



Report for:

FOR ACTION

Contains Confidential or Exempt Information	No
Title	Summary of gap analysis, performance report, and general health and safety update
Member Reporting	Councillor Katherine Dunne, Lead Member for Housing, Equalities and Inclusion
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For Consideration By	Health and Safety Committee
Date to be Considered	20 th July 2015
Implementation Date if Not Called In	N/A
Affected Wards	All
Keywords/Index	Health, Safety

1. Details of Recommendations

This report includes three main items:

- A gap analysis using the Council's adopted health and safety system has been carried out in order to identify priorities and actions for 2015/16. A summary of this analysis is available for comment and noting by the Health and Safety Committee.
- Performance update for the period January to June 2015
- General update on health and safety

If the recommendations are adopted, how will residents benefit?

Benefits to residents and reasons why they will benefit, link to Values	Dates by which they can expect to notice a difference
The benefits to residents are indirect, but important to the operation of health and safety across the Borough and in ensuring that Elected Members are able to maintain an overview of the operation of the function.	Ongoing improvement

2. Report Summary

1. This report introduces a summary of the gap analysis undertaken against the Council's adopted health and safety system. This analysis will be used to identify priorities and actions for 2015/16.
2. Performance for the period January to June 2015 is included as an appendix to this report which reflects the seven performance indicators identified within the Health, Safety and Wellbeing Strategy.
3. A general update is provided to give an overview of progress within health and safety since the last committee meeting.

3. Reason for Decision and Options Considered

- 3.1 Carrying out a gap analysis is a good way of identifying what is being done satisfactorily and what could potentially be improved so that action can be taken to address any shortfall. The analysis has been undertaken at this time due partly for the need to update the action plan and partly due to a number of staffing changes within the Occupational Health, Safety & Wellbeing team which includes the integration of Advisers from Hounslow Housing.

A summary of the gap analysis is included to give members an overview of the areas considered and their findings. These findings are intended to be helpful in identifying key priorities and future actions.

- 3.2 Providing regular performance updates is a requirement of the Council's health and safety management system. Trend analysis and performance monitoring enables any significant change to be identified quickly and addressed accordingly. Measuring performance allows simple comparisons to be made to provide assurance that the Council is managing its risks effectively.
- 3.3 An update of health and safety is provided for information purposes.

4. Key Implications

4.1 Gap Analysis Summary

- 4.1.1 The Council's management system is based on the Plan, Do, Check, Act approach which according to the Health & Safety Executive aims to achieve a balance between the systems and behavioural aspects of management so that it becomes fully integrated into the 'day job'.

- **PLAN** – identifying the current position and the end objective to help determine what action needs to be taken to achieve it. This is linked to corporate leadership, policy and commitment. This strategic first stage

identifies how performance will be measured and sets a benchmark for active and reactive indicators.

- **DO** – identifying risk and what measures will be necessary to reduce that risk, including that of legislative compliance. Prioritising action based on resource and threat then organising activities to deliver those priorities. This means that employee consultation, communication, provision of information and training is vital at this stage to ensure a positive behavioural culture.
- **CHECK** – measuring performance to ensure plans have been implemented and assessing how risks are being controlled using for example audits and incident data.
- **ACT** – reviewing performance for lessons learnt from incidents and ill-health. Reviewing and updating policies and plans to reflect change.

4.1.2 The gap analysis was carried out to identify what areas of health and safety the Council were performing satisfactorily and whether there were any areas of performance which the Council could improve. The gap analysis focuses primarily on safety because a separate report is currently being prepared on occupational health and well-being. The analysis has been carried out objectively by the interim Head of Health, Safety & Wellbeing (OHSW) with input from the outgoing Head and members of the OHSW team.

4.1.3 Upon agreement from the Health and Safety Committee, the gap analysis will be used to develop an action plan for 2015/16. This will then help to directly prioritise the work of the Occupational Health & Safety team and to indirectly direct the work of others who have health and safety responsibilities across the Council. The gap analysis summary is attached at appendix A.

