



**INTERNAL AUDIT FINAL REPORT
CHIEF EXECUTIVE'S DEPARTMENT**

REVIEW OF COVID 19 RISK ASSESSMENTS

Issued to: Health & Safety Officer
Director of HR & Customer Services
Assistant Director, Property
Head of Planning & Development Support
Assistant Director, Customer Services
Assistant Director, Operations
Head of Early Interventions,

Prepared by: Principal Auditor

Reviewed by: Head of Audit and Assurance

Date of Issue: January 31st 2022

Report No.: CEX/07/2021

REVIEW OF COVID 19 RISK ASSESSMENTS

INTRODUCTION

1. This report sets out the results of our audit of Covid 19 Risk Assessments. The audit was carried out as part of the work specified in the 2021-22 Internal Audit Plan agreed by the Section 151 Officer and Audit Sub-Committee. The controls we expect to see in place are designed to minimise the Council's exposure to a range of risks. Weaknesses in controls that have been highlighted will increase the associated risks and should therefore be addressed by management.
2. Risk assessments can be categorised into 3 main types:-
 - a) Corporate Risk Assessment.
 - b) Service Risk Assessment.
 - c) Individual Risk Assessment.
3. For the purposes of this review, the audit concentrated on the service risk assessment that should include Covid 19 risk assessment (or a stand alone risk assessment). The risk assessments are covered by the Health & Safety at Work Act 1974 as well as the Management of Health & Safety Regulations 1999.
4. The National Association of Local Councils advise that 'A Covid 19 risk assessment is a logical step by step process looking at each individual place, service or activity and identifying who uses them and the risks to these people when they do'. The risk assessment process adopted by Councils is no different but instead concentrates more on the 'specific risks arising from the coronavirus pandemic'.
5. There should be a consistent approach to these risk assessments and service risk assessments should clearly identify which teams are covered by the Covid 19 risk assessment and also detail the number of staff / sites that it encompasses. There should be linkage also to the completion of individual staff risk assessments.
6. Guidance on completion of the Covid 19 risk assessment was provided via the Corporate Leadership Team (CLT) to senior management. This is also available on the Intranet and training has also been made available to managers. The Staff Handbook- Return to The Workplace supports this and is readily available to all staff on the Covid 19 portal.
7. Regular monitoring and review of the risk assessments is essential to ensure that arrangements remain effective and adhered to.

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8. A sample of 5 services were selected for review, 4 services that had submitted a risk assessment to Corporate Health & Safety and 1 where no risk assessment had been submitted for their service.
9. The service selected for testing were :-
 - Planning
 - Registrars
 - Citizenship
 - Contact Centres
 - Children's Centres
 - Assessment & Care Management
 - Property
10. We would like to thank everyone contacted during this review for their help and co-operation.

AUDIT SCOPE

11. The original scope of the audit was outlined in the Terms of Reference issued on 22/6/21.
12. We identified the following key risks:
 - Risk Assessments and Procedures are not readily available and may not have been updated to reflect changes in processes, within individual service areas.
 - All areas have not been identified and therefore may not have submitted a covid-19 risk assessment.
 - Assessments may not be in compliance with Health & Safety or Covid regulations.

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AUDIT OPINION

13. Our overall audit opinion, number and rating of recommendations are as follows.

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| AUDIT OPINION | |
| Reasonable Assurance | (Definitions of the audit assurance level and recommendation ratings can be found in Appendix B) |

| Number of recommendations by risk rating | | |
|--|-------------------|-------------------|
| Priority 1 | Priority 2 | Priority 3 |
| 0 | 5 | 0 |

SUMMARY OF FINDINGS

14. We would like to bring the following to management’s attention :-

- At the time of testing, it was found that there were 4 areas who had not completed and submitted a service risk assessment. Additionally, one other area was relying instead on the Corporate Risk Assessment.
- Two areas had not completed a risk scoring matrix unlike other services and detailed within the issued guidance.
- The review of the service risk assessments was not always detailed.
- It was not clear how staff were updated with any changes to the service risk assessment for one area.
- Service risk assessments did not detail the number of staff covered by the service risk assessments.

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DETAILED FINDINGS / MANAGEMENT ACTION PLAN

15. 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, together with management's responses and timescales for implementation. Appendix B details the definition of the audit assurance and priority ratings.

