

University of Sussex

Fire Safety Policy

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Fire Safety Policy

1. Introduction

The Regulatory Reform (fire safety) Order 2005 (FSO) places duties on “responsible persons”¹, to the extent that they have control over premises, the responsible person must:

- undertake a duty to take “general fire precautions” in relation to the premises as detailed in Article 4 of the FSO such as;
 - (a) measures to reduce the risk of fire on the premises and the risk of the spread of fire on the premises;
 - (b) measures in relation to the means of escape from the premises;
 - (c) measures for securing that, at all material times, the means of escape can be safely and effectively used;
 - (d) measures in relation to the means for fighting fires on the premises;
 - (e) measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises; and
 - (f) measures in relation to the arrangements for action to be taken in the event of fire on the premises, including—
 - (i) measures relating to the instruction and training of employees; and
 - (ii) measures to mitigate the effects of the fire.
- take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of any of his employees; and
- in relation to relevant persons who are not his employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe.
- the responsible person must make a suitable and sufficient assessment of the risks to which relevant persons are exposed for the purpose of identifying the general fire precautions he needs to take to comply with the requirements and prohibitions imposed on him by or under this Order
- the responsible person must make and give effect to such fire safety arrangements as are appropriate, having regard to the size of his undertaking and the nature of its activities, for the effective planning, organisation, control, monitoring and review of the preventative and protective measures.

2. Responsible Person

Legislation defines the ultimate responsible person for fire safety arrangements and for the University of Sussex this is the Vice Chancellor. Strategically the Council of the University have responsibility for ensuring that arrangements for managing Fire Safety are in place and regularly monitored. ***Responsibility cannot be delegated, however the functions related to that responsibility may be delegated.***

3. Policy Statement

It is the policy of the University of Sussex to ensure that all relevant staff, students, contractors and visitors are protected from the risks of its undertaking against fire. It recognises and acknowledges its responsibility to take general fire precautions to protect the safety of all relevant persons, so far as reasonably practicable. Also, ensure appropriate evacuation procedures shall be developed, implemented and periodically tested. All persons shall be provided with sufficient and appropriate fire awareness training and instruction. All premises shall comply with relevant fire safety legislation and recognised best practice.

4. Policy Objectives

The objectives of this policy are to ensure, so far as reasonably practicable that:

- Roles, responsibilities and accountabilities are clearly defined and understood in order to secure fire safety and both corporate and individual compliance with relevant legislation;
- One or more competent persons is appointed to provide fire safety advice;
- Risks from fire, or from dangerous substances which could lead to a fire, are assessed and control measures commensurate with the general principles of control or the principles of control (dangerous substances) as detailed¹, are implemented to either eliminate risk or to reduce residual risk to a tolerable level;
- Measures are devised and implemented to ensure that satisfactory procedures are in place to reduce risks to persons in the event of a fire and that all persons affected are able to reach a place of safety in the event of a fire emergency;
- Any aspect of University premises and any equipment provided in connection with assuring fire safety is maintained, by a competent person, in a fit and efficient state, in efficient working order and in good repair;
- All members of the campus community, including contractors and visitors, are provided with clear and relevant information regarding fire risks and measures taken to prevent fires occurring or to mitigate against the consequences of fire;
- University buildings are designed in accordance with relevant standards;
- Employees are properly consulted about policy, procedures and arrangements for ensuring fire safety;
- Employees are provided with appropriate information, instruction and training at appropriate intervals about the fire precautions in place at the University;
- The University co-operates and co-ordinates, as necessary, with any other responsible persons as defined²;

¹ Appendix section 8, page 16; Schedule 1, Part 1, Article 9 (2)

² Appendix section 7, page 15; Article 22

- The University will liaise with relevant statutory authorities as required by³ and any other relevant statutory provisions.

5. Application

This Fire Safety Policy applies to all premises and activities falling, to any extent, under the University's control. The policy sets down the framework by which the University and all members of the campus community will be expected to meet their fire safety compliance duties.

The majority of premises on the University campus, including temporary structures such as marquees, fall within the requirements of the current fire safety legislation.

The inside of student occupied study bedrooms are exempt; however, these rooms are covered within the provisions of the Housing Act which imposes broadly similar fire safety requirements as the current fire safety legislation.

