INTERNAL AUDIT REPORT

FROM:	Audit and Risk Manager	**SUBJECT:**	Corporate Health and Safety
TO:	Head of Health and Community Protection	**DATE:**	8 January 2020

C.C.
Chief Executive
Deputy Chief Executive (AJ)
Head of Finance
Safer Communities Manager
Services Team Leader
Building Manager/Corporate
    Health & Safety Coordinator
Portfolio Holder – Cllr Falp

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1 Introduction

1.1 In accordance with the Audit Plan for 2019/20, an examination of the above subject area has been completed recently and this report is intended to present the findings and conclusions for information and action where appropriate.

1.2 Wherever possible, results obtained have been discussed with the staff involved in the various procedures examined and their views are incorporated, where appropriate, in any recommendations made. My thanks are extended to all concerned for the help and co-operation received during the audit.

2 Background

2.1 The Health and Safety at Work etc. Act 1974 is the primary piece of legislation covering occupational health and safety in Great Britain.

2.2 Under this Act, the Council has statutory duties that include ensuring that the working environment is safe and there are no undue risks to health, and ensuring that staff and Members are given appropriate information and training.

2.3 Whilst the legislative element is focused primarily on employees, the Council also aims to protect the public from exposure to health and safety risks arising from its activities and those of its employees and Members acting on its behalf.

3 Scope and Objectives of the Audit

3.1 The audit examination was undertaken for the purpose of ensuring that appropriate processes are in place to meet the Council's statutory obligations on health and safety as an employer and provider of services and facilities to customers and the public.

3.2 The examination took the form of an evidential risk-based evaluation of structures and processes in place to meet the Council's health and safety obligations under the statutory framework and contribute effectively to the delivery of priority objectives in relation to the Council's workforce and public wellbeing.

3.3 The programming and recording of the audit used the CIPFA systems-based audit model for organisational health and safety management, structured into sub-systems according to the following themes:

- policies and procedures
- awareness
- risk assessment
- managing risk
- training
- monitoring and reporting
- information governance.

3.4 Due to time constraints, the full test model was applied to the first four of the above sub-systems only with the other areas covered in overview only. The findings are based on discussions with Ian Carden, Building Manager/ Corporate Health and Safety Co-ordinator, and examination of relevant documents and records.

4 **Findings**

4.1 **Recommendations from previous report**

4.1.1 The current position in respect of the recommendations from the audit reported in October 2016 (all classified low risk) is as follows:

Recommendation	Management Response	Current Status
1 The policy and procedure documentation should be reviewed to ensure that it accurately reflects the current processes and any reference anomalies are removed.	Recommendation agreed and actioned.	On review, the anomalies referred show to have been duly corrected.
2 The documentation held on the Health & Safety team page of the intranet should be removed, with staff being directed to the AssessNet portal to assist with document version control.	Recommendation agreed and actioned.	The document resources are now clearly concentrated in AssessNet and generally accessible through Intranet links.

	Recommendation	Management Response	Current Status
3	Relevant staff should be reminded of the need to provide a health and safety induction to any non-Council staff working on behalf of the Council.	Recommendation agreed and actioned.	Assume implemented, but the scenario leading to the recommendation no longer exists so there is nothing to specifically test here.
4	Relevant risk assessments on AssessNet should be reviewed to ensure that noise hazards are appropriately covered.	Recommendation agreed and assessments to be reviewed by March 2017.	The review was reported to have been completed as scheduled. An expanded range of assessments with noise hazards flagged is in evidence.
5	Departments should be reminded of the need to send representatives to the Health & Safety Reps meetings.	Recommendation agreed – to be raised with to Senior Management Team.	It was reported that the terms of reference for the Safety Representatives would be reviewed. A refreshed Terms of Reference was produced in 2018, although the issue of poor meeting attendance remains unresolved and has culminated in actual meeting activity having lapsed altogether (discussed further in 4.7.2 below).