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DETAILED FINDINGS AND ACTION PLAN

APPENDIX A

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| 1. Submission of Covid 19 Risk Assessment by all services. | |
| <p><u>Finding</u></p> <p>It was confirmed by the Health & Safety Officer on 18/11/21 that the following areas had not submitted a risk assessment.</p> <ul style="list-style-type: none"> - Communications and Public Affairs - Mental Health Services - Property - Office – Leader of the Council <p>Property was included within the testing. It was found that Property had not undertaken a specific risk assessment because they were relying on having been included within Corporate Risk Assessment.</p> <p>This corporate risk assessment document was dated June 2021 and states that the service specific risks are to be further updated. There is no specific coverage for this service area for a Covid 19 risk assessment.</p> <p>Corporate Health and Safety advised that they had been emailing all four of the remaining services about the need to carry out a service risk assessment.</p> <p>Internal Audit were advised that the Communication & Public Affairs team have since submitted their service risk assessment dated 18/1/22 to the Corporate Health and Safety Officer.</p> <p><u>Risk</u></p> <p>Non- compliance of the legal duty to assess the risks to the health and safety of all employees (and others) to which they are exposed while they are at work.</p> | |
| <p><u>Recommendation</u></p> <p>All services should comply with the legal duty to assess risks to the health and safety of staff and others and include the risk of Covid 19. The identified areas should submit a completed risk assessment as soon as possible.</p> | <p><u>Rating</u></p> <div style="border: 1px solid black; background-color: #ffcc00; padding: 5px; display: inline-block;"> <p>Priority 2</p> </div> |

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| 2. Risk Assessment Scoring | |
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| <p><u>Finding</u></p> <p><u>Children Centres & Contact Centres</u> It was found that for these services, although the risk assessments were detailed, there were no risk assessment scoring included as per guidance, unlike other areas reviewed.</p> | |
| <p><u>Risk</u></p> <p>Identified hazards are not rated and risks may not be adequately determined.</p> | |
| <p><u>Recommendation</u></p> <p>A risk assessment scoring should be undertaken to accompany the main body of the risk assessments for each area. This will also ensure that there is a consistent approach across the Authority.</p> | <p><u>Rating</u></p> <p style="text-align: center;">Priority 2</p> |
| <p><u>Management Response and Accountable Manager</u> The form used has been updated to reflect the advice and recommendations made in this Audit Report. It is worth noting that the form used was originally provided to the Service to use but has since been updated. As an action from this Audit, all our COVID Risk Assessments were immediately reviewed, updated and were passed from Head of Service to the Assistant Director, to Director of Children’s Services and finally up to the Director for HR in his capacity as the Chair of the Corporate H&S Board, for approval and authorisation. Approval was granted by Director for HR on 12 January 2022. The Service is waiting for the signed copies to be returned by have an email from the Director of H.R. dated 12 January 2022 confirming his approval. As soon as the signed copies are returned to the Service, they will be forwarded to Internal Audit to complete this record. The Service were grateful for the clarification provided by colleagues in Internal Audit and the opportunity to discuss this element of the audit process. Agreed, Head of Early Interventions.</p> | <p><u>Agreed timescale</u></p> <p>January 31st 2022.</p> |

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| 3. Planned Review of Risk Assessments | |
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| <p><u>Finding</u></p> <p>It was found that there was no evidence of review in relation to the risk assessment for:-</p> <ul style="list-style-type: none"> • Assessment & Care Management <p>The risk assessment for this Assessment & Care Management service is dated 1/7/20 and was completed at the time by a previous post holder. There is no evidence of review since that date and whether this is a draft or final document.</p> <p><u>Risk</u></p> <p>Risks detailed within the assessment may have changed and further control measures may be required.</p> | |
| <p><u>Recommendation</u></p> <p>The agreed final service risk assessment should be regularly reviewed and updated.</p> | <p><u>Rating</u></p> <p style="text-align: center;">Priority 2</p> |
| <p><u>Management Response and Accountable Manager</u></p> <p>It is noted that the Covid risk assessment for this Assessment & Care Management service is dated 1/7/20. Since that time the author has retired. The role was covered by an Interim Head of Service for Assessment and Case Management until the Assistant Director took up the role in August 2021. This audit has been shared with Head of Service Operation Management on 7th Jan. A formal review of the services risk assessment will take place in February 2022.</p> | <p><u>Agreed timescale</u></p> <p>February 28th 2022.</p> |

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| 4. Risk Assessment – Communication to Staff | |
| <p><u>Finding</u></p> <p>It was not clear how updates and reviews of the risk assessments were being clearly communicated to staff. This was found to be the cases in respect of Assessment & Care Management. It should be noted that there has been changes in staffing within this post since last year.</p> <p><u>Risk</u></p> <p>Staff may be operating to different working practices and affecting management of risks/ hazards.</p> | |
| <p><u>Recommendation</u></p> <p>Updates and reviews of the service risk assessments should be clearly and comprehensively communicated to staff. Staff should be made aware of all changes to risk assessments within their service area.</p> | <p><u>Rating</u></p> <p style="text-align: center;">Priority 2</p> |
| <p><u>Management Response and Accountable Manager</u></p> <p>Agreed. Assistant Director, Operations.</p> | <p><u>Agreed timescale</u></p> <p>February 28th 2022.</p> |

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| 5. Risk Assessment Coverage | |
|--|---|
| <p><u>Finding</u></p> <p>Through testing it was found that it was not clear for all areas reviewed, the number of staff that were covered by the individual service risk assessment.</p> <p><u>Risk</u></p> <p>It is possible that not all staff are identified within the risk assessment, which may also affect completion of individual risk assessments for staff.</p> | |
| <p><u>Recommendation</u></p> <p>The service risk assessments should clearly state that how many staff are covered by the individual service risk assessment.</p> | <p><u>Rating</u></p> <p style="text-align: center;">Priority 2</p> |
| <p><u>Management Response and Accountable Manager</u></p> <p><i>Corporate Response:</i> In the email to CLT, regarding service risk assessments, which will be sent out by the 7th February, colleagues will be advised that service risk assessments must state how many staff members are covered by the assessment. The Corporate Health and Safety Officer will also be emailing all colleagues who completed service risk assessments to advise that their service risk assessments must clearly state how many staff are covered by the assessment. This will also be completed by 7th February 2022. Furthermore, in the section about risk assessments on the H&S intranet site, there will be a line added to clarify this.</p> <p>Departmental Response:-</p> <p>Agreed, Assistant Director, Property</p> <p>Agreed, Assistant Director, Customer Services. The number and names of staff covered by each risk assessment will be added to all of the Covid 19 risk assessments.</p> <p>Agreed, Assistant Director, Operations.</p> <p>Agreed, all staff and service users will be captured within the risk assessments, Head of Early Interventions.</p> | <p><u>Agreed timescale</u></p> <p>February 7th 2022.</p> <p>January 31st 2022</p> <p>January 21st 2022</p> <p>February 28th 2022</p> <p>January 31st 2022</p> |

OPINION DEFINITIONS

Assurance Level

| Assurance Level | Definition |
|------------------------------|--|
| Substantial Assurance | There is a sound system of control in place to achieve the service or system objectives. Risks are being managed effectively and any issues identified are minor in nature. |
| Reasonable Assurance | There is generally a sound system of control in place but there are weaknesses which put some of the service or system objectives at risk. Management attention is required. |
| Limited Assurance | There are significant control weaknesses which put the service or system objectives at risk. If unresolved these may result in error, abuse, loss or reputational damage and therefore require urgent management attention. |
| No Assurance | There are major weaknesses in the control environment. The service or system is exposed to the risk of significant error, abuse, loss or reputational damage. Immediate action must be taken by management to resolve the issues identified. |

Recommendation ratings

| Risk rating | Definition |
|--------------------|---|
| Priority 1 | A high priority finding which indicates a fundamental weakness or failure in control which could lead to service or system objectives not being achieved. The Council is exposed to significant risk and management should address the recommendation urgently. |
| Priority 2 | A medium priority finding which indicates a weakness in control that could lead to service or system objectives not being achieved. Timely management action is required to address the recommendation and mitigate the risk. |
| Priority 3 | A low priority finding which has identified that the efficiency or effectiveness of the control environment could be improved. Management action is suggested to enhance existing controls. |