



General Purposes Estates and Facilities

Model Safety Permit-to-Work System

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1. Introduction

1.1 The guidance contained in this document (Scottish Hospital Technical Note 4) has been compiled by Trusts for Trusts through the Estates Environment Forum. It is intended for use in all healthcare premises, including those covered by the Registered Establishments (Scotland) Act 1987.

1.2 Permits-to-work for General Purpose Estates and Facilities are an essential part of a safe system of working. They are documents which specify the work to be done and the precautions to be taken before work commences. Work can only start after safe procedures have been defined and all foreseeable hazards have been formally considered and, where possible, eliminated or minimised.

NOTE: Permits-to-work as detailed in this document should only be used when the risks and perceived hazards are considered sufficient to necessitate a formal written safety procedure, i.e. "Permit-to-work", in order to achieve the standards set out in the organisation's Health and Safety Policies and to comply with statutory and advisory standards. The person receiving the permit must fully understand the risks and the precautions to be taken.

1.3 The Permit-to-work contains a record of the hazard assessment or conclusions from a careful examination of an activity which could cause harm to people, and the safety precautions to be taken to prevent such harm or reduce the risk to an acceptable level.

1.4 'Hazard' means anything that can cause harm (e.g. chemicals, fumes, working at heights, etc.).

'Risk' is the chance, great or small, that someone may be harmed by the hazard.

1.5 The risk assessment should be carried out for each significant perceived hazard making reference to safety policies, professional

advice, manufacturers' instructions, drawings and data sheets where appropriate.

The process of assessment should ensure that:

- a suitable and sufficient check is made of the location and nature of the work;
- consideration is given to all of the people who may be affected by the work;
- a record has been made of all the significant perceived hazards associated with the work;
- information relating to work of a similar nature carried out previously is taken into account;
- all precautions are reasonable and practical and the remaining risks are acceptable.

The assessments should also take account of precautions which must be taken, including the provision of personal protective equipment (PPE), cleaning, the need for special tools, training or information relating to the work detailed.

NOTE: Regulation 3 of the Management of Health and Safety at Work Regulations 1992 requires employers to undertake, and record, the significant findings of risk assessments.
See Appendix 1.

1.6

It is recognised that not all routine work will require a Permit-to-work and in actual practice Permits-to-work are likely to be the exception.

The overuse of Permits-to-work should be avoided.

1.7 Areas of work where the safety issues are such that a Permit-to-work might be considered appropriate follow. This list is not exhaustive and should only be used as a guide:

PERMIT-TO-WORK: APPROPRIATE WORK AREAS
Work involving the use of heating appliances (Hot Work).
Limitation of Access to controlled areas.
Testing, maintenance and repair of lifts.
Testing, maintenance and repair of fire alarm systems.
Testing, maintenance and repair of laboratory equipment (where there is no infection risk).
Breaches of fire compartmentation.
Testing, maintenance and repair of security alarm equipment.
Testing, maintenance and repair of pressurised systems (e.g. steam, oil, air, non medical gas systems).
Testing, maintenance and repair of hot & cold water distribution systems (Legionella risks).
Testing, maintenance and repair of emergency generator engines.
Testing, maintenance and repair of radioactive waste receptacles.
Testing, maintenance and repair of hazardous fixed and portable equipment.
Work in an area where hazardous substances are known to exist (e.g. asbestos, chemicals, clinical waste).
Work of a nature liable to generate dust, smoke, fumes or vapours.
Working at a height.
Working within an excavation (but not confined space entry).
Working within restricted areas (e.g. clean rooms, specialist areas).
Working with ladders, scaffolding, cranes, hoists and lifting equipment.
Working within areas with excessive noise levels.
Demolition work

- 1.8 This model Permit-to-work does not apply to certain situations and specific guidance must be followed for Permits-to-work in these circumstances. See Section 6, *Reference Documents*.

PERMIT-TO-WORK - EXCEPTIONS	Guidance on Permits-to-work available in:
Infection control situations	Health Technical Memorandum 2010, Sterilization
Requirements for decontamination of equipment (will feature in local policy guidelines)	
Sterilization	
Electrical low voltage systems	Health Technical Memorandum 2020, Electrical Safety Code for Low Voltage Systems
Electrical high voltage systems	Health Technical Memorandum 2021, Electrical Safety Code for High Voltage Systems
Medical gas and scavenging pipeline systems	Health Technical Memorandum 2022, Medical Gas Pipeline Systems
Entry into confined spaces	Health and Safety Executive, Guidance Note GS5 Entry into confined spaces Confined Space Regulations 1997
Cleaning and gas freeing of tanks containing flammable residues	Health and Safety Executive, Guidance Note CS15, Cleaning and Gas freeing of tanks containing flammable residues

- 1.9 As far as is practicable, Trusts should have only one centre for issuing and controlling Permits-to-work to ensure that all operations are, from the safety view point, fully co-ordinated. This applies to all safety permit systems including those mentioned in paragraph 1.8 above.

