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Nottingham

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Health and Safety

Monitoring of Health and Safety Performance

Policy, Guidance & Arrangements

SAF-MAN3.1



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Nottingham

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Health and Safety Department

**Approved
Document**

Document Control

Document Details	
Reference	SAF-MAN3.1
Title	Monitoring of University Health & Safety Performance
Version Number	1
Approval Date	December 2019
Issue Date	August 2020
Review Date	August 2022
Status	Finalised and Published
Author	Sarah Watson

Document Revision History				
Revision	Date	Nature of Revision	Prepared by	Approved by
1	11/09/2019	Version 1	Sarah Watson	UoN H&S Committee

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1. Introduction

University policies establish standards and expectations for health and safety across the organisation and set the minimum standards expected. This policy covers the University's expectations on health and safety monitoring.

Each unit, which may be a Faculty, School, Department or Institute, will be referred to as Business Unit (BU) in this policy and should produce its own local arrangements for monitoring health and safety standards and implementation of actions (See Arrangements section). Any local arrangements imposed at a local level must meet all requirements set out in this policy. Where there is a discrepancy, the University policy takes precedence.

The University operates a Health and Safety Management system that is based upon the four stages: Plan, Do, Check, and Act, as endorsed by the Health and Safety Executive in their publication, HSG65. Stage 3, the Checking stage, aims to ensure that the University is maintaining good health and safety standards in practice by carrying out timely and proportionate monitoring. This policy aims to lay down the minimum standards for monitoring at the University, both in terms of Active Monitoring (housekeeping checks, inspections, audits) and Reactive Monitoring (incident investigation and trend analysis). Robust monitoring does not just identify problems but helps understand what caused them and what sort of changes are needed to address them.

Key: BU: Business Unit, HoBU: Head of Business Unit, HSC: Health and Safety Coordinator, HSA: Health and Safety Assistant

2. Regulatory Background

Legal duties to adopt and maintain safe methods of working are placed on both employers and employees by general health and safety legislation, principally by the **Management of Health and Safety at Work Regulations 1999**. These regulations require organisations to have a safety management system with appropriate monitoring included, as referred to above.

3. Roles and Responsibilities

3.1 University Council will

- Seek assurance from the Director of Health and Safety that appropriate systems are in place to ensure compliance with this policy;
- Receive annual reports from the Director of Health and Safety on safety performance, including leading and lagging indicators and monitoring outcomes.

3.2 University Executive Board (UEB) will

- Seek assurance that there are suitable systems in place for monitoring health and safety performance across the institution, taking account of all activities;

- Ensure that they are provided with reports on the University's safety performance and monitoring outcomes.
- Be notified of significant findings from adverse events such as accidents and occupational ill-health.

3.3 The University Health and Safety Department will

- Provide suitable reports to Council and UEB regarding monitoring activities and their significant outcomes. Reports will include relevant KPIs, including leading and lagging indicators and contextual information about comparisons with sector norms;
- Carry out and report upon internal health and safety audits based upon an agreed programme that is proportionate to the degree of risk in the BU;
- Provide overarching arrangements and guidance regarding the strategy for monitoring and the procedures to be followed to undertake such monitoring;
- Ensure appropriate oversight of monitoring activities across the institution and provide reports as appropriate on compliance;
- Ensure that BUs adhere to the University Policy by carrying out reviews of BU monitoring activities.

3.4 The University Health and Safety Committee will

- Be the formal oversight and compliance committee in relation to monitoring activities and will provide assurance to Council and UEB;
- Review and approve relevant policies and arrangements within the University with regard to monitoring activities to ensure compliance with current legislation, and to recommend to Council and UEB any actions necessary to improve compliance and/or performance;
- Consider reports of monitoring activities across the University.

3.5 The Head of Business Unit will

- Ensure that there is a programme of Active Monitoring identified that is proportionate to the level of risk in the BU;
- Ensure adverse incidents (accidents and occupational ill-health) are appropriately investigated and remedial actions taken;
- Ensure that adequate resources are allocated to monitoring activities within the BU and for any resulting actions to deal with non-compliance;
- Seek assurance from direct reports and local Safety Critical Roles that actions and recommendations from Active and Reactive monitoring activities are appropriately implemented in a timely fashion;
- Where monitoring activities identify significant compromises of health and safety, suspend the activity pending a further investigation.
- Periodically undertake leadership walk rounds to show commitment to BU health and safety monitoring.

3.6 The Health and Safety Coordinator (and other safety critical roles) will

- Ensure there are suitable monitoring arrangements in place that are proportionate to the BU's activities;
- Coordinate and manage the carrying out of the monitoring activities;
- Ensure that there are suitable records maintained of the monitoring carried out and of the actions identified and progressed/completed;
- Provide assurance, via the BU Safety Committee where applicable or directly to senior management, that the monitoring arrangements are being implemented and actions arising are being appropriately progressed/completed.
- Ensure that areas of health and safety coordinated by other Safety Critical Roles are included in Monitoring activities (e.g. Biological Safety, Laser Safety, Radiation Safety).
- Where monitoring activities identify significant compromises of health and safety, suspend the activity pending a further investigation.
- Consider any incident data for emergency trends in the BU and support management in identifying actions to deal with problem areas;
- Participate in monitoring activities organised and undertaken by the University Health and Safety Department.

3.7 The Line Manager / Principle Investigator will

- Ensure that the BU's requirements for monitoring are completed in their area of responsibility;
- Receive reports of monitoring activities and will manage the completion / progress of actions arising;
- Consider any incident data for emerging trends in their area of responsibility and identify actions to deal with problem areas;
- Lead by example e.g. be involved in monitoring activities in their area of responsibility;
- Where monitoring activities identify significant compromises of health and safety, suspend the activity pending a further investigation.

4. Types of Monitoring

4.1 Active Monitoring

Active monitoring refers to monitoring carried out prior to adverse events occurring, for example housekeeping checks, health and safety inspections, and health and safety audits.

In order to ensure high standards of health and safety are maintained, the University requirement is to carry out monitoring in all areas in accordance with this policy. Monitoring must be carried out at both Business Unit and University levels, records of monitoring must be kept and the responsible person must ensure that actions are being followed up and completed.

The key types of active monitoring required of university activities is split into five levels:

Key Types of Active Monitoring required				
Level	Type	Brief Description	Environments it applies to	Who leads/carries out
1	Housekeeping check	A Check of the working environment mainly focussing on physical conditions. Daily to Monthly medium to high risk and monthly to six monthly for low risk depending on type of area, how it's used and who's present in it.	All Business Units All types of working environment	HSC sets up arrangement. Local staff carry out.
2	Inspections	More in-depth check of working environment including the presence of safety documents. 3-6 monthly, rolling programme depending on risk profile. Aim to cover all areas of a BU over 3 years.	All Business Units although deemed essential in higher risk BUs. All types of working environment	HSC sets up arrangement. Defined roles carry it out with local manager or their rep present.
3	BU Mini-audits with Success Indicators	A detailed consideration of compliance in relation to specific topics, e.g. hazardous substances, lasers, compressed gases. Aim to cover 2-3 topics per year.	Mainly aimed at high risk BUs. Low risk – mainly DSE.	HSC (or other safety critical role) sets up and carries out.
4	Health & Safety Review and Plan	A desk-top self-review of a BU's safety management system that is recorded on a set University template. Annually required.	All Business Units.	Health and Safety Department coordinates, HSC completes and HoBU approves.
5	University Audits	Thorough in-depth audit of a BU or section of a BU. 3-5 yearly depending on risk profile of BU.	All Business Units	Health and Safety Department coordinates and carries out.

4.2 Reactive Monitoring

Reactive monitoring refers to monitoring carried out after adverse events (incidents). It involves investigation of individual incidents and review of overall incident data to identify emerging trends and to identify remedial actions.

Although by definition, reactive monitoring means someone has either been injured or become ill, or nearly done so, as a result of a University activity, valuable lessons can be learnt to prevent reoccurrence.

The University's policy is for all incidents to be recorded on the [on-line incident reporting system](#) and guidance and training are available on the investigation process.

5. Training and Competency relating to carrying out monitoring activities

Staff involved in carrying out monitoring activities should be competent in recognising non-compliant standards or poor health and safety practice (in terms of unsafe behaviours and conditions) for the level of monitoring they are carrying out and the type of area involved.

The following training and competencies are required under this policy:

Training and competencies for carrying out Monitoring activities				
Type of Monitoring	Carried out by	Training and competency	Template (UoN Templates are available on Workspace)	Reporting to
Level 1 Housekeeping Checks	Local worker/monitor e.g. Technician, Post-Doc, PGR, Administrator	Briefed on what to look for, how to record and how to report issues,	Housekeeping checklist with BU additions as required	Local manager and HSC/HSA as set in BU arrangements
Level 2 Inspections	HSC/HSA or other safety critical role with local staff	Briefed on what to look for, how to record and how to report issues.	Inspection checklist with BU modifications as required	HSC & local manager Summary report to BU Safety Committee
Level 3 BU Mini-audits with Success Indicators	HSC	NEBOSH cert. or equiv. Trained in how to undertake inspections and report.	University Success Indicators	HoBU and BU Safety Committee
Level 5 University Audits	Health and Safety Advisors in H&S Department	NEBOSH Diploma trained or equiv. Trained & experienced in formal auditing techniques	Standard templates in line with auditing system being used	HoBU UoN Safety Committee
Incident Investigations	Line manager for simple, low impact incidents.		UoN On-line Incident reporting system	
“	HSC and/or H&S Advisors (H&S Department) for investigation of serious incidents	Minimum of internal incident investigation training	H&S Department detailed investigation form for serious/high impact incidents.	BU Safety Committee, Local Managers, Head of Business Unit

6. Recording and Reporting of Monitoring Activities

6.1 Active Monitoring (housekeeping checks, inspections, audits)

The University requires all active monitoring activities, both at University and Business Unit levels, to be recorded in a robust fashion in line with the University’s standard, including identification of

problems, the recommendations for action, who is responsible for completing/progressing the actions and the timescale for completion (see related guidance).

In addition to the recording of individual monitoring activities, reports, at both University and BU level, must be compiled to provide key data to relevant safety committees and management on a routine and regular basis. The University has an escalation mechanism for the follow up of actions and defining, as a minimum, what findings must be reported to local committees.

6.2 Reactive monitoring (incident reporting and investigation)

Individual incidents including near misses and occupational ill-health must be recorded on the University on-line incident reporting system; this includes reporting the facts of the incident and the investigation.

In addition to the recording of individual incidents, reports, at both University and BU level, must be compiled to provide key incident data to relevant safety committees and management on a routine and regular basis. Such reports must focus on trends in incident root causes and the improvement plans to address these.

7. University Level Monitoring

Active Monitoring

Audits

The Health and Safety Department will organise regular audits with BUs in line with their level of risk. Generally an audit team will examine in detail the BU's premises and equipment to establish if they are fit for purpose, examine relevant documentation such as risk assessments, SOPs and Codes of Practice and discuss working practices with local workers and if possible observe them working. There should be the opportunity to check that engineering controls and PPE are used correctly.

A written report will be submitted by the Health and Safety Department to the Head of Business Unit and Health and Safety Coordinator. The report will include details of any issues highlighted, the remedial actions required, who is responsible for taking action and a timescale. The Head of the Business Unit must ensure that, with the support of the Health and Safety Coordinator and Safety Committee, the audit findings are taken forwards to a satisfactory conclusion.

Mini-Audits using Success Indicators

Success Indicators will be used by the Health and Safety Department to lead a mini-audit or for HSCs to lead mini-audits within their BU. The majority of the Success Indicators are topic-specific and aim to test compliance with legal requirements and / or University policy.

Health and Safety Review and Plan Documents

The Health and Safety Department will ensure all BUs make an annual return of the above and will review responses for common themes in order to identify potential University actions and to support BUs in addressing issues.

Reactive Monitoring

The Health and Safety Department will, as appropriate, support or directly carry out incident investigations for more serious incidents, e.g. those reportable to HSE and others with significant consequences.

A summary of these will be submitted to the University Safety Committee for consideration. The Health and Safety Department will also compile, as a minimum, an annual report detailing significant incident KPIs and trends; this will also be submitted to University Safety Committee and UEB/Council.

Reporting

On a regular basis, as part of standard reporting, the Health and Safety Department will provide data concerning the above types of monitoring to the University Safety Committee and to BUs as relevant.

8. Monitoring Arrangements within Business Units

To inform members of the Business Unit about local monitoring policy and arrangements, it is necessary for each Business Unit to have local arrangements. As a minimum, the following should be modified to suit:

(Name of BU) has the following arrangements for actively monitoring health and safety standards:

- Housekeeping checks - Level 1
- Inspections – Level 2
- Mini-audits using Success Indicators – Level 3
- Health and Safety Review and Plan – Level 4

The table below explains how these monitoring activities are organised:

Reporting on active monitoring activities is a standing agenda item on the BU Safety Committee or senior management team meeting where applicable.

In addition to the above, senior management periodically carry out health and safety leadership walk rounds.

Reactive monitoring is carried out by using the University on-line incident reporting system for recording the details of what happened and the investigation. Incident investigations will be carried out by the relevant line manager, supported by the local Health and Safety coordinator.

The Health and Safety Coordinator will provide reports to BU management (via the BU Safety Committee if applicable) on overall incident numbers and trends. Lessons learnt and improvement

How BU Monitoring Activities are organised					
Type of Monitoring	Level 1 Housekeeping	Level 2 Inspections	Level 3 Mini-Audits	Level 4 H&S Review & Plan Return	Level 5 Audits
Who carries it out	Complete rows as relevant	Complete rows as relevant	Complete rows as relevant	Health and Safety Coordinator	Health and Safety Department
How frequently it is done	“	“	“	Annual	3-5 yearly
How it is recorded	“	“	“	H&S Department Template	University Audit Template
Who receives reports	“	“	“	Health and Safety Department	HoBU and HSC
Where records are kept	“	“	“	e.g. BU shared drive	H&S Department shared drive
How completion of actions are monitored	“	“	“	HSC forms plan of action & progress monitored via BU Safety Committee	Scheduled follow-up meetings with senior managers and HSC
How significant findings or repeat poor practice is dealt with	“	“	“	N/A	Reported to UoN H&S Committee & Director of H&S for action

plans will be shared with relevant staff and students.

Guidance

Developing an Active Monitoring Plan (HSC to set up)

The BU, coordinated by the HSC, needs to agree how each level of active monitoring will be applied in the Business Unit

Divide the BU into manageable sections and be clear on who is doing what.

Define the frequency for each level of monitoring. Record the arrangements for each level to aid consistency of approach.

Aim to set schedules of inspections and mini-audits for the year ahead so that those involved know what time commitment is expected of them and can plan to ensure they are available.

The Health and Safety Department has a template for recording scheduling of monitoring.

Record Keeping

Note: Early 2022: the H&S IT system, Compass, will enable online recording of monitoring.

In the meantime, the BU, coordinated by the HSC, needs to agree how each level of monitoring will be recorded. For Basic Housekeeping and Inspections, a set checklist is advised. Templates are available from the Health and Safety Department.

Actions Tracking

Note: Early 2022: the H&S IT system, Compass, will enable action tracking.

In the meantime, whatever format is used to record the check, it must be clear what defects or deficiencies have been identified, how they are to be corrected and who is responsible for taking action.

Within the BU arrangements, it must be clear what timescales should be applied to taking corrective action.

Ensure there is a mechanism for ensuring actions are followed up to completion.

Ensure there is a mechanism for robustly storing the records of the various monitoring activities. BUs are directed to keep historical records of Levels 2-5 for 6 years and housekeeping checks (Level 1) for 3 years. (The Health and Safety Department will be keeping records of any formal monitoring activities that are undertaken, i.e. Audits and Annual Health and Safety Review and Plan Returns.

Reporting and Escalation Process

HSCs need to have oversight of active monitoring to ensure it is being done to an appropriate standard in line with the BU's arrangements and schedule.

HSCs must ensure a report of Active Monitoring outcomes is provided to the BU H&S Committee or equivalent forum. This should include:

- Progress against the schedule including monitoring not being carried out
- Key findings
- Serious issues / imminent danger concerns
- Progress against actions including stats on overdue actions

- Learning at BU level

The BU should consider how to escalate issues such as monitoring repeatedly not being carried out and large numbers of overdue actions. These should be flagged at the H&S Committee for senior management to agree resolution.

Who will be carrying out monitoring and are they competent to do so?

It is necessary to designate workers to carry out and record the different levels of monitoring. Particularly for Levels 1 and 2, it is expected that these will not automatically fall to safety critical roles. Workers from the areas to be inspected (Post docs, Technicians, PGRs), with the appropriate training and instruction can be involved in carrying out these levels of monitoring. To maximise effectiveness of monitoring activities, the HSC must consider the competence of those inspecting and may need to provide local instruction on what is required.

For Level 3 mini-audits, other representatives can be involved, for example, topic specialists (be guided by Health and Safety Department), Union/Employee Reps (have the legal right to participate in monitoring activities) and senior management (to demonstrate commitment to local health and safety). Again competence to participate must be considered.

In assigning monitoring to members of their BU, the HSC should ensure that those involved, understand the standards expected and are competent to assess the standards for the level of monitoring they are carrying out. If necessary, the HSC should provide instruction and support to enable this.

Forms (Templates) for recording monitoring

To support Business Units with the recording of monitoring activities, tracking actions to completion and reporting KPIs, the University has invested in an IT system (Compass). The system has set question sets for each of the monitoring levels. The system is due for implementation in 2022 and in the meanwhile, there are manual forms available:

- 1. Housekeeping Checklist**
- 2. Inspection Checklist**
- 3. Mini-Audits (topic-specific)**
- 4. Annual Health and Safety Review and Plan Template**