

Report for: Employees'

**Consultative Forum** 

Date of Meeting: 10 November 2021

Subject: Annual Health and Safety Report

**Key Decision:** No

Responsible Officer: Tracey Connage, Divisional Director of

Human Resources & Organisation

Development

Portfolio Holder: Councillor Natasha Proctor, Portfolio Holder

for Finance & Resources

Exempt: No

**Decision subject to** 

Call-in:

No

Wards affected: N/A

**Enclosures:** Appendix 1 – Analysis Report for Accidents

and Incidents Quarter 1 To Quarter 4 (1st

April 2020 – 31st March 2021)

Appendix 2 – Trends

Appendix 3 – H&S Strategy 2019-2022 And

Corporate H&S Plan 2020-21

Appendix 4 – Occupational Health Overview

2020-2021

Appendix 5 – Terms of Reference Appendix 6 – Health and Safety Policy

2021-22

# **Section 1 – Summary**

This report summarises the council's health and safety performance for the year 1st April 2020 to 31st March 2021, providing an update of activities and giving information on outcome measures —Covid-19 response, training, audits and accidents. Information about Occupational Health is provided for information as this does not sit within the Corporate Health & Safety remit. This report also includes the Health & Safety Strategy, Corporate Health and Safety Plan and Policy

#### **Recommendations:**

The Forum is requested to:

- 1. Note the Accidents and Incidents report for information
- 2. Note the relevant strategies and policies enclosed in the appendices to this report for information

## **Section 2 – Report**

### Introductory paragraph

This report details the annual safety review of health and safety performance to enable the Council to determine its effectiveness in managing risk and address any shortcomings.

### **Options considered**

None.

### **Executive Summary**

- 2.1. The Corporate Health and Safety Service has continued to develop the health and safety management system and to provide support and guidance across the organisation during the period April 2020 to March 2021.
- 2.2. The key work streams during the period have been:
- ➤ Leading on plans to monitor operational and occupational risk assessments with respect to Harrow council's Corona virus (Covid-19) control plans which involved,
  - Developing a risk assessment template that can be used across the council and can be tailored to suit specific needs in response to the Covid-19 pandemic.
  - Reviewing and supporting managers to undertake risk assessments
    - ☼ Over 223 Building and Environmental Services Operations Covid Risk assessments have been reviewed in this time frame
    - ☆ 164 new risk assessments entries have been made on SHE Assure which is the councils Health & Safety Management system
    - ↑ 109 existing risk assessments have been modified to reflect Covid changes

- CSB 'Gold' Covid emergency response group delegated the responsibility for approving pandemic risk assessments to the Covid 'Silver' Resources group as a key part of the governance. Reviewed risk assessments are put on a tracker and monitored by the Corporate Health and Safety Board (CHSB)
- ➤ The annual review of the Health & Safety Policy (see Appendix 6)
- Maintenance and introduction of organisation specific health and safety policies and Codes of Practice.
- Provision of health and safety support, advice and guidance across resources, community and people directorates.
- Review of the Corporate Health and Safety Handbook.
- Continued delivery of health and safety training
  - 21 supervisors and first line managers completed level 3 health and safety (Highfield accredited)- 3-day course
  - 35 employees completed a level 3 risk assessment (Highfield accredited)-3 days course
  - 12 employees completed mandatory e-learning health and safety training as part of induction
  - 52 employees completed a training on accident reporting, undertaking audits and risk assessments using the health and safety management software (SHE Assure)
- Inspections, Audits, Site visits, Monitoring and Investigation of accidents/incidents
  - 49 audits were undertaken on corporate services, schools and children centres in 2020/21 with an average score of 91% in schools and 75.1% in corporate services- Environment and Waste Service specifically.
  - 70% of audits were executed as scheduled. Non-conformances with high priority have been addressed. Other non-conformances will be monitored and checked during the Health & Safety inspection and required implementations will be verified at subsequent yearly audit.
- 2.3. The management of the occupational health service and employee assistance programme has stayed with Human Resources, due to direct links with employment and sickness.
- 2.4. Key incident points from the period April 2020 to March 2021 are as follows:

- No enforcement action from the Health & Safety Executive (HSE).
- There has been a 73% decrease in the number of accidents/incidents reported in comparison with the previous year (1105 in 2019/20 to 298 in 2020/21). This decrease is attributed to the Covid-19 pandemic which led to schools shutting down and majority of staff working from home. Although, staff working from home have been encouraged to report work related incidents that happen at home, there have been very few instances of such reporting. This can also partly account for the decrease in the number of accidents reported.

The reduction in the number of reported accidents occurred across Community, People and Resources Directorates.

- There has been an increase in the number of incidents reported as a RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations). Data compared across 4 years shows that in 2017/18, 4.2% (32 out of 757), of all reported incidents were RIDDORS, 2018/19 had 0.2%(24 out of 1351), and 2019/20 had 0.8%(9 out of 1105), while 2020/21 had 5%(15 out of 298). Lost time injuries and the number of schools which have signed up to the Health and Safety Service Level Agreement can impact the number of RIDDORS. A slight increase has been observed with lost time incidents, this might be sufficient to account for the increase in RIDDORS.
- Lost time injuries (LTI¹) made up 4.2% of all incidents reported within this time period. Compared with the previous year, this is an increase (2019/2020 had 11 LTI out of 1105 incidents, 2020/21 had13 LTI in 298 incidents). Number of working days lost is also high compared with the previous year(67 in 2019/2020 and 232 in 2020/21). The Directorate mostly impacted by lost time incidents was community with 8 cases, and schools 5 cases. There were no lost time injuries in People and Resources directorates. Employee incidents also had the most time off when compared with incidents involving agency employees. There is no definite trend that accounts for this increase in LTI, but a point to note is that 3 of these incidents led to the injured staff taking over 30 days off and this accounts for the increase in working days lost.
- Academies, Voluntary Aided Schools do not report accident/incidents to the corporate health and safety team. Their governing body has legal duty under the Health and Safety at

<sup>&</sup>lt;sup>1</sup> LTI-Lost time Injuries

Work. Act 1974 to approve the strategic vision for the school, working in partnership with the headteacher and promoting continuous improvement in the performance of the school's health and safety. The accident/incident data for schools is generated from the incident reports on SHE Assure system of community schools that have a service level agreement with the health and safety team.

 There are 25 community schools, 21 of these schools are signed up to a service level agreement with the corporate health and safety team.

### **Background**

2.5. This report details the annual safety review of health and safety performance to enable the Council to determine its effectiveness in managing risk and address any shortcomings.

#### **External Assurance**

- 2.6. In 2016 an external audit was conducted, leading to a full review of all aspects of Corporate Health & Safety including the governance, resulting in an initial action plan that was taken to Corporate Strategic Board in 2017 and GARMSC in 2018.
  - In January 2021, a new health and safety structure was developed to support the council and meet specific aims listed below. This will fulfil some of the areas highlighted by the external auditor in the 2016 audit.
    - To ensure future service is robust, fit-for-purpose, high calibre team
    - Integrate all H&S functions into single corporate H&S function (CH&S)
    - CH&S to be part of Corporate Resources Directorate HR and OD
    - New job profiles with essential professional qualifications and credentials

# **Improvement Plan**

2.7. Following the completion of the external audit in January to March 2016, series of actions were approved by Corporate Strategic Board in September 2017 and Governance, Audit and Risk Management Committee (GARMSC) in October 2017.Subsequently, in 2019, a 3-year

- strategy document including Corporate Health and Safety Plan was produced setting out the aims and objectives for the council.
- 2.8. The action plan is underway and monitored by the Corporate Health & Safety Board that meets on a monthly basis to ensure implementation. Focus is on transparency and ensuring all are aware of their responsibilities and that effective governance is in place.
- 2.9. As part of this, and in line with legislative requirements, the Health & Safety Policy for the Council has been refreshed and updated, and is included in Appendix 6
- 2.10. High priority will be placed on outstanding actions from the Corporate Health & Safety Management Plan, ensuring they are implemented.
  - Management self-audits
  - Introduction to incident investigation course for first line managers
  - Fire safety audits of schools- To establish schools' compliance with the health and safety legislations

### **Health and Safety Policy and Guidance**

- 2.11. A review of existing policies and codes of practice was undertaken this year, including the overarching Health and Safety Policy which was endorsed by the Council Leader and Chief Executive. This is to ensure Harrow Council meets its obligations under the Health and Safety at Work Act (HASAWA)1974.
- 2.12. The following documents were reviewed.
  - Asbestos policy
  - First aid code of practice
  - Eye care procedure
  - Lone working policy
  - Health & Safety Policy
  - Health & Safety Handbook
  - Accident Reporting Code of practice
  - Accident/Incident Investigation Policy-currently under review

## **Health and Safety Groups**

2.13. Due to the Covid-19 pandemic, there were very little face-to-face Health and Safety meetings. Corporate Health and Safety Board (CHSB) still continues to hold meetings on Microsoft Teams.

#### **Safety Culture**

- 2.14. Due to the pandemic, Safety Circles have not been held across all the Directorates. During the Covid pandemic safety concerns have been centred around adjustments in many staff working from home or ensuring safe work with citizens. Safety Circles have now restarted in some Directorates however, these will need to be looked at again and modified to meet the current climate.
- 2.15. Post pandemic and with the council's introduction of agile working, the way health and safety is managed within office based teams will change. As most office-based teams will not have designated areas in buildings, the Health & Safety of these areas will become a more central responsibility. For example, ensuring Fire Marshalls and First Aiders are available and trip hazards are mitigated against. Individual responsibility will also need to be heightened as people work more agilely and remotely.
- 2.16. The Health and Safety Handbook is available to all staff. However, there has been an update to its design and contact numbers. This is in the design stage. A copy of the handbook can be downloaded from SHEAssure document library, reference 133.

# Risk Assessments, Health and Safety Visits, Inspections and Audits

- 2.17. Site visits, Risk Assessments, Audits, Inspections and Accident investigations have continued to be performed by the Corporate Health and Safety Service through the organisation.
- 2.18. Internal Health and Safety Audits were undertaken on
  - 25 Community Schools
  - 9 Children Centres
  - 8 Operations in Environmental & Waste Strategy department and
  - 6 Corporate Services (Hard & Soft FM, THAM, Parking Enforcement,
  - Community & Public Protection, CA site, Transport, Waste)

An overall average score of 75.1% was obtained on Waste Strategy Department while Schools had an average of 91%.

2.19. Over **223** Building and Environmental Services Operations Covid Risk assessments have been reviewed in this time frame.**164** new risk

assessments entries have been made on SHE Assure, and **109** existing risk assessments have been modified to reflect Covid changes.

2.20. Fire Risk Assessments were completed in428 high risk priority common areas (4 or more stories),350 low risk priority areas (1-3 stories/house),62 corporate buildings, and13 schools.

All council housing targets were met; however, targets were still unmet in the council facilities management service which is under community directorates - These were unmet because FM relies on the schools not in the Facilities SLA to send in documentation after they have carried out their Fire Safety Risk Assessment.

- 2.21. Fire Safety Audits in Council Housing was completed in high priority sites (9 community halls and 21 sheltered housing schemes).
- 2.22. Asbestos re-inspection survey was carried out on 49 corporate buildings, 10 community schools and schools with an asbestos SLA.428 Asbestos Surveys were also completed in Council Housing.
- 2.23. Senior management safety tours were unable to held as usual due the Covid pandemic and resultant staff working from home. The mitigation control measure as agreed is the use of the Building Risk Assessment to substitute for Safety Tours. The Building Risk Assessment covers key areas required for compliance and is being monitored by the building owners, hence it can serve as a safety tour. Management self-audit targets were not met but plans are underway to make this a priority in 2021/2022.