4.2 Health and Safety Performance

4.2.1 The performance report includes data for the period January to June 2015.

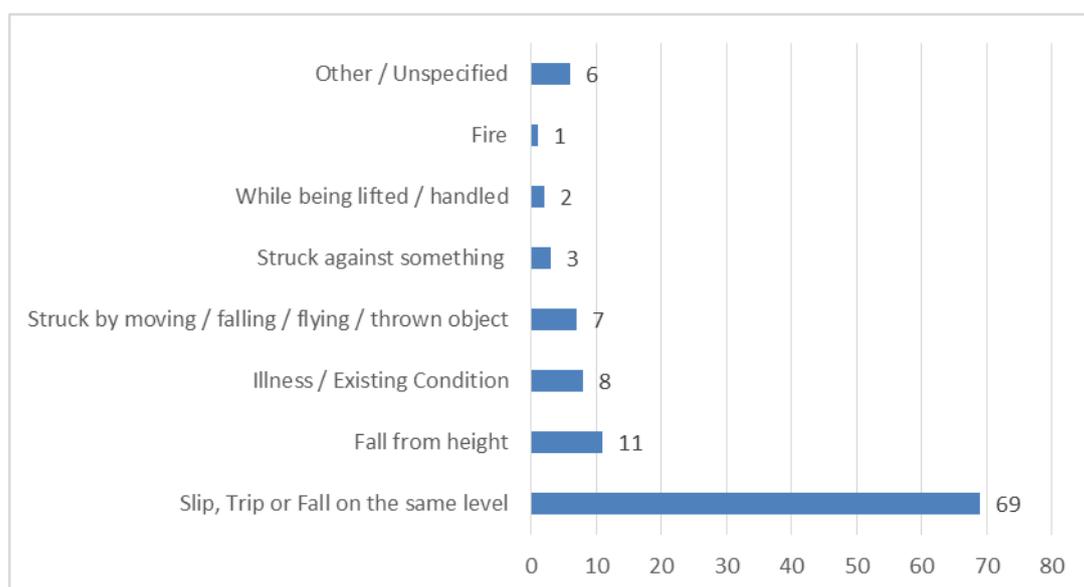
4.2.2 The target incident rates applied across all indicators 4, 5, 6 and 7 are currently blanket ones applied to every directorate. This does not accurately reflect the risks present within each directorate because inevitably some will be much higher than others. As a consequence the target rates need to be reviewed based on individual past performance. This will be done before the next six monthly report.

4.2.3 The integration of the Hounslow Housing service to the Council means that there is insufficient data to provide a full comparison but the data, where available, has been used within the report.

4.2.4 The indicators within the current strategy apply only to Council employees which means that incidents occurring to others such as visitors, service users and contractors are omitted from the data. The Council has a legal obligation under health and safety legislation to assess and reduce the risk to all those who may be affected by their work activities whether employed or not. It

would therefore be appropriate for the Council to include data for all incidents irrespective of the affected person's status i.e. employed or not. It is therefore suggested that future reports include all incidents but that there is clarification about incidents affecting employees only. The performance report is attached at appendix B.

- 4.2.5 Between January and June 2015, there were a total of 107 incidents which resulted in physical injury to non-employees i.e. service user, customer or client (excludes schools). The primary causes for these are shown in the table below, with the most prominent cause being 'Slip, trip or fall on the same level'. Nearly half (46) of these incidents occurred in residential nursing homes where residents have reduced mobility and / or suffer with a form of dementia.
- 4.2.6 Risk assessments for trips, slips and falls are completed for each resident and reviewed regularly as part of their individual care.
- 4.2.7 In February 2015 there was a fatality involving a non-employee, following a fall at Sandbanks Resource Centre. The Health & Safety Executive completed a preliminary investigation and established that there was no reason to investigate further. In addition, the West London Coroner conducted an inquest and gave a verdict of accidental death.



4.3

General Update

- 4.3.1 Integration of Hounslow Housing – The last Health & Safety report for this Committee identified a number of areas which needed to be addressed in order for the health and safety management of Hounslow Housing to be integrated with the Council. This was prioritised as incident reporting, risk management and internal auditing.
- 4.3.2 All three of these areas are being addressed partly by the interim senior management within Hounslow Housing itself and part by the OHSW service.

