



Health & Safety Performance Monitoring

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Comments: Updated and renamed version of our H&S Audit Procedure

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[CP 09a Health and Safety Audit Program.docx](#)

[CP 09b Health and Safety Audit Scope.docx](#)

[CP 09c Health and Safety Audit Checklist.docx](#)

[CP 09d Health and Safety Audit Risk Register.xlsx](#)

1. Introduction

- 1.1. The Management of Health and Safety at Work Regulations 1999 place a duty on employers to monitor and review the arrangements which have been put in place for health and safety. Performance measuring and monitoring is also a key component of Blackwood's Safety Management System (SMS). Our SMS is based on 'BS OHSAS 18001: 2007' and utilises the Plan – Do – Check – Act (PDCA) methodology. This requires us to regularly 'Check' our health and safety management system to ensure we are compliant with health and safety legislation, good practice and our own internal policies and procedures.
- 1.2. Performance measuring and monitoring can be both active and reactive.
- 1.3. **Reactive monitoring** - looks at accidents, ill health and other incidents, and provides an opportunity for identifying and correcting deficiencies after an event has occurred. Whilst reactive monitoring is important we should not wait for things to go wrong before we assess if the measures in place are adequate. We have other procedures that cover this side of performance monitoring.
- 1.4. **Active monitoring** - provides us with feedback on our current performance to allow us to take action, if necessary, to prevent an accident, incident or ill health from occurring.
- 1.5. Both active and reactive monitoring are important elements of our SMS. However, an additional benefit from active monitoring is that it can also allow us to measure success and reinforces positive achievement.

2. Purpose

- 2.1. Health and safety systems can be subject to examination by external stakeholders, including independent audit organisations, customers or enforcing authorities. The purpose of this document is to describe the arrangements in place for active monitoring, and specifically internal health and safety auditing, in Blackwood.

3. Aims and Objectives

3.1. The HSE defines a health and safety audit as "The systematic examination to determine whether activities and related results conform to planned arrangements and whether these arrangements are implemented effectively and are suitable for achieving the organisation's policy and objectives". The overall aim of this procedure is therefore to review and evaluate the performance and effectiveness of Blackwood's SMS. The key objectives are to;

- Confirm that Blackwood's SMS has conformed and been effectively implemented;
- Identify strengths and weaknesses within the SMS and ensure statutory compliance throughout the organisation;
- Provide feedback to our SMT;
- Help with the creation of action plans for improvement based upon audit findings;
- Help ensure that resources committed to health and safety are value for money and effectively control risks.

4. Responsibilities

4.1. Each Service/Team/Care Home will be responsible for its own local Health & Safety management arrangements, and as such must be able to demonstrate and satisfy under audit that the implementation of policies and procedures are adequate and in compliance with Blackwood's SMS, and Statutory and Mandatory H&S requirements. Those with specific responsibilities under this procedure are;

4.1.1. **H&S Advisor** - Will have overall responsibility for implementing this procedure and establishing a health and safety audit programme. The H&S Advisor will also act as the lead auditor and be responsible for planning, organising and completing all H&S audits.

- 4.1.2. **Relevant Managers** - Will co-operate and provide whatever assistance is necessary for the conduct of health and Health and Safety Audits. They will respond to the findings of Health and Safety Audits and ensure action plans are prepared to address any findings. They will also monitor the progress of the implementation of audit findings and associated corrective actions.
- 4.1.3. **Senior Management Team (SMT)** – Will monitor the progress of the implementation of all non-conformances identified and the associated corrective actions. A member of the SMT will also be required to attend/participate in at least 20% of all programmed audits.
- 4.1.4. **All Employees** – Will co-operate with persons conducting local audits.

