Objectives	Current June 2015	Recommendations
PLAN		
Commitment from the top is in evidence	The Council has identified a Health & Safety champion and Portfolio holder at senior and Councillor level.	
Suitable H&S management system established	The Council has adopted OHSAS 18001. Accreditation under the scheme has been achieved for one or more departments	
Strategic plan in place which identifies current position and ambition for the future	A Health, Safety & Wellbeing Strategy was produced in 2014 and lasts until 2019. It identifies future aims and provides an overview of how this will be achieved	
Health & Safety Policy in place. Three parts including • Statement - commitment • Organisation - key responsibilities • Arrangements – how H&S will be managed Further policies which reflect legislation, promote compliance and good practice.	A Health & Safety policy is in place and approved although not yet fully adopted. It includes the three parts required. Some addendums were made in June 2015 to ensure greater relevance to the prevention of ill-health. Revised policy is currently awaiting signature from PH. The Council has a Safety Manual which includes a raft of documents that combine policy, guidance and information.	• The Health & Safety Policy to be signed by the PH and circulated to all employees via marketing and cascade communication. • The Safety Manual is in need of updating. It would benefit from having separate policies, procedures, guidance and information which are simple to understand and easy to follow
Indicators identified as to how performance will be measured • Active • Reactive	The Council has identified 7 KPI's to measure its H&S performance. • 2 Active • 5 Reactive Reports on progress against these indicators are presented routinely to the Health and Safety Committee.	
Emergency planning – clear systems in place to prevent and protect employees, contractors, visitors	• Fire evacuation has been delegated to Property Managers who are required to identify a suitable system, provide training and implement. Any evacuation procedure should take into account the safe passage of contractors and visitors. • First aid has previously been managed by OHSW who made an assessment of need. It doesn't appear to have been updated since then. Training for first aiders is managed by Organisational Development. • Incidents are generally managed within each directorate although major incidents are referred to OHSW for investigation and liaison with any enforcement authority. The Security team have a first response role at the Civic Centre.	• Fire evacuation should be a high priority for the Council who need assurance from Property Managers that the systems and training put in place are fit for purpose. • A cross matrix audit of fire evacuation would be beneficial in identifying areas for further development and enable any inconsistencies or concerns to be addressed. • A review of first aid need would be useful in identifying whether the current provision is suitable and sufficient or not. • The First Aid Policy should be updated and reflect the fact that any significant change should trigger the review of first aid provision. • The Council would benefit from having clear procedures in place for the escalation of incidents to help ensure that they are investigated appropriately where necessary. It would also

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		benefit from having a consistent and identified process for incident investigation so that evidence is captured effectively and incident scenes are not contaminated prematurely.
Access to competent advice	• The Council employs a number of H&S Advisers in the OHSW team who would be considered competent by virtue of experience. There are no employed specialists within the current team although there are a number of interim specialists. • The Council also has access to operational managers (Facilities) and property related specialists in addition to contractors and consultants as and when the need arises. • The Council is currently recruiting a new Head of OHSW	• Members of the OHSW team would benefit from having further CPD training to enable them to support others in the Council as would be expected from such a team. Specific support in the areas of fire safety and construction safety would be the most useful. • Advisers would also benefit from coaching to help them develop themselves and liaise with others more effectively.
DO		
Significant risks identified and a risk profile produced	A risk profile is not evident. Significant risks are generally known but there would appear to be no formal mapping or profile to identify this.	• The Council would benefit from developing a risk profile which is informed by the risk assessments from each Directorate so that an overview of significant health and safety risks can be prioritised and addressed. This will help the Council's decision making in respect of which actions to prioritise and address.
Priorities based on risk assessment and controls to reduce risk identified	• Departments are expected to carry out risk assessments prior to all activities and to follow the risk hierarchy in implementing controls. It would appear that some departments are better at this than others although there was little evidence that the risk hierarchy is being followed. • The risk assessment template would benefit from being amended to reduce the number of bands so that high risk is identified at a much lower level than is currently the case.	• A cross matrix audit of risk assessment would help identify areas where further support is required to ensure suitable and sufficient assessments are carried out and implemented. • The risk assessment template should be amended to reduce the risk rating from four bands to three which would reduce the level of acceptable risk and enable the Council to use the RAG system for identification purposes (red, amber, green)
Communication plans in place to engage with employees	OHSW have developed a system for communicating legislative changes and highlighting new documentation. Advisers attend Departmental meetings and build relationships with their colleagues. This system is not recorded however.	• A clearer structure and leadership within the OHSW team together with autonomy and greater understanding of their role would enable Advisers to engage more effectively and proactively with their directorates - some already do this well. • A Health & Safety Communications Plan would help focus more on proactive marketing and engagement rather than the current reactive information giving.
Training provision to improve competency	• No training needs analysis is evident but there is an understanding of the need to improve and increase the level of H&S training. • Training provision appears patchy - some Advisers have been successful in getting Departments to pay for their own training whereas others have not. • Training needs are often identified within Health & Safety legislation but these are not necessarily delivered consistently by the Council partly due to the delegation of duties to Property Managers. • OHSW are currently developing IT leaning modules where suitable.	• The Council would benefit from undertaking an assessment of Health and Safety training need which could be used to inform and prioritise the type of training provided. It would also help identify the best means of training delivery. • Where training duties are delegated to Directorates it would be useful to produce a minimum standard by which such training should comply. Having a single point of training delivery would improve this further by helping to ensure a more consistent approach and providing legal assurance to senior