Higher education institutions are however exempted from licensing under the Housing Act 2004 providing they sign up to a code of practice that has been approved by the Department for Communities and Local Government (DCLG).

Three codes of practice for the higher education sector⁴ were approved by parliament in April 2006.

Where study bedrooms are let to third parties, e.g. for conference purposes, then the FSO will apply in full.

6. Organisational Responsibilities Council of University of Sussex

Terms of Reference:

- Council is one of the three Statutory bodies of the University (the others being Senate and Court). Council is the governing body of the University, strategically ensures that arrangements for managing Fire Safety are in place and regularly monitored.

Its role is as follows:

- (a) To determine strategic objectives for the University and to monitor fire safety performance against these objectives and against appropriate external benchmarks;
- (b) To discharge its responsibilities in relation to general legal and other external requirements;
- (c) To meet general requirements deriving from the Charter and Statutes, other than those matters delegated to committees or to individuals;
- (d) To monitor institutional effectiveness;
- (e) To monitor its own effectiveness

The Vice Chancellor (Responsible Person)

³ Appendix section 4, page 13; Article 13

⁴ Appendix section 9, page 19; Three housing codes of practice for Higher Education premises

Role:

The Vice Chancellor acting on behalf of the University is appointed as the responsible person with authority to act in taking decisions in the best interests of the University, as the responsible person as defined⁵. Therefore is legally ultimately responsible in this role for Fire Safety for the University of Sussex.

The “responsible person” will ensure that:

- Adequate resources are made available to enable the University to fulfil their compliance duties under the FSO

The Vice-Chancellor’s Executive Group**Terms of Reference:**

- (a) To advise and assist the Vice-Chancellor in the day-to-day management of the University, in the initial formulation of policy and in the preparation of business for consideration by University statutory and other committees including fire safety;
- (b) To provide a formal management link between members of the Executive and the Heads of the Schools and other operating units.

The Registrar and Secretary**Role:**

Is directly responsible to the Vice Chancellor for the University’s professional services, comprising all of its support services. With directors reporting directly to the Registrar & Secretary.

- Is responsible for the implementation of the Fire Safety Policy where it applies, on a day-to-day basis the responsibility for ensuring that these duties are undertaken is delegated to individual officers within the University.

The Heads of School and Directors of Professional Services

- The Heads of School and Directors will be responsible for ensuring that, in areas falling under their control:
- The significant findings of the specific fire risk assessments are properly addressed and suitable control measures implemented in accordance with the principles of control⁶.

⁵ Appendix section 1, page 12; Article 3

⁶ Appendix section 8, page 16; Schedule 1

- Liaise and co-operate, as applicable, with other responsible persons, e.g. tenants / contractors, to ensure that they are aware of the University's fire safety policy and procedures and to identify any risks arising from their activities which could impact upon the University or members of the campus community.
- All activities and processes falling under their control are assessed for fire safety and suitable control measures implemented in accordance with the principles of control defined⁷.
- All staff falling under their control are given training and instruction in fire safety matters commensurate with their activities and have time allocated for them to achieve this.
- Sufficient numbers of people are appointed as fire wardens for all areas occupied by their school, division or units;
- All staff, students, visitors and contractors falling under their control comply with the requirements of the fire safety policy.

Director of Estates Services

Role:

The Director will ensure that:

- Fire risk assessments are undertaken and significant findings brought to the attention of those responsible so that they may fulfil their duties under this policy;
- Competent fire safety advice is available to enable the University to comply with its duties under this policy, the FSO and any other relevant legislation and standards;

Director of Health, Safety & Environment

Role:

To be responsible for advising on all aspects of health, safety and environment in the University, co-ordination and review of University Health, Safety & Environmental management systems and facilitating the implementation of the University Health, Safety & Environment Plan. In liaison with the Director of Human Resources and the Occupational Health provider; for advising the University on health, safety and environmental legislation; for liaising with external authorities in relation to health, safety and environment, and liaising with the SEF QSHE manager on all aspects of Health & Safety.

The Director will ensure that:

⁷ Appendix section 8, page 16; Schedule 1

- The fire safety policy and statutory requirements are monitored and reviewed and an annual report on fire safety performance submitted to the University's Health, Safety & Environment Committee and Council;
- Relevant statutory external authorities are consulted on matters of fire safety as and when necessary;
- Appropriate guidance and standards are developed to enable the requirements of this policy to be properly implemented;
- Appropriate fire safety information, instruction and training is made available to all members of the campus community as required.