2. Management Guidance

- 2.1 It is the responsibility of the Owners and Occupiers of properties, Trust Chief Executives and Managers to ensure that their premises comply with all statutes.
- 2.2 Employers have a duty under the Health and Safety at Work etc. Act 1974, so far as reasonably practicable, to ensure the health and safety of their employees, residents and visitors to their premises. It is incumbent upon both owners and occupiers of premises to ensure that there is a management regime for the proper purchase, design, installation and operational management of buildings, plant, equipment and systems.
- 2.3 All personnel should be made fully aware of their safety responsibilities, as required by statute, and they should be given the necessary information and training to properly understand and carry them out. This also applies to organisations and individuals to whom work has been contracted.
- 2.4 Management should make available guidance on the safe operation and practice of all activities undertaken by themselves or others under contract.
- 2.5 Contractors will need specific advice about special hazards within healthcare premises, such as contaminated plant, hazardous locations, processes and substances. Contractors should be advised of the safety standards and policies applicable within the healthcare premises. Contractors must fully understand the importance of adhering to the procedures of the Permit-to-work system in force and its limitation.
- 2.6 Management should nominate in writing a **Designated Person** with responsibility for the implementation and operation of safe systems of work, including Permit-to-work systems.

Staff Functions

2.7 Designated Person

The Designated Person is an individual designated by Management who has overall authority and responsibility for safe working practices within the premises, as related to the Estates and Facilities Management functions. The Designated Person is appointed to prepare and issue a general policy statement on Health and Safety at Work including the arrangements for carrying out that policy.

2.8 Authorised Person

The Authorised Person is an individual possessing adequate professional and technical knowledge, having received appropriate training and appointed in writing by Management. The Authorised Person is responsible for the practical implementation and operation of the Management's Health and Safety policies and procedures and for issuing of General Purpose Estates and Facilities Permits-to-work.

2.9 Responsible Person

The Responsible Person is an individual who has been given permission, in writing, to undertake work where it is considered that the inherent risk of danger and/or injury requires extra vigilance. Permission is given by the issue and acceptance of a Permit-to-work. The individual will have sufficient technical knowledge and experience to organise, supervise and control skilled persons to prevent danger, whilst the defined work is being undertaken. This Responsible Person may be a member of staff or a contractor.

2.10

Summary

1. The Owners, Occupiers, Trust Chief Executives or Managers of properties should appoint, in writing, the **Designated Person**.
2. On the recommendation of the **Designated Person** the Owners, Occupiers, Trust Chief Executives or Managers of properties should appoint, in writing, the **Authorised Person(s)**.
3. The **Authorised Person** addresses the safety requirements and the work to be undertaken and issues the Permit-to-work to the **Responsible Person**.
4. The **Responsible Person** accepts the Permit-to-work in writing and undertakes to organise, supervise and control skilled persons to prevent danger, whilst the work detailed on the Permit-to-work is being undertaken.
5. On cessation of the work the **Responsible Person** and the **Authorised Person** “sign-off” the Permit-to-work, the work being suspended or completed, with the necessary safety precautions being addressed.

3. Operation of the Permit-to-work System

- 3.1 The Permit-to-work system and documentation are intended for general purpose use only.
- 3.2 A Permit-to-work may only be issued by an Authorised Person. The Authorised Person concerned should be informed in writing about the areas of work for which he/she can issue Permits-to-work.
- 3.3 The Permits-to-work should be kept in a secure location with access only by Authorised Persons. The Permit-to-work system is made up of two parts, i.e. parts A and B – see model forms in Part 5.

The model form should be single copies but in practice both Parts A and B will have second copies, each copy known as the top and bottom copy, perhaps carbon copies in actual practice.

- 3.4 When a Permit-to-work is issued, the Authorised Person will complete part A of the Permit-to-work, the top copy of which will be given to the Responsible Person who must retain the Permit-to-work throughout the duration of the work. The bottom copy of part A will remain in the secure location.

NOTE: It is expected that the Authorised and Responsible Persons will “walk the job” to establish exact conditions and safety requirements, prior to the issue of Permits-to-work if required.

- 3.5 The Authorised Person and Responsible Person must satisfy themselves that the work described on the Permit-to-work may be carried out safely.
- 3.6 On completion of the work the Responsible Person and the Authorised Person will “sign off” the Permit-to-work by completing part B of the bottom copy held in the secure location.