#### **Education outside the Classroom**

2.24. The service has continued to review assessments for a wide range of trips including residential trips, outdoor activities and overseas trips.

#### **Occupational Health**

- 2.25. Health Management Limited (HML) continues to provide the occupational health service and the employee assistance programme (EAP). The service is overseen by HR. The services continued to carry out online appointments during the Covid pandemic.
- 2.26. Occupational Health Service continues to provide adequate health surveillance, return to work rehabilitation, health promotion and reduction of work-related sickness absence. However, due to the Covid Pandemic, HEP B vaccination was suspended.
- 2.27. **Appendix 4** provides a breakdown of Occupational Health referrals for information
- 2.28. Employee Assistance Programme has continued to be promoted throughout the year. Employees can freely obtain a range of services including specialist counselling and financial advice.

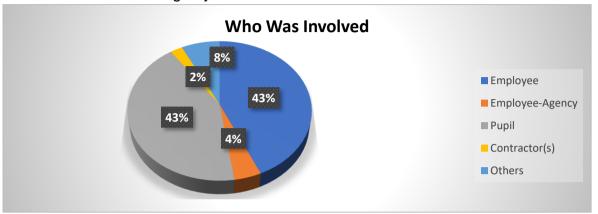
### **Promotion of Health, Safety and Well Being**

- 2.29. Public Health is still leading on the Council's Outbreak Control Plans for COVID-19 and have provided the council with advice over this.
- 2.30. A wellbeing and mental health strategy is being put together to support staff mental health. The council has trained 30 employees and 10 volunteers in Mental Health First Aid course (MHFA). These first aiders will be referred to as wellbeing champions.
- 2.31. Practical initiatives and steps have also been taken to support staff mental health and wellbeing such as support resources on the intranet and the Wellbeing Wednesdays where there is a variety of activities, bereavement drop-in sessions and other events on the wellbeing calendar.

## **Incidents reported**

2.32. Incident performance is monitored by the Corporate Health and Safety Board (CHSB) monthly. The data is considered both in terms of volume and through key performance indicators which allow consideration of the number of employees and number of employee hours worked.

2.33. There have been 129 employee related incidents in this period (this includes all near misses and not just accidents), which is 43% of all incidents/accidents reported. 7 these incidents have required reporting to the Health and Safety Executive as a RIDDOR2. This has resulted in loss of 222 working days.



- 2.34. Incidents to non-employees where it relates to the organisation's activities or the use of its facilities are also been recorded.43% percent of these incidents relates to pupils, agency employees, contractors and others contribute just 14%.
- 2.35. This year the top 5 accident types across the corporate estate, including schools which have signed up to the Service Level Agreement with Corporate Health & Safety, were Slipped, Tripped or Fell on The Same Level (68),

Physically Assaulted by A Person (49)

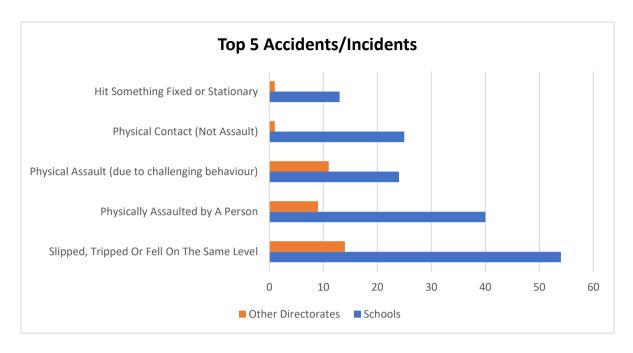
Physical Assault (due to challenging behaviour) (35),

Physical Contact (Not Assault) (26) and

Hit Something Fixed or Stationary (14).

The vast majority of these occurred at schools.

<sup>&</sup>lt;sup>2</sup> RIDDOR -Reporting of Injuries, Diseases and Dangerous Occurrences Regulations



- 2.36. Across the council, 15 RIDDOR types of incident were recorded.7of those were employee incidents while 8 related to Others (Pupils, Firs clients). A further breakdown is included in **Appendix 1**
- 2.37. A Significant incident that should be noted for information is the exposure to asbestos debris by an asbestos surveying contractor in housing. This is further broken down in **Appendix 1**
- 2.38. Community directorate accounted for 19% out of 298 incidents recorded for the year 2020/21. Of the 56 incidents recorded, 5 of the most frequently reported incidents were Slips, Trips and Falls, Physical assault (due to challenging behaviour), Injury while handling and physical assault. Majority of these incidents were in environmental services- (special needs transport, facilities, libraries and housing). The severity of a high proportion of the incidents reported is minor.
- 2.39. People's directorate accounted for 7% out of 298 incidents recorded for the year 2020/21. Of the 20 incidents recorded, 5 of the most frequently reported incidents were Physical assaults, Physical assault (due to challenging behaviour), Slips, Trips and Falls, Hit by A Moving, Flying or Falling Object, and Hit Something Fixed. Majority of these incidents were in children and young people services- (Firs). The severity of a high proportion of the incidents reported is minor
- 2.40. Resources directorate accounted for 1.7% out of 298 incidents recorded for the year 2020/21. Of the 5 incidents recorded, the most frequently reported incidents were burns, slips, trips and falls, incident with verbal abuse and near misses. Majority of these incidents were in

- revenues team, business support hub and careline. The severity of a high proportion of the incidents reported is minor
- 2.41. Schools directorate accounted for 72.8% out of 298 incidents recorded for the year 2020/21. Of the 217 incidents recorded, 5 of the most frequently reported incidents were Slips, Trips and Falls, Physical assault (due to challenging behaviour), physical assault and hit a fixed object. These incidents occurred uniformly across the schools. Although some of these incidents resulted in fractures, they have been investigated and the majority were due to lack of due care/attention by individuals during playground/ sports. The severity of a high proportion of the incidents reported is minor
- 2.42. The review of accident/incident statistics of schools has highlighted schools with a low record of incidents. This is attributed to schools reporting only major incidents to the corporate health and safety service
- 2.43. Analysis of the trends from the key performance indicators and the incident type and occupation indicates fluctuations in performance. However, fluctuations in performance can be influenced by a range of business variables rather than direct impact of health and safety management. In this instance, accident reporting has been majorly impacted by the Covid-19 pandemic, hence the reason for the low records and high number of working days lost when compared with the previous years.
- 2.44. Continuous improvement in accident reporting campaigns, risk assessments and safety procedures will improve incident performance but due to the low numbers and the diverse nature of the incidents, the improved performance cannot be attributed to direct intervention in key areas.

# **Health and Safety Training Data**

- 2.45. The Health and Safety training programme has continued to be delivered by the Corporate Health and Safety Service, but within the bigger remit of the Training Academy since 2017
- 2.46. The Commercial Safety Team has worked with the Training Academy to ensure it is an accredited training centre for Highfield and Chartered Institute of Environmental Health (CIEH); offering accredited and bespoke courses across all areas of health & safety, food safety and public health matters.

- 2.47. These courses are available on the training calendar and the service will continue to monitor incidence performance, using the improved SHE Assure software arrangements, against delivered training to identify positive impacts and areas where further training is necessary
- 2.48. Trainings completed in this timeframe include.
  - 21 supervisors and first line managers completed level 3 health and safety (Highfield accredited)- 3-day course
  - 35 employees completed a level 3 risk assessment (Highfield accredited)-3 days course
  - 12 employees completed mandatory e-learning health and safety training as part of induction
  - 52 employees completed a training on accident reporting, undertaking audits and risk assessments using the health and safety management software (SHE Assure)
- 2.49. Plans are underway to ensure first line managers and supervisors attend the 1-day Introduction to Incident Investigation course. This will be carried out by Highfield at the training academy
- 2.50. It has been noted that the provision of an online induction training course through learning pool has aided greater completion of the course.
- 2.51. Work is taking place with the Learning and Development Team to improve the induction training as well as the mandatory online health & safety training course.

## **Legislation Update**

- 2.52. The period 2020/21 saw some changes in legislations, guidance, codes of practice, health & safety updates and general safety notices
  - The Health Protection (Coronavirus, Restrictions) (Steps) (England) Regulations 2021-Came into force 29 March 2021 England. This instrument revokes and replaces the Health Protection (Coronavirus, Restrictions) (All Tiers) (England) Regulations 2020 ("the All Tiers Regulations") (S.I. 2020/1374) and contains the legislative framework which will implement Steps 1-3 of the Government's Roadmap out of lockdown in England. The Regulations came into force on 29 March 2021 and will expire at the end of 30 June 2021.

- The Building Safety Bill-The Building Safety Bill makes provision for the development of a new Building Safety Regulator (BSR), which will ultimately be responsible for all major regulatory decisions made at key points during a building's design, construction, occupation and refurbishment. In February 2021, the HSE announced the appointment of a chief inspector of buildings to establish and lead the new BSR.
- Fire safety update-The government response to the public consultation on fire safety sets out the next steps the government will take to strengthen fire safety for all regulated buildings which involves, legislating through the Building Safety Bill to strengthen the Fire Safety Order in a number of key areas.
  - Delivering new regulations through Article 24 of the Fire Safety Order in response to the Grenfell Tower Inquiry Phase 1 Report recommendations.
  - Implementing changes to improve engagement between building control bodies and fire and rescue services.
     Other measures to strengthen fire safety, include unlimited fines for building owners who are not compliant with fire safety regulations under the Fire Safety Order and for anyone caught obstructing or impersonating a fire inspector.
- UK REACH-The UK brought the European Union (EU) Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation into law on 1 January 2021, as UK REACH. UK REACH places equivalent responsibilities and standards on GB companies as they had under EU REACH.
- ISO45003-Occupational Health and Safety Management –
   Psychological Health and Safety at Work: Managing Psychosocial Risks. This is the first global standard giving practical guidance on managing psychological health in the workplace.
- THE PANDEMIC-England's government published its roadmap out of lockdown in February, which will see restrictions lifted in four stages. Restrictions are to be lifted nationally, meaning there will be no return to the regional tier system that was in place before lockdown. The roadmap says, "decisions on easing restrictions will be led by data rather than dates", with at least five weeks between each of the four steps. Before each step, the Government will review data assessing the impact of the previous step against four tests.

#### Stakeholder Feedback

- 2.53. The Corporate Health & Safety Board was initially chaired by the Corporate Director Community, however, from April, this has changed. The Director of HR and OD now chairs this board.
- 2.54. The Corporate Health & Safety Board includes both recognised Trade Unions, who continue to be proactive in their approach to health & safety. During the last 6 months of 2020/21 only GMB attended the corporate health and safety board meetings. However, both GMB and UNISON unions have now reconvened attendance at CHSB. The terms of reference for this is shown in **Appendix 5**
- 2.55. Collaboration with the trade unions by sharing of relevant documents and addressing raised concerns has no doubt impacted positively on the implementation of health and safety within the council. One notable area is the access to risk assessments, safe systems of works, safety tours, policies, procedures and all other documents available on the SHEAssure software which is the council's health and safety management software.
- 2.56. There has been no enforcement activity by the HSE during this period

### **Management Assurance**

- 2.57. Monitoring of health and safety performance within the organisation will continue to sit with the Corporate Health & Safety Board going forward, who will provide updates to the Corporate Strategic Board.
- 2.58. Presentations around performance, strategy and policy have taken place on a regular basis to the Corporate Strategic Board and are reported on at the Corporate Health & Safety Board

# Plans for April 2021 - March 2022

- 2.59. The key actions for 2021/22 include the following:
  - To implement a new corporate health and safety structure that supports the whole of the council with qualified health and safety professionals.

