INTERNAL AUDIT REPORT

FROM: Audit and Risk Manager **SUBJECT:** Corporate Health & Safety

TO: Head of Health & Community Protection **DATE:** 25 October 2016

C.C. Chief Executive
Deputy Chief Executive (AJ)
Head of Finance
Interim Environmental
Sustainability Team Leader
Corporate Health & Safety
Coordinator / Building
Manager

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1 **Introduction**

1.1 In accordance with the Audit Plan for 2016/17, an examination of the above subject area has been undertaken and this report presents the findings and conclusions drawn from the audit for information and action where appropriate. This topic was last audited in December 2013.

1.2 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation 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 primarily focused 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 An extensive examination has been undertaken using the CIPFA systems-based control evaluation models. This entailed completion of Internal Control Questionnaires (ICQs) and testing of controls in accordance with evaluation programmes. Detailed testing was performed to confirm that controls identified have operated, with documentary evidence being obtained where

possible, although some reliance has had to be placed on verbal discussions with relevant staff, including the Corporate Health & Safety Coordinator / Building Manager (CHSC).

3.2   The objectives that have been considered as part of this audit include:

- Appropriate policy and procedural documentation is in place which is kept up to date and is available to all relevant staff
- Staff at all levels of the organisation are aware of their responsibilities with regards to health and safety
- Health and safety risks are appropriately identified and managed
- Relevant health and safety training is available to all staff and Members
- Accidents and incidents are appropriately reported and investigated, with appropriate action being taken to prevent reoccurrence
- Personal data is securely held on relevant systems.

3.3   The expected controls covered by the CIPFA matrices for corporate health and safety are categorised into the following main headings:

(1) Policies and procedures
(2) Awareness
(3) Risk identification
(4) Managing risk
(5) Training
(6) Accidents and incidents
(7) Monitoring and reporting
(8) Security of data

3.4   Some specific tests were not performed as they were either considered not relevant to the operations at the council or are covered under separate audits (e.g. data security and corporate training audits). A supplementary test was, however, undertaken on the attendance at Health and Safety Reps meetings.

4   **Findings**

4.1   **Recommendations from Previous Report**

4.1.1   The current position in respect of the recommendations from the audit reported in December 2013 is as follows:

Recommendation	Management Response	Current Status
1 Periodic payslip reminders to employees on the requirement to hold car insurance with business travel cover should be reintroduced and made suitably prominent.	H&S Advisor to contact Finance and HR regarding this issue.	Payslips are no longer issued in paper form. A new Driving For Work procedure is due to be launched later this year which includes a relevant declaration form.

Recommendation	Management Response	Current Status
2 In accordance with the Health and Safety Policy Section 5.10 Paragraph 4.5, individual checks on employees' driving licence, MOT and insurance documentation should be instituted with particular emphasis on those claiming high mileage amounts.	No response recorded.	As above.
3 Consultations should be instituted with a view to factoring health and safety matters into general Member training and to identify and address any specialist needs for Employment Committee as part of the programme to be implemented for the new Council in 2015.	Induction presentation available (DSM to arrange). DSM advised that Members/Trade Unions Joint Consultation & Safety Panel also needs to be covered.	Health and safety training has been run on two occasions following the last council elections. This was available to all Councillors.
4 The format of the annual report should be reviewed with consideration given to emphasising the effectiveness of the management system based on performance against clear goals.	To be considered as part of formulation of the 2013/14 Annual Report.	The format of the last annual report was not reviewed, as the CHSC has not yet produced an annual report and advised that he will be reviewing the format before producing this year's report (expected December 2016).

4.2   Policies & Procedures

4.2.1   A main policy document is in place which is supported by a number of sub-policies and procedure notes on specific subjects. The policy statement was signed off by the Chief Executive in March 2016 and the sub-policies were also reviewed at this time.

4.2.2   Copies of all of these documents are available to staff via the AssessNet portal which can be accessed from the intranet homepage. Copies can also be accessed from the Health & Safety team page on the intranet.