- 3.7 The top copy, issued to the Responsible Person, **MUST** be destroyed on cancellation or suspension of the Permit-to-work.

NOTE: Any changes to procedures, precautions or work content detailed in the Permit-to-work will require the issue of a new Permit-to-work following cancellation of the original.

- 3.8 The locations and the unique numbers of the Permits-to-work should be recorded, reviewed and inspected at regular intervals by the management.

4. Completing the Permit-to-work

- 4.1 The Permit-to-work for General Purpose Estates and Facilities' operations must only be issued by an Authorised Person as defined in this document following careful assessment of the hazards and risks involved.
- 4.2 The form is designed to be completed in a logical sequence helping to minimise the opportunity for error. The following details are necessary to complete part A:
- **Trust:** supply the name of the Trust or Health Service Holding Body or the name of the organisation issuing the Permit-to-work.
 - **Permit Number:** this is a unique number to assist in the tracking of the work and comply with audit and quality control systems.
 - **Name of Authorised Person and Emergency Contact Telephone Number:** supply this information or a means by which he/she can be contacted or where assistance can be obtained in an emergency.
 - **Name of Responsible Person and Emergency Contact Telephone Number:** supply this information or a means by which he/she can be contacted in an emergency.
 - **Reasons for the work:** define these as Planned Preventative Maintenance (PPM) or a Planned Repair or Emergency Work.
 - **Exact Location of the work:** define the site, building(s), floor, room, etc. which is the subject of the Permit-to-work.

- **Names of the Persons undertaking the work:** supply the names of the staff carrying out the work. Do not use the company name of the contractor.
- **Details of the Equipment and/or nature of the work to be undertaken:** make this as specific as possible and include the Plant Identification Number. Where this is not appropriate, give a general description of the work (i.e. Cleaning of..., Spraying of..., etc.)
- **Details of work to be undertaken:** endeavour to make this as specific and prescriptive as possible, eliminating any possible misunderstanding of the instructions given.
- **Hazards and Risks:** record any that are known to, or may exist prior to, during and/or following the work undertaken.
- **Precautions to be taken BEFORE work is undertaken** should identify the personal protective equipment, signs, special tools, training and the information necessary to undertake any preparatory measures for the work required.
- **Precautions to be taken DURING the work** should identify the personal protective equipment, signs, special tools, training and information necessary to undertake the work required.
- **Precautions to be taken on COMPLETION of the work** should identify the personal protective equipment, signs, special tools, training and information necessary to reinstate the equipment and location for normal safe operation.
- **Testing:** record all details of the tests to be carried out prior to starting work, during work and on completion of the work. If no tests are required, record this too.
- **Record any Special Requirements** or points of special note, not already referred to on the Permit-to-work (e.g. Authorisation by Departmental Manager).

- **Signatures.** The Permit-to-work will only be valid if signed by the Authorised Person and the Responsible Person including the date and time.

4.3 On completion or suspension of the work, **Part B** of the permit must be completed as follows:

- **Record all Test Results** for each stage of the work, including the type of tests undertaken and by whom, and the location of detailed test results (i.e. Equipment Log Book, Job File, Manager's Office, etc.)
- **Alarm Conditions:** record the type of alarms, the areas affected, and who tested the alarms for each stage of the work. Also record details of the location, date and time of the test, results and any alarm test failures.
- **COMPLETION or SUSPENSION of the work detailed in the Permit-to-work:** always record this with the date and time. Give details of the reasons for any suspension of the work as well as details of the actions required to complete the work where necessary or to make the location or equipment safe. Mark the appropriate response (Yes or No) to indicate whether the subject of the Permit-to-work can safely be accessed and put back into service.
- **The Permit-to-work is Cancelled** by entering the date and time with both the **Authorised Person and Responsible Person** signing the Permit-to-work. Where work has been suspended, for whatever reason, a new Permit-to-work must be issued before the work can be resumed.

NOTE: Where a section or part of the Permit-to-work does not apply to the work being undertaken, then NOT APPLICABLE or N/A should be entered.

NOTE: Before issuing a Permit-to-work, ensure that no other Permits-to-work have been issued which will affect the work to be undertaken. Permits-to-work which have been issued, or other work of which the responsible person should be aware, must be recorded on the Permit-to-work.

NOTE: Permits-to-work must not be issued, altered, suspended or cancelled over the telephone or by radio communications.

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5. Model Permit-to-work

A model Permit-to-work is provided on pages [16](#) and [17](#).

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PART A

Organisation _____

Permit No. _____

GENERAL PURPOSE ESTATES AND FACILITIES PERMIT-TO-WORK

A Permit-to-work may only be issued by a Person who is Authorised to do so for the type of work to be undertaken.

