



Health & Safety Record Keeping

1 INTRODUCTION

Two questions that are raised very frequently with Health & Safety Services staff are “*What kind of (Health & Safety) records should we keep?*”, and “*For how long should we keep these records?*”. This Safety Note attempts to answer these questions.

The University requires that certain types of record should be kept to comply with the University Health and Safety Policy (as specified in the various University Safety Guides, which give detailed advice on matters of health and safety). In addition, specific records must be kept for statutory reasons, *i.e.* the requirement is embedded in specific pieces of legislation.

Keeping good health and safety records is important for the following reasons:

- It ensures key information is easily retrievable, and can be passed on from one person to another, ensuring consistency and continuity;
- It ensures that the University can demonstrate (internally and externally) compliance with our legal duties under health and safety law;
- It makes the job of the Area Health & Safety Co-ordinator easier if he/she knows what needs to be done and when;
- It enables senior managers to monitor health and safety performance;
- It is a legal requirement, in many cases, to keep certain health and safety records available for inspection. Health and Safety Executive Inspectors and Union Health and Safety Representatives have a legal right to inspect health and safety records. Health & Safety Services staff and the University Health and Safety Committee will also want to periodically review school / directorate health and safety records.

It should be noted that in cases of potential civil litigation, records might be requested by Solicitors acting on behalf of claimants, many years after the statutory need to keep records has expired. (The advice of the Insurance Officer should be sought as soon as possible if a Directorate or School is approached directly in such a regard). Where records include personal data that would allow an individual to be identified, the requirements of the Data Protection Act apply.

2 UNIVERSITY REQUIREMENTS FOR HEALTH AND SAFETY RECORDS

2.1 Health and Safety Log-book

You may have been asked in the past to keep a chronological health and safety log book / diary. There are some obvious problems with relying on this type of record system, since if you need to quickly identify, for example, which staff have received induction training, or when the last fire drill was held, you will have to thumb through the diary to the relevant date. Instead, it is recommended that each area maintains a Health and Safety File that has sections for each type of health and safety record (training / risk assessments / fire drills etc). This does not prevent Area Health & Safety Co-ordinators from keeping a diary record if they find this helpful and it will also be necessary to put reminders in your own diary as a prompt to carrying out specific activities such as health and safety inspections or fire drills.

2.2 The Health & Safety File

Area Health and Safety Co-ordinators should maintain a Health and Safety File which should be readily available for inspection. Files can be electronic, as long as they are easily and quickly retrievable, but ideally, a hard copy should be printed out for the Health and Safety File. The file should serve as the central health and safety record for the department / school / directorate. Details of the following should be kept in the file (where applicable):

- A current list of names of individuals with key health and safety roles - e.g. Area Health & Safety Co-ordinator, risk assessors, DSE assessors, first aiders (include date certificates expire), fire evacuation officers, Union Health and Safety Representatives working in the area etc;
- A copy of the Area Health and Safety Code / School or Directorate Health and Safety Policy, and projected date for review;
- Copies of other local health and safety policies, procedures or guidance given to staff or students;
- A Register of Risk Assessments Completed for the school / department / directorate (see revised Safety Guide 4 – Health and Safety Risk Assessment, Appendix 3).
- Copies of Risk assessments*, including (where applicable):
 - General risk assessments;
 - COSHH assessments;
 - Display Screen equipment workstation assessments;
 - Fire risk assessments;
 - Manual Handling operations;
 - Machinery / equipment;
 - Lifting equipment and lifting operations;
 - Fieldwork risk assessments;
 - Lone working;
 - Noise and vibration;
 - Risk of violence and aggression;
 - Social events risk assessments;
 - Student Supervision forms (if used);
 - Work in confined spaces, work at height etc;
 - Genetic modification activity risk assessments.