4.2.3   Tests against the CIPFA criteria indicate that the documentation is generally clear and comprehensive in demonstration of commitment, scope and appropriate hierarchical structure of roles and responsibilities. However, a number of issues were noted, including:

- There is inconsistent numbering in the main policy document, with two different sections being numbered as section three.
- The document versions available on the AssessNet portal are different to the ones held on the Health & Safety team page of the intranet. It is believed that this just relates to the review dates shown, but there is a need for consistency.
- The 'Contractors' sub-policy makes reference to contractors needing to be on an approved list.
- The 'Bomb Threats & Opening of Post' procedure makes reference to a checklist being at appendix seven, but this is now included within the document.
- The 'Staff Alert List' procedure includes references to staff that no longer work for the organisation and includes processes that appear incorrect (e.g. accident forms should be completed for processing by Internal Audit!).

(NB this list may not be exhaustive, as not every document was reviewed in as much detail)

Risk
Staff may not be aware of the correct procedures to follow.

Recommendations
The policy and procedure documentation should be reviewed to ensure that it accurately reflects the current processes and any reference anomalies are removed.

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.

4.3 **Awareness**

4.3.1 Awareness of the Health & Safety policy was due to be covered via the 'Meta Compliance' (How We Do It Here) system. However, this appears to have stalled.

4.3.2 The Learning & Development Officer (LDO) confirmed that the policy is due to be covered, although she advised that there have been a few minor system issues that has delayed the roll-out of a number of policies.

4.3.3 The CHSC highlighted that new employees get a copy of the policy document during their induction and when they sign the attendance sheet for the induction they are also signing to say that they have agreed to the policy.

4.3.4 However, the LDO advised that this is only a hand-written note on the document at present and advised that it was not uniformly undertaken so suggested that a separate sheet could be maintained in future. As this is in hand to be undertaken, no recommendation is included in the report.

4.3.5 New starters are also given some basic health and safety instruction on their first day, as detailed in the 'First Day Health & Safety Induction Training Record'.

4.3.6   This document also includes a section of the induction of Non-WDC employees. This places the onus of the individual service area managers to make such individuals aware of the relevant health and safety procedures and retain evidence that this has been performed.

4.3.7   However, upon discussion with the Gas & Electric Contract Administrator, it was established that staff working for Dodds (electrical maintenance contractors), who have an office in Riverside House, had not received an induction.

Risk
Those working on behalf of the council may not be aware of the health and safety requirements.

Recommendation
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.

4.3.8   Ongoing awareness of general health and safety issues is largely undertaken via the intranet, though a combination of notices to advise of changes to any policies or procedures and the prominent link to the AssessNet portal. Where staff do not have access to the Intranet, it is the responsibility of the applicable service managers to ensure that they are made fully aware of the policies and procedures as they affect them.

4.4   **Risk Identification**

4.4.1   The policy indicates that Service Area Managers are responsible for performing of risk assessments, with the CHSC being responsible for ensuring that they have been undertaken and recorded.

4.4.2   Risk assessments are recorded on the AssessNet system. This was reviewed via the staff portal and an extract of the 'database' of risk assessments that are on the system was obtained. This shows the review date that has been entered by the assessor and the person who is responsible for undertaking this review.

4.4.3   Another extract was also obtained which showed those risk assessments that were overdue for review. The CHSC advised that the system will send prompts to those who should be updating the assessments. He also highlighted that he prepares quarterly reports for SMT on corporate health and safety and the position on risk assessments is covered as part of this report.

4.4.4   The Code of Procurement Practice (CoPP) makes reference to the council's expectations of its contractors regarding (amongst other things) the need for all health and safety requirements to be met. A separate guidance document, on how to take health and safety into account during the procurement process, is also available on the Procurement intranet page.

4.4.5   Links to further information for suppliers are available from the Business Procurement page of the council's internet site. A guidance document for potential suppliers (How to do business with Warwick District Council) highlights that the council may need to receive a copy of the supplier's health and safety policy (depending on the nature of the goods or services) and a page on the 'Minimum Standards for Suppliers' is also in place which echoes this.