Sussex Estates & Facilities LLP

Role:

Sussex Estates Facilities LLP (SEF) as partner of the University of Sussex and service provider with responsibility to carry out the function of facilities management services. Within the organisation of SEF there is a Quality, Safety, Health & Environment (QSHE) team consisting of a manager and advisors, part of the advisors role is to act as the Fire Safety Advisor and be the competent person for conducting the Fire Risk Assessments. The Service Provider shall also be responsible for undertaking any rectification works within the terms of the contract with the University of Sussex that are identified in the fire risk assessments of the premises.

As the partner of The University of Sussex and service provider of estates and facilities management for the University of Sussex, Sussex Estates and Facilities supports the University in managing its Health and Safety operations by providing expert advice, guidance, training, risk assessment, inspections, reporting, auditing.

- All premises passive and active fire safety measures (e.g. fire alarm components, emergency lights, fire doors, signage, fire resisting compartmentation lines, etc.) and equipment provided in connection with assuring fire safety is maintained, by a competent person, in a fit and efficient state, in efficient working order and in good repair and regular checks by appointed persons are undertaken to ensure this is carried out.
- All new and refurbished areas are so designed to ensure compliance with this policy and the requirements of any relevant fire-safety legislation;
- QSHE Fire Advisor to provide fire safety advice to the project teams during refurbishment works.

The Quality Safety Health & Environment team will:

- Undertake the fire risk assessments as required by Article 9 of the FSO for the University premises

- Undertake interim fire risk assessments following controlled building projects / works to comply with Regulation 38 of the Building Regulations (Reactive on Request)
- Provide general fire safety training or advice, as required to ensure all staff understand their responsibilities for fire safety
- Provide Fire Warden Training
- Provide Fire Marshal Training
- Provide Fire Extinguisher training
- Undertake fire drills in each building at least once each year
- Ensure liaison with enforcing authority “East Sussex Fire & Rescue Service”
- Investigate and provide guidance on reducing unwanted fire alarm activation
- Investigate and provide guidance following fire events in University premises
- Provide competent fire safety advice and guidance for new building projects
- Provide competent fire safety advice and guidance for existing buildings, to ensure passive and active fire safety measures are maintained
- Provide competent fire safety advice and guidance on existing and new fire safety equipment

Supervisors / Managers (including academic supervisors of research and teaching activities)

Supervisors / Managers will be responsible for ensuring that:

- All activities and processes falling under their control are assessed for fire safety and suitable control measures implemented i.e. included in the risk assessments for research activities and for practical teaching activities (e.g. included in lab scripts)
- All staff and students falling under their control are given training and instruction in fire safety matters commensurate with their activities
- All staff, students, visitors and contractors falling under their control comply with the requirements of the fire safety policy.

Staff & Students

Staff and students have a responsibility to comply with the Fire Safety Policy. This will include, but not be limited to:

- Observing all instructions, information and training intended to secure fire safety
- Co-operating with the University on matters of fire safety

- Not interfering with any building fabric or equipment provided in connection with assuring fire safety
- Report any evident defects or short-comings in University fire safety arrangements or procedures.

NB. Failure to comply with the requirements of this policy could result in disciplinary action being taken.

Contractors

Contractors are required to:

- Assess the fire safety risks arising from their works / activities and implement control measures in accordance with the principles of control defined in the FSO;
- Co-operate with the University on all matters of fire safety
- Ensure that they and all staff falling under their control have received appropriate information, instruction and training to enable them to comply with this policy and the University's emergency arrangements
- Obey all instructions relating to fire safety given by authorised members of the University.

NB. Failure to comply with the requirements of this policy could result in the contractor being asked to leave site and removal from the University's list of approved suppliers / contractors.

Tenants (Commercial properties)

Tenants will have their own duties under the FSO. This will include the identification of a responsible person. This responsible person will have a responsibility to:

- Co-operate and Co-ordinate as required by the FSO with the University to ensure that the University can meet all relevant statutory requirements
- Conduct a fire risk assessment as required by FSO
- Assess the fire safety risks arising from their works / activities and implement control measures in accordance with the principles of control defined in Schedule 1.
- Ensure that they and all staff falling under their control have received appropriate information, instruction and training to enable them to comply with this policy and the University's emergency arrangements.