- The introduction of agile and flexible working will impact the implementation of health and safety hence, new policies and safe working procedures will be developed to reflect new work systems, the display screen equipment assessment will be monitored to ensure compliance across the council.
- Safety Circles have not been held across the directorates. With the Covid pandemic, safety concerns have been centred around adjustments in working from home or ensuring safe work with citizens. Safety circles will need to be looked at again and modified to meet the current climate.
- Corporate Health and Safety will continue to lead on plans to monitor operational and occupational risk assessments with respect to Harrow Councils Corona virus (Covid-19) control plans.
- Reviewed risk assessments on the tracker will continue to be monitored by the corporate health and safety board.
- Corporate take up of the Assure SHE Software as the recognised software system for all health and safety matters including reporting of incidents especially work-related incidents that happen while working from home. Focus will be placed on training individuals and teams on use of SHE Assure software.
- Health and safety support and advice within Harrow Council.
- Training programme across the Council to ensure all receive the necessary training, this training will be delivered by the training academy, Highfield.
- Implementation of the Health and Safety Strategy and the Corporate Health and Safety Plan
- Development of the staff wellbeing (and mental health) strategy

#### Ward Councillors' comments

N/A

### **Risk Management Implications**

2.60. Risks included on corporate or directorate risk register? Yes

- 2.61. Separate risk register in place? Yes
- 2.62. The relevant risks contained in the register are attached/summarised below

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	I Mitinations	RAG Status
Failure to fulfil the Council's Health & Safety duties leading to a harmful event for individual/individuals for whom the Council is responsible leading to litigation	Continual monitoring of key measures listed in the corporate risk register 2021/22 to manage risk to ensure they are been implemented and are effective.  Review of the H&S service and also its structure to enable it to be sustainable in the long term for future council requirements  Implementation of the further actions listed in the corporate risk register 2021/22.	Amber

# **Legal Implications**

- 2.63. The Health and Safety at Work etc Act 1974 requires employers to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees, and to prepare (and review) a policy in relation to it.
- 2.64. There has been no enforcement action from the HSE in this time frame.
  Recommendations of the ECF for implementation have to be referred to the relevant portfolio holder or Cabinet
- 2.65. The Council's Constitution states the following at Part 3A Terms of Reference for the Employees' Consultative Forum (ECF):

. . .

- 3.0 Health & Safety
- 3.1 The ECF will seek to promote health and safety and welfare within the Council and will keep under review the measures taken to ensure health and safety and welfare at work.

The Forum will receive and comment on reports, including: -

- The Council's half-year and annual health and safety performance report providing an update of health and safety activities and giving information on outcome measures.
- 3.2 Any health and safety and welfare matters which are the responsibility of the Council as set out in the schedule to the Council's Constitution must be referred to the Licensing and General Purposes Committee

### **Financial Implications**

2.66. The total budget to support the Health and safety function across the organisation is £384k:

£211k (net) – General Fund £173k – Housing Revenue account

## **Equalities implications / Public Sector Equality Duty**

2.67. Protected characteristics are constantly measured as part of any health & safety system, especially aspects of age and disability and Equality Impact Assessments are undertaken in respect of new policies and strategies (or significant amendments to them) to understand any negative (or positive) implications and to ensure appropriate mitigations etc are put in place if needed.

#### **Council Priorities**

Please identify how the decision sought delivers these priorities.

2.68. The delivery of health and safety management is integral to and supports the achievement of all Corporate Priorities.

# **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Dawn Calvert** 

Signed on \*behalf of/by the Chief Financial Officer

Date: 27/10/2021

**Statutory Officer: Paresh Metha**Signed on \*behalf of the Monitoring Officer

Date: 27/10/2021

**Chief Officer: Tracey Connage** 

Signed off by the Divisional Director of the HR OD

Date: 26/10/2021

# **Mandatory Checks**

Ward Councillors notified: NO

**EqIA** carried out: NO

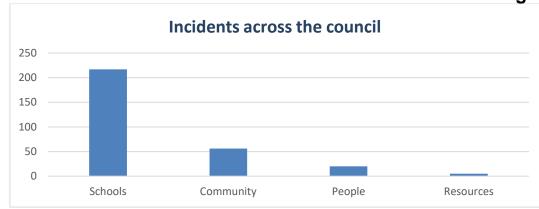
# Section 4 - Contact Details and Background Papers

**Contact:** John Griffiths, Health and Safety Compliance Manager, Community, 07716227493, John.Griffiths@harrow.gov.uk

Background Papers: Corporate Health & Safety Action Plan

# APPENDIX 1 Accident / Incident Analysis Report for Quarter 1 to Quarter 4 (1st April 2020 – 31st March 2021) - All Directorates

### Number of Incidents recorded across the council-Including Schools

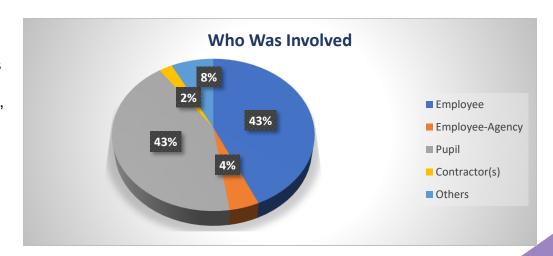


In 2021, the total incident count across the council was 298 which is a decrease of 807 (73%) from the previous year. This decrease is attributed to the Covid-19 pandemic which led to schools shutting down and majority of staff working from home Although, staff working from home are been encouraged to report work related incidents that happen at home, there has been very few instances of this report. This can also partly account for the decrease in the number of accidents reported.

Schools had the highest number of incidents with 217 records, Community had 56 incidents while people and resources had 20 and 5 respectively.

#### Classification by Who was Involved

Employee incidents topped the charts with 129 reported incidents, incidents involving pupils had 127 records while agency employees, contractors and others had 13,7 and 22 respectively. Contractor incidents when compared with previous years has remained stable with 8 cases in the previous year. Others refer to incidents where a member of the public, a volunteer, tenant, clients from Firs and in some cases, no one was involved. An example is damage to property due to strong winds



# **RIDDORS**

Row Labels	Count of RIDDOR Reportable
Slipped, Tripped or Fell on The Same Level	7
Hit by A Moving Vehicle	2
Physical Contact (Not Assault)	2
Fell from A Height (State Height in Notes)	2
Incident Involving a Vehicle	1
Incident with Faulty Equipment	1
Grand Total	15

RIDDOR Type of Incident	Directorate	What Happened	Reason	Employ ee	Employee- Agency	Othe rs
	School	A teaching assistant tripped over whilst in the playground on duty welcoming students into school	The TA was off work for more than 7days	1		
	Community	A contractor was coming down from the podium and missed a step, slipped and landed on the floor.	The contractor was taken directly to the hospital for treatment			1
Slipped, Tripped or Fell on The Same Level	School	A pupil was using the keep fit equipment. He jumped off, slipped and fell hurting his left hand.	Pupil was taken directly to the hospital and sustained a fracture			1
	Community	A driver tripped on ice	IP was off work for more than 7 days	1		
	School	A teaching assistant was showing children how to use the balancing bridge	The TA was taken directly to the hospital	1		

RIDDOR Type of Incident	DDOR Type of Incident		Reason	Employ ee	Employee- Agency	Othe rs
		and slipped and fell down and broke her wrist	and sustained a broken wrist			
	School	A pupil while falling put out his right hand to stop his fall	IP was taken directly to the hospital and sustained a fracture			1
	Community	A cleaner tripped over a lead while vacuuming	IP was off work for more than 7 days	1		
Hit by A Moving Vehicle	Community	A loader stepped into the road and was subsequently hit by a car. The car failed to stop.	The IP was off work for more than 7days	1		
The Sy 7t moving volucio	School	A student was crossing the road (Porlock Avenue) and was struck by a car.	IP was taken directly to the hospital with significant injuries			1
Physical Contact (Not	School	A pupil fell while playing and fractured his arm in 2 places.	This is a RIDDOR because the pupil was taken directly to the hospital			1
Assault)	School	A pupil bumped into another and fractured his femur	This is a RIDDOR because the pupil was taken directly to the hospital			1
Fell from A Height (State	School	A pupil fell from a climbing frame from a height of about 1.5/2 metres in the playground and hurt her arm.	This is a RIDDOR because the pupil was taken directly to the hospital			1
Height in Notes)		A firs client pushed another client off the bus	This is a RIDDOR because the pupil was taken directly to the hospital			1

RIDDOR Type of Incident	Directorate	What Happened	Reason	Employ ee	Employee- Agency	Othe rs
Incident Involving a Vehicle	Schools	As staff got into the vehicle and was trying to wear a seatbelt, the driver pulled away and braked sharply.	Staff was off work for more than 7days	1		
Incident with Faulty Equipment	Community	A caretaker hurt his back while closing a damaged garage door	IP was off work for more than 7 days	1		Q

# **Significant Incidents across the Council**

Type of	Directorate	What Happened	Injury Sustained	Action plan/Control
Incident				
Exposure To, Or	,	An asbestos	No injury sustained but	22/01/2021-The surveyor has sealed the doors (as per
in Contact With,	Housing	surveying contractor	potential for serious injury/ill	photographs). Door looked.
A Harmful		came across loose	health	27/01/2021 Warning signage Do not enter placed. Doors
Substance- in		asbestos debris in		looked to el. intake cupboard. Asbestos removal contractor
this case		electrical intake		attended and undertook ambient air testing/all clear. Clean
asbestos		cupboard		up works notifiable, HSE notification done by the Asbestos
				contractor who will return to clean up the el. intake
				cupboard and provided site certification for reoccupation.

Lost Time Incidents for Q1-Q4 -Employees and Agency Employees

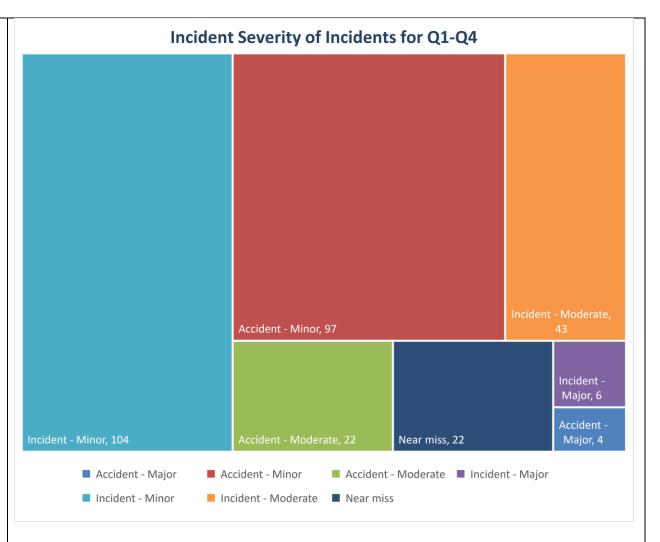
Person Injured		Days Lost
Employees	12	222
Employees-Agency	1	10
		232

#### **Accident Incident Rate**

Accident Incidence Rate=No of defined accidents per thousand employees

Note, the defined accidents is the number of employee incidents

$$\frac{\text{No of defined accidents}}{\text{Average number of employees}} \times 1000 \ \left(\frac{129}{4943} \times 1000 = 26.1\right)$$



67.5% of incidents which occurred in this time period were minor incidents and accidents and resulted in cuts, bumps, minor scratches and grazes. Most were treated with first aid. Near misses have been investigated. Major accidents all occurred in schools and were incidents such as a pupil was hit by a moving vehicle, sports injury, staff injured while lifting/handling, slips, trips and falls.