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		management.
Preventive and protective measures identified and in place	• The Council has delegated responsibility for managing fire safety to Property and Facilities Managers. They source and manage contracted Fire Risk Assessments, fire protection measures, fire prevention measures, fire safety training, fire drills, fire evacuation and fire alarms. • The Occupational Health, Safety & Wellbeing team (OHSW) provide advice upon request and produce the Fire Safety Policy although this policy is currently in need of updating. • Practice in respect of fire safety would appear to vary across each property. A view as to whether these practices are suitable and sufficient or not would be identified via the audit programme and regular inspections.	• The Fire Safety Policy should be updated and simplified to provide useful support to Property Managers and enable a more consistent approach to fire safety across the Council. • A cross matrix audit of fire safety across the Council would be useful in identifying where there might be inconsistencies or non-conformities so that these can be addressed. • A simple fire safety inspection template could be introduced to ensure greater awareness of local conditions, improve consistency and fire safety culture. • The Council could consider the appointment of a dedicated in-house Fire Safety Adviser to carry out fire risk assessments, provide specialist advice and monitor fire safety actions.
	• Asbestos management has been delegated to the Property Managers who are required to maintain an Asbestos Register and provide an asbestos induction to contractors working in areas where asbestos is known or suspected to be.	• The Asbestos policy needs to be updated to reflect the change in legislation in 2014. It also needs to identify the measures that the Council wants all Property Managers to take in order to ensure good practice in respect of this high risk hazard. • A cross matrix audit of asbestos management would be beneficial to help identify areas of further focus and clarification. • An overview of asbestos registers and contractor inductions would be useful in providing assurance to the Council.
	• Legionella management has been delegated to the Property Managers who generally contract out the measuring and monitoring role.	• The Legionella policy needs updating. • Council wide procedures for the management of water systems would be useful in ensuring consistency, legal compliance and good practice, thus reducing risk to the Council.
	• There is currently no Construction and Demolition Policy to reflect the new legislation in 2015. • Practice across the Council is very varied especially in relation to the application of the new regulations	• Produce a relevant Construction and Demolition Policy • Work with Property Managers to produce and provide 'good practice' processes and procedures • Provide suitable training for Property Managers to improve consistency and application of legislation. • Work with Property Managers to produce and provide simple checklists for those working within construction and refurbishment
	• Lone working and personal safety is managed autonomously by each directorate with some areas of good and not so good practice	• Carry out a cross matrix audit of lone working and personal safety to identify the risk, determine what processes, procedures and policy need to be implemented and which if any pragmatic solution needs to be put in place.
Equipment identified and well maintained	• The Council has an asset register although it's not clear how comprehensive this is and whether it includes all equipment or	• Identify or implement a single Asset Register for all Council assets to include condition and maintenance records.