7. Appendix:

Relevant Articles Regulatory Reform (Fire Safety) Order 2005

The following is a link to the full Statutory Document 2005 – No.1541

http://www.legislation.gov.uk/ukxi/2005/1541/pdfs/ukxi_20051541_en.pdf

The following is an abridgement of the relevant Articles, “Article 5” gives clear direction of the University’s duties.

1 Responsible Person (Article 3):

Meaning of “responsible person”

3. In this Order “responsible person” means—

- (a) in relation to a workplace, the employer, if the workplace is to any extent under his control;
- (b) in relation to any premises not falling within paragraph (a)—
 - (i) the person who has control of the premises (as occupier or otherwise) in connection with the carrying on by him of a trade, business or other undertaking (for profit or not); or
 - (ii) the owner, where the person in control of the premises does not have control in connection with the carrying on by that person of a trade, business or other undertaking.

2 Duties under this Order (Article 5):

5.—(1) Where the premises are a workplace, the responsible person must ensure that any duty imposed by articles 8 to 22 or by regulations made under article 24 is complied with in respect of those premises.

(2) Where the premises are not a workplace, the responsible person must ensure that any duty imposed by articles 8 to 22 or by regulations made under article 24 is complied with in respect of those premises, so far as the requirements relate to matters within his control.

(3) Any duty imposed by articles 8 to 22 or by regulations made under article 24 on the responsible person in respect of premises shall also be imposed on every person, other than the responsible person referred to in paragraphs (1) and (2), who has, to any extent, control of those premises so far as the requirements relate to matters within his control.

(4) Where a person has, by virtue of any contract or tenancy, an obligation of any extent in relation to—

- (a) the maintenance or repair of any premises, including anything in or on premises; or
- (b) the safety of any premises,

that person is to be treated, for the purposes of paragraph (3), as being a person who has control

of the premises to the extent that his obligation so extends.

(5) Articles 8 to 22 and any regulations made under article 24 only require the taking or observance of general fire precautions in respect of relevant persons.

3 Risk Assessment (Article 9):

Risk assessment

9.—(1) The responsible person must make a suitable and sufficient assessment of the risks to which relevant persons are exposed for the purpose of identifying the general fire precautions he needs to take to comply with the requirements and prohibitions imposed on him by or under this

Order.

(2) Where a dangerous substance is or is liable to be present in or on the premises, the risk assessment must include consideration of the matters set out in Part 1 of Schedule 1.

(3) Any such assessment must be reviewed by the responsible person regularly so as to keep it

up to date and particularly 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 including when the premises, special, technical and organisational measures, or organisation of the work undergo significant changes, extensions, or conversions,

and where changes to an assessment are required as a result of any such review, the responsible

person must make them.

4 Fire-Fighting & Fire Detection (Article 13 (3) a, b, c (4)):

Liaison with Enforcing Authority

13.—(1) Where necessary (whether due to the features of the premises, the activity carried on

there, any hazard present or any other relevant circumstances) in order to safeguard the safety of

relevant persons, the responsible person must ensure that—

(a) the premises are, to the extent that it is appropriate, equipped with appropriate firefighting equipment and with fire detectors and alarms; and

(b) any non-automatic fire-fighting equipment so provided is easily accessible, simple to use and indicated by signs.

(2) For the purposes of paragraph (1) what is appropriate is to be determined having regard to

the dimensions and use of the premises, the equipment contained on the premises, the physical and

chemical properties of the substances likely to be present and the maximum number of persons

who may be present at any one time.

(3) The responsible person must, where necessary—

(a) take measures for fire-fighting in the premises, adapted to the nature of the activities carried on there and the size of the undertaking and of the premises concerned;

(b) nominate competent persons to implement those measures and ensure that the number of such persons, their training and the equipment available to them are adequate, taking into account the size of, and the specific hazards involved in, the premises concerned; and

(c) arrange any necessary contacts with external emergency services, particularly as regards fire-fighting, rescue work, first-aid and emergency medical care.

(4) A person is to be regarded as competent for the purposes of paragraph (3)(b) where he has sufficient training and experience or knowledge and other qualities to enable him properly to implement the measures referred to in that paragraph.

5 Emergency Routes & Exits (Article 14):

Means of Escape

(1) Where necessary in order to safeguard the safety of relevant persons, the responsible person must ensure that routes to emergency exits from premises and the exits themselves are kept clear at all times.

