanglement could occur.	<ul style="list-style-type: none"> • Loss of life, major injury 	<ul style="list-style-type: none"> • No lone working is permitted
Working near water	<ul style="list-style-type: none"> • Drowning 	<ul style="list-style-type: none"> • No lone working is permitted

5 ii) Specific Risk Assessments

By application of the controls listed in the generic risk assessments above it will be possible to minimise the risk associated with lone working to an acceptable level. Where however this is not the case, for example accessing the service tunnel below Exhibition Road, it will be necessary to produce a [‘specific risk assessment’](#) or Safe System of Work.

It will be the responsibility of managers within Estates Operations to identify any tasks or activities undertaken by their staff involving lone working where the risk cannot be mitigated by application of the above control measures and, produce a specific risk assessment.

5 iii) Dynamic Risk Assessment

In keeping with the [Support Services Risk Assessment Code of Practice](#) staff are expected to exercise caution before and during the operation of all work activities / tasks. The term used in the Code of Practice is ‘dynamic’ which effectively means that all staff need to be aware of the risks involved with any task and be prepared to react in an appropriate way if that risk changes.

6. Implementing the Code of Practice

As stated in Section 2 & 4 of this Code of Practice, the duty to manage lone working rests with line managers who are responsible for identifying when and where their staff work alone, and what control measures need to be in place to eliminate or mitigate the risk(s).

It is recommended that service managers involve their staff in the process of mapping when and where they 'work alone' and what tasks they undertake which potentially increases the associated risk. This same forum can then be tasked with identifying the control measures and Team arrangements for addressing the risk.

Where a significant risk is identified the results of the risk assessment above should be recorded on the standard pro-forma, signed and dated by the line manager and shared with all the team.

7. Training & Competence

To enable managers to implement this Code of Practice and manage lone working they will need to have a working knowledge of risk assessment and should as a minimum have taken and passed the [College Risk Assessment Foundation Training course \(RAFT\)](#).

For staff in general the hazards of lone working will be covered in the College Health & Safety Awareness course and where appropriate in specialist task-centred training.

8. Performance Monitoring

Managers who are responsible for staff who undertake lone working must use both proactive and reactive monitoring to evaluate the effectiveness of the controls they have implemented to eliminate or mitigate the risk of lone working.

Proactive Monitoring – Managers should from time to time take the opportunity to discuss lone working with their team in meetings, and seek feedback as to whether the controls are being used appropriately and are still valid. Managers should also carry out random audits of their staffs' working practice to ensure they are complying with the control measures.

Reactive Monitoring – The main source of information which can be used for reactive monitoring is the consideration of accident and incident reports. When accidents / incidents occur within the team an investigation should be undertaken which amongst other lines of questioning should consider whether lone working was a contributing factor.

Risk Assessment for:		Assessment undertaken by:	(name)
Task:		Signed:	
Assessment ref. No.		Date:	
		Assessment review date:	
Significant hazards:	Persons at risk and effect(s):	Controls and/or actions needed:	