**Categories of Accidents/Incident across the Council-Including Schools** 

Categories of Accidents/Incidents	Count
Allergic Reaction/Anaphylaxis	1
Burns	2
Contact with Moving Machinery or Material Being Machined	1
Contact with Sharp Object	7
Dangerous Occurrence	1
Exposure To, Or in Contact With, A Harmful Substance	3
Faecal smearing	1
Feeling faint / Unconsciousness	3
Fell from A Height (State Height in Notes)	6
Fire Alarm Activated (non-emergency)	1
Foreign Object in Eye	2
Hit by A Moving Vehicle	2
Hit by A Moving, Flying or Falling Object	13
Hit Something Fixed or Stationary	14
Incident Involving a Vehicle	3
Incident with Faulty Equipment	2
Incident with Threatening Behaviour	4
Incident with Vandalism	1

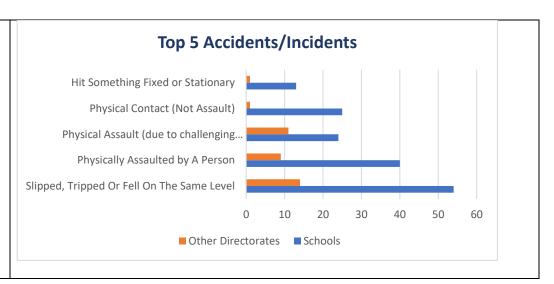
Categories of Accidents/Incidents	Count
Incident with Verbal Abuse	1
Infectious disease	1
Injured While Handling, Lifting or Carrying	8
Insect or Animal Bite	1
Medical Emergency	5
Near Miss	12
Nosebleed	1
Other - Please add details below	8
Physical Assault (due to challenging behaviour)	35
Physical Contact (Not Assault)	26
Physical injury from an unknown origin	2
Physically Assaulted by A Person	49
Property Damage	3
Safeguarding Incident	5
Self-harm	1
Slipped, Tripped or Fell On The Same Level	68
Sports Injury	2
Trapped	3
Grand Total	298

## Frequently Reported Accidents/Incidents across the council-Including Schools

Slips, Trips and Falls was most frequently reported although, fewer incidents were reported but there was a general low record of incidents owing to the Covid Pandemic.Challenging behaviour had been the most frequently reported in the previous year.In 2020/21, Challenging behaviour type of incident was changed to physical assault due to challenging behaviour.These incidents are mostly seen with special needs schools like woodlands and kingsley or special needs transport in community and Firs in people services.

In the Least frequently reported incidents category were infectious disease, allergic reaction, dangerous occurrence, activated fire alarm, incident with vandalism, self-harm.

Some other significant incidents include hit by a moving, flying object, hit something fixed, vehicle incidents, injured while handling/lifting, medical emergencies or near misses

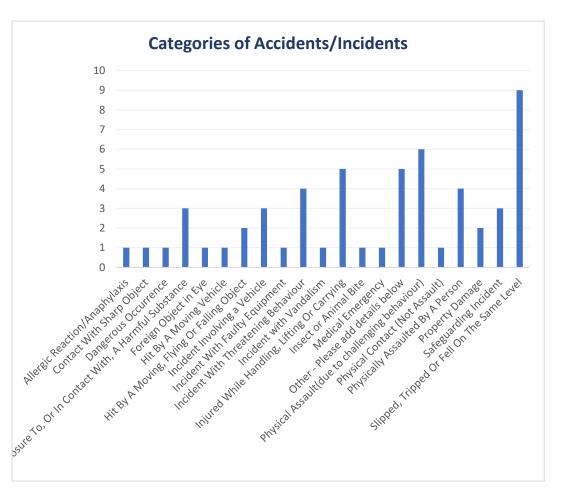


Types of	Other		Grand	79% of these incidents occurred at Schools. 13% at community, 6% at
Accidents/Incidents	Directorates	Schools	Total	People services and 1% in resources. It has been noted that 23% of
Slipped, Tripped Or Fell On				these incidents resulted in fractures, however, there has been no identifiable trend in method of work, sports activity or playground
The Same Level	14	54	68	supervision. Other types of injury include cuts, minor graze, bruising.
Physically Assaulted by A Person	Q	40	49	81% of these incidents occurred in schools-woodlands and Kinsley had accounted for most as they are special schools, 8% in community relating to housing and environmental services ,10% in people service which is mainly FIRS. Injury types are bite, minor fracture, cuts, sprain, ache.
Physical Assault (due to challenging behaviour)	11	24	35	69% of these incidents occurred in schools-woodlands and Kinsley accounted for most as they are special schools.17% in community mainly housing and environmental services, 14% in people services-FIRS. Injuries recorded are bites, minor grazes, cuts.
Physical Contact (Not				96% of these incidents were at schools and 1% in community. Injuries
Assault)	1	25	26	recorded are bruises, bumps, minor grazes.

Hit Something Fixed or				93% occurred in schools, 7% in people service. Injuries recorded are eye,
Stationary	1	13	14	mouth and dental injury, concussion, bumps/bruises.

# Accident / Incident Analysis Report for Quarter 1 to Quarter 4 (1<sup>st</sup> April 2020 – 31<sup>st</sup> March 2021) - Community Categories of Accident/Incident across Community

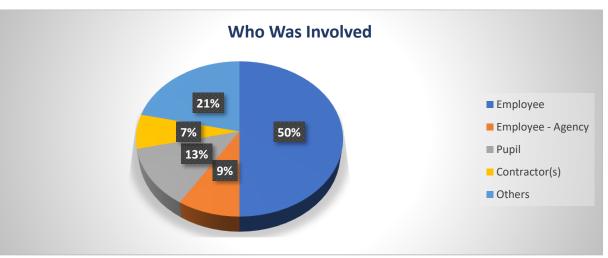
Categories of Accidents/Incidents	Count
Allergic Reaction/Anaphylaxis	1
Contact With Sharp Object	1
Dangerous Occurrence	1
Exposure To, Or In Contact With, A	3
Harmful Substance	
Foreign Object in Eye	1
Hit By A Moving Vehicle	1
Hit By A Moving, Flying Or Falling Object	2
Incident Involving a Vehicle	3
Incident With Faulty Equipment	1
Incident With Threatening Behaviour	4
Incident with Vandalism	1
Injured While Handling, Lifting Or	5
Carrying	
Insect or Animal Bite	1
Medical Emergency	1
Other - Please add details below	5
Physical Assault(due to challenging	6
behaviour)	
Physical Contact (Not Assault)	1
Physically Assaulted By A Person	4
Property Damage	2
Safeguarding Incident	3
Slipped, Tripped Or Fell On The Same	9
Level	
Grand Total	56



Top 5 Accidents/Incidents - Community		77% of incidents were in environmental services mainly special needs transport, facilities team, domestic team and CA site, 11% in libraries, sports &leisure and 11% in Housing. Injuries
Slipped, Tripped or Fell On The		recorded are bruises, bumps, a fracture and a nosebleed. Some examples include loss of
Same Level	9	balance, tripping over an electrical lead
Physical Assault (due to		83% of incidents were in environmental services-special needs transport & facilities
challenging behaviour)	6	management,16% in Housing. Injuries recorded were minor grazes and a minor fracture.
Injured While Handling, Lifting Or	5	80% of these incidents occurred in housing services-sheltered housing, while 20% was in
Carrying		environmental services-waste strategy. They resulted in bruises and muscular injuries
		60% of these incidents were in Special Needs Transport, and 40% was in sheltered. Injuries
Other - Please add details below	5	include cuts
		75% of these Incidents happened in environmental service-waste strategy and 35% was in
Physically Assaulted By A Person	4	housing-resident. Injuries include bruises, bumps

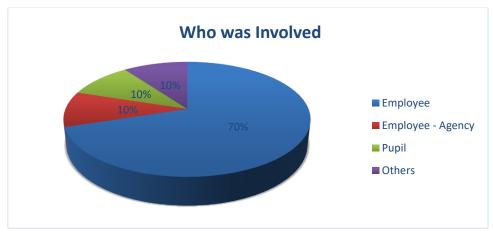
Classification by Who was Involved

Who was involved	Count of Who Was Involved
Employee	28
Employee - Agency	5
Pupil	7
Contractor(s)	4
Others	12
Grand Total	56

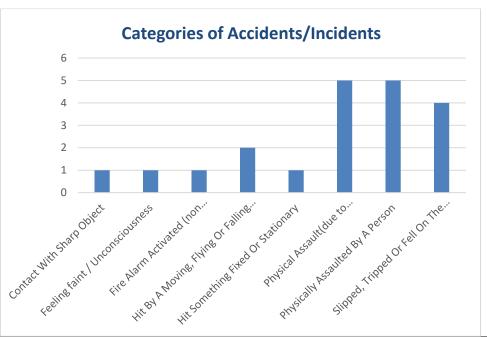


Note: Others here refers to clients, service users, members of the public, Volunteers

# Accident / Incident Analysis Report for Quarter 1 to Quarter 4 (1st April 2020 – 31st March 2021) - People



14 employee incidents were recorded, 2 involved agency employees, 2 were with pupils and others includes a young person and an incident where no one was involved



Top 5 Accidents/Incidents - People		100% of these incidents occurred in Children and Young Peoples Service-The Firs. They resulted in minor injuries like grazing, scratches.
Physically Assaulted by A Person	5	
Physical Assault (due to challenging behaviour)	5	80% of incidents of physical assaults were in Children and Young Peoples Service-The Firs, while 20% was in Adult Social Service. Injuries recorded are minor grazes and scratches.
Slipped, Tripped or Fell on The Same Level	4	75% of incidents of slips, trips and Falls occurred at Children and Young Peoples Service, 35% was at Adult Social Service. Injuries were mainly bruising, inflammation, minor grazes, aches
Hit by A Moving, Flying or Falling Object	2	100% of these incidents were in Children and Young Peoples Services-The Firs and Quality Assurance and Service Improvement. Injury recorded was aches
Hit Something Fixed or Stationary	1	100% of these incidents were in Children and Young Peoples Services-The Firs. Injuries recorded were bruising, bumps, swelling

Accident / Incident Analysis Report for Quarter 1 to Quarter 4 (1st April 2020 – 31st March 2021) – Resources

**Categories of Accidents/Incidents across Resources** 

Accident/Incident Categories	Count
Burns	2
Incident With Verbal Abuse	1
Near Miss	1
Slipped, Tripped Or Fell On The Same Level	1
Grand Total	5



Top Accidents/Incidents - Resources		50% of burns incident happened in the Revenues team while 50% was in
		Business Support Hub. They were mostly hot water scalding and did not require
Burns	2	major hospitalisation
Incident With Verbal Abuse	1	These incidents did not result in any injuries
		100% of Slips, Trips and Falls happened in Business Support Hub and resulted
Slipped, Tripped Or Fell On The Same Level	1	in a minor cut
Near Miss	1	There was a near miss incident at Careline and did not result in any injury

