

Report to the Audit and Governance Committee 18th January 2021 on the actions taken in relation to key recommendations made in the Health and Safety Internal Audit report

Lead and presenting officer: Ruth Saunders – Head of Communities

Summary of Audit Area

Gloucester City Council is committed to managing health and safety at work as an integral part of its business; to foster and promote a positive and caring attitude to health and safety in the workplace.

In March 2019, Internal reviewed the arrangements and procedures established by the Council to meet its commitment to health and safety, and fulfilment of legal requirements.

Whilst the review confirmed that service managers displayed a positive attitude towards the wellbeing of their team members, it also highlighted that the control environment was ineffective; and the day to day practical application of the requirements were not understood or consistently applied.

Summary Terms of Reference of the Audit

The key findings from the 2018/19 review were reported to the Audit and Governance Committee on 22nd July 2019. It was agreed that Internal Audit would undertake a follow-up review as part of the 2019/20 work-plan.

Risks

- Loss of life/serious injury.
- Corporate manslaughter.
- Loss of credibility/damage to reputation.
- Financial penalties.

Key Findings – follow-up review January 2020

The follow-up audit confirmed that positive progress had been made in enhancing the management and oversight of the Council's responsibilities under the Health and Safety Policy and this was moving in the right direction.

However, it was also evident that several of the agreed key management actions had only been partially completed or were still to be progressed.

To enable the internal control environment to be upgraded to satisfactory 'Assurance opinion', Internal Audit considered that a renewed push from senior management was again required to ensure that the outstanding key actions are finally completed. In particular to:

- Complete annual health and safety audits and inspections (which are to be documented, appropriately reviewed with any remedial actions taken);
- Ensure the training is delivered (where gaps are identified) in accordance with the policy; and
- Provide the clarification of roles and responsibilities between AMPS and service/building managers, including where supporting documentation is to be retained (including the drafting a manual for service managers and one for Property Management officers).

Action(s) taken to implement the recommendations as at 18 December 2020 and / or proposed.

No.	Original Recommendation	Original Management Response	Internal Audit assessment January 2020
1 (M)	<p>The Operational Health and Safety Management Group is formed. Membership should include a representation of managers and/or team leaders who have a responsibility for managing health and safety performance and dealing with health and safety issues across the Council.</p> <p>The group should report operational concerns / performance issues to the Strategic Health and Safety Management Group and make appropriate recommendations on how the existing systems and processes could be enhanced and/or consistently applied.</p>	<p>It is our intention to form the Operational Health and Safety Management Group from 1st April 2019. This group will include Team Leaders and Officers from a variety of roles and locations, including outstations. This will ensure a broader operational knowledge and focus for all members of that group and allow them to feed knowledge and ideas based on operational knowledge to the Strategic Health and Safety Management Group.</p> <p>The Operational Group was not formed at the same time as the Strategic Group as it seemed prudent for the Strategic Group to establish itself, its focus and familiarise itself with the new policy.</p> <p>Person Responsible/Completion date: Ruth Saunders (Head of Communities) / 1st July 2019</p>	<p>The Operational Health and Safety Group has now been formed and has met on two occasions, resulting in positive and constructive/meaningful discussions regarding health and safety provision at the Council.</p> <p>Fully implemented.</p>

No.	Original Recommendation	Original Management Response	Internal Audit assessment January 2020
2 (H)	The Head of Communities should ensure that annual health and safety audits and inspections are carried out as per the policy.	<p>The Head of Communities, with the support of the Community Wellbeing Officer (CWO) will be reporting to the Strategic Health and Safety Management Group at each meeting to update on audits, inspections and risk assessments. Asset and Property Services are also in the process of completing a series of property compliance inspections and they will report into the Strategic Health and Safety Management Group. The Head of Communities will also be creating a timeline for Managers as part of a wider piece of work, which identifies important tasks throughout the year, including Health and Safety responsibilities. We anticipate a consistent and coordinated approach will see significant improvements in the control and management of this area.</p> <p>Person Responsible/Completion date: Ruth Saunders (Head of Communities) / 1st July 2019</p>	<p>Annual Health and Safety Audits have not yet been completed and have been put on hold until appropriate external training has been completed by relevant officers.</p> <p>Not implemented</p>
			<p>Management Update 28/05/2020</p>
			<p>Although the recommendation has not been completed work has been done to ensure it can be. The Community Wellbeing officer has now completed auditing training and service managers have completed their annual risk assessment reviews. These will be audited within the next 12 months and could not be audited until they had been created.</p>
<p>Management update: Position as at 18 December 2020</p>			
<p>The first audit by Community Wellbeing Officer and Asset Management has taken place at the Guildhall and there is a rolling programme of inspections with the audit of the Museum booked for the 15th of December. This was delayed ensuring that there was a period after the updating of the risk assessment which could allow Officers to check practice and compliance with that assessment.</p> <p>Asset management have procured a new management system which will allow all of the H&S and compliance information can be saved against each property and reviewed when required. This will greatly improve the annual audit process.</p>			

No.	Original Recommendation	Original Management Response	Internal Audit assessment January 2020
3 (M)	The incident/accident report form is amended to include near miss fields. Once updated, the importance of reporting all incidents, including near misses, is effectively communicated to all concerned.	<p>This recommendation has already been implemented.</p> <p>Person Responsible/Completion date: Ruth Saunders (Head of Communities) / 8th February 2019.</p>	<p>The accident/incident report forms have been amended to reflect the current risks faced by the Council and are available to all staff.</p> <p>Fully implemented.</p>

No.	Original Recommendation	Original Management Response	Internal Audit assessment January 2020
4 (H)	The Head of Communities to identify the gaps in knowledge of all service managers and then arrange for appropriate training to be provided.	<p>A skills audit will be conducted when the Operational Health and Safety Management Group has been formed and will be one of their first tasks. This will feed into the strategic planning of development and implementing new processes.</p> <p>Person Responsible/Completion date: Ruth Saunders (Head of Communities): 1st July 2019</p>	<p>Gaps in building/service manager knowledge have been assessed and a training budget agreed. It is envisaged that whilst the mandatory Health and Safety training has yet to be arranged, the intention is to complete this by the end of the financial year.</p> <p>Partially implemented</p>
			<p>Management Update 28/05/2020</p>
			<p>The Head of Communities has completed a training audit to enable the Strategic Health and Safety Group to understand the training needs of managers and Team Leaders. We had liaised with the County Council to look at options for joint training but that has not been possible. However, a training budget specifically for health and safety has been set aside for the 2020/21 financial year which will enable us to deliver the training required.</p>
<p>Management update: Position as at 18 December 2020</p>			
<p>The budget has been set aside for training delivery in the financial year 2020/21 and we hope it will be possible to deliver this training in a face to face setting rather than virtually due to Covid 19. Plans for delivery of training this financial year were put on hold due to the pandemic. In the meantime Service Managers and Team Leaders have been developing their Covid-secure risk assessments for their teams and service areas and these have had to differ widely due to changing restrictions and the variety of services delivered by the Council. These have been overseen by the Corporate Director with responsibility for Health and Safety and guidance received from the Community Wellbeing Officer. This has given valuable experience to managers in managing Health and Safety in their workplace.</p>			

No.	Original Recommendation	Original Management Response	Internal Audit assessment January 2020
5 (H)	<p>The Community Wellbeing Officer should provide guidance to service managers on:</p> <ul style="list-style-type: none"> • What records should be maintained by them to demonstrate compliance with the policy; and • How to complete and review risk assessments, and resolve any issues highlighted. 	<p>This ties into recommendations 2 and 4; training, guidance and implementation of improved processes. Ascertaining the skills, training and knowledge gap will be the first task of the operational group and will guide the development of new guidance.</p> <p>Person Responsible/Completion date:</p> <p>Ruth Saunders (Head of Communities) / 1st July 2019</p>	<p>The majority of the risk assessments (RAs) had been completed and returned to the Head of Communities, with progress relating to any gaps being monitored. In addition, training on the completion of RAs has positively been arranged for March 2020 and a new RA template and guidance published on the staff intranet pages.</p> <p>Partially implemented</p>
			<p>Management Update 28/05/2020</p>
			<p>This sits alongside recommendation 2 and guidance has been created for managers to help them fully risk assess and record the risks of their activities. Risk management is now part of the Service Planning process and is reported through Pentana.</p>
<p>Management update: Position as at 18 December 2020</p>			
<p>All risk assessments for Service areas have now been completed and guidance provided has been used by Managers. Risk assessments and risk management by managers has been excellent during the pandemic so we are confident that there has been an increase in knowledge and skill for all managers in relations to risk assessment.</p>			

No.	Original Recommendation	Original Management Response	Internal Audit assessment January 2020
6 (H)	<p>The Property and Commissioning Manager should provide clarity to building managers on where the division of responsibilities lay regarding premise related health and safety issues.</p>	<p>Prior to the Audit we had commenced a gap analysis of our records, although inspections have been carried out jointly by Property Management and Community Wellbeing officers the records were incomplete. To complete this process we are now on site carrying out property compliance inspections and will have finished this exercise by the end of March, steps are in place following this to close any gaps in our records and ensure that actions are picked up and all timescales complied with. We will also assist in drafting a manual for service managers and one for Property Management officers.</p> <p>Any outstanding tests in the examples above have either been completed or contractors have been instructed. For the sake of clarity, it should be noted that there is no requirement for further asbestos testing at our properties unless work is being carried out.</p> <p>Person Responsible/Completion date:</p> <p>Mark Foyn (Property Commissioning Manager) / 1st July 2019.</p>	<p>Asset Management and Property Services (AMPS) have completed a gap analysis of statutory testing and positively rectified outstanding statutory tests. However, Internal Audit analysis has confirmed that despite good progress, there are still consistent gaps in the supporting documentation held within the electronic file system evidencing the testing regime undertaken.</p> <p>The division of responsibilities between AMPS and building managers has not been clarified and documented within a manual as agreed in the management response to the recommendations made.</p> <p>Partially implemented</p>
			<p>Management Update 28/05/2020</p>
			<p>Implementation is planned as part of a more comprehensive piece of work which will see a new piece of management software implemented in the Asset Management Team. It would not have been efficient to implement measures ahead of this new system and then redesign them later and so the decision was made to wait for the new software. We are confident that the implementation of this will contribute significantly to this and several of the other recommendations.</p>

Management update: Position as at 18 December 2020

Asset Management have acquired the software, which is a comprehensive system of linked modules and key officers have had the initial training. It is vital to check and validate the information being loaded as this will be the source of all management information going forward. A project team has been formed and we have an external project manager and training to support the implementation of the system. There is a programme in place that is due to run until May 2021 to fully complete the migration of data and instigate new working practices.

As we populate information into the modules' we have purchased we are receiving specific training and consultancy support, we have loaded the basis property data for the operational properties and the next module coming into use is for property compliance. This will contain asbestos management and health and the safety reports for our operational properties. This information is in the process of being loaded and is due to be completed before the end of December this year. This will bring H&S data together in one place and allow much better control and access to the information the software will be used for reporting, MI, a diary system and for workflows with allocated tasks for the users.