

## Operational Standards Monitoring Procedure

### Purpose

Operational Standards are developed within the Health & Safety Management System to ensure that significant health, safety, and operational risks are effectively managed and controlled. This Monitoring Procedure defines how compliance with Operational Standards is monitored, measured, and reviewed to ensure continued effectiveness, legal compliance, and alignment with company requirements.

### Scope

This procedure applies to all departments within Lothian and covers the ongoing monitoring, assurance, and review of existing Operational Standards. It applies to all activities, locations, employees, contractors, and managers responsible for implementing or complying with Operational Standards.

### Process

#### **1. Identification of Monitoring Requirements**

Each Operational Standard will define proportionate monitoring and assurance activities based on risk and legal requirements. Monitoring should be considered where:

- The activity presents significant health, safety, environmental, or operational risk
- Legal or regulatory duties require demonstration of compliance
- Previous audits, inspections, or incidents have identified non-compliance or control weaknesses
- Performance data indicates declining compliance or effectiveness
- There is a corporate requirement for consistent assurance across business units

#### **2. Monitoring Methods**

Compliance with Operational Standards may be monitored using one or more of the following methods:

- Planned audits and inspections
- Supervisor and management safety checks
- Review of risk assessments, permits, and records
- Incident, near-miss, and hazard trend analysis
- Performance indicators (e.g. training completion, inspection close-out rates)
- Contractor assurance and verification activities

Monitoring frequency and depth will be proportionate to risk and documented within the relevant Standard or associated assurance plan.

#### **3. Roles and Responsibilities**

- Managers are responsible for ensuring Operational Standards are implemented locally and for completing required monitoring activities.

- Supervisors are responsible for day-to-day checks and addressing non-compliance at the point of work.
- Employees and Contractors must comply with Operational Standards and cooperate with monitoring activities.
- H&S Department will:
  - Provide guidance on monitoring requirements
  - Coordinate audits and assurance activities where required
  - Analyse monitoring data and trends
  - Escalate significant non-compliance or systemic issues

#### **4. Recording and Reporting**

- Monitoring outcomes must be recorded using approved systems or templates.
- Non-compliances, corrective actions, and improvement opportunities must be documented with assigned owners and target dates.
- Significant findings will be reported to relevant managers and, where appropriate, the Strategic H&S Committee.

#### **5. Corrective Actions**

Where monitoring identifies non-compliance or ineffective controls:

- Immediate actions must be taken to manage any increased risk
- Corrective actions will be agreed, assigned, and tracked to completion
- Root causes will be considered for repeated or significant failures

#### **6. Review and Continuous Improvement**

- Monitoring results will inform the formal review of Operational Standards.
- Trends, audit findings, and incident data will be considered to determine whether:
  - The Standard remains suitable and effective
  - Additional controls or guidance are required
  - A revision or replacement of the Standard is necessary
- All Operational Standards will continue to follow the established two-year review cycle, or sooner where monitoring indicates the need for change.

#### **Records**

Records generated through monitoring activities will be retained in line with company document control and record retention requirements.