Name of Authorised Person issuing Permit-to-work _____
Emergency Contact Telephone Number _____

Name of Responsible Person Receiving Permit-to-work _____
Emergency Contact Telephone Number _____

REASON FOR THE WORK PPM ☐ REPAIR ☐ EMERGENCY ☐

Exact Location of work _____

Names of Person(s) undertaking the work

- _____
- _____
- _____

Details of the equipment and/or nature of the work to be undertaken

Plant Identification Numbers (if applicable) _____

Details of work to be undertaken

NO WORK OTHER THAN DETAILED IN THIS PERMIT-TO-WORK IS TO BE UNDERTAKEN

Hazards and Risks

PRECAUTIONS to be taken BEFORE work is undertaken

Including Personal Protective Equipment, cleaning, special tools, training or information relating to the work detailed.

PRECAUTIONS to be taken DURING the work

Including Personal Protective Equipment, cleaning, special tools, training or information relating to the work detailed.

PRECAUTIONS to be taken on COMPLETION of work

Including Personal Protective Equipment, cleaning, special tools, training or information relating to the work detailed.

TESTING must be carried out

Details of Tests

Prior to Starting work YES/NO _____
During work YES/NO _____
On Completion of work YES/NO _____
ALL TEST RESULTS MUST BE RECORDED IN WRITING

ANY SPECIAL REQUIREMENTS

(e.g. Authorisation of Departmental Manager; other relevant Permits-to-work in force)

Having read and understood the details of the work specified, the hazards, risks and precautions required this permit-to-work is only operational if signed and dated by both the **Authorised Person** and **Responsible Person**.

I certify that the above particulars are correct and hereby authorise the work to commence in accordance with the above.

Signature - Authorised Person _____

Date: _____ Time: _____ Name in Block Capitals

I declare that no work other than that stated above will be carried out and all precautionary measures will be adhered to.

Signature - Responsible Person _____

Date: _____ Time: _____ Name in Block Capitals

**PART B****Organisation** _____**Permit No.** _____**ALL TEST RESULTS MUST BE RECORDED****Type of TEST undertaken:** _____
_____**Tests done by:** _____ **Date:** _____ **Time:** _____**Location of Detailed Test Results** _____

The location of the detailed test results MUST be recorded.

RESULTS

Prior to Starting work	Satisfactory <input type="checkbox"/>	UNSATISFACTORY <input type="checkbox"/>
During work	Satisfactory <input type="checkbox"/>	UNSATISFACTORY <input type="checkbox"/>
On Completion of work	Satisfactory <input type="checkbox"/>	UNSATISFACTORY <input type="checkbox"/>
No Tests were required	<input type="checkbox"/>	

ALARM CONDITIONS**Type of Alarms:** _____**Locations Affected by the Alarms:** _____**Alarms Tested by:** _____ **Date:** _____ **Time:** _____**Location of Detailed Alarm Test Results** _____

The location of the alarm test results MUST be recorded.

ALARM TEST RESULTS

Prior to Starting work	Satisfactory <input type="checkbox"/>	UNSATISFACTORY <input type="checkbox"/>
During work	Satisfactory <input type="checkbox"/>	UNSATISFACTORY <input type="checkbox"/>
On Completion of work	Satisfactory <input type="checkbox"/>	UNSATISFACTORY <input type="checkbox"/>
No Alarms were Affected by the work	<input type="checkbox"/>	

Details of ANY failure of a TEST or ALARM _____

_____**COMPLETION OR SUSPENSION OF THE WORK DETAILED IN THIS PERMIT-TO-WORK****The work has been Completed** YES/NO **Date:** _____ **Time:** _____**The work has been Suspended** YES/NO **Date:** _____ **Time:** _____

The work detailed in this Permit-to-work has now been concluded and all persons affected under this permit have been informed that:

No further work is to be undertaken and all persons are withdrawn from the location YES/NO

All tools and equipment used to perform the work have been removed from the location YES/NO

Safety Precautions, Actions and Equipment detailed in this Permit-to-work can be withdrawn YES/NO

REASONS FOR SUSPENSION OF WORK.

Reasons MUST be recorded for all work that is SUSPENDED.

DETAILS OF THE ACTIONS REQUIRED TO COMPLETE THE WORK.Plant, Buildings and/or Equipment, subject of this Permit-to-work ,
can safely be accessed and put back into service. YES/NO**THIS PERMIT-TO-WORK IS NOW CANCELLED**

We certify and agree that this Permit-to-work is now cancelled as detailed above.

Signatures:**Authorised Person** _____ **Responsible Person:** _____**Date:** _____ **Time:** _____If the work is suspended, a new Permit-to-work MUST be issued to continue the work.
The copy of the Permit-to-work held by the Responsible Person must now be destroyed.