4.5   **Managing Risk**

4.5.1   This section of the test programme 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   With the exception of the documentation issues raised above (see 4.2.3), the evidence obtained confirmed that appropriate policies and procedures are in place to ensure that risks are managed effectively in the majority of areas.

4.5.3   The previous audit raised issues regarding the risks of staff not providing evidence of their eligibility to drive on council business (i.e. no requirement to regularly provide evidence of appropriate insurance, license details or the roadworthiness of their vehicle) (see table at 4.1.1). Whilst this issue has not been fully resolved to date, an updated Driving For Work procedure is in the process of being drafted and is due to be launched later this year.

4.5.4   The only other area of concern related to noise risks. Whilst appropriate procedural documentation is in place, it was not clear whether noise hazards were routinely being identified and mitigated against.

4.5.5   The AssessNet system was interrogated to ascertain whether noise hazards had been identified and this search only identified four assessments were noise had been flagged.

4.5.6   Known activities where noise is a factor (e.g. grass strimming undertaken by Estates Supervisors) did not include reference to noise hazards, although the measures recorded to prevent risk of injury did suggest that full PPE should be warn at all times and, whilst not specifically mentioned, this should include ear defenders.

4.5.7   It was also highlighted that the assessment for one plant room was included in this list, but other similar assessments made no reference to noise hazards.

Risk
Noise hazards may not be appropriately identified and action may not be taken to mitigate against them.

Recommendation
Relevant risk assessments on AssessNet should be reviewed to ensure that noise hazards are appropriately covered.

4.6   Training

4.6.1   The corporate Performance Appraisal & Competency Scheme does not specifically require health and safety matters to be dealt with in staff appraisals. The Scheme is primarily focused on Fit for the Future objectives with particular emphasis on efficiencies / savings and service improvement.

4.6.2   However, health and safety is included in induction training for all new staff and this is provided by the CHSC.

4.6.3   Health and safety training is also provided throughout the year with formal IOSH courses now available. Refresher training also available for the 'managing safely' course. These are detailed on the HR 'On Course' directory along with the CHSC's details should individuals require any training on specific topics.

4.7   Accidents & Incidents

4.7.1   The Accident & Near Miss Reporting policy details the procedures to be followed with regards to accidents, dangerous occurrences, potential accidents and reportable diseases.

4.7.2   An accident form is available on the intranet via the Health & Safety team page, although direct reporting via AssessNet is now the preferred method of communicating the incidents.

4.7.3   Once reported, the follow-up process is directed by the CHSC. He will check details of all reported incidents and follow this up either via phone or via site visit depending on the severity of the incident.

4.7.4   A list of all incidents recorded on AssessNet was provided by the CHSC and this highlighted that the majority of incidents involving users of the council's sports and leisure facilities.

4.7.5   There had only been one incident that required reporting under the RIDDOR regulations in the current calendar year. A report was produced from AssessNet of the incident and it was found that appropriate steps had been taken in a timely manner, including reporting the incident.

4.7.6   Three other, older, incidents were covered in overview, with the CHSC being able to show evidence that the cases had been appropriately dealt with.

4.8   Monitoring & Reporting

4.8.1   The responsibilities of the CHSC, as detailed in the Health and Safety Policy, include '(performing) independent inspections in order to monitor and evaluate the performance of the council's Service Areas in meeting their statutory obligations in terms of health, safety and welfare.'

4.8.2   The CHSC advised that contractor monitoring was not specified, although he suggested that he would deal with any queries that came his way. He does not routinely see their method statements, although these should be received and reviewed by the relevant service area.

4.8.3   Corporate procedures are in place with regards to whistleblowing and complaints, and these can be used to report instances of health and safety issues, although they do not make specific reference to health and safety within the processes.

4.8.4   A summary of the accidents that have occurred (including the action taken) is reported to the Members / Trades Unions Joint Consultation & Safety Panel on a quarterly basis and this will include details of any lost time incidents that require reporting to the HSE. However, there have been no relevant incidents to report to the last two meetings.

