

Internal Audit Report

Corporate Health & Safety Arrangements

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Distribution:

Peter Dale, Director of Regeneration and Environment

Gill Gillies, Assistant Director - Environment

Peter Harrison, Corporate Health and Safety Manager

Auditors:

Emma Riley
Senior Internal Auditor

Peter Jackson
Internal Audit Manager

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Introduction

This report presents the results of a review of the Corporate Health & Safety arrangements in place within Doncaster Council. This audit forms part of the 2014/15 annual audit plan approved by the Audit Committee and was carried out on a risk basis.

The Council's Health and Safety Section are a team of 8 whom:

- Develop, produce and implement a Corporate Health and Safety Management System that includes Strategic Assurance Standards and Strategic Assurance Monitoring Standards and set out how the Council will manage health and safety risks.
- They aim to promote a positive Health and Safety culture to secure the effective implementation of the policy.
- They maintain the procedures for recording, reporting, investigation and analysis of accidents, incidents and cases of ill health.
- They establish and maintain adequate and appropriate active monitoring and auditing systems.

The Council's Corporate Plan states that: Health and Safety is central to all the Council's Services.

The service is affected by the Health and Safety at Work etc. Act 1974 which at Section 2(3) states:

"---, it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the Health and Safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of all his employees.

Objectives of the Audit

The objectives of this audit were to: -

- Take account of existing, new and emerging Health and Safety risks.
- Confirm compliance with the control process that regulates the risks threatening Health and Safety objectives.
- Identify any unregulated risks threatening Health and Safety objectives
- Agree, in conjunction with Managers, control process improvements to further mitigate or transfer risks threatening the Health and Safety objectives.
- Give assurance to stakeholders, including the Audit Committee, that the risks threatening the Health and Safety objectives are adequately managed.

All risks have been assessed using the Council's risk management arrangements and this audit was carried out in compliance with the United Kingdom Public Sector Internal Audit Standards (UKPSIAS).

Scope of the Audit

This audit has been scoped on a risk basis. Objectives key to the success of the Health and Safety team have been identified and the appropriate associated risks assessed. Each of these risks is controlled by a series of controls, put in place by Managers to regulate exposures that threaten the key objectives of the team. A listing of the risks identified is shown below.

- Health and Safety risks are not properly identified or managed
- Lack of corporate ownership / Staff roles and responsibilities are unclear
- System or process performance is poor / Lack of appropriate management information

All our evaluations, assessments and opinions are based on the control processes identified at the time of the audit. Control processes mitigating and transferring risks were tested using information and data from the period between April 2013 and June 2014.

Executive Summary

Residual Risk Analysis

The results of this audit have been shown in the heat map below.

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Likelihood	Very Likely	0	0	0	0	0
	Likely	0	0	0	0	0
	Possible	0	0	0	2	0
	Unlikely	0	0	0	1	0
	Very Unlikely	0	0	0	0	0
		Slight	Moderate	Significant	Major	Critical
Impact						

The above heat map, which is consistent with the Council's Risk Management Policy, shows the level of residual risk exposure. Each of the risks assessed during the course of this audit has been plotted on the above heat map with the numbers representing the number of risks in each category. Further, more detailed analysis of these risks is included in the Detailed Risk Analysis section of this report.

Assurance Opinion

Internal audit reports give 4 general levels of opinion. These are based on the level of risk that we assess remains at the end of our assessment, before any actions have been implemented. These 4 opinion levels are: -

- Substantial assurance
- Partial assurance
- Limited assurance
- No assurance

In our opinion, Health and Safety objectives are exposed to major risks or threats from either limited or deficient control activities or from a major exposure to uncontrollable inherent risks. As such, we are only able to provide **limited assurance** that business objectives are likely to be achieved.

Reasons for this opinion

The Health & Safety Team have a role to assist Managers put in place appropriate

arrangements to protect employees and people in Doncaster.

It is acknowledged that this is an inherently difficult area to control and there is a possibility that the impact of an accident to an employee or member of public can be death or serious injury and hence risks in this area will be rated to reflect this.