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	whether there is one for each property etc. • IT equipment will be the subject of an IT equipment register • There is some evidence that equipment is routinely maintained and serviced although this is not necessarily applied consistently across all areas. • There is no evidence that the lifecycle of equipment is considered in budget planning to ensure that it is replaced before breaking down although this could be a conscious decision.	• Ensure procedures in place to visually inspect, service and maintain equipment • Clarify the Council's policy in respect to the equipment lifecycle • Ensure an inventory of equipment is routinely carried out and that employees know what to do in respect of broken or damaged equipment.
Adequate supervision of tasks	• The Council has adopted a hierarchy which puts the onus of supervision on each line manager. It is the line manager's responsibility to ensure that adequate supervision is afforded to each employee or contractor, as necessary. It is the employee's responsibility to ensure that each task is undertaken without undue risk to themselves or others. • Employees are subject to performance review • Contractors are monitored for compliance to method statements and other procurement tender documentation • Incident investigations and audits carried out by OHSW include questions about the adequate supervision of tasks.	The Council would benefit from ensuring that all procurement of contracted work has a requirement to adhere to health and safety legislation and that adequate supervision of tasks is an essential element of those contracts.
CHECK		
Plans implemented to reduce risk	There are a number of plans or systems in place to reduce risk but they are not necessarily applied in a consistent way. In some cases there is evidence that individual teams have developed their own systems which may or may not be suitable and sufficient. In the event of a major incident it is likely that determining Council practice might be difficult especially if more than one team is implicated.	A review of health and safety practices across the Council using cross matrix audits would help identify any policy, procedures or process required of the central OHSW which would in turn need to be cascaded to all teams and monitored to ensure a more consistent approach.
Control of risk is assessed	There is insufficient evidence to determine whether risk has been assessed adequately or not.	Application of the revised risk assessment template should be checked as part of the audit process and performance management reporting. This is a critical aspect of Health and Safety management and thus Directors for each area need to be assured that their teams are adequately carrying out such assessments.
Incidents are suitably investigated	• Incidents are generally managed within each directorate and as such are likely to be subject to significant variation. • Major incidents should be referred to OHSW for investigation and liaison with any enforcement authority. • The Security team have a first response role at the Civic Centre but it's not clear what procedures they follow to ensure that the incident scene is not contaminated.	• Produce and communicate an incident investigation toolkit which includes policy, procedure, process, templates and guidance. • Provide training on incident investigations • Work with Security to ensure they know how to escalate incidents to OHSW in a timely fashion and protect the scene.
ACT		
Lessons learnt from incident	• Analysis is currently undertaken of incident data by OHSW and	• The Council would benefit from deeper analysis to identify the

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investigation, ill-health data, benchmarking	used to inform the regular Performance Report to the Health & Safety Committee. • Incident investigations include reports which are used by OHSW to implement and drive change • Incident investigations not carried out by OHSW should also be the subject of review by the directorate to ensure that changes are implemented where necessary. This approach however means that lessons learnt in one directorate or team may not be relayed to others across different parts of the Council although efforts to do so are made by members of OHSW via the Advisers. • Ill-health data is analysed by HR and by the Occupational Health part of OHSW.	root causes of incidents. • It would also benefit from having a process whereby all incident investigations, regardless of the directorate, is forwarded to OHSW for review. This is common practice is some directorates already.
Policies reviewed and revised routinely	There is currently no active process in place for routinely reviewing and updating Health & Safety policies.	• OHSW would benefit from having a database of policies and their review dates • A process of review and update, together with the identification of an Adviser responsible for monitoring and performance within OHSW would help ensure that this important area of work is not forgotten. • A space on the intranet for policy changes would help highlight updates to others across the Council. • A more proactive approach should also be adopted whereby updates are highlighted by each OHSW Adviser when attending directorate management meetings
Risk assessments reviewed and revised routinely	There is insufficient evidence to determine whether risk assessments are routinely reviewed and revised.	
Action taken as a consequence of audits and inspections	All audits carried out by OHSW identify key actions. These actions are monitored by each individual Adviser	• OHSW would benefit from having SMART action plans and a process which ensures that all actions are transferred into the actions database. • The database should be monitored both by the Adviser responsible for Monitoring and Performance and the relevant auditor • Regular updates as to progress against audit actions should be provided by the Adviser to the relevant directorate at their management meetings • Actions not undertaken in accordance with the audit should be escalated for a decision as to whether they should be carried out or identified as 'no action'.

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