**Classification by Occupation** 

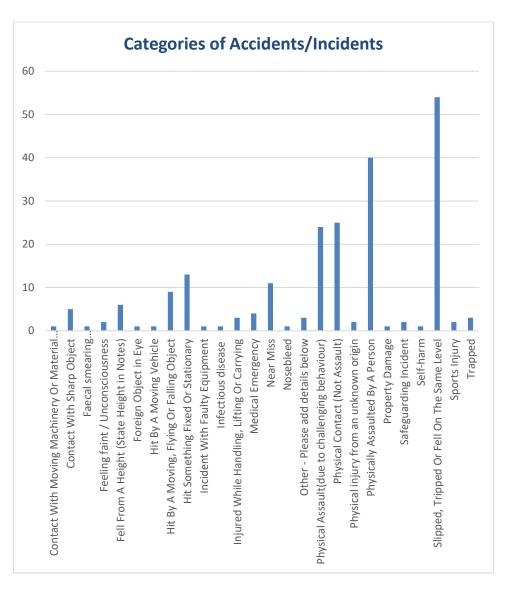
Row Labels	Count of Who Was Involved
Employee	4
Employee - Agency	1
Grand Total	5



Accident / Incident Analysis Report for Quarter 1 to Quarter 4 (1st April 2020 – 31st March 2021) – Schools

**Categories of Accidents/Incident across Schools** 

Categories of Accidents/Incidents	Count of Type of Incident
Contact with Moving Machinery or Material Being Machined	1
Contact with Sharp Object	5
Faecal smearing	1
Feeling faint / Unconsciousness	2
Fell from A Height (State Height in Notes)	6
Foreign Object in Eye	1
Hit by A Moving Vehicle	1
Hit by A Moving, Flying or Falling Object	9
Hit Something Fixed or Stationary	13
Incident with Faulty Equipment	1
Infectious disease	1
Injured While Handling, Lifting or	3
Carrying	
Medical Emergency	4
Near Miss	11
Nosebleed	1
Other - Please add details below	3
Physical Assault (due to challenging behaviour)	24
Physical Contact (Not Assault)	25
Physical injury from an unknown origin	2
Physically Assaulted by A Person	40
Property Damage	1
Safeguarding Incident	2
Self-harm	1
Slipped, Tripped or Fell on The Same Level	54



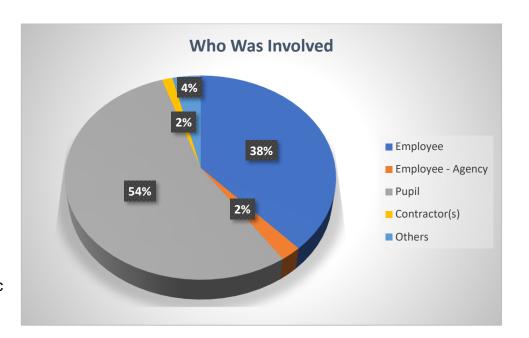
Sports Injury	2
Trapped	3
Grand Total	217

Top 5 Accidents/Incidents in Schools	Type of Incident	All cases of <b>Slips</b> , Trips, Falls happened uniformly across the SLA schools. Although 20% of these incide resulted in fractures, they have been investigated and majority were due to lack of due care/attention during the state of the state	
Slipped, Tripped or Fell on The Same Level	54	playground/ sports. Slips, trips and falls mainly occurred at the <b>playground</b> , during <b>sports activities</b> , due to a <b>wet floor</b> and sometimes <b>poor attention while walking</b>	
Physically Assaulted by A Person	40	92% of incidents of physical assaults occurred at Woodland and Kingsley High School. 3% was at Cannons Lane and 3% at Glebe Primary School. Physical assault by a person comprised of mainly <b>bites</b> , <b>scratches</b> , <b>hits</b> , <b>kicks</b> between pupils and teachers or teaching assistants and resulted in bruising, minor grazes, cuts	
Physical Contact (Not Assault)	30	All cases of these incidents are spread uniformly across the SLA schools- woodlands, Camrose, Longfield, Elmgrove, Glebe, Vaughan, Cedars, and Kingsley High School. Injury recorded are minor grazes, cuts, bumps and 2 minor fractures. Some examples include <b>bumping into each other during sports/play</b>	
Physical Assault (due to challenging behaviour)	24	96% of these incidents occurred at Woodlands School and Kingsley High School. These schools are special needs schools. St. Joseph had 4%. Injuries include bites, grazes.	
Hit Something Fixed or Stationary	13	These incidents were spread evenly across Cedars, St Joseph, Kenmore Park, Longfield, Whitmore and Woodland School. Injuries reported includes eye, mouth and dental injury, head injury and bumps.	

**Classification by Occupation - Schools** 

Who was Involved	Count of Who Was Involved
Employee	83
Employee - Agency	5
Pupil	118
Contractor(s)	3
Others	8
Grand Total	217

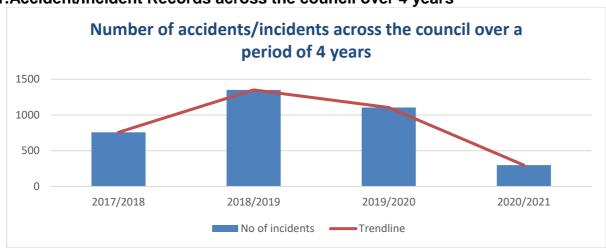
Note: Others refers to service users, young persons, member of public and no one was involved in some cases such as fire alarm activation



#### APPENDIX 2 – TRENDS

We will be comparing accident/incident data across Harrow Directorates over a period of 4 years (2017/2018, 2018/2019, 2019/2020 and 2020/2021)

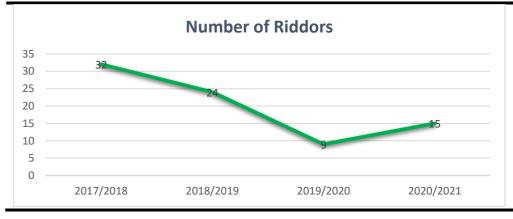
1.Accident/Incident Records across the council over 4 years



A steady decline in accident reporting can be observed from this data. This is due to the Covid-19 pandemic. The resultant lockdown and stay at home directive meant less accidents were recorded especially in schools as this directorate impacts largely on the number of accidents reported.

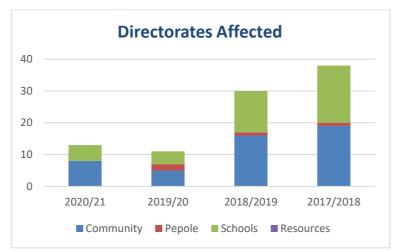
#### 2. RIDDORS

There has been an increase in the number of incidents reported as a RIDDOR. Data compared across 4 years shows that in 2017/18, 4.2%(32 out of 757), of all reported incidents were RIDDORS, 2018/19 had 0.2%(24 out of 1351), and 2019/20 had 0.8%(9 out of 1105), while 2020/21 had 5%(15 out of 298). Lost time injuries and the number of schools which have signed up to the Health and Safety Service Level Agreement can impact the number of RIDDORS. A slight increase has been observed with lost time incidents, this might be sufficient to account for the increase in RIDDORS.



**3.Lost Time Injuries-** Number of Lost time injuries saw a slight increase, the number working days lost has remained high and only saw a decrease in 2019/20. The directorate mostly impacted by lost time incidents is community with 48 cases, schools trails not far behind with 40 cases. We also had very few cases in people and none in resources. Employee incidents had the

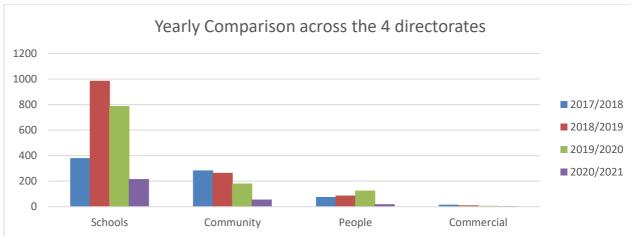




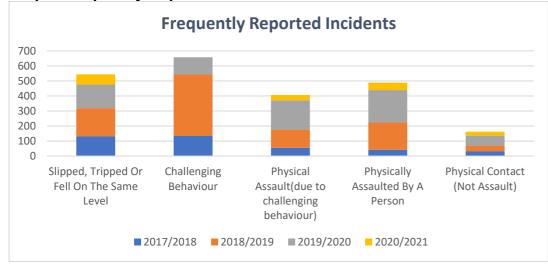


4. Yearly Comparison across the 4 directorates

Schools had the highest reported incidents in 2018/19 with 986 records. A clear downward trend can be observed in community and Commercial directorates. Commercial directorate constantly has the least number of reported incidents and its numbers have remained stable. People directorate saw an upward trend in 2017, 2018 and 2019 however, in 2010/2021 a decrease of 117 is noted. This was no doubt due to the Covid pandemic and the stay at home orders.



### 5.Top 5 Frequently Reported Incidents

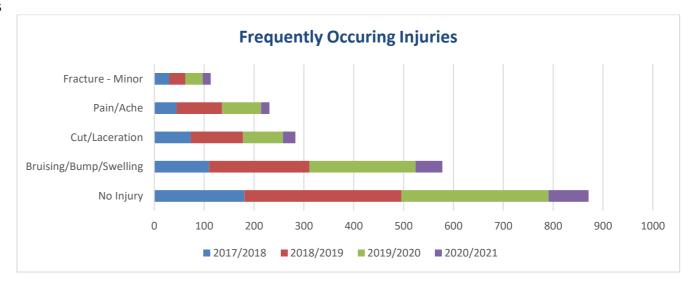


Challenging behaviour was most frequently reported in 2017, 2018 and 2019 across the system with 2018 having the highest number recorded. Slips, Trips and Falls has been consistent across the directorates however, in 2020/21, it became the most reported incident type, although, fewer incidents were reported but there was a general low record of incidents owing to the Covid Pandemic.Physical contact(not assault) has remained fairly constant.

In the Least frequently reported incidents category were electrical fault, incident with vandalism,fatality,self-harm,stress, work related illness and exposure to harmful gases or vapours. Some other significant incidents hit by a moving, flying object, hit something fixed, vehicle incidents, injured while handling/lifting, medical emergencies or near miss had lowest values of 13 and highest of 66.With lowest values in 2020/21 due to the Covid-19 pandemic

### **6.Top 5 Frequently Occuring Injuries**

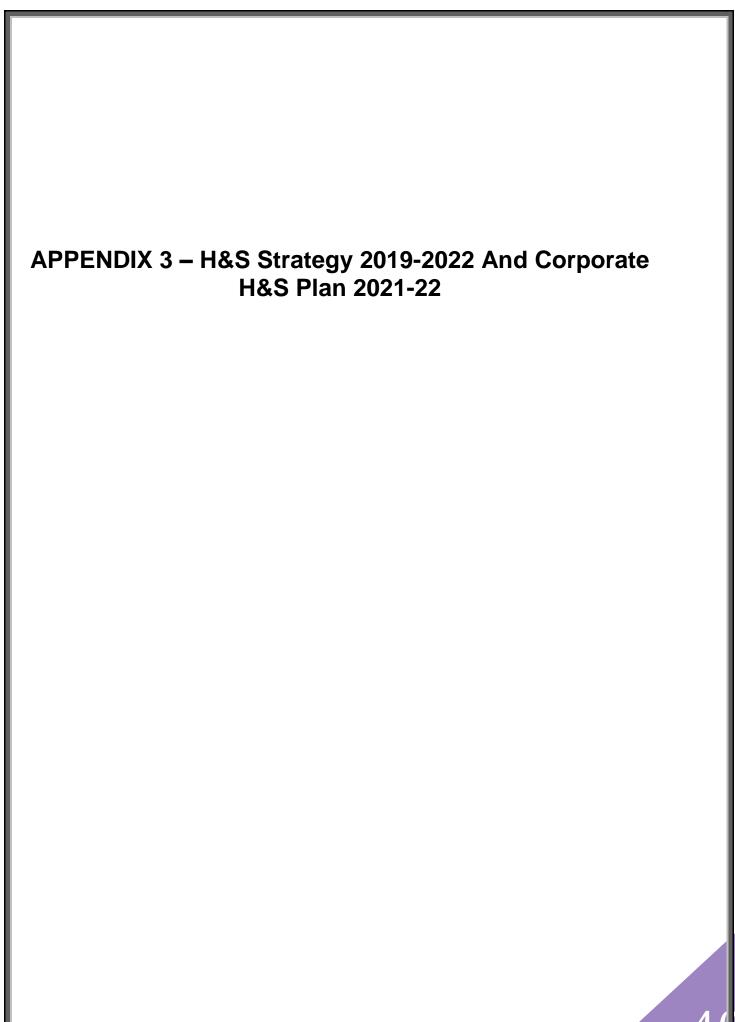
Over the 4-year period, 25% (871) of incidents resulted in no injuries. Bruising/bumps/swelling accounted for 16% (578) of injuries and remains the top injury reported. Cuts/Laceration made for 8% (283), Pain/Ache was 7% (231) while Minor Fractures accounted for 3% (113).



### 7. Who was Involved



Across the 4 years, the chart shows that majority of the incidents recorded involved employees and pupils.2018/19 saw an increase in the number of employee incidents from 276 in 2017/18 to 668 in 2018/2019; however, more incidents were also recorded in 2018/19, this could account for this increase. Pupil incidents were highest in 2019/2020 with 418 incidents recorded, however, majority of these incidents were minor incidents resulting in bruises, bumps or cuts. Contractor incidents have remained fairly stable with values ranging from 7-10 across the years. Others refers to incidents which involved members of the public, clients from firs/SNT, volunteers, service users, tenants, and in some instances where no one was involved such as property damage due to strong winds.





# OCCUPATIONAL HEALTH AND SAFETY STRATEGY

# 2019 – 2022 Corporate and Council Housing

### Provision of service of:

- Health & Safety
- Fire Safety
- Asbestos Management,
- Occupational Health Management
- Employees Assistance

	Name	Signature		Date					
Prepared by:	John Griffiths	Topph		01/03/2020					
Checked by:	Richard Lebrun	4		06/08/2020					
Approved by:	Paul walker	Paul Walke		07/08/2020					
Document Title:	OCCUPATIONAL HEALTH & SAFETY STRATEGY 2019 - 2022								
Version Number:	1	Date of Next Review:	11						

Occupational Health and Safety Strategy



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### MANAGEMENT SUMMARY

It is essential to the achievement of our strategy for Health and Safety to ensure that access to the right knowledge, skills, and support is available to staff not only when, but also before, they need it, and that this is widely communicated and understood to achieve a culture of health and safety excellence. Key to achieving this is the actions and support of the Corporate Health and Safety Team through continuous improvement and maintenance of the safety management system (SMS) by qualified and competent safety practitioners.

In line with best practice the strategy and model for the safety management system follows the precepts laid down in the Health and Safety Executives guidance 'Managing for health and safety (HSG (65)'. The strategy therefore is based on the principles of the Plan, Do, Check, Act approach and aims to achieve a balance between the systems and behavioural aspects of management. It also builds in health and safety management as an integral part of good management generally, rather than as a stand-alone system.

To achieve this, in addition to providing systems for policies, organisation planning, arrangements, training, communication and measurement there are clear objectives and monitoring of performance by the Corporate Health and Safety Team through health and safety management plans and proactive audit programmes. In addition, the strategy looks to ensure all Directors, Managers, Department Management Teams and Service Managers lead by example by demonstrating best practice in health and safety management and ensuring whenever possible, that all management decisions further health and safety objectives.

This strategy is intended to incorporate the whole Council; it is about effective partnerships between managers, staff and trade unions that are all crucial to successful health and safety management. Poor health and safety management is rarely the result of malicious intent. Support by professional safety practitioners, training in health and safety skills and risk management are key to achieving a strong health and safety culture which benefits all staff, service users, pupils, visitors and contractors who work in our premises, and improves the quality of our service. This strategy is intended to create a safety culture that places a high level of importance on safety beliefs, values and attitudes that is positively shared by the majority of people with the organisation or workplace. A positive safety culture can result in improved workplace health and safety and organisational performance

### INTRODUCTION

The Health and Safety at Work etc Act 1974 places overall responsibility for health and safety with the employer. In this case the employer is Harrow Council and the expectation is that health, safety and wellbeing are, in turn, the responsibilities of the Chief Executive and Board of Directors. In respect of matters pertaining to Health, Safety, Welfare, Asbestos Management, Wellbeing and Occupational Health; the Chief Executive of Harrow Council is the Duty Holder.

Where suitable and sufficient competent advice and support is not available in organisations there will be clear failings in meeting legal requirements and hence considerable exposure to risk of prosecution to individuals and the organisation. Furthermore, there is additional exposure to moral failings, the cost of expensive litigation and reputational damage.

The Council's corporate Health and Safety Team provides a Health & Safety, and Fire advisory service. Asbestos Management is managed by facilities management that facilitates risk reduction and helps develop or sustain inbuilt safety management. This should form part of the organisational management system that enables achievement of legal requirements. Specifically, as experienced practitioners, the teams are used to dealing with the processes undertaken by the local authority; they are experienced in the application and requirements of legislation and how it can be effectively applied judicially in this arena. In addition, provision of a comprehensive occupational health service with employee counselling and support service enables the Council to facilitate the well-being of all their employees.

The Council achieves its obligations in a number of ways that includes; a comprehensive system of occupational health support, employee counselling service, asbestos plans and surveys, safety processes, policies, guidance etc. Moreover, they can provide the, more intangible, experienced competent advice tailored to support the organisation.

This document sets out the strategy for Health and Safety, asbestos management and Fire Safety for Harrow Council for the three years between 2019 and 2022. It aims to build on the work already achieved to date in improving the health and safety management systems across the Council and thereby reduce illness, ill-health damage and loss, whilst continuing to deliver services to the people within the London Borough of Harrow.

### 1.0 BACKGROUND

In recent years legislation has reinforced the need for organisations to ensure effective management of safety, health, wellbeing, fire and asbestos. The Health and Safety Offences Act 2008, has increased penalties and provides courts with greater sentencing powers for those who break health and safety law. The Corporate Manslaughter and Corporate Homicide Act 2007 has meant organisations can be

found guilty of corporate manslaughter as a result of serious management failures resulting in a gross breach of a duty of care.

Statutory obligations for health and safety arrangements can be found in the Health and Safety at Work etc Act 1974 and Management of Health and Safety at Work Regulations 1999 - specifically regulations 5 and 7 that refer to the need for competent advice and ensuring a suitable and sufficient safety management system exists (see also the Health and Safety Executive (HSE) HSG 65 Guidance). The HSE, although the enforcing authority, are keen to point out that the many employers who do manage health and safety and wellbeing well, have nothing to fear from legislative requirements.

Harrow Council achieves high standards through the use of an occupational health provider and established in-house services for health and safety. Harrow Councils Corporate Health and Safety Team consist of a three professional experienced, qualified safety practitioners. The team are fully aware of the impact and need for competent advice to ensure effective delivery of a health and safety management system.

### 1.1 The Current Situation

Corporate Health and Safety sits within the Community and Public Protection Service, being three members of staff with responsivity for the overseeing of the corporate health and safety system and provision of advice.

Occupational Health remained part of the function of the Human Resources Team, including the provision of service by Health Management Ltd (HML) which oversees fitness to work and vaccinations.

In terms of the Corporate Health and Safety Board, this is chaired by the Corporate Director for Community.

The Corporate Director for Community launched a refresh of health and safety within the council, setting up a new meeting hierarchy that put the frontline staff at the heart of health and safety in their areas through the use of safety teams.

The safety teams are a joint worker management team that assists the employer in creating and maintaining a safe workplace. The goal of the team is to enhance the ability of workers and employers to resolve safety and health concerns reasonably and co-operatively.

The strategy seeks to replicate joint worker safety across all directorates and all levels of the council.

The Council Corporate Health and Safety Team have three health and safety advisers that provide an advisory service that covers corporate and schools.

Together the team provides a comprehensive Safety Management System that provides organised processes with planning, policies, monitoring and ongoing review; a wide range of advice, guidance and assistance that includes: management of Asbestos, Occupational Health, Well Being, Health and Safety, Welfare and Fire Safety across the whole Council.

The Corporate Health and Safety Team comprehensive Safety Management System ensures that the Council reduces health and safety risks across the board. This, in turn ensures we meet with statutory obligations, minimise costs from losses or civil litigation and fulfil our moral obligations to all those affected by our undertaking which includes; employees, contractors, school pupils, those who visit, play or use corporate premises, or live in Council Housing. We do this by:

- Ensuring that health and safety remains a vital part of standard management practice across the Council and provide planning for this to be achieved;
- Providing information, advice and training to all employees to help them stay safe at work and understand their own responsibilities to themselves and others:
- Developing strategic and operational initiatives and reviews that properly address any Health, Safety or Fire related risks associated with Council Housing, Council operations, schools and premises;
- Ensuring provision of an Occupational Health Service for all employees;
- Ensuring that risk assessment remains the process by which hazards are identified and risks arising are eliminated or adequately controlled;
- Monitoring standards by undertaking; audits, inspections, asbestos surveys, investigating significant accidents and incidents and providing interpretation of Health and Safety legislation that impacts on the Council;
- Management that ensures protection from exposure to asbestos in or near any of our premises.
- Monitoring of contractors for Health and Safety particularly with regard to Council Housing.
- At the start of each new financial year set out a Corporate Health and Safety Plan detailing the planned programme of auditing that designated safety advisers will undertake.

In all cases, the primary intention is to utilise resources in a way that assists with the development and implementation of systems that proactively reduces risk and gives feedback on performance **before** an accident, incident or ill health.

### 2.0 Corporate Health and Safety Governance Overview

The Council Corporate Health & Safety Policy clearly sets out roles and responsibilities to meet the needs of health and safety.

To ensure a successful culture is the responsibility of all management. To this end, all Heads of Service shall be the primary lead for health & safety in their services, with a nominated person acting as safety representative for that service. This is in conjunction with any Union Health & Safety representative.

Safety circles have been introduced as a means of communication and tackling safety issues at the most appropriate level. They will be chaired by the Safety Circle Lead and involve staff and representatives of all of the services represented. Heads of Service should ensure that suitable representatives are nominated and that all risk areas covered. These meetings shall take place as a minimum every 2 months.

The purpose of these meetings is to:

- Involve managers and employees in achieving a safe and healthy workplace.
- Review safety-related incidents, audits
- Review management and Corporate H&S audits of the workplace, communicate identified hazards, and recommend immediate methods for eliminating or controlling them.
- Introduce and assist with workplace safety and health initiatives and recommend improvements to management.

The Safety Circle is a space to share information and discuss specific risks in the service areas represented and maintain a record of issues raised and actions completed.

All actions shall be recorded on the SHEAssure software, with clear timescales. A review will take place at the directorate management meeting to ensure actions are being followed up and information fed into the directorate risk registers monthly.

Updated risk registers and any areas of key risks are raised quarterly to the Directorate Joint Committee for discussion, including with Unions. Decisions to escalate to the Corporate Health & Safety Board shall be made at this point. All actions recorded on the SHEAssure software.

The Corporate Health & Safety Board will meet on a quarterly basis and will:

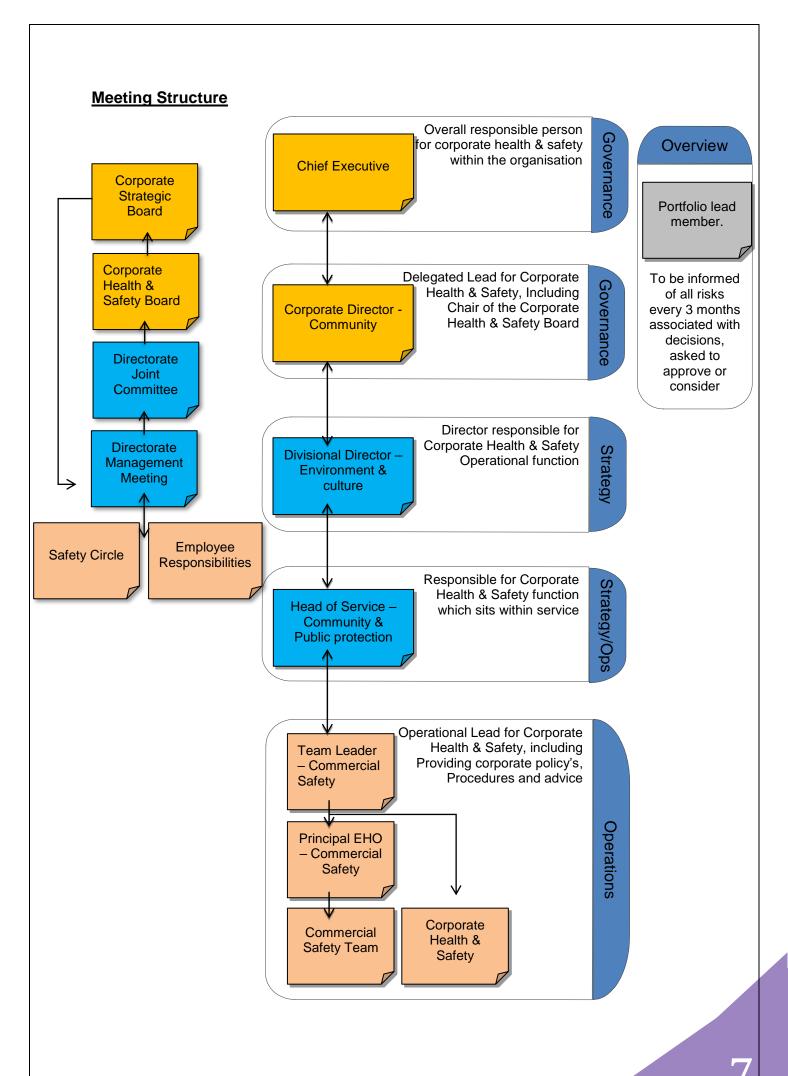
- Sign off all health & safety risk registers;
- discusses areas of concern and
- agrees items for future agenda items / areas of concern for DMTs and Safety Circles

Minutes of Corporate Board sent to Corporate Strategic Board and loaded onto SharePoint software. CSB will have the overview of corporate Health & Safety and Occupational Health / Wellbeing, and co-ordinate joint approach.

CSB retains overall governance of corporate health & safety, ensuring the aims and objectives are being met. They shall discuss any areas of concern and identify any issues they want to know more about or provide direction where needed.

Any actions resulting from CSB shall be recorded on the Assure SHE software and fed back to DMTs for action.

The Corporate Health & Safety Team shall oversee the process including being the administrators of the Assure SHE software. They shall also provide the relevant statistics and information to inform safety circles, directorate meetings and the corporate health and safety board



### 3.0 PRIORITIES AND AIMS FOR 2019 - 2022

Over many years the Corporate Safety Team has committed time and resource towards developing a comprehensive set of Corporate Health and Safety policies and supporting guidelines which are kept under review and audited against. These systems and procedures enable departments, in turn, to ensure the development of the necessary health and safety documentation that meets as minimum, statutory obligations together with corporate policies. To build on this, the following priories are highlighted for the next three years:

### a) Maintaining and improving the Council's safety management system

Through supporting the Executive Management Team, Departmental Management Team, managers, with review and monitoring process which support initiatives, remediation and decision making.

### b) Completing a series of audits, risk assessments and surveys

This includes schedules for the following health, safety and fire processes:

- Internal fire and health & safety audits on identified teams, premises and processes for corporate and council housing buildings
- · Audits in schools and children centres.
- Fire Risk Assessments for corporate, schools and council Housing.
- Fire Risk Audits for Corporate buildings.

### c) Maintaining an Asbestos survey programme

To locate, assess and monitor the condition of asbestos containing materials within the council's corporate and Council Housing portfolio with schedules which includes:

- Corporate Asbestos survey programme
- Council Housing Asbestos survey common parts (statutory) and void dwellings
- Schools asbestos survey programme (statutory)
- Asbestos awareness training
- Reactive response to Refurbishment & Demolition surveys and incidents
- d) To support managers and staff in achieving suitable levels of health & safety competency;

Effective management of health and safety involves people using their skills and knowledge to work safely. A fundamental requirement is for all managers to undertake British Safety Council Training to provide them with a solid grounding in the requirements of Occupational Health and Safety legislative requirements. Undertaking computer based training modules will ensure knowledge is continually professionally developed and reinforced. This will in turn help ensure managers have the basic skills to identify the health and safety competency needed by their staff.

e) To ensure the Occupational Health Service continues to provide adequate health surveillance, return to work rehabilitation, health promotion and reduction of work-related sickness absence;

The Council will continue to work in close partnership with its appointed Occupational Health Service provider to ensure the most efficient use of service resources.

# f) To build on the communication and consultation arrangements to ensure staff are fully involved and committed to achieving acceptable health and safety standards;

To achieve success in health and safety management, there needs to be effective communication up, down and across the Council. Front line staffs are involved in communication primarily through the risk to their health and safety identified in their risk assessments, and the preventive and protective measures necessary to control risk. This is supported with safety circles, tool box talks that reinforce a process for direct consultation. Further to this, other means of communication include newsletters, and the council intranet.

At a more strategic level; all Directorates are to have effective health and safety committees with Executive Director Representation on the Corporate Health and Safety Committee. Representatives of each Directorate are expected at attend a Corporate Health and Safety Committee that now has a corporate lead (Corporate Director of Community) and steer on health and safety.

# g) To encourage greater visible and active leadership on health and safety matters by managers;

Active leadership is essential if the Council is to foster a positive health and safety culture. The Corporate Health and Safety Team have promoted this through making available British Safety Council training courses for both Senior Managers/Directors and those who managed staff.

# h) To align health and safety more closely with the overall Risk Management arrangements;

The Councils Risk Management Strategy aims to establish a culture where risks are understood and managed. Health and Safety management aims to ensure risks to health and safety are identified and managed. While Risk Management covers all business risks and is focused on the major risks to the Council, there are areas where the two strategies meet. Health and safety processes and arrangements should therefore be seen and understood as supporting the Risk Management Strategy. Significant health and safety issues identified during risk management assessments will therefore be communicated to the executive board.

# i) To ensure good health and safety practice in our relationships with partners;

As well as setting out to improve our own health and safety performance, the Council will work with its partners to improve health and safety overall in the delivery of its services. The aim will be to share knowledge and experience and at the same time provide managers overseeing contracts with feedback on safety standards.

### 3.1 Monitoring Progress against Aims & Priorities

A number of proactive measurement activities take place to monitor safety performance for the Council. These measures are set out with performance targets in the Corporate Health and Safety Management Plan which is agreed by Executive Management Team at the start of the financial year.

The key measures against which progress will be assessed in meeting the strategic aims and priorities are;

- Number of audits and compliance levels achieved
- Number of Fire Risk Assessments and actions completed
- Number of Asbestos surveys completed
- Number of Asbestos re-inspections completed

Other methods of monitoring the success of the safety management system are:

- Review of accidents and statistics and related sick leave.
- Number of staff undergoing health and safety training
- Computer Based Training completed
- Senior managers safety tours completed
- Manager's self- audits completed.
- Health and Safety performance reports
- Action status of items on risk registers

### 4.0 HEALTH AND SAFETY MANAGEMENT SYSTEMS

The Management of Health and Safety at Work Regulations 1999 – Regulation 5 - requires Harrow Council to have arrangements in place for managing health and safety. Like any management system, it is essential that the Council collects information on the system implemented if it is to be able to make judgements about its adequacy and performance.

The system followed by the Corporate Health and Safety Team is based on that described in HS(G)65 Successful Health and Safety Management. Diagram 1 illustrates the system showing the main topic headings and the communication flows by which continuous improvement in health and safety management is achieved. Health and safety audits aim to verify compliance with each aspect of the management system:

Information link	 •
Control link	 •

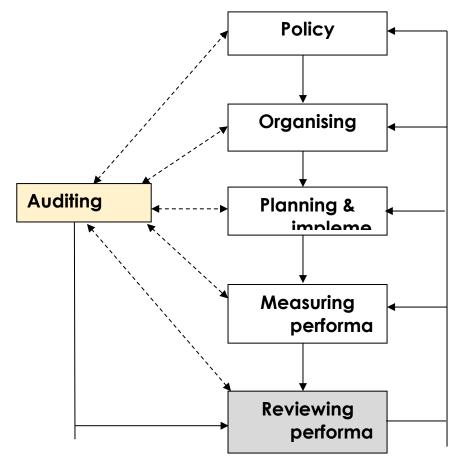


Diagram 1: HS(G)65 Health and Safety Management System Elements

### **POLICY**

Effective health and safety policies set a clear direction for the Council to follow. They contribute to all aspects of business performance as part of a demonstrable commitment to continuous improvement. The Council already has a well-developed set of Corporate Policy Arrangements that are available on the council SHE software system and this is subject of a rolling programme of review.

### **ORGANISING**

The Council needs to ensure that it has an effective management structure and arrangements are in place for delivering its health and safety policies. To achieve success, all staff will need to be motivated and empowered to work safely and to protect their long-term health, not simply to avoid accidents. The Council is currently embarking on developing a safety circle safety culture, ensuring robust health and safety management supports this programme and will better shape the way it deals with health and safety issues in the future. The activities necessary to promote a positive health and safety culture are;

### **Control**

Everyone working in the organisation can contribute to controlling health and safety risks. Control is achieved by getting the commitment of employees to clear health and safety objectives. Managers will need to take full responsibility of controlling

factors that could lead to ill health, injury or loss thereby helping to create a positive atmosphere and encouraging a creative and learning culture.

### Co-operation

Participation is essential to control risks effectively. By encouraging employee 'ownership' of health and safety policies this will assist with their better understanding that the organisation as a whole, and people working in it, benefit from good health and safety performance.

The Council has a legal obligation to consult with all employees about those health and safety issues in the workplace that affect them. The Council has already fostered good relationships on health and safety matters with its recognised trade unions.

### Communication

All managers need to lead by example. Their visible commitment to, and involvement in, health and safety management should be obvious and consistent. They will need to provide regular and reliable information on health and safety to everyone who needs it.

### Competence

If Council employees are to make a maximum contribution to health and safety, the Council will need to have in place robust arrangements to ensure that they are competent. Health and safety is already a mandatory competency for all employees.

### PLANNING AND IMPLEMENTING

This element concerns the adoption of a planned and systematic approach to implementing the health and safety policy through an effective health and safety management system. The aim is to minimise risks. This strategy provides the framework, against which the Council will judge the adequacy of its health and safety management systems to ensure,

- The mitigation of risks;
- The ability to react to changing demands;
- Sustainability of a positive health and safety culture.

### **MEASURING PERFORMANCE**

The Council needs to measure what it is doing to implement its health and safety policy and to assess how effectively risks are controlled. There are many different types of monitoring, but they can generally be categorised as either 'proactive or reactive'.

- Proactive methods monitor the operation of management arrangements and workplace precautions and tend to be preventative in nature, for example; routine inspections and surveys of premises, plant and equipment by staff;
- **Reactive** methods monitor evidence of poor health and safety practice but can also identify better practices that may be transferred to other parts of the

organisation, for example, investigating accidents and incidents, monitoring cases of ill health and sickness absence records

Where services are delivered on behalf of the Council via contractor relationships, these activities should also be subject to continual health and safety performance monitoring and review. In such circumstances, the level, nature and frequency of monitoring undertaken will be based on an assessment of risk. Evidence of such systems will be required to enable demonstration of due diligence.

### **REVIEWING PERFORMANCE**

All control systems tend to deteriorate over time. To provide essential feedback and information to managers, on how effectively plans and the components of the health and safety management systems are being implemented, professional safety and health advisers from the Corporate Health and Safety Team carry out a regime of regular auditing and performance review of *premises, teams and processes*. The findings on success and failure are then fed back in to the system and should be acted upon to enable continuous improvement to be made.

### 5.0 AUDITS (TEAM, PREMISE & PROCESS AUDITS)

### 5.1 Team Audits:

Team audits are necessary to verify that appropriate safe systems of work are operating across the division. These audits focus in on staff training, team risk assessments and safe systems of work.

The categorisation of teams will be based on:

- The activities of the team/service front facing staff interacting with the public are generally deemed to be at a higher risk to workplace aggression especially when working alone. Similarly, teams using dangerous equipment e.g. chainsaws, abrasive wheels or engaged in high risk activities such as working at height.
- Where there is thought to be an absence of suitable team assessments and safe systems of work the team will be targeted.
- Any other significant hazards that may be identified.

### **5.2 Premise Audits:**

Premise audits are required to ensure compliance of buildings and assets. These audits focus on statutory requirements and industry good practice relating to aspects of Corporate Landlord. Every corporate building will be audited within an 18 month circle.

The categorisation of premises will be based on;

• The physical location:

The location category will be based on known untoward activity in the area of the premises, its remoteness and proximity to essential emergency services.

• The use and occupiers of the premise/site, Use of the building/premises will be based on a sliding scale from office use, being inherently safe, to

depots being dangerous because of transport movement. Sites made available to the public especially where there is no onsite supervision will similarly tend to present a higher risk due to factors like vandalism. The amount and variety of mechanical systems in the building will also need to be taken into account, that is water, sanitation, washing systems, air conditioning, (all potential legionella hazards), lifts (goods & passenger) will raise the risk profile on the basis that the more systems the more maintenance is required.

- Sites where vulnerable persons reside (i.e. Residential Care and Sheltered Housing Schemes) will need higher levels of oversight,
- Any other significant hazards that may be identified.

### **5.3 Process Audits:**

Process audits enable us to identify systemic problems within managed processes and enable effective remediation of risk across boundaries.

The categorisation of processes will be based on;

- Where there is reliance on contractors to fulfil essential aspects; for example repair and maintenance contracts,
- The overall success of the process is dependent on input from several teams; for example the maintenance of play areas.

### 6.0 SELF-AUDITS AND SAFETY TOURS

The program of audits carried out by the Corporate Health and Safety team is supported with 'Self-audits' by Managers and 'Safety Tours' by Senior Managers.

The managers 'Self-audit' comprises of question sets and requires reference to sample inspection of documents and a physical inspection of the premises. The senior managers 'Safety tours' are a more general approach relying on observation and talking to staff.

Both audits aim to breach the gap and ensure that all areas of the Council are examined each year. Further information can be found under the Corporate Health and Safety Assure SHE system.

### 7.0 SERVICE DELIVERY

Corporate Health and Safety Team services will be delivered by fully trained, qualified, experienced competent persons with a detailed knowledge of legislative requirements, good practice and understanding of fire safety, Asbestos Management, Occupational Health Management, Employee Counselling and Health & Safety Law. The teams are able to provide support on wellbeing, health and safety issues that can be applied so not as to be onerous in its application to achieve service aims.

### 7.1 Health and Safety, Fire and Asbestos Services include:

 Auditing - Essential in the first instance to identify shortfalls and recommend course of action to ensure an effective safety management system. The Safety Management System provides robust and comprehensive audits for Premises, Teams and Processes.

- Policies and Arrangements Developed, updated and reviewed Council Corporate Policies, Processes, Guidance & Briefing Notes providing suitable and sufficient, arrangements, information for Managers and Premises controllers to follow for practical application.
- Risk Assessments A comprehensive set of risk assessment processes (including DSE, work, Stress, Manual Handling, New and Expectant Mothers, etc) that are in line with HSE approved systems together with model assessments and advice on their use. The team will also support and assist managers with the production of specific risk assessments.
- Fire Risk Assessments For Council Housing, experienced qualified fire risk
  assessor will undertake predominantly Type 1 Fire Risk Assessments over a
  cyclical programme. High priority buildings, Sheltered Housing Schemes,
  Community Halls and Converted Street Properties) being risk assessed annually
  whilst Medium/low priority (purpose built blocks are assessed over a two year
  cycle. Type 4 assessments in high rise void properties will be undertaken as and
  when suitable properties become available.
- Advice/Professional support and guidance by expert officers for Health, Safety, Asbestos and Fire related issues.
- Asbestos Management The council facilities management team will provide management policy and guidance, awareness training and offer help in the application of recommended and required management processes.
- Asbestos register Access to an on-line asbestos management suite that holds records and surveys for properties surveyed by specialist asbestos surveyors, via facilities management, Council Housing employ an asbestos surveyor.
- Asbestos Surveying service and Management Plan. It is a requirement of the Control of Asbestos Regulations 2012 that premises set out in a detailed plan how asbestos is managed. The Council as the Duty holder has this work carried out by a licenced asbestos contractor.
- Training Provision of health and safety and asbestos training from a range of
  courses by competent staff. Asbestos awareness training is a requirement of the
  Control of Asbestos Regulations 2012. This is provided to all those in control of
  premises and those who may be designated as carrying out any work with
  asbestos or with the planning or arrangement of that work.
- Access to a Computer Based Training (CBT) A wide range of modules
  including asbestos management, fire safety, health and safety awareness etc.
  This is provided to reinforce knowledge and act as an easily accessible way to
  complete refresher training.

- Accident/ Incident Reporting Provision of an on-line system for reporting and maintaining records (Assure SHE software). The reporting system acts as a tool to provide data, graphs and statistics that enables analysis of trends to aid with risk mitigation, defence in litigation and reduces insurance costs.
- Accident/ Incident Investigation All accidents that may be deemed necessary
  for an officer to conduct a full accident/incident investigation can be advised and
  supported to ensure a professional approach and documentation.
- Support, advice and liaison with enforcing authorities are provided. Experience has shown that liaison with enforcing authorities using safety professionals has resulted in positive outcomes.
- **Site Inspection/ Visit** A Health and Safety professional are available to attend sites to monitor and advice on specific issues.
- **Violence at work and Lone working systems** The team will work alongside management in providing a suitable lone working solution.

### 7.2 Occupational Health Service

The Occupational Health Service provides:

- A Consultant-led team focus on early intervention, executing tried-and-tested approaches that will help to safeguard employees' health and get them back on their feet as quickly as possible.
- Strategies to assist with managing employees more decisively.
- Development of coordinated plans so staff can return to work as soon as possible.
- Employees can visit the Occupational Health providers clinics where required.

### 8.0 RESOURCE ALLOCATION

A key area of support of the Corporate Health & Safety Team is to undertake external monitoring of the implementation of departmental safety management arrangements. Each Directorate receives a level of professional support from the team of Safety Advisers. The amount of resource allocated to each Directorate is based on the level of risk associated with the undertakings of teams.

A significant amount of work is outsourced to contractors. This equally requires safety monitoring to ensure not only legislative compliance but avoidance of reputational damage. One particular area requiring significant monitoring across the Council concerns compliance with Client duty holder responsibilities under the Construction (Design and Management) Regulations 2015, which takes in construction, repair and maintenance work.

9.0 CORPORATE HEALTH AND SAFETY PLAN 2020/21

# Corporate Health & Safety Management Plan 2020 – 2021

Prepared by:	John Griffiths Corporate Health & Safety and Compliance Manager
Approved by:	Paul Walker Corporate Director of Community
Director's Signature	Paul Walker
Date	07 <sup>th</sup> July 2020

Section	<u>Objective</u>	Start	End	Lead	Target	Achieved	<u>k</u>	<u>Remarks</u>
		Date	Date			Six Months	End Perio	
						WOTHIS	<u>d</u>	
Safety Management	ť							
Senior Managers Safety Tours  (Linked to priorities and Aims (A,B,D,G,H,I)	(a) Conduct safety tours of premises/ sites within areas of responsibility, a minimum of four a year (quarterly), to ensure the safety and upkeep of the workplaces.	April 2020	Marc h 2021	Directors/HO S	100%			Directors and HOS can jointly carry out workplace inspections  One safety tour to be conducted within another Directorate and share outcomes.  The mitigation control measure as agreed is the use of the Building Risk Assessment to substitute for safety tours. The Building Risk Assessment covers key areas required for compliance and is been monitored by the building owners, hence it can serve as a safety
	(b) Record the results of safety tours and submit quarterly returns on Pro-forma to Corporate Director. Each Director to discuss at their DMT's	April 2020	Marc h 2021	Directors/HO S	100%			tour.  To be discussed at Department Team Meetings at least quarterly and minuted

Section	Objective	Start	End	Lead	Target	Achieved	t	Remarks
		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
								The actions from the building RA are covered on the tracker which is updated monthly
Management Self Audits (Linked to priorities and Aims (A,B,D,G, H,I)	(a) First line or second line managers/supervisors to carry out <b>one</b> Management Self Audit per year on areas of responsibility.	April 2020	Marc h 2021	First/second Line managers to carry out audits, Directors to ensure audits take place.	100%		35 audit s	Directors to ensure process take place. Where H&S team have audited, these count in lieu of self-audits.  Community-13 out of 27 services completed a manager's self-audit Resources- 21 out of 29 services completed a manager's self-audit People- 1 out of 22 services completed a manager's self-audit
	(b) Management of Self Audits; Managers to remediate actions and provide Directors with information. Directors to maintain record.	April 2020	Marc h 2021	First/Second Line managers to follow up and ensure actions completed.	100%			Safety Circle Leads to maintain record that this has been carried out by their teams. Information to be sent quarterly to the Directors by team/line manager.  Safety circles have not held due to the Covid

Section	Objective	Start	End	Lead	Target	Achieved	1	Remarks
<u>occurrent</u>	<u> </u>	Date	Date	<u> </u>	Targot	Six	<u>End</u>	<u>itomarko</u>
						<u>Months</u>	<u>Perio</u> d	
Conoral Hookh & So	fate Cantral Systems						<u>u</u>	pandemic. These will need to be re-evaluated and plans put in place for integration into the current work climate
	fety Control Systems	April	Mara	Hood of	24		15	Audita will be an
Corporate H&S Audits by Department General Audits  (Linked to priorities and Aims (A,B,D,H,I)	Create and undertake a schedule of Internal Health, Safety and Fire Safety Audits on high risk services on identified teams and premises. Focus to be on processes as part of audit where applicable. Overall 24 audits.  12 Corporate and 12 audits in Environment and waste strategy	April 2020	Marc h 2021	