5. Health and Safety Audits

- 5.1. At the start of each year an annual audit program will be prepared by the H&S Advisor and presented to SMT for approval. The number of audits carried out each year will be as follows;
- Care Homes and Care at Home Services – 100% annually;
 - Housing Services - 33% of services annually (i.e. one region);
 - All other Services/Teams/Areas – As specified/agreed by SMT.
- 5.2. Details of the approved audit program and progress towards completion will be recorded here - [CP 09a Health and Safety Audit Program.docx](#)
- 5.3. A Health and Safety audit cannot look at every element of a system, and so sampling is important. Our Health and Safety Audits shall be sample audits, meaning that it will examine only specific parts of our Safety Management System. This will form the audit scope, which will be prepared for each audit and issued to the auditee prior to the programmed date of the audit. The audit scope shall clearly identify which parts of the SMS are to be included in the audit and which parts are to be omitted. However, if, during an audit, a non-conformance is noted out-with the audit scope and the non-conformance is of a serious nature then that non-conformance will be recorded in the audit report.

- 5.4. The audit scope can be changed each year to focus on specific areas, which might arise as a result of accident and incident trends, risk assessment findings, or a change in legislation. Each year, the audit scope for each service to be audited shall be proposed/prepared by the H&S Adviser and approved by our SMT. A Health and Safety Audit Scope template can be found here – [CP 09b Health and Safety Audit Scope.docx](#)
- 5.5. A Health and Safety Audit Checklist will be used by the auditor for each planned audit. As the checklist is generic, not all items on the checklist will be applicable to all services/teams/areas and a certain degree of interpretation/flexibility by the auditor will be required. The checklist is there to ensure a consistent approach and aid the auditor when preparing their reports. A copy of the checklist can be found here – [CP 09c Health and Safety Audit Checklist.docx](#)
- 5.6. Each Health and Safety Audit shall record, where identified, all Non-Conformances with Statutory and Mandatory requirements, and any Observations or recommendations for improvement.
- 5.7. **Non-conformances** - are classified as any action, procedure, document or item not meeting or complying with Statutory and/or Mandatory procedures or requirements.
- 5.8. Where identified, a Non-Conformance (NC) will be recorded in the audit report for that service/team/area. These shall be numbered sequentially, prefixed by the audit reference and given a specific NC number. The proposed corrective action and a target date for completion of that action shall be agreed at the time of the audit and recorded. It should be noted that compliance with the requirements of an NC is Mandatory under Blackwood's SMS.
- 5.9. Where an NC has been written against an audit, the action noted in the NC shall be automatically added to Blackwood's Health and Safety Audit Risk Register (HSARR) - [CP 09d Health and Safety Audit Risk Register.xlsx](#). The HSARR will form part of the H&S Advisor's report to the Senior Management Team (SMT) and will be reviewed at their quarterly meetings. All such NC's shall remain on the ARR until they are satisfactorily completed and verified as complete by the H&S Advisor and removal approved by the SMT.

- 5.10. **Observations/Recommendations** - are classified as potential non-conformances or less serious breaches of Statutory and/or Mandatory requirements, or weaknesses in the management of Health & Safety, where immediate action can be taken for improvement.
- 5.11. Where identified, an Observation/Recommendation (OR) will be recorded in the audit report for that service/team/area. These shall be numbered sequentially, prefixed by the audit reference and given a specific OR number. The proposed corrective action and a target date for completion of that action shall be agreed at the time of the audit and recorded. This will also be added to Blackwood's H & S Audit Risk Register (HSARR) and reviewed by the SMT at their quarterly meetings. Unlike an NC these can be verified as complete and removed from the HSARR by the H&S Advisor, so that only outstanding OR's are reviewed by the SMT.
- 5.12. The output from each audit will be in the form of a written report encompassing each area of the audit. The report shall be laid out in a summary and detailed format. The audit report shall be issued via electronic format to the auditee who undertook the audit plus a copy to the relevant managers.
- 5.13. Health and Safety Audit reports will be retained for a period of 10 years and will be kept in the following H&S Folder - <G:\Health & Safety\7. Monitoring & Measuring>. This procedure will also be reviewed on a 3-yearly basis or sooner if there are significant changes to the process.

6. References

- 6.1. Blackwood's Safety Management System - <G:\Policies, strategies and guides\02 Document Library\Health & Safety\Safety Management System - Part 2\Safety Management System.docx>.
- 6.2. HSE Managing Health and Safety Performance - <http://www.hse.gov.uk/managing/delivering/check/measuring-performance.htm>