(2) The following requirements must be complied with in respect of premises where necessary

(whether due to the features of the premises, the activity carried on there, any hazard present or

any other relevant circumstances) in order to safeguard the safety of relevant persons—

(a) emergency routes and exits must lead as directly as possible to a place of safety;

(b) in the event of danger, it must be possible for persons to evacuate the premises as quickly and as safely as possible;

(c) the number, distribution and dimensions of emergency routes and exits must be adequate

having regard to the use, equipment and dimensions of the premises and the maximum number of persons who may be present there at any one time;

(d) emergency doors must open in the direction of escape;

(e) sliding or revolving doors must not be used for exits specifically intended as emergency exits;

(f) emergency doors must not be so locked or fastened that they cannot be easily and immediately opened by any person who may require to use them in an emergency;

(g) emergency routes and exits must be indicated by signs; and

(h) emergency routes and exits requiring illumination must be provided with emergency lighting of adequate intensity in the case of failure of their normal lighting.

6 Maintenance (Article 17):

Maintaining Active & Passive Fire safety Measures

17.—(1) Where necessary in order to safeguard the safety of relevant persons the responsible

person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises under this Order or, subject to paragraph (6), under any other enactment, including any enactment repealed or revoked by this Order, are subject to a suitable system of maintenance

and are maintained in an efficient state, in efficient working order and in good repair.

(2) Where the premises form part of a building, the responsible person may make arrangements

with the occupier of any other premises forming part of the building for the purpose of ensuring

that the requirements of paragraph (1) are met.

(3) Paragraph (2) applies even if the other premises are not premises to which this Order applies.

(4) The occupier of the other premises must co-operate with the responsible person for the purposes of paragraph (2).

(5) Where the occupier of the other premises is not also the owner of those premises, the references to the occupier in paragraphs (2) and (4) are to be taken to be references to both the

occupier and the owner.

(6) Paragraph (1) only applies to facilities, equipment and devices provided under other enactments where they are provided in connection with general fire precautions.

7 Co-operation & co-ordination (Article 22):

More than one Responsible Person

22.—(1) Where two or more responsible persons share, or have duties in respect of, premises

(whether on a temporary or a permanent basis) each such person must—

(a) co-operate with the other responsible person concerned so far as is necessary to enable

them to comply with the requirements and prohibitions imposed on them by or under this Order;

(b) (taking into account the nature of his activities) take all reasonable steps to co-ordinate the measures he takes to comply with the requirements and prohibitions imposed on him by or under this Order with the measures the other responsible persons are taking to comply with the requirements and prohibitions imposed on them by or under this Order; and

(c) take all reasonable steps to inform the other responsible persons concerned of the risks to

relevant persons arising out of or in connection with the conduct by him of his undertaking.

(2) Where two or more responsible persons share premises (whether on a temporary or a permanent basis) where an explosive atmosphere may occur, the responsible person who has

overall responsibility for the premises must co-ordinate the implementation of all the measures

required by this Part to be taken to protect relevant persons from any risk from the explosive atmosphere.

8 Schedule 1 (Provides guidance on application of Regulatory Reform (fire safety) Order 2005):

**SCHEDULE 1
PART 1 - Article 9(2)**

MATTERS TO BE CONSIDERED IN RISK ASSESSMENT IN RESPECT OF DANGEROUS SUBSTANCES

The matters are—

- (a) the hazardous properties of the substance;
- (b) information on safety provided by the supplier, including information contained in any relevant safety data sheet;
- (c) the circumstances of the work including —
 - (i) the special, technical and organisational measures and the substances used and their possible interactions;
 - (ii) the amount of the substance involved;
 - (iii) where the work will involve more than one dangerous substance, the risk presented by such substances in combination; and
 - (iv) the arrangements for the safe handling, storage and transport of dangerous substances and of waste containing dangerous substances;
- (d) activities, such as maintenance, where there is the potential for a high level of risk;
- (e) the effect of measures which have been or will be taken pursuant to this Order;
- (f) the likelihood that an explosive atmosphere will occur and its persistence;
- (g) the likelihood that ignition sources, including electrostatic discharges, will be present and become active and effective;
- (h) the scale of the anticipated effects;
- (i) any places which are, or can be connected via openings to, places in which explosive atmospheres may occur; and
- (j) such additional safety information as the responsible person may need in order to complete the assessment.