4.2 Policies and Procedures

4.2.1 An official corporate Policy Statement remains in force, signed off annually by the Chief Executive. In terms of content, this document and supporting sub-policies come across as coherent and comprehensive in their coverage from testing against the CIPFA model. The relevant legislation and regulatory framework show as unchanged from the previous audit.

4.2.2 Since the previous audit, the electronic corporate policy awareness tool (MetaCompliance) has continued to be rolled out with health and safety policy now captured. Although the 2018 refresh of the Policy Statement was launched through MetaCompliance, it was advised that the planned launch of the 2019 refresh is still in the pipeline to be actioned.

4.2.3 As stated in 4.1.1 above, a user portal into the AssessNet health and safety cloud application is available to all staff with Intranet access to retrieve the Policy Statement and all related sub-policies, procedures and guidelines as well as links to on-line Health and Safety Executive (HSE) resources.

4.2.4   The overall governance arrangements for the corporate health and safety framework show as unchanged from the previous audit. It was observed that the Constitution assigns an effective policy approval role to the Employment Committee in as much as it affects staff, although no evidence could be found of any formal submission of the Health and Safety Policy to this Committee for some years.

4.2.5   Acknowledging that the Policy provisions represent the fulfilment of a long-standing statutory duty and that the Policy content itself has not significantly changed since its last known submission to the Committee (subject to restructuring and updating to maintain alignment with the corporate strategy and management structures), the need for such a submission is seen as questionable at best.

4.3   **Awareness**

4.3.1   The ways in which awareness of the Policy and responsibilities arising is addressed are especially manifest in:

- the job description of the central co-ordinating officer post
- policy refresh through MetaCompliance
- Intranet notices linking to the AssessNet portal
- mandatory induction training for new employees
- induction briefings to Members
- mandatory manager training under the Learning and Development Programme
- discretionary employee training under the Learning and Development Programme.

4.3.2   Standard agenda formats for departmental management teams are expected to include health and safety as a standing item.

4.4   **Risk Identification**

4.4.1   Under the Policy Statement the responsibility for performing risk assessments is effectively vested in the Heads of Service for their respective areas of operation. Procedural resources covering prescribed methods and recording are retrievable from the AssessNet portal.

4.4.2   All completed risk assessments are uploaded to the AssessNet application, the content of which is managed by the Corporate Health and Safety Co-ordinator.

4.4.3   Quarterly reports to Senior Management Team by the Corporate Health and Safety Co-ordinator include status updates on risk assessments including those due for review.

4.4.4   Separate policies on procurement and contractors require the contracted parties to comply with relevant health and safety standards.

4.5 **Managing Risk**

4.5.1 This CIPFA test model for this sub-system seeks to establish that adequate policies and procedures are in place for the management of risk in respect of:

- Ensuring safe systems of work
- Insurance cover
- Fire and bomb threats
- First aid
- Display screen equipment users
- Driving for work
- Hazardous substances
- Asbestos
- Noise
- Conflict and aggression.

4.5.2 A re-run through the tests generally confirmed that the policies and procedures are appropriate and comprehensive, subject to the following observations:

1) It was advised that the role and number of designated Fire Wardens were under review at the time of the audit.

2) The leisure centre management contractors are required to carry out their own fire risk assessments for their respective premises. Records indicate that the Council will still perform assessments for these premises, but at a reduced frequency.

3) Some progress is noted on addressing the long-standing issue of evidencing staff eligibility to drive on Council business. A Driving for Work Policy document was found on AssessNet with an appended Driver Declaration Form. On further enquiry it was advised that the Policy document is pending review and it became evident that its implementation is not being rolled out consistently throughout the Council (discussed further in Paragraph 4.5.3 below).

4) Some question arose concerning the status of the Violence to Staff Policy as it was not found on AssessNet, despite being referenced directly by the Lone Worker Policy. It was advised that this document is also under review.

4.5.3 Two separate approaches adopted to instituting driver checks emerge from discussions:

- Heads of Services to institute checks for their own respective service areas. While examples were reported where these checks are implemented as part of staff appraisals, this has evidently not been applied consistently across all services.

- Completion of the Driver Declaration Form has become mandatory for all new staff as part of the induction process, but has not been rolled out to existing staff.