**Note that in most cases, the risk assessment should be carried out by the person in control of the work, and this may well not be the Area Health & Safety Co-ordinator (AHSC). The AHSC should obtain copies of risk assessments from those actually performing the assessments, and remind those individuals when a reassessment is due. See Safety Guide 4 for more details.*

- Completed Accident Records Sheets [removed from the Accident Book] – or at least details of where these and the Accident Book are kept;
- Copies of any Accident Report Form sent to Health and Safety Services, plus the report of any investigation made into the accident / incident and details of any remedial action taken following an accident or incident;
- Details of emergency procedures – e.g. fire evacuation, procedures to deal with a chemical / biological or radiological spillage, location of first aid kits and first aiders etc.
- Date and findings of Health and Safety Inspections of the Area; together with details of any actions / timescales to be taken following such an inspections;
- Record of Portable Electrical Appliance tests, remedial action required / effected, and date for repeat of test;

- Copies Material Safety Data Sheets
- Inspection and statutory examination reports relating to equipment or plant (or at least a reference to what other records are kept and where these can be found) – such as respiratory protective equipment, fume cupboards, dust extraction, pressure systems, lifting equipment, gas fired equipment etc.
- Results of monitoring of designated radiation areas;
- Other equipment maintenance and service records (or at least a reference to what other records are kept and where these can be found);
- Fire Drill Records - dates and performance [clearance time; details of any problems, etc.];
- Health and safety training records – names, dates and course title for health and safety training provided / attended (include local training such as health and safety induction; courses provided by Health & Safety Services, and external courses) - plus projected date for refresher training;
- Copies of completed health and safety induction checklists (for new staff);
- Copies of annual health and safety audit checklists and action plans;
- Minutes of meetings of the Area Health and Safety Committee [if applicable] and copy of terms of reference, membership etc;
- Copies of memos and reports received following visits from Health & Safety Services staff, Occupational Health Service staff or Health and Safety Executive / Environmental Health Inspectors, including a note of action taken to remedy any shortcomings identified;
- Waste disposal consignment notes (if applicable);
- Copies of *Safety Matters* newsletter;
- Any other health and safety records relevant to the area in question.

2.3 How long should health and safety records be kept?

Five years is a good rule thumb for most health and safety records.

Risk assessment records should be kept as long as the particular process or activity, to which the assessments refer, is performed. Examination of past assessments allows changes and improvements to be identified. Also, civil claims for injury can be made up to 3 years after an incident, so it is a good idea to also keep risk assessments relating to the previous 3 years.

Some records relating to health or environmental risks must be kept for longer periods – these are listed in the Appendix. The associated legislation is also listed.

Further copies of this Safety Note can be downloaded from the health and safety website www.extra.reading.ac.uk/safety, go to the A to Z index, Regards for 'records'. Alternatively, contact Health & Safety Services on extn. 8888.

Statutory health and safety records that must be kept for more than 5 years

Type of Record	Act or Regulation	Minimum Retention time
Environmental risk assessment	Genetically Modified Organisms(Contained Use) Risk assessment) Regulations	10 years after activity has ceased
List of persons exposed to Hazard Group 3 microbiological agents	Control of substances hazardous to health Regulations [COSHH] – Schedule 3, Biological agents	40 years from date of last entry [list to show type of work done; identity of biological agent to which the employee has been exposed, and record of exposures, accidents and incidents.]
Records of monitoring of exposures to hazardous substances <i>(only when exposure monitoring is required under COSHH)</i>	COSHH– Reg. 10(5); Control of Lead at Work [CLAW] Reg. 9(4), 18(4)	General exposure [workplace] – 5 years Personal exposure of identifiable employee – 40 years
Health records of personnel under occupational health surveillance	COSHH – Reg. 11(3) CLAW – Reg. 10(3) Control of Asbestos at Work – Reg. 10(5))	40 years from last exposure or entry on the record
Radiation dose records and health records for classified persons [Currently, no Classified Workers at the University.]	Ionising Radiations Regulations 1999 – Reg. 21(3)	50 years , or until age 75 of the individual, whichever the longer