Whilst the Corporate Health and Safety Management arrangements are considered to be generally sound, the apparent lack of prioritisation given by some Managers and employees regarding their ownership and commitment leave Doncaster Council exposed to major risks in this area. As such, we are only able to provide limited assurance that business objectives are likely to be achieved.

Attendance on the Health and Safety courses for Managers needs to be accelerated to reduce risk levels in this area. Despite a number of instructions to all Managers, as at 31st July 2014 only 48% have attended or have booked to attend the course.

The more user friendly information and the policy compliance tool available to managers and all staff will help increase levels of knowledge and understanding on Health and Safety. Levels are currently low in this area with only 10% of all staff having completed the E-Learning Health and Safety module. However, approximately a third of staff does not have routine access to a PC and would need to be provided with alternate guidance material.

These actions will be supported by maintaining a programme of regular Health and Safety Audits covering all sections within the authority ensuring for example that Risk Assessments are fit for purpose and they will identify a series of key measures regarding the levels of Health and Safety awareness and compliance for on-going corporate monitoring purposes.

As a result of the audit work completed, 3 recommendations have been made. All of these recommendations are included in Appendix A to this report.

Detailed Risk Analysis

The risks identified within the scope of this audit, have been further analysed below to give further information on the findings of the audit and to cross reference any improvement points / recommendations that have been made. The risk ratings reflected here are consistent with those shown in the earlier heat map and the Doncaster Council Risk Management Framework.

Risk	Final Score Rating	Headline Reason for Rating	Related Issues
Health and Safety risks are not properly identified or managed	<p>Major</p> <p>Impact: Major</p> <p>Likelihood: Possible</p>	<p>The Corporate Health & Safety Team provides individual Managers with training and guidance to enable them to implement adequate Health and Safety arrangements in their areas to manage their health and safety risks. All managers are then expected to ensure all their sub-ordinates are briefed and</p>	<p>ISS.1 Policy Compliance Tool</p> <p>ISS.2 Health & Safety Audits</p> <p>ISS.3 Manager Training</p>

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Risk	Final Score Rating	Headline Reason for Rating	Related Issues
		<p>trained with an overview of the Health and Safety Management system and perform monitoring to ensure these instructions are being implemented in practice and are kept up to date. They are also responsible for the production of risk assessments for their area.</p> <p>Regular audits by the Corporate Health & Safety Team and feedback from training sessions show that there are still areas who still do not take on board the responsibility of embedding adequate Health and Safety arrangements in their areas, particularly producing risk assessments and keeping them up to date.</p> <p>Risk assessments could ensure that necessary steps are put in place to reduce the likelihood of accidents occurring in the future.</p>	
<p>Lack of corporate ownership / Staff roles and responsibilities are unclear</p>	<p>Major</p> <p>Impact: Major</p> <p>Likelihood: Possible</p>	<p>The Corporate Health & Safety Team provides all staff within the council with training courses specific to the level required. All staff has a statutory requirement to complete Health & Safety training on the E-Learning Pool. There is also a newly produced, in depth Corporate Health & Safety Management booklet published on the Councils intranet for guidance and the team are available for further help and guidance if necessary.</p>	<p>ISS.1 Policy Compliance Tool</p> <p>ISS.3 Manager Training</p>

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Risk	Final Score Rating	Headline Reason for Rating	Related Issues
		<p>Although all this training and guidance is available and there appears to be an increase in awareness, Managers still do not appear to follow procedure and do not take ownership for the Health & Safety in their areas.</p> <p>The reporting procedure is not always correctly followed.</p> <p>Some Departmental Managers still rely on the Corporate Health & Safety team and expect risk assessments to be completed for them.</p>	
<p>System or process performance is poor / Lack of appropriate management information</p>	<p>Significant</p> <p>Impact: Major</p> <p>Likelihood: Unlikely</p>	<p>Adequate systems are in place for recording and reporting Health & Safety accidents and incidents. Relevant statistics are available and are reported at Joint Safety Committee and Departmental Liaison meetings.</p> <p>Additionally, benchmarking is completed on an annual basis with other local authorities.</p> <p>The final score rating of this risk is still rated as significant even though there were no issues raised when looking at the controls for this risk. This is because although we concluded that the likelihood was low; the impact of inadequate Management information could result in a major impact and no further controls can be applied to reduce this risk rating.</p>	

*Improvement actions are cross referenced to the attached improvement plan at Appendix A. Implementing these actions will reduce exposure to unregulated risks.

