

Monitoring, Audit, Inspection & Review policy

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Contents

1. Introduction	3
2. Scope	3
3. Legal Requirements	3
4. Responsibilities	3
4.1. University Responsibilities	3
4.2. Senior Management Team	3
4.3. Managers	4
4.4. Employees	4
4.5. Health & Safety Team	4
5. Definitions	4
5.1. Monitoring	4
5.2. Safety Auditing	4
5.3. Safety Inspection	5
5.4. Safety Review	5
5.5. Health and Safety Plan	5
6. Monitoring	5
6.1 Departmental Health and Safety Meetings	5
7. Auditing	6
7.1. Health and Safety Management Audits	6
7.2. Other Specific Audits	6
7.3. Auditing of the Health and Safety Auditing System	6
8. Inspection	7
8.1. Categories of planned inspections	7
8.2. A Successful Health & Safety Planned Inspection Programme	8
8.3. Inspection of work places and work activities	8
8.4. Inspection of equipment	10
9. Review	10
10. Information, Instruction & Training	11
11. Records	11
12. References	11
Appendix A – Typical topics to be included in an H&S Plan	12
Appendix B - School/ Departmental Health and Safety Meeting	13

1. Introduction

The purpose of monitoring, auditing and reviewing health and safety management is to measure and monitor of the health and safety management system performance against pre-determined plans and standards.

Monitoring, auditing and review will enable the organisation , identify the need for remedial action and opportunities for improving performance. By doing so, the University will be able to identify, avoid or mitigate risks and to ensure the health and safety of all those to whom it owes a duty of care.

2. Scope

This policy is applicable to all services within the University.

3. Legal Requirements

These arrangements will be carried out in full compliance with all relevant health and safety at work legislation. The legislation applicable includes the following:

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999

4. Responsibilities

4.1. University Responsibilities

The University has, through the Health & Safety Policy Statement, made the commitment to continuously improve the effectiveness of the health and safety management system.

Senior management shall review the organisation's health and safety management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews will consider both pro-active and reactive data and shall include audit performance, assessing opportunities for improvement and the need for changes to the health and safety management system, including the policy and objectives.

4.2. Senior Management Team

It is the responsibility of Senior Management to ensure that:

- This policy is brought to the attention of all staff to whom it may relate;
- The Health and Safety (H&S) activities (audits/inspections/training/incident investigation, etc) are completed within their areas.
- H&S performance is reviewed within each area, e.g. completion of identified actions from audits and inspections, incident rates.
- Key performance management information is supplied to the Health & Safety Committee on request.

4.3. Managers

It is the responsibility of all managers to ensure the following;

- Ensure that the areas in their control are inspected in line with set schedule in the H&S plan or an audit schedule. Where safety representatives are elected to represent staff, they should be invited to be part of the inspection team.
- Co-operate with any health and safety audits/inspections undertaken by others in their area.
- Consider and agree with the person undertaking the audit/inspection the findings and any remedial actions needed.
- Ensure all agreed actions are completed in an appropriate and timely way as agreed.
- Set up arrangements to monitor and review health and safety performance in their own area of responsibility.

4.4. Employees

All employees shall:

- Co-operate with the employer with regard to monitoring and auditing.

4.5. Health & Safety Team

The Health & Safety team shall:

- Develop and maintain a programme of audits to independently monitor the levels of compliance with University and legislative requirements.
- Assist Schools and Departments in developing of the H&S plan and oversee relevant activities.
- Provide reports to the relevant groups e.g. performance boards, senior management team groups with relevant management information, including audit performance.
- Provide summaries of the overall level of compliance with health and safety requirements to the Health & Safety Committee.

5. Definitions

5.1. Monitoring

The processes to continuously measure safety performance, e.g. incident statistics, safety training undertaken against safety training planned, safety inspections undertaken etc. with the aim of taking timely action to improve performance

5.2. Safety Auditing

An examination of the safety arrangements in a given work site or management unit by an independent evaluator who will provide feedback on the level of compliance with departmental or University policies, standards and procedures, including areas

requiring improvement and identify required actions to be taken where non-compliance is found.

5.3. Safety Inspection

The process of visually checking the work area to find examples of safety systems in operation or where safety improvements are needed. This will normally result in a list of agreed actions. The inspection(s) are undertaken by individuals or groups including Line Managers, safety representatives or the Health and safety team.

5.4. Safety Review

A formal and recorded evaluation of the safety performance of a School or Department. This should be undertaken by the Senior Management in high risk Schools, supported by the Health and Safety team, annually. The output should be a report highlighting successes and any areas for improvement and include actions for the following year's Health and Safety Plan.

5.5. Health and Safety Plan

Each department needs to plan health and safety improvements and monitor the implementation of that plan. The H&S Plan will include any University priorities agreed at the Health & Safety Committee, areas needing improvement identified in audit reports and from any previous School health and safety review. Plans for longer periods than a year are recommended, but these should be reviewed and amended annually. Departments are encouraged to embed this within the existing planning activities and a list of suggested items is included in Appendix A.

6. Monitoring

Each School or Department should be regularly monitoring health and safety. Monitoring should include the following:

- Examining notifiable accident reports, accident statistics and trends and make recommendations to relevant parties (e.g. Senior management, managers and Performance Groups) for corrective action;
- Monitoring the completion and adequacy of risk assessments undertaken across the School;
- Monitoring the effectiveness of the safety content and numbers attending staff & student training;
- Monitoring the effectiveness of health and safety communication and employee engagement in the School;
- Examining the findings of safety audits and inspections;
- Monitor plans to implement actions identified as necessary;
- Monitoring any measures introduced within the School that may substantially affect the health and safety of staff, including the introduction of new technologies;
- Monitor the adequacy of measures introduced to control significant risks within the directorate.

6.1 Departmental Health and Safety Meetings

Schools or Departments must include H&S update as a standing item on one of their regular management committee/group, in addition, Schools may choose to monitor their performance by creation of a local health and safety meeting with relevant representatives of the workforce. See Section 9 for additional details. A template Terms of Reference is included in Appendix B.

7. Auditing

7.1. Health and Safety Management Audits

The Health & Safety team conduct audits of all Schools or Departments on a risk based cycle.

This is a systematic evaluation of how health and safety is managed on a particular site. (Note: It does not necessarily include a physical inspection of the premises).

See Health and Safety Audit webpages for Health and Safety Management Auditing Strategy and Audit Schedule: <https://staff.londonmet.ac.uk/employment-support/health-and-wellbeing/health-and-safety/health-and-safety-audit/>

7.2. Other Specific Audits

Although the auditing strategy of the University is generally premises based, from time to time the need will arise to carry out an in depth check of a specific health and safety subject, in a corporate or more tightly defined area of the University. This may arise in a number of ways such as:

- Concerns raised as a result of health and safety management audits;
- Through routine re-active monitoring (such as accident, assaults or sickness statistics);
- Because of a change in the legal standards;
- As a result of a request from the Health & Safety Committee.

The aim of these audits is to identify strategic issues in order to give early warning of potential safety management failures (such as lack of resources, poor planning or failures in procurement or risk assessment processes). In this way it aims to avoid accidents, ill health and liabilities to the University.

Results of these audits will always be reported back to the Health & Safety Committee.

7.3. Auditing of the Health and Safety Auditing System

The Health & Safety team will make every effort to ensure independence and consistency of standards when operating the University's auditing process.

The Health & Safety team will also keep under continuous review the content of the audit, in order to ensure current legal standards (and best practice) are applied.

However, it is recognised that there may occasionally be the need to:

- Verify that the standards applied are still valid;
- Seek an independent assessment of the effectiveness of the system and its implementation.

When the above are thought necessary the Health & Safety team will commission an independent body to carry out the above. This may be undertaken by external organisations.

Health and safety will also be a topic that will be included in the overall strategic plan for the University's internal audit arrangements, so subject to periodic review through this mechanism.

8. Inspection

The purpose of planned inspections includes the detection of hazards and unsafe conditions as part of an accident prevention programme. For this to be successful planned inspections have to be intrinsically linked to a corrective action process that identifies and prioritises the actions to be taken to eliminate or reduce the risks associated with the findings within acceptable time frames. This could involve changes to the work place and working practices and/or maintenance, repair, replacement of plant and equipment.

As well as identifying hazards and unsafe conditions the process can also be used for highlighting good practices. Additional benefits of carrying out planned inspections include:-

- The enhancement of safety performance
- The identification of accident potential.
- Inspections and an effective corrective action process can contribute to improving the quality of the work environment and work efficiency.
- Planned inspections can identify potential failures in safety critical equipment and may reduce costs by early detection of deterioration of plant and equipment
- The inspection process involves employees in the health and safety management of their workplace and equipment.
- Conducting planned inspections contributes towards meeting legal requirements

8.1. Categories of planned inspections

There are three distinct areas within the University where planned inspections are required:-

- Inspection of work places and work activities:** Inspection of work places may include offices, laboratories, plant rooms, workshops etc. The inspection of work activities may include waste collection, sports ground maintenance, etc.
- Inspection of Work Equipment:** The inspection of work equipment may include pre-use inspections to ensure that the equipment is safe for use and that any safety features are in place and in working order.

Typical equipment where pre-use inspections are appropriate are transport vehicles and ride on equipment, lifting equipment, power tools, electrical equipment. Other types of equipment inspections are carried where the equipment is inspected as an integral part of a general inspection or as a requirement under statutory inspections as detailed below e.g. checking guards or interlock devices, alarm operation, lifting equipment, cut out switches etc.

- c) **Statutory Inspections:** There are legal requirements to carry out inspections of specific plant/equipment and systems. Within the University this type of inspection is normally managed by Estates and carried by specialised contractors e.g. for fire prevention and detection equipment; lifts and lifting equipment; boilers and pressure vessels; portable electrical equipment and electrical wiring systems; water tanks/systems for biological hazards etc.

8.2. A Successful Health & Safety Planned Inspection Programme

The success or otherwise of any planned inspection programme is dependent on a number of factors being in place and being effective. By far the most important factors are managerial support and the **generation, implementation and monitoring of a corrective action plan**. Without these it is possible to have an excellent inspection programme but with no resulting improvements, the inspection programme will be ineffective. The criteria for a successful planned inspection programme are:-

- Trained persons to carry out inspections
- A plan that includes the schedule of inspections and responsibility for conducting the inspections.
- Carrying out the inspections in accordance with the plan
- Generation of the report and corrective action plan with agreed targets.
- Checks on the completion and effectiveness of the corrective actions.
- Reporting to management and the Health and Safety committees on the effectiveness of the inspection programme.
- Reviewing the inspection programme as required.

8.3. Inspection of work places and work activities.

In general, Schools and Professional Services Departments are responsible for carrying out safety inspections of the work areas which they manage. Shared areas are generally managed by Estates, in cooperation with the main users of those areas.

There are several types of inspection that are employed at London Met:

Planned periodic area inspection

Schools and Departments are empowered to conduct inspections of Offices and Classrooms without the need to involve the Health & Safety Team in each visit.

The frequency of the inspections of all hazardous areas (workshops, labs, plant rooms etc), should be identified in the annual H&S Plan. As guidance high risk areas should be based on any licencing or regulatory requirements, risks & hazards present. Initially when inspections are carried out there are likely to be a high number of issues to report and monthly inspections could be considered, but, with continual improvement, the frequency could be reduced.

Planned inspection must be carried out by a responsible person identified in the H&S plan, may or may not be accompanied by the Schools H&S Advisor, DSLOs and Union representatives. This may involve the use of checklist which act as an aide-memoir and record for identifying unsafe conditions and/or unsafe actions. Note that alternative formats may be used for inspections, providing they are comprehensive.

Where area inspection is required by licence or regulation this shall be conducted by local managers, DSLO's with assistance from the Schools H&S Advisor.

Management inspection

All schools shall conduct at least one management inspection per year of areas under their management. The frequency may be greater in schools with a large number of hazardous areas or a substantially large number of low hazard areas and should be identified in the annual H&S plan. This inspection should be conducted by the Dean / Head of School with assistance from DSLO's and Schools H&S Advisor. .

Professional services departments should conduct similar management inspections at least once between audits, with assistance of Schools H&S Advisor.

Management inspections, while planned may be announced or unannounced to the local users, at the discretion of the Dean / Head of School / Department

Unplanned / follow up inspection

An unplanned inspection should also be carried out following any accident or serious incident. This type of inspection may also be carried by Union representatives, the Health and Safety Team and/or managers.

Trade Union Inspections

Union Safety Representatives also have a legal right to inspect the workplace areas they cover provided they give reasonable notice in writing. They also have the right to carry out an inspection if there has been a notifiable accident, disease or dangerous occurrence.

With the agreement of the Trade Unions these inspections will be coordinated with the H&S Team.

Start / end of day inspections & routine weekly checks

For example, opening or lock up checks, eye wash / infrequently used outlet flushing. These should be identified in risk assessment and/or local rules including who is responsible for carrying out checks.

Routine condition inspection

Inspection of conditions of areas where the condition may change through the working day to present an increased risk. e.g. Toilets and showers should be inspected at regular intervals throughout the day to ensure that no water spillage has been formed that would increase the risk of a slip.

This should be identified in risk assessment including who is responsible for carrying out checks. Action identified during this type of inspection should be taken immediately to correct / report / made safe any issues identified at the time of inspection, and daily log / sign of sheet should be maintained.

8.4. Inspection of equipment

This guidance does not describe the statutory inspection process which will normally be carried for the University by external contractors. This section provides guidance on the inspections of equipment carried out in the following circumstances:-

- Pre-use inspections

The purpose of pre-use inspections is to identify any damage or defect in the equipment, to identify if it requires any maintenance or repair to ensure it is safe to use and to check if any dates for examination and testing of the equipment have expired. This type of inspection is normally carried out by the person using the equipment e.g. the driver of the vehicle; the person operating the lifting equipment or the person using the chainsaw.

- A part of general inspection

As part of general inspection process or other type of inspection of a work activity e.g. checking cabling during a computer workstation installation.

Checklists are used to assist those carrying out the inspection to remind them what to look for, to initiate corrective actions where necessary and to record their findings. Pre-use inspection checklists should be specific to the equipment, tool, vehicle or machine. If help is required in generating the checklist please contact Health and Safety Team.

9. Review

Reviews will be conducted, both within Schools and Departments and at the Health & Safety Committee.

All Schools/Departments are expected to have a rolling program of reviewing their health and safety standards. Each area will have risk assessments, fire risk assessments, local policies and procedures (including safe systems of work), health and safety training needs. All of these must be reviewed on a regular basis to ensure they are current and that actions identified are being completed;

By default (i.e. assuming there is no reason to review these documents sooner) all the above should be reviewed at least annually, together with the H&S plan;

Actions produced following an audit or inspections should be reviewed at least termly

to ensure all actions have been taken; Updates on actions from H&S audits are communicated to the H&S Committee at the termly meetings.

Each School will have at least one management committee/group which includes Health & Safety as an agenda item and can consider and address health and safety issues within their School, as well as implementing corporate decisions cascaded via the Health & Safety Committee. These groups should meet not less than three times per year and review the following:

- The annual safety plan based on the corporate plan and local needs. This plan will set out health and safety objectives for the School as a whole, and how these objectives are to be met.
- Monitor performance against the annual plan, including the items listed in section 6 and Appendix A.

A manager from each service or section within the group must take part in this review (All Services within Groups must be represented.);

10. Information, Instruction & Training

All staff are expected to complete their health and safety training in line with the health and safety training matrix.

Audits should be led by a suitably competent person. Normally someone with health and safety training and experience plus auditor training such as lead auditor for ISO 9001 or ISO 45001 or similar.

Minutes from the Health & Safety Committee should be circulated and available to all staff. Generally this should be on the health and safety notice board or other health and safety display areas.

11. Records

Records of performance groups meeting, inspection reports and audit data should be retained in line with the University's' document retention policy.

12. References

"Managing for Health and Safety" HSG 65

Appendix A – Typical topics to be included in an H&S Plan

- Risk Assessments – topics and review dates
- Training Matrix
- Training Completion
- Induction Completion
- Inspection Results and action tracker
- Audit Results and action tracker
- Health Surveillance Needs and arrangements
- New Projects
- Outstanding Issues (from previous Reviews)
- Appointments to Safety Roles
- Departmental H&S Meeting Terms of Reference and Minutes
- Business Continuity Plans
- Equipment Records (PPMs, Reactive Maintenance, Servicing, Statutory Inspections etc.)

Appendix B - School/ Departmental Health and Safety Meeting

Suggested Terms of Reference

London Metropolitan University's health and safety policy statement requires Heads of Schools and Professional Services Directors to manage health and safety at the local level, while ensuring conformity within their Schools/Professional Services to the requirements of LMU's Health & Safety Management System.

To this aim, they may choose to establish their own local Health and Safety Working Group acting as a forum for management to consult and communicate with their staff on matters relating to health and safety by considering issues to:

- Interpret and apply LMU's Health & Safety policies and procedures at the School/Professional Service level.
- Ensure risk assessment are undertaken and control measures implemented
- Receive at least termly inspections reports.
- Keep under review all accidents and incidents which relate to the School's/Professional Service's activities.
- Identify and consider all health and safety training requirements, to meet current legislative standards and best practice.
- Communicate any health and safety information throughout the School/Professional Service.
- Monitor progress against School's/Professional Service's Health and Safety Local Annual Action Plan.
- Receive reports from the DSLOs on their areas of operation.
- Consider changes within the School/ Professional Service that are likely to effect health and safety of staff and students.

Standing Agenda Items (for inclusion at every meeting)

- Attendance/Apologies.
- Minutes of the previous meeting.
- Matters arising/outstanding actions from previous minutes.
- Consider regular reports such as Audit, DSLO, management, appropriate surveys, Trade Union Safety Representatives, Inspection, accident investigation, other Health and Safety Committees and Health and Safety Training.
- Review accident statistics and serious incident reports.
- Requests or issues to be considered by Trade Unions Safety Representatives.
- Review risk assessment controls, associated objectives, and targets.
- Review regulatory activities unique to the School/Professional Service (i.e. X-ray, Laser, GM, asbestos, radiation, lifting equipment, etc.).
- Progress of audit and inspection recommendations.

- AOB.

Agenda Items to be included (at least) annually.

- Review the School's/ Professional Service's Health and Safety Local Action Plan annually.
- Review School/ Professional Service annual accidents and incidents.
- Review the School/Professional Service Hazard Register.
- Review annually health and safety training needs of the School/Professional Service.

Membership

Membership of the committee should include representation from all areas within the School or Professional Service.

Table below to be populated by the School /Professional Service

Compositions	Membership
Chair	Nominated by the Head of School/Director of Professional Service
Deputy	If Required
School or Professional Services Safety Representatives	DSLOs
Departmental Representatives	Nominated by Heads of Service or Departments
Safety Critical Role Holders	(E.g.) Laser Safety Officer
Estates Business Partner	
Schools H&S Advisor or Estates and Fire Safety Adviser	
Union Safety representatives	

Other members of the School/Professional Service can be co-opted by the Chair, as necessary.

Whilst the purpose of these groups is to support communication and the management of health and safety at a School/ Professional Service level and not to consult formally on H&S arrangements, Trade Union H&S Representatives may also be invited to join meetings of the Working Groups at the discretion of the chair.

In attendance: Health and Safety Advisor for the School/ Professional Service.

Secretary: To be determined by the School/ Professional Service.

Frequency of Meetings

The Committee will meet at least three times yearly and at least termly.

There may be a necessity to hold meeting more frequently for those areas that carry complex risks.

Further, the chair can convene extra committee meetings if required but must give at least 7 days clear notice.

Documentation

The Committee Chair will draw up the necessary agenda and papers for each committee meeting.

Agenda, minutes of the previous meeting and reports, will be produced and circulated in accordance with agreed timescales; they should be received 7 days before the meeting.

Minutes to be emailed to all members regardless of committee membership as soon as possible after the date of the meeting, but no later than 14 days of the meeting being held.

Reporting

The local Health, Safety, and Welfare Committee formally reports to the School Leadership Team or Professional Services Director management team.