PART 2 - Article 9(5)

MATTERS TO BE TAKEN INTO PARTICULAR ACCOUNT IN RISK ASSESSMENT IN RESPECT OF YOUNG PERSONS

The matters are—

- (a) the inexperience, lack of awareness of risks and immaturity of young persons;
- (b) the fitting-out and layout of the premises;
- (c) the nature, degree and duration of exposure to physical and chemical agents;
- (d) the form, range, and use of work equipment and the way in which it is handled;
- (e) the organisation of processes and activities;
- (f) the extent of the safety training provided or to be provided to young persons; and
- (g) risks from agents, processes and work listed in the Annex to Council Directive 94/33/EC(a) on the protection of young people at work.

PART 3 - Article 10

PRINCIPLES OF PREVENTION

The principles are—

- (a) avoiding risks;
- (b) evaluating the risks which cannot be avoided;
- (c) combating the risks at source;
- (d) adapting to technical progress;
- (e) replacing the dangerous by the non-dangerous or less dangerous;
- (f) developing a coherent overall prevention policy which covers technology, organisation of work and the influence of factors relating to the working environment;
- (g) giving collective protective measures priority over individual protective measures; and
- (h) giving appropriate instructions to employees.

PART 4 - Article 12

MEASURES TO BE TAKEN IN RESPECT OF DANGEROUS SUBSTANCES

1. In applying measures to control risks the responsible person must, in order of priority—

- (a) reduce the quantity of dangerous substances to a minimum;
- (b) avoid or minimise the release of a dangerous substance;
- (c) control the release of a dangerous substance at source;
- (d) prevent the formation of an explosive atmosphere, including the application of appropriate ventilation;
- (e) ensure that any release of a dangerous substance which may give rise to risk is suitably collected, safely contained, removed to a safe place, or otherwise rendered safe, as appropriate;
- (f) avoid—
 - (i) ignition sources including electrostatic discharges; and
 - (ii) such other adverse conditions as could result in harmful physical effects from a dangerous substance; and
- (g) segregate incompatible dangerous substances.

2. The responsible person must ensure that mitigation measures applied in accordance with article 12(3)(b) include—

- (a) reducing to a minimum the number of persons exposed;
- (b) measures to avoid the propagation of fires or explosions;
- (c) providing explosion pressure relief arrangements;
- (d) providing explosion suppression equipment;
- (e) providing plant which is constructed so as to withstand the pressure likely to be produced by an explosion; and
- (f) providing suitable personal protective equipment.

(a) O.J. No L216, 20.8.94, p.12.

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3. The responsible person must—

- (a) ensure that the premises are designed, constructed and maintained so as to reduce risk;
- (b) ensure that suitable special, technical and organisational measures are designed, constructed, assembled, installed, provided and used so as to reduce risk;
- (c) ensure that special, technical and organisational measures are maintained in an efficient state, in efficient working order and in good repair;
- (d) ensure that equipment and protective systems meet the following requirements—
 - (i) where power failure can give rise to the spread of additional risk, equipment and

protective systems must be able to be maintained in a safe state of operation independently of the rest of the plant in the event of power failure;

(ii) means for manual override must be possible, operated by employees competent to do so, for shutting down equipment and protective systems incorporated within automatic processes which deviate from the intended operating conditions, provided that the provision or use of such means does not compromise safety;

(iii) on operation of emergency shutdown, accumulated energy must be dissipated as quickly and as safely as possible or isolated so that it no longer constitutes a hazard; and

(iv) necessary measures must be taken to prevent confusion between connecting devices;

(e) where the work is carried out in hazardous places or involves hazardous activities, ensure that appropriate systems of work are applied including —

(i) the issuing of written instructions for the carrying out of work; and

(ii) a system of permits to work, with such permits being issued by a person with responsibility for this function prior to the commencement of the

9 Three codes of practice for the higher education sector were approved by parliament in April 2006

These are:

- The Universities UK Code of Practice for University Managed Student Accommodation
- The ANUK / Unipol Code of Standards for Larger Residential Developments for Student Accommodation Managed and Controlled by Educational Establishments
- The ANUK / Unipol Code of Standards for Larger Developments for Student Accommodation NOT Managed and Controlled by Educational Establishments