

FINAL INTERNAL AUDIT REPORT

REVIEW OF HEALTH AND SAFETY AUDIT FOR 2018-19

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REVIEW OF HEALTH AND SAFETY AUDIT 2018-19

INTRODUCTION

1. This report sets out the results of our systems based audit of Health and Safety. The audit was carried out in quarter 3 as part of the programmed work specified in the 2018/19 Internal Audit Plan agreed by the Section 151 Officer and Audit Sub-Committee.
2. The controls we expect to see in place are designed to minimise the department's exposure to a range of risks. Weaknesses in controls that have been highlighted will increase the associated risks and should therefore be corrected to assist overall effective operations. Any Priority 1 recommendations or Nil/Limited Assurance opinions must be considered for inclusion in the Department's Risk Register.

AUDIT SCOPE

3. The scope of the audit was outlined in the Terms of Reference issued on 1st November 2018.

AUDIT OPINION

4. Overall, the conclusion of this audit was that Limited assurance can be placed on the effectiveness of the controls. Definitions of the audit opinions can be found in Appendix C.

MANAGEMENT SUMMARY

5. Organisations have a legal duty to put in place suitable arrangements to manage for Health and Safety. The Health and Safety at Work etc. Act 1974 is the primary piece of legislation covering occupational health and safety in Great Britain and is supplemented by the Management of Health and Safety at Work Regulations (1999) and guidance from the Health and Safety Executive.

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6. Historically, the Corporate Safety Unit comprised a Manager, three Safety Advisors and an Administration Assistant. In the last ten years, this has reduced and is now one part time member of staff employed for three days a week, who was appointed in March 2018. The function reports to the Director of Human Resources, having moved from the Environment and Community Services Directorate earlier in the 2018/19 Financial Year.
7. The level of Employers' Liability Claims remains few in number - between 4 and 6 most years.
8. Our testing identified the following issues which we would like to draw to management's attention. Some of these can be remedied with relative ease by refreshing and relaunching existing documents and processes:-

Risk Assessments

- A full suite of comprehensive Health and Safety Risk Assessments (Risk Assessment Universe) is not held. The Authority is not, therefore, able to demonstrate that it has assessed its Health and Safety risks and has action plans in place to implement controls.

Control Framework

- Whilst a Control Framework for Health and Safety is in place, this does not reflect the current structure and the process in practice is disjointed. Corporate oversight and strategic links could not be evidenced and resilience may be compromised as there is no professional cover outside of the Corporate Safety Advisor's core days of Tuesday – Thursday.

Health and Safety Policies

- A suite of Health and Safety Policies is in place and available to all staff electronically. These, however, are not subject to regular review, with 21/24 not updated since 2014.

Measuring and Reviewing Performance

- Whilst accident statistics and details are collated from the AR3 forms with the statistics available to the internal Health and Safety Groups, there is not an effective performance reporting system supported by performance measures.

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First Aid

- The list of Civic Centre First Aiders held electronically and displayed on Notice Boards across the Civic Centre site does not accurately detail the staff members holding a valid First Aid Certificate.
- There is no process in place for monitoring the First Aid Boxes to ensure that they remain fully stocked.

Employers' Liability Insurance

- A copy of the current Employers' Liability Insurance Certificate could not be located, either electronically available to staff or on display at the Civic Centre site; however this has now been rectified.

SIGNIFICANT FINDINGS (PRIORITY 1)

9. The following Significant Finding was identified:-

A full suite of comprehensive Health and Safety Risk Assessments (Risk Assessment Universe) is not held. Failure to manage risks, as required by the Management of Health and Safety at Work Regulations 1999 and subsequent Health and Safety Executive (HSE) legislation, could result in injury leading to financial penalties and/or reputational damage.

DETAILED FINDINGS / MANAGEMENT ACTION PLAN

10. The findings of this report, together with an assessment of the risk associated with any control weaknesses identified, are detailed in Appendix A. Any recommendations to management are raised and prioritised at Appendix B.

ACKNOWLEDGEMENT

11. Internal Audit would like to thank all staff contacted during this review for their help and co-operation.

DETAILED FINDINGS

No.	Findings	Risk	Recommendation
1	<p>Risk Assessments A full suite of comprehensive, fully documented Health and Safety Risk Assessments (Risk Assessment Universe) is not held. The Authority is not, therefore, able to demonstrate that it has assessed its Health and Safety risks and has action plans in place to implement controls.</p>	<p>Non compliance with the Management of Health and Safety at Work Regulations 1999 and subsequent Health and Safety Executive (HSE) legislation.</p> <p>Failure to manage risks could result in injury leading to financial penalties and/or reputational damage.</p>	<p>Health and Safety Risk Assessments must be undertaken across the organisation. Action plans should be developed, prioritising actions for implementation, and kept under review.</p> <p>Guidance should be provided to managers to enable them to do this, with consideration given to parameters to ensure both full coverage and the avoidance of duplication in shared areas. Boundaries with the remit of the Authority's Total Facilities Management contractor should be established.</p> <p>[Priority 1]</p>