6. Reference Documents

1. Health Technical Memorandum 2010, Sterilization
2. Health Technical Memorandum 2020, Electrical Safety Code for Low Voltage Systems
3. Health Technical Memorandum 2021, Electrical Safety Code for High Voltage Systems
4. Health Technical Memorandum 2022, Medical Gas Pipeline Systems
5. Health Technical Memorandum 2050, Risk Management in the NHS Estate
6. Management of Health and Safety at Work: Approved Code of Practice
7. Health and Safety Executive, Electricity at Work, Safe Working Practices Guidance HSG85
8. Health and Safety Executive, Guidance Note GS5 Entry into confined spaces
9. Health and Safety Executive, Guidance Note CS15 Cleaning and Gas freeing of tanks containing flammable residues.
10. HSC/Oil Industry Advisory Committee *The Safe Isolation of Plant and Equipment*
11. HSC/Oil Industry Advisory Committee *Guidance on Permit-to-Work Systems in the Petroleum Industry*
12. Recommendations for Welding and Other Hot Work Process + Hot Work Permits (Revised), Loss Prevention Council Document RC7
13. Health and Safety Executive, Managing Contractors, A Guide for Employers
14. The Construction (Design and Management) Regulations 1994 [CDM]
15. Confined Spaces Regulations 1997
16. Approved Code of Practice *Safe Work in Confined Spaces*

APPENDIX 1:

Extract from Health and Safety Commission Management of Health and Safety at Work Approved Code of Practice

Regulation 3: Risk assessment

(1) *Every employer shall make a suitable and sufficient assessment of:*

- (a) the risks to the health and safety of his employees to which they are exposed whilst they are at work; and*
- (b) the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking,*

for the purpose of identifying the measures he needs to take to comply with the requirements and prohibitions imposed upon him by or under the relevant statutory provisions.

(2) *Every self-employed person shall make a suitable and sufficient assessment of:*

- (a) the risks to his own health and safety to which he is exposed whilst he is at work; and*
- (b) the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking,*

for the purpose of identifying the measures he needs to take to comply with the requirements and prohibitions imposed upon him by or under the relevant statutory provisions.

(3) *Any assessment such as is referred to in paragraph (1) or (2) shall be reviewed by the employer or self-employed person who made it if:*

- (a) there is reason to suspect that it is no longer valid; or*

(b) there has been a significant change in the matters to which it relates; and where as a result of any such review changes to an assessment are required, the employer or self-employed person concerned shall make them.

(3A) Subject to paragraph (3B), an employer shall not employ a young person unless he has, in relation to risks to the health and safety of young persons, made or reviewed an assessment in accordance with paragraphs (1) and (3C).

(3B) Where an employer is employing a young person when this paragraph comes into force he shall, in relation to risks to the health and safety of young persons, review the assessment forthwith.

(3C) In making or reviewing the assessment, an employer who employs or is to employ a young person shall take particular account of:

(a) the inexperience, lack of awareness of risks and immaturity of young persons;

(b) the fitting-out and layout of the workplace and the workstation;

(c) the nature, degree and duration of exposure to physical, biological and chemical agents;

(d) the organisation of processes and activities;

(e) the extent of the health and safety training provided or to be provided to young persons; and

(f) risks from agents, processes and work listed in the Annex to Council Directive 941331EC.

(4) Where the employer employs five or more employees, he shall record:

(a) the significant findings of the assessment; and

(b) any group of his employees identified by it as being especially at risk.

Extract from Health and Safety Commission Management of Health and Safety at Work: Approved Code of Practice

General principles of risk assessment

This Regulation requires all employers and self-employed persons to assess the risks to workers and any others who may be affected by their undertaking. Employers with five or more employees must also record the significant findings of that assessment.

Many employers already carry out de facto risk assessments on a day-to-day basis during the course of their work; they will note changes in working practice, they will recognise faults as they develop and they will take necessary corrective actions. This Regulation however requires that employers should undertake a systematic general examination of their work activity and that they should record the significant findings of that risk assessment.

A risk assessment should usually involve identifying the hazards present in any undertaking (whether arising from work activities or from other factors, e.g. the layout of the premises) and then evaluating the extent of the risks involved, taking into account whatever precautions are already being taken. In this Approved Code:

- (a) a hazard is something with the potential to cause harm (this can include substances or machines, methods of work and other aspects of work organisation);
- (b) risk expresses the likelihood that the harm from a particular hazard is realised;
- (c) the extent of the risk covers the population which might be affected by a risk; i.e. the number of people who might be exposed and the consequences for them.

Risk therefore reflects both the likelihood that harm will occur and its severity.