Risk

Staff may not be eligible to drive on Council business.

Recommendations

(1) The review of the Driving for Work Policy should be expedited and the final document rolled out to staff as soon as possible.

(2) Checks on the eligibility of staff to drive on Council business should be undertaken in a uniform manner across the Council with consideration given to rolling out the Driver Declaration Form to all staff.

4.6 **Training**

4.6.1 It was re-confirmed that the Corporate Health and Safety Co-ordinator gives health and safety presentations to new staff as part of mandatory induction and similar briefings have been given to Members following the 2019 elections.

4.6.2 As well as mandatory Institution of Occupational Safety and Health (IOSH) training for managers, the Learning and Development Programme also provides for IOSH training on working safely and briefing sessions and e-learning tools for specific responsibilities and workplace scenarios.

4.7 **Monitoring and Reporting**

4.7.1 Quarterly reporting to Senior Management Team was verified by review of relevant reports and minutes.

4.7.2 Related to this area, issues still remain concerning the role and activity of the Safety Representatives. Despite a report of the Group having been re-formed in mid-2018 with refreshed terms of reference, it has been advised that the poor attendances continued and the meetings subsequently lapsed altogether.

4.7.3 While it is recognised that this lapse of meetings does not signify in any way a failure to meet the Council's statutory responsibilities, the matter in question is seen as the perceived value of the Safety Representatives' support role to management and the extent to which that value is enhanced by their acting as a group.

Risk

Valuable insights into health and safety matters 'on the ground' may not be given due consideration by management.

Recommendation

The role and activity of the Safety Representative Groups should be revisited in light of the re-institution of properly attended meetings not proving successful.

4.8   **Information Governance**

4.8.1 The examination briefly considered security levels for AssessNet given that the key information resources are concentrated in that application. There were no governance issues arising.

5   **Conclusions**

5.1   Following our review, in overall terms we are able to give a SUBSTANTIAL degree of assurance that the systems and controls in place in respect of the corporate health and safety management framework are appropriate and are working effectively.

5.2   The assurance bands are shown below:

Level of Assurance	Definition
Substantial Assurance	There is a sound system of control in place and compliance with the key controls.
Moderate Assurance	Whilst the system of control is broadly satisfactory, some controls are weak or non-existent and there is non-compliance with several controls.
Limited Assurance	The system of control is generally weak and there is non-compliance with the controls that do exist.

5.3   Certain areas were found to be under review at the time of the audit and it assumed that they any changes arising will be finalised in due course. The only matters seen as warranting recommendations relate to unresolved issues concerning the Safety Representatives Group and the institution of driver checks/declarations under the Driving for Work Policy.

6   **Management Action**

6.1   The recommendation arising above is reproduced in the attached Action Plan (Appendix A) for management attention.

Richard Barr
Audit and Risk Manager

Action Plan

Internal Audit of Corporate Health and Safety – January 2020

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.5.3 (1)	The review of the Driving for Work Policy should be expedited and the final document rolled out to staff as soon as possible.	Staff may not be eligible to drive on Council business.	Low	Head of Health and Community Protection	The driving for work policy is being reviewed and will be consulted upon in due course.	03/20
4.5.3 (2)	Checks on the eligibility of staff to drive on Council business should be undertaken in a uniform manner across the Council with consideration to rolling out the Driver Declaration Form to all staff.		Low	Head of Health and Community Protection / Senior Management Team	The driving for work policy is being reviewed and will be consulted upon in due course.	03/20
4.7.2	The role and activity of the Safety Representative Groups should be revisited in light of the failure to re-institute properly attended meetings.	Valuable insights into health and safety matters 'on the ground' may not be given due consideration by management.	Low	Head of Health and Community Protection / Senior Management Team	A review of the function of the group, its attendees will be undertaken.	03/20

* Risk Ratings are defined as follows:

High Risk: Issue of significant importance requiring urgent attention.
Medium Risk: Issue of moderate importance requiring prompt attention.
Low Risk: Issue of minor importance requiring attention.