Risk Register Considerations

It has been agreed as part of this audit that the risks showing a Major or Critical rating in the table above will be included on the covalent risk register with the appropriate referenced action points and agreed timescales. This means that there will be clear accountability for each risk and that they will be reviewed in line with the Councils risk management policy.

Acknowledgement

Thanks are due to your staff, particularly Peter Harrison, for taking time out of their busy schedules to provide us with information and answer our questions

Improvement Plan

APPENDIX A

Issue Identified

ISS.1 - Policy Compliance Tool

Although there appears to be extensive guidance, templates and training, and a newly produced Corporate Management System in place, there is still a gap in staff and Managers being aware of their own roles and responsibilities.

There have been recent incidents whereby employees have failed to follow correct procedure and instructions when reviewing incidents and accidents which have resulted in Health and Safety Executive investigations which furthermore could result in a substantial fine to the Council.

Anticipated Exposure: -

Without adequate ownership, risks may be ignored and measures may not be in place to ensure accidents and incidents are prevented.

Related Agreed Management Actions

<u>Action Title</u>	<u>Risk Exposure</u> Significant	<u>Agreed Management Action</u>	<u>Responsible Officer:</u> Corporate Health and Safety Manager
<i>Policy Compliance Tool</i>	Significant	<p><i>Guidance will be sought from the Policy and Performance Team on how to produce and distribute a Health and Safety policy compliance tool which will be sent to all staff and states "I, xxxx, in the position of xxxxxx, understand that I am responsible for xxxxxxxx with regards to Health and Safety.</i></p> <p><i>Once the methodology of how to implement the tool has been established a later implementation date will be set to follow up the action.</i></p>	<p><u>Estimated Date of Completion:</u> 31/07/2014</p>

Improvement Plan

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Issue Identified

ISS.2 - Health & Safety Audits

The Corporate Health & Safety Team carries out an annual audit programme within Doncaster Council departments which is done on a priority / rolling programme. It appeared some departments had not had an audit carried out for a number of years and were now overdue a visit.

Anticipated Exposure: -

Although each department / team should be completing its own risk assessments, without a visit from the Health & Safety Team new risks may have emerged which have not been appropriately managed.

Related Agreed Management Actions

<u>Action Title</u>	<u>Risk Exposure</u>	<u>Agreed Management Action</u>	<u>Responsible Officer:</u>
<i>Health & Safety Audits</i>	<i>Moderate</i>	<i>The Corporate Health and Safety Team are currently in the process of producing a more robust system to ensure all establishments are visited when required.</i>	<i>Corporate Health and Safety Manager</i> <u>Estimated Date of Completion:</u> <i>31/12/2014</i>

Improvement Plan

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Training Related

Issue Identified

ISS.3 - Manager Training

Despite attempts to ensure all Managers attend a Health & Safety training course, at the time of the audit there was still over 50% of the Council's people managers who had not attended and were not booked onto future courses.

Anticipated Exposure: -

Managers may not be aware of their roles and responsibilities for Health and Safety which could result in incidents and accidents occurring that may have been prevented.

Related Agreed Management Actions

<u>Action Title</u>	<u>Risk Exposure</u>	<u>Agreed Management Action</u>	<u>Responsible Officer:</u>
<p>Manager Training</p>	<p>Major</p>	<p>The Corporate Health and Safety Team are currently in the process of targeting the Managers who have not yet attended the Health and Safety training course. They have a target of 90% of Managers to have attended by the end of 2014.</p> <p>Any Managers who have not attended by then will have this fact escalated to Senior Management and reported to the Joint Safety Committee.</p>	<p>Corporate Health and Safety Manager</p> <p><u>Estimated Date of Completion:</u> 31/12/2014</p>