In some cases, this detailed approach may not be necessary since all the hazards are known and the risks are readily apparent and can therefore be addressed directly.

Purpose of risk assessment in this Regulation

The purpose of the risk assessment is to help the employer or self-employed person to determine what measures should be taken to comply with the employer's or self-employed person's duties under the "relevant statutory provisions". This phrase covers the general duties in the Health and Safety at Work etc. Act 1974 and the more specific duties in the various Acts and Regulations (including these Regulations) associated with the HSW Act.

Regulation 3 does not itself stipulate the measures to be taken as a result of the risk assessment. The measures in each workplace will derive from compliance with other health and safety duties as described above, taking carefully into account the risk assessment. In essence, the risk assessment guides the judgement of the employer or the self-employed person, as to the measures they ought to take to fulfil their statutory obligations.

Suitable and sufficient

A suitable and sufficient risk assessment:

(a) should identify the significant risks arising out of work.

This means focusing on those risks that are liable to arise because of the work activity.

Trivial risks can usually be ignored as can risks arising from routine activities associated with life in general, unless the work activity compounds those risks, or there is evidence of significant relevance to the particular work activity.

Employers and the self employed are expected to take reasonable steps, e.g. by reading HSE guidance, the trade press, company or supplier manuals etc. to familiarise themselves with the hazards and risks in their work.

- (b) should enable the employer or the self-employed person to identify and prioritise the measures that need to be taken to comply with the relevant statutory provisions.
- (c) should be appropriate to the nature of the work and such that it remains valid for a reasonable period of time.

This will enable the risk assessment and the significant findings to be used positively by management, e.g. to change working procedures or to introduce medium to long-term controls.

For relatively static operations, the risk assessment should be such that it is not necessary to repeat it every time someone is exposed to a hazard in comparable circumstances.

For more dynamic activities, i.e. where the detailed work activity may change fairly frequently or the workplace itself changes and develops (e.g. on a temporary work site or where the work involves peripatetic workers moving from site to site) the risk assessment might have to concentrate more on the broad range of risks that might arise so that detailed planning and employee training can take account of those risks and enable them to be controlled as and when they arise.

Review and revision

The Regulation requires employers and the self-employed to review and, if necessary, modify their risk assessments, since assessment should not be a once-and-for-all activity. The nature of work changes; the appreciation of hazards and risks may develop. Monitoring under the arrangements required by Regulation 4 may reveal near misses or defects in plant. Adverse events may take place even if a suitable and sufficient risk assessment has been made and appropriate preventive and protective measures taken.

The employer or self-employed person needs to review the risk assessment if there are developments that suggest that it may no longer be valid (or that it can be improved). In most cases, it is

prudent to plan to review risk assessments at regular intervals – the time between reviews being dependent on the nature of the risks and the degree of change likely in the work activity. Such reviews should form part of standard management practice.

Risk assessment in practice

There are no fixed rules about how a risk assessment should be undertaken, although the general principles that should be followed are set out on the next page. The assessment will depend on the nature of the undertaking and the type and extent of the hazards and risks. Above all the process needs to be practical and it should involve management, whether or not advisers or consultants assist with the detail. Employers should ensure that those involved take all reasonable care in carrying out the risk assessment although the assessment would not be expected to cover risks which were not reasonably foreseeable.

For small undertakings presenting few or simple hazards a suitable and sufficient risk assessment can be a very straightforward process based on judgement and requiring no specialist skills or complicated techniques. At the other extreme, in the case of, for example, complex chemical, large scale mineral extraction, or nuclear plant, it may need to be developed so far as to produce the basis for a complete safety case or report for the plant incorporating such techniques as quantified risk assessment.

In many intermediate cases it will not be possible to make a suitable and sufficient assessment without specialist advice in respect of unfamiliar risks, such as those requiring some knowledge of ergonomics or the more complex processes and techniques in the enterprise. And some risks cannot be properly evaluated without the application of modern techniques or measurement.

In some cases a single exercise covering all risks in a workplace or activity may be appropriate; in other cases separate

assessment exercises for the risks arising from particular operations or groups of hazards may be more effective. But in all cases, it is important that the employer or self-employed person adopts a structural approach to risk assessment.