4.8.5   An annual Health and Safety Report is also meant to be drawn up and submitted to the relevant Members and management teams. However, the CHSC advised that there has not been a report since the previous holder of the relevant role left his post. However, he suggested that he was aiming to have a report produced by December 2016 and was in the process of reviewing the format of the report.

4.9   Security of Data

4.9.1   Health and safety data is included on two separate systems: Civica APP; and AssessNet. A separate application audit of Civica APP is undertaken, so this is not covered in this audit.

4.9.2   The CHSC is the 'system owner' for AssessNet which is a cloud-based system with the database being hosted externally. The CHSC advised that he controls access to the main system, although all staff have access to the portal via the intranet.

4.9.3   He highlighted that there is not much in the way of personal detail held on the system, although some is held in relation to accident reports.

4.9.4   The council is registered on the data protection register (Z623925X). The entry on the Information Commissioner's website is very general in nature and does not mention specific systems, but it is felt that the declaration regarding data usage is appropriate.

4.10   Health & Safety Reps Meetings

4.10.1   The Safety Reps meetings should be held on a quarterly basis. There should be at least one representative from each department, although some

departments will have more than one representative due to their presence in different locations. A representative from Unison is also invited.

4.10.2   Internal Audit intended to review the minutes of recent meetings to ensure that the meetings were being appropriately attended. However, the last full minutes available were from January 2016.

4.10.3   The CHSC advised that that the minutes for the July meeting have yet to be drawn up, although some notes were held which showed attendance. He also advised that there had been a meeting between January and July but no minutes exist due to a miscommunication as to who was due to make notes.

4.10.4   Upon review of the minutes of the January meeting it was identified that only three departments had been represented, although apologies from staff in a further three departments had been received. The July notes suggested that only four departments had sent a representative. Three departments had not been represented at either meeting.

Risk
Staff may not be appropriately represented in terms of the development and promotion of health and safety measures.

Recommendation
Departments should be reminded of the need to send representatives to the Health & Safety Reps meetings.

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 Corporate Health & Safety 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 controls that do exist.

5.3   Minor issues were, however, identified relating to:

- The need to ensure that policy and procedural documentation is up to date and accurate
- Different versions of documentation being available to staff
- Contractors not being provided with an appropriate health and safety induction
- Noise hazards not being reflected in risk assessments

- Departments not sending representatives to Health & Safety Reps meetings.

6   **Management Action**

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

Richard Barr
Audit and Risk Manager

Action Plan

Internal Audit of Corporate Health & Safety – October 2016

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.3	The policy and procedure documentation should be reviewed to ensure that it accurately reflects the current processes and any reference anomalies are removed.	Staff may not be aware of the correct procedures to follow.	Low	Corporate Health & Safety Coordinator / Building Manager	Agreed. This has now been undertaken.	Completed
4.2.3	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.	Staff may not be aware of the correct procedures to follow.	Low	Corporate Health & Safety Coordinator / Building Manager	Agreed. This has now been undertaken.	Completed
4.3.7	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.	Those working on behalf of the council may not be aware of the health and safety requirements.	Low	Corporate Health & Safety Coordinator / Building Manager	Agreed. When staff ask for door passes / system access for contractors, they will be reminded of the need to provide an induction.	November 2016
4.5.7	Relevant risk assessments on AssessNet should be reviewed to ensure that noise hazards are appropriately covered.	Noise hazards may not be appropriately identified and action may not be taken to mitigate against them.	Low	Corporate Health & Safety Coordinator / Building Manager	Agreed. Risk assessments will be reviewed.	March 2017

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.10.4	Departments should be reminded of the need to send representatives to the Health & Safety Reps meetings.	Staff may not be appropriately represented in terms of the development and promotion of health and safety measures.	Low	Corporate Health & Safety Coordinator / Building Manager	Agreed. This will be raised with SMT.	October 2016

* 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.