4.3.3 Policy updates –

The next area to be aligned is that of health and safety policy to reflect the raft of legislation applicable to council activities. The policies from Hounslow Housing are currently very different to those of the Council both in terms of style and content. In addition, the majority of policies for the Council are in need of updating and simplifying. The Occupational Health, Safety & Wellbeing service is therefore actively reviewing and re-writing all policies to ensure a more consistent and legally compliant approach across all directorates. A copy of the proposed template is attached at appendix C.

4.3.4 Risk assessment -

OHSW have adjusted the risk assessment template to reduce the number of risk bands from four to three. This means that the RAG system of red, amber and green can be used more effectively to identify the level at which further control measures are required:

- Red – activity not to proceed until further controls implemented
- Amber – activity can proceed but further controls should be implemented if possible
- Green – activity can proceed without further controls

4.3.5 To encourage the use of the new template, OHSW have produced a simple guidance note explaining how the risk assessment should be completed. The new risk assessment template and guidance note are attached at appendix D.

4.3.6 Incident reporting –

The online system is being upgraded to ensure it continues to be supported by the provider, to make it more user friendly and to reduce the complexity of the form filling process.

5. **Financial Details**

a) **Financial Impact On The Budget (Mandatory)**

Except in terms of officer and member time, there are no financial implications directly arising from this report.

Actions which result from the gap analysis could potentially have a financial impact but this needs to be offset against the provision of having a more robust management system which will reduce the likelihood of legal challenge and loss of production due to reputational damage. All actions should be considered on a case by case basis and met from existing budgets where possible.

Cost implication can be considered as mitigation for not undertaking a suggested action but any such decision would need to be considered carefully. The Health & Safety Executive will deal with risks proportionately which means the higher the risk the less likely they would be in accepting cost as a mitigating factor unless the cost was extremely high.

b) Comments of the Assistant Director Strategic Finance

The costs of addressing issues raised by the gap analysis need to be funded from within approved budgets.

6. Legal

Where there are legal implications in terms of health and safety these have been highlighted within the analysis.

a) Comments of the Assistant Director Corporate Governance

Good governance is essential to the efficient management of any organisation. Where there are governance issues these have been identified within the report and appendices.

7. Value For Money

7.1 There are no 'value for money' issues arising from this report

8. Sustainability Impact Appraisal

8.1 There are no sustainability issues arising from this report

9. Risk Management

Risks	Uncontrolled Risk	Controls	Controlled Risk
Health and Safety failure creating risk of injury or death, or other loss	Significant	Health and safety strategy, planning and team	Managed

10. Links to Council Priorities

10.1 Ensuring Members have a clear oversight of health and safety activity and compliance will contribute to the council's pledges towards a Safer Borough and an ambitious council which improves the lives of residents and works in a transparent way.

11. Equalities, Human Rights and Community Cohesion

11.1 The council has to give due regard to its Equalities Duties, in particular with respect to general duties arising pursuant to the Equality Act 2010, section 149. Having due regard to the need to advance equality involves, in particular,

to the need to remove or minimize disadvantages suffered by persons who share a relevant characteristic that are connected to that characteristic.

- 11.2 The council has considered the relevance of the proposal to the provisions of the Equality Act 2010 and the Human Rights Act 1998 and concluded that Equalities Duties and the Human Rights Articles are not engaged by this proposal. As the report does not have any significant bearing on the substantive equality duty it is not considered necessary to undertake an Equality analysis.

12. Staffing/Workforce and Accommodation implications:

- 12.1 The information contained in this paper will be used to target areas where intervention is needed to reduce health and safety risks to staff.

13. Property and Assets

- 13.1 There are potential implications for property and assets arising from the actions of this report although not from the report itself.

14. Any Other Implications

None.

15. Consultation

- 15.1 The gap analysis has been subject to consultation by members of the Occupational Health, Safety & Wellbeing team including the outgoing Head.

16. Timetable for Implementation

N/A

17. Appendices

- 17.1 Gap Analysis Summary
17.2 Health and Safety performance report for quarter 1-3 2014/15.

18. Background Information

Included within text of report and supporting appendices.

REPORT ENDS