In particular a risk assessment should:

- (a) ensure that all relevant risks or hazards are addressed;
 - (i) the aim is to identify the significant risks in the workplace. Do not obscure those risks with an excess of information by concentrating on trivial risks;
 - (ii) in most cases, first identify the hazards, i.e. those aspects of work (e.g. substances or equipment used, work processes or work organisation) which have the potential to cause harm;
 - (iii) if there are specific Acts or Regulations to be complied with, these may help to identify the hazards;
 - (iv) assess the risks from the identified hazards; if there are no hazards, there are no risks. Some risks may already be controlled in some way, whether by deliberate measures or by the circumstances in which they are found. The effectiveness of those controls needs to be taken into account in assessing the residual risk;
 - (v) be systematic in looking at hazards and risks. For example it may be necessary to look at hazards or risks in groups such as machinery, transport, substances, electrical etc. In other cases, an operation by operation approach may be needed, e.g. materials in production, dispatch, offices etc.;
 - (vi) ensure all aspects of the work activity are reviewed.
- (b) address what actually happens in the workplace or during the work activity; actual practice may differ from the works manual; indeed this is frequently a route whereby risks creep in unnoticed;

- (i) think about the non-routine operations, e.g. maintenance operations, loading and unloading, changes in production cycles;
- (ii) interruptions to the work activity are a frequent cause of accidents. Look at management of such incidents and the procedures to be followed;
- (c) ensure that all groups of employees and others who might be affected are considered; do not forget office staff, night cleaners, maintenance staff, security guards, visitors;
- (d) identify groups of workers who might be particularly at risk; for example young or inexperienced workers; those who work alone; any disabled staff;
- (e) take account of existing preventive or precautionary measures; they may already reduce the risk sufficiently in terms of what needs to be done to comply with relevant statutory provisions. *But* are they working properly? Does action need to be taken to ensure they are properly maintained?

The level of detail in a risk assessment should be broadly proportionate to the risk. The purpose is not to catalogue every trivial hazard; nor is the employer or self-employed person expected to be able to anticipate hazards beyond the limits of current knowledge. A suitable and sufficient risk assessment will reflect what it is reasonably practicable to expect employers to know about the hazards in their workplaces.

Where employees of different employers work in the same workplace their respective employers would have to consider risks to their own employees and to the other employer's employees and may have to co-operate to produce an overall risk assessment. Detailed requirements on co-operation and co-ordination are covered by Regulation 9.

In some cases employers may make a first rough assessment, to eliminate from consideration those risks on which no further action need be taken. This should also show where a fuller assessment

is needed, if appropriate, using more sophisticated techniques. However, care should be taken not to exaggerate the level of sophistication needed. As mentioned above, the use of quantified risk assessment will be needed only in the most extreme cases, and most of those are already identified by specific Regulations.

Employers who control a number of similar workplaces containing similar activities may produce a basic 'model' risk assessment reflecting the core hazards and risks associated with these activities. 'Model' assessments may also be developed by trade associations, employers' bodies or other organisations concerned with a particular activity. Such 'model' assessments may be applied by employers or managers at each workplace, but only if they:

- (a) satisfy themselves that the 'model' assessment is broadly appropriate to their type of work; and
- (b) adapt the 'model' to the detail of their own actual work situations, including any extension necessary to cover hazards and risks not referred to in the 'model'.

Assessment under other Regulations

Other Regulations also contain requirements for risk assessment but which are addressed specifically to the hazards and risks that are covered by those Regulations. An assessment made for the purpose of such regulations will cover in part the obligation to make assessments under these Regulations. Where employers have already carried out assessments under other Regulations, they need not repeat those assessments so long as they remain valid; but they do need to ensure that all significant risks are covered.

Where an employer is assessing a work situation or activity for the first time, a first rough assessment may be particularly useful in identifying those aspects of the work where a more detailed risk assessment may be needed in accordance with other Regulations.

The overall risk assessment under this Regulation might then consist of separate risk assessments covering particular duties under other Regulations plus a further risk assessment covering any aspects of the work not covered elsewhere.

Recording

While all employers and self-employed persons are required to make a risk assessment, the Regulations also provides that employers with five or more employees must record the significant findings of their risk assessment. This record should represent an effective statement of hazards and risks which then leads management to take the relevant actions to protect health and safety. It needs therefore to be a part of an employer's overall approach to health and safety and where appropriate should be linked to other health and safety records or documents such as the record of health and safety arrangements required by Regulation 4 and the written health and safety policy statement required by Section 2(3) of the Health and Safety at Work Act.

This record would normally be in writing; however, it could also be recorded by other means, e.g. electronically, so long as it is retrievable for use by management or for examination, e.g. by an inspector or a safety representative. The record will often refer to and rely on other documents and records describing procedures and safeguards. In cases of highly hazardous plant which is required by law to present a 'safety case', the safety case documents will frequently incorporate the risk assessment so far as the main processes are concerned, and will probably be referred to as an ancillary document.

The significant findings should include:

- (a) the significant hazards identified in the assessment. That is, those hazards which might pose serious risk to workers or others who might be affected by the work activity if they were not properly controlled;
- (b) the existing control measures in place and the extent to which they control the risks (this need not replicate details of

measures more fully described in works manuals etc. but could refer to them);

- (c) the population which may be affected by these significant risks or hazards, including any groups of employees who are especially at risk.

In many cases, employers (or the self-employed) will need to record sufficient detail of the assessment itself, in addition to the significant findings, so that they can demonstrate (e.g. to an inspector or to safety representatives) that they have undertaken a suitable and sufficient assessment and also so that if circumstances change the assessment can be readily reviewed and, if necessary, revised. Only in the most straightforward and obvious cases in which the risk assessment can be easily repeated and explained is a record totally unnecessary.

Preventive and protective measures

The preventive and protective measures that have to be taken following the risk assessment depend upon the relevant legislation – both the Health and Safety at Work Act and legislation covering particular hazards or sectors of work – and the risk assessment. In deciding upon the measures employers and self-employed should apply the following principles:

- (a) it is always best *if possible to avoid a risk altogether*, e.g. by not using or stocking a particular dangerous substance or article if it is not essential to the business;
- (b) *combat risks at source*, rather than by palliative measures. Thus, if the steps are slippery, treating or replacing them is better than providing a warning sign;
- (c) *wherever possible, adapt work to the individual* especially as regards the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view in particular to alleviating monotonous work and work at predetermined work rate. This helps reduce possible adverse effects on health and safety;

- (d) *take advantage of technological and technical progress*, which often offers opportunities for improving working methods and making them safer;
- (e) risk prevention measures need to *form part of a coherent policy and approach* having the effect of progressively reducing those risks that cannot be prevented or avoided altogether, and which will take account of the way work is to be organised, working conditions, the working environment and any relevant social factors. Health and safety policies required under Section 2(3) of the Health and Safety at Work Act should be prepared and applied by reference to these principles;
- (f) *give a priority to those measures which protect the whole workplace* and all those who work there, and so yield the greatest benefit; i.e. give collective protective measures priority over individual measures;
- (g) workers, whether employees or self-employed *need to understand what they need to do*;
- (h) the avoidance, prevention and reduction of risks at work needs to be an accepted part of the approach and attitudes at all levels of the organisation and to apply to all its activities, *i.e. the existence of an active health and safety culture affecting the organisation as a whole needs to be assured.*

Extract from Health and Safety Commission Management of Health and Safety at Work: Approved Code of Practice

Regulation 4 - Health and safety arrangements

- (1) *Every employer shall make and give effect to such arrangements as are appropriate, having regard to the nature of his activities and the size of his undertaking, for the effective planning, organisation, control, monitoring and review of the preventive and protective measures.*
- (2) *Where the employer employs five or more employees, he shall record the arrangements referred to in paragraph (1).*

Approved Code of Practice

This Regulation in effect requires employers to have arrangements in place to cover health and safety. It should be integrated with the management system for all other purposes. The system in place will depend on the size and nature of the activities of the undertaking but generally will include the following elements which are typical of any other management function:

- (a) *Planning:* Adopting a systematic approach which identifies priorities and sets objectives. Whenever possible, risks are eliminated by the careful selection and design of facilities, equipment and processes or minimised by the use of physical control measures.
- (b) *Organisation:* Putting in place the necessary structure with the aim of ensuring that there is a progressive improvement in health and safety performance.
- (c) *Control:* Ensuring that the decisions for ensuring and promoting health and safety are being implemented as planned.
- (d) *Monitoring and review:* Like quality, progressive improvement in health and safety can only be achieved through the constant

development of policies, approaches to implementation and techniques of risk control.

The Regulation also provides that undertakings with five or more employees should record their arrangements for health and safety. The arrangements recorded should include a list of those competent persons appointed under Regulation 6. As with the risk assessment, this record could form part of the same document containing the health and safety policy required under Section 2(3) of the Health and Safety at Work Act.

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APPENDIX 2

Sources of further information:

National Health Service in Scotland

Healthcare Engineering and Environment Unit

University of Strathclyde,
Room 8:51 Graham Hills Building,
50 George Street,
Glasgow G1 1QE
Telephone 0141 548 3446

Health & Safety Executive

Belford House,
59 Belford Road,
Edinburgh EH4 3UE
Telephone 0131 247 2000

Health & Safety Executive

375 West George Street,
Glasgow G2 4LW
Telephone 0141 275 3000

Incidents Reporting and Investigation Centre (IRIC)

Hazard Co-ordinator,
Scottish Healthcare Supplies,
Trinity Park House,
South Trinity Road,
Edinburgh EH5 3SH
Telephone 0131 551 8402

Medical Devices Agency, Helpline in Scotland

Scottish Healthcare Supplies,
Trinity Park House,
South Trinity Road,
Edinburgh EH5 3SH
Telephone: 0131 551 8333

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