Priority 1
 Required to address major weaknesses and should be implemented as soon as possible

Priority 2
 Required to address issues which do not represent good practice

Priority 3
 Identification of suggested areas for improvement

DETAILED FINDINGS

No.	Findings	Risk	Recommendation
2	<p>Control Framework Whilst a Control Framework for Health and Safety is defined in the Authority’s Health and Safety Policy number 1.02 ‘Organisation’, this does not reflect the current structure and the process in practice is disjointed. Corporate oversight and strategic links could not be evidenced and resilience may be compromised as there is no professional cover outside of the Corporate Safety Advisor’s core days of Tuesday – Thursday.</p>	<p>i) Lack of an up to Control Framework, known to and understood by all staff, could lead to an organisational lack of commitment to Health and Safety.</p> <p>ii) Lack of clarity of Strategic and Operational links throughout the process could lead to the Control Framework not covering all of the core elements of Health and Safety.</p>	<p>i) The Control Framework should be refreshed to reflect the current structure and relaunched to all members of staff. Roles within the Health and Safety workstream and the supporting training available should be reiterated. The relaunch should reinforce senior management’s commitment to Health and Safety.</p> <p>ii) The Terms of Reference for all Health and Safety Groups within the Authority should be reviewed, ensuring Strategic and Operational links and clarity of function.</p>

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No.	Findings	Risk	Recommendation
		iii) During the Corporate Safety Advisor’s absence (non working days, holidays or sickness), there is no equivalent professional/‘competent’ point of referral within the organisation.	iii) Consideration should be given to the level of Corporate Resilience within the organisation with particular reference to the Corporate Safety Advisor’s non working days, holiday and sickness. [Priority 2]
3	Health and Safety Policies Whilst a suite of Health and Safety Policies is in place and available to all staff electronically, these are not subject to regular review, with 21/24 not updated since 2014.	Without a suite of up to date policies, staff may lack clear direction and understanding as to how Health and Safety is managed and their role within the workstream.	i) The suite of Health and Safety Policies should be reviewed and updated where necessary, ensuring an appropriate level of staff and union engagement.

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			<p>ii) The approval process for policies should be defined.</p> <p>iii) Annual reviews of all policies should be incorporated into the Health and Safety work programme.</p> <p>[Priority 2]</p>
4	<p>Measuring and Reviewing Performance Whilst accident statistics and details are collated from the AR3 forms and the statistics are available to the Health and Safety Groups, there is not an effective performance reporting system in place supported by performance measures.</p>	<p>Lack of an effective reporting system may lead to issues remaining unidentified and a consequent lack of understanding as to causes, or what may be required to address them and improve performance.</p>	<p>A performance reporting system should be developed and the outcomes of the monitoring presented to key decision makers within the organisation.</p> <p>[Priority 2]</p>

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No.	Findings	Risk	Recommendation
5	<p>First Aid</p> <p>i) The list of Civic Centre First Aiders held electronically and displayed on Notice Boards across the Civic Centre site does not accurately detail the staff members holding a valid First Aid Certificate. One member of staff listed left in August 2018 and staff who passed the course in June 2018 have not been added.</p> <p>ii) There is no process in place for monitoring the First Aid Boxes to ensure that they remain fully stocked.</p>	<p>Lack of an up to date and accessible list of First Aiders could lead to a delay in the provision of medical attention.</p>	<p>i) The list of Civic Centre First Aiders should be updated, distributed and all old lists removed.</p> <p>ii) Clarity should be obtained as to whom is responsible for ensuring that the First Aid Boxes are fully stocked and the process for replenishment.</p> <p>[Priority 2]</p>

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No.	Findings	Risk	Recommendation
6	<p>Employers' Liability Insurance A copy of the current Employers' Liability Insurance Certificate could not be located either as electronically available to staff or on display at the Civic Centre site.</p>	<p>Non compliance with Health and Safety Executive 'Managing for Health and Safety' and 'Health and Safety Made Simple' Guidance.</p>	<p>A copy of the current Employers' Liability Insurance Certificate should be made available either electronically to all staff or displayed at the Civic Centre site.</p> <p>[Priority 3]</p>

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MANAGEMENT ACTION PLAN

Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
1	<p>Risk Assessments Health and Safety Risk Assessments must be undertaken across the organisation. Action plans should be developed, prioritising actions for implementation, and kept under review.</p> <p>Guidance should be provided to managers to enable them to do this, with consideration given to parameters to ensure both full coverage and the avoidance of duplication in shared areas. Boundaries with the remit of the Authority's Total Facilities Management contractor should be established.</p>	1	<p>a) Arrangements will be put in place to collate individual risk assessments into a Departmental Suite and cross-cutting risk assessments e.g. homeworking into a Corporate Suite.</p> <p>b) Corporate risk assessment procedures and accompanying guidance will be prepared and relaunched with training and Managers Briefing by the Corporate Health & Safety Advisor.</p>	Corporate Health & Safety Advisor	April/May 2019

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Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
2	<p>Control Framework</p> <p>i) The Control Framework should be refreshed to reflect the current structure and relaunched to all members of staff. Roles within the Health and Safety workstream and the supporting training available should be reiterated. The relaunch should reinforce senior management’s commitment to Health and Safety.</p> <p>ii) The Terms of Reference for all Health and Safety Groups within the Authority should be reviewed, ensuring Strategic and Operational links and clarity of function.</p>	2	<p>a) The corporate oversight for Health & Safety will be managed by the revamped Corporate Health & Safety Group chaired by the Director of Human Resources & Customer Services reporting to the Corporate Leadership Team and the Chief Officers’ Executive; both chaired by the Chief Executive.</p> <p>b) The Corporate Health & Safety Group will provide a 6-monthly monitoring report to the Corporate Leadership Team and Chief Officers’ Executive.</p> <p>c) The Terms of Reference for the Corporate Health & Safety</p>	Director of HR & Customer Services/ Corporate Health & Safety Advisor	April/May 2019

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Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
	iii) Consideration should be given to the level of Corporate Resilience within the organisation with particular reference to the Corporate Safety Advisor’s non working days, holiday and sickness.		Group are being updated. The membership of the Group is also being reviewed to reflect any departmental changes.		
3	<p>Health and Safety Policies</p> <p>i) The suite of Health and Safety Policies should be reviewed and updated where necessary, ensuring an appropriate level of staff and union engagement.</p> <p>ii) The approval process for policies should be defined.</p> <p>iii) Annual reviews of all policies should be incorporated into the Health and Safety work programme.</p>	2	<p>a) The newly-appointed Corporate Health & Safety Advisor is already looking to review and update the suite of Health & Safety policies and procedures starting with the:</p> <p>(i)Lone Working procedure, and</p> <p>(ii)Risk Assessment procedure.</p> <p>b) All Corporate Health & Safety policies and procedures will be considered by the Corporate Health & Safety Group and approved by the Corporate Leadership Team.</p>	Director of HR & Customer Services/ Corporate Health & Safety Advisor	Ongoing, commencing immediately

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Finding No.	Recommendation	Priority *Raised in Previous Audit	Management Comment	Responsibility	Agreed Timescale
4	<p>Measuring and Reviewing Performance A performance reporting system should be developed and the outcomes of the monitoring presented to key decision makers within the organisation.</p>	2	See 2(b) above.	Corporate Health & Safety Advisor	Ongoing, commencing immediately
5	<p>First Aid i) The list of Civic Centre First Aiders should be updated, distributed and all old lists removed. ii) Clarity should be obtained as to whom is responsible for ensuring that the First Aid Boxes are fully stocked and the process for replenishment.</p>	2	<p>a) Following a recent assessment a total of 22 First-Aiders have been recruited for the Civic Centre, new First-Aid boxes allocated to each First-Aider. b) Circa £1k has been ear-marked from HR budget for restocking First-Aid boxes in the Civic Centre.</p>	Corporate Health & Safety Advisor/ Head of Workforce Development	April/May 2019

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			c) Similar review of First-Aid arrangements in the satellite office will be commissioned. d) Mental First-Aid training is also being commissioned for all First-Aiders.		
6	<p>Employers' Liability Insurance</p> <p>A copy of the current Employers' Liability Insurance Certificate should be made available either electronically to all staff or displayed at the Civic Centre site.</p>	3	<p>The 2018/19 Employers' Liability Insurance Certificate has now been published on the Managers' Toolkit and can be accessed via the link below</p> <p>2018/19 Employers' Liability Insurance Certificate</p>	Completed	17 th January 2019

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OPINION DEFINITIONS

APPENDIX C

As a result of their audit work auditors should form an overall opinion on the extent that actual controls in existence provide assurance that significant risks are being managed. They grade the control system accordingly. Absolute assurance cannot be given as internal control systems, no matter how sophisticated, cannot prevent or detect all errors or irregularities.

Assurance Level	Definition
Full Assurance	There is a sound system of control designed to achieve all the objectives tested.
Substantial Assurance	While there is a basically sound systems and procedures in place, there are weaknesses, which put some of these objectives at risk. It is possible to give substantial assurance even in circumstances where there may be a priority one recommendation that is not considered to be a fundamental control system weakness. Fundamental control systems are considered to be crucial to the overall integrity of the system under review. Examples would include no regular bank reconciliation, non-compliance with legislation, substantial lack of documentation to support expenditure, inaccurate and untimely reporting to management, material income losses and material inaccurate data collection or recording.
Limited Assurance	Weaknesses in the system of controls and procedures are such as to put the objectives at risk. This opinion is given in circumstances where there are priority one recommendations considered to be fundamental control system weaknesses and/or several priority two recommendations relating to control and procedural weaknesses.
No Assurance	Control is generally weak leaving the systems and procedures open to significant error or abuse. There will be a number of fundamental control weaknesses highlighted.