

Active Monitoring Procedure

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Approved By	Head of Occupational Health and Environmental Safety		
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Policy Owner	OHES	Impact Assessed	Yes
Version	6	Date of next review	2025

Version Number	Purpose/Change	Date
1	Update to reflect organisation	2017
2	New web format, addition of condition surveys to LTM plan. Update to reflect organogram.	2023

Active Monitoring of Health and Safety Standards

1. Background and Rationale

The Arrangements section of the University's Health and Safety Policy states:

• All aspects of the University's undertaking are subject to detailed active monitoring. This is programmed and carried out according to separately detailed procedures and protocols.

Deans of Schools and Heads of Departments and subsidiaries are responsible for ensuring each aspect under their responsibility is actively monitored and that the outcomes are recorded, and necessary improvements are prioritised and actioned.

Active Monitoring is undertaken at four levels:

- 1. regular self-inspection by each School and Department
- 2. audit of issues and topics; and
- 3. audit of each School and Department at a frequency based on hazard level;
- 4. full institutional management system audit;

This procedure gives effect to the above aims and describes the arrangements to be followed.

2. Purpose

This procedure has two main aims: firstly, it describes the health and safety inspection system to be adopted, implemented and maintained at School and Department level; and secondly it describes an audit system whereby all parts of the organisation will be scheduled for a regular detailed audit at a frequency determined by the perceived risk.

3. Scope and Definitions

This procedure applies to all parts of Robert Gordon University, and to all its Schools, Departments and Subsidiaries. It does however apply in different ways depending upon the risk category. Deans of Schools and Heads of Departments should therefore familiarise themselves with the following definitions:

<u>High Hazard areas</u> are areas with high levels of laboratory and machinery usage and areas in which temporary hazardous work is carried out, e.g., construction, one-off projects, marquee erection and degree shows.

<u>Medium Hazard areas</u> are areas with less significant levels of laboratory and machinery usage and those that regularly have public events or custom.

Low Hazard areas are areas where only low hazard tasks are undertaken, with no hazardous equipment. This includes office activities, meetings and lecturing.

For the purposes of this procedure, all Schools and Departments have been assigned a hazard rating and location based on the most hazardous of their activities:

	High Hazard Schools/Departments	Medium Hazard Schools/Departments	Low Hazard Schools/Departments
	Gray's School of Art	Scott Sutherland School of Architecture and Built Environment	School of Computing Science
	School of Pharmacy and Life Sciences	Clinical Skills Centre	Academic Administration
	School of Engineering	School of Health Sciences	School of Applied Social Studies
	Estates: Grounds	RGU: SPORT, Boathouse & Streetsport	Governance & Academic Quality
	National Subsea Centre	Gatehouse Design & Print Consultancy	RGU Art & Heritage Collections
		Student Union	Communications & Marketing
		Estates: Reception & Administration	Human Resources
		Estates: Maintenance & Projects	Finance & Procurement
		Estates: Facilities	DELTA
		Estates: Catering & Accommodation	Library Services
		Admissions / Student Recruitment	Student Life
		Business & Economic Development	Aberdeen Business School
		IT Services	School of Creative and Cultural Business
			The Law School
			School of Nursing and Midwifery
			Entrepreneurship and Innovation Group
			Energy Transition Institute Alumni & Fundraising
			Planning & Insight
			Centre for Employability and Community Engagement
			Graduate School
			Research Strategy & Policy
			RGU Orkney
			Widening Access & Participation

4. Actions

a. Inspection

Inspections should be proactively planned, and relevant areas subject to inspection should appear on the School/Departmental Annual Health and Safety Plan.

Inspections should be carried out internally – i.e. by a representative of the management of the School or Department to be inspected.

Any request by a Trade Union Health and Safety Representative (made to the Dean of School or Department) to be included in a specific inspection should be accommodated where reasonably possible.

All low-hazard areas of Schools and Departments should be thoroughly inspected not less often than sixmonthly using the appropriate form. The inspection form serves as a location-based risk assessment record for routine hazards not subject to further specific risk assessment, e.g. machinery or COSHH.

All medium-hazard areas of Schools and Departments should be thoroughly inspected not less often than quarterly using the appropriate form.

All high-hazard areas of Schools and Departments should be thoroughly inspected not less often than quarterly using the appropriate form. High hazard temporary works will be inspected at a frequency determined by the Head of OHES.

Common areas, e.g. computer labs, lecture theatres and toilets are the responsibility of, and are inspected during routine occupation by, the Estates and Property Services Department. Actions will be logged via the Estates Helpdesk.

The fabric of Buildings and external areas will be inspected and recorded by periodic condition surveys on a schedule determined by the Estates and Property Services Department, including the condition of roofs and masonry subject to deterioration. Additional inspections will be performed following storm events liable to cause damage.

Areas that are under the control of RGU's contractors should be inspected by the School or Department that arranged the contract.

Any defects should be discussed in the first instance with the occupants or users of the area being inspected.

If defects can be rectified in situ, this should be done, and the action noted on the form.

The report should be submitted, together with any recommendations for improvement, to the Dean of School or Head of Department who will decide on the recommendations and provide feedback to all stakeholders. All inspection forms should be kept for a minimum of three years for audit purposes.

b. Full System Auditing

The application of Robert Gordon University's health and safety management system will be audited at least every two years by an in-depth audit using the university insurer's system.

Findings of the audit will be agreed with the nominated Health and Safety Director and outcomes published as follows:

- Executive
- Health and Safety Committee

c. Detailed Internal Auditing

All audits will be performed by or on behalf of the Occupational Health and Environmental Safety Department. Subject to availability of key personnel:

All "high hazard" Schools and Departments will be audited annually.

- All "medium hazard" Schools and Departments will be audited biennially.
- All "low hazard" Schools and Departments will be audited every three years.

All audits will include in their scope all relevant subject areas listed in the "Arrangements for Health and Safety Management" part of the Health and Safety Policy, viz:

- Suitability of and performance against the local Health and Safety Plan
- Communication and consultation
- Risk Assessment
- Health and Safety Competency
- Investigation and reporting
- Reactive response and closure of health and safety actions

In addition, the Occupational Health and Environmental Safety Department will preset corporate priority topics on an annual basis.

Where relevant to the School or Department being audited, these topics will be included automatically in the scope of the audit.

The auditor will agree with the Dean of School or Head of Department the scope of the audit. Additional local issues can be added to the scope of the audit. This process will involve relevant staff and/or their Safety Representatives.

The Dean of School or Head of Department will ensure that all key people and facilities are available during the audit.

The findings of the audit and the priority to be given to improvements will be agreed with the Dean of School or Head of Department. The audit report will be published, with copies as follows:

- Dean of School or Head of Department
- Health and Safety Coordinator
- Members of the Health and Safety Committee
- Director or Vice-Principal (Departmental audits only)
- Nominated Health and Safety Director

The Dean of School or Head of Department will agree an action plan to effect the improvements agreed following the audit, and ensure its implementation.

This action plan will be presented to and must be accepted by the Health and Safety Committee.

Progress on all issues will also be monitored by the Health and Safety Coordinator, or the Occupational Health and Safety Adviser as appropriate.

d. Audit of Special Risks

Disciplines for which there are specific competencies, separate regulations or codes of practice, or for which specialist arrangements are in place will be subject to a specialist audit. Special risks currently include:

- Radiography
- Laser safety
- Workplace Transport
- Control of legionella
- Asbestos

Where specialist knowledge is required to perform an audit, this will be performed by an external expert. However, the arrangements and performance of the contract will be subject to an internal annual review.

All other disciplines will be audited internally by the Occupational Health and Environmental Safety Department.

Audit reports will be published and actioned in the same way as those for general audits, with the close involvement of the relevant line manager or supervisor.

5. Responsibilities

a. Dean of School / Head of Department

Deans of Schools and Heads of Departments are responsible for:

- Planning inspections on a proactive basis and including them in their Health and Safety Plan.
- Ensuring inspections are carried out timeously by an appropriately competent and resourced person.
- Accommodating reasonable requests by Trade Union Health and Safety.
- Representatives for inclusion in the inspection process.
- Deciding on an appropriate course of action to deal with recommendations in inspection reports and providing feedback to all stakeholders.
- Jointly with the Auditor, agreeing the scope of the audit, ensuring that current corporate priorities and concerns of stakeholders are considered.
- Facilitating the audit by arranging times when key personnel and facilities will be available.
- Agreeing the terms of the final report with the Auditor. NB, if agreement cannot be reached this must be reflected in the audit report.
- Agreeing an action plan pursuant to the audit report.
- Presenting an action plan for resolving high priority issues that is acceptable to the H&S Committee.
- Implementing the agreed action plan.

b. Inspector

Inspectors, i.e. those charged with carrying out inspections, are responsible for:

- Recording the inspection on the appropriate form (i.e. for high, medium or low hazard areas as appropriate).
- Remedying those defects that can be remedied at the time of inspection.
- Making recommendations for improvements to the Dean of School or Head of Department.

c. Project Manager/Project Leader

Those responsible for temporary projects are responsible for all aspect of the health and safety of staff, students or others involved in or who may be affected by those projects. This includes inspection. Project managers and leaders therefore take on the responsibilities of Dean of School / Head of Department and/or Inspector as appropriate.

d. RGU Hosts Who Employ Contractors

Where a contract is awarded which assigns responsibility to the contractor for the safe maintenance of an area, the RGU host awarding the contract is responsible for ensuring appropriate inspections are carried out.

e. Head of OH&ES

The Head of the Occupational Health and Safety Department is responsible for: Ensuring a full system audit of the University is carried out every two years and for resourcing and implementing an internal audit programme auditing each School/Department based on assigned risk rating.

Publishing all audit reports and their synopses in an appropriate manner. Ensuring detailed internal audits are planned for all parts of the University. Keeping the hazard category of each School and Department under review and ensuring it remains appropriate.

f. Health and Safety Committee

The Health and Safety Committee, via the Vice-Principal (Corporate Services) as Chair, is responsible for making reports and recommendations in the following areas specific to audit:

Recommending corporate health and safety priority topics for audit each year. Escalating significant unresolved concerns re adequacy of or closure of actions following audit.

g. Auditor

The person carrying out or leading the audit is responsible for:

- Jointly with the Dean of School or Head of Department, agreeing the scope of the audit, and ensuring that current corporate priorities and concerns of stakeholders are considered.
- Agreeing the terms of the final report with the Head of School or Department. NB, if agreement cannot be reached this must be reflected in the audit report.

h. Health and safety Coordinator

School/Departmental Health and Safety Coordinators are responsible for maintaining records of inspections carried out in the School/Department and assisting the audit process.

6. References

a. Health and Safety Management System

RGU Health and Safety Policy – Arrangements for Health and Safety Management

Risk Assessment Procedure

b. Forms

Inspection Form – Low Hazard Areas

Inspection Form – Medium and High Hazard Areas

Inspection Form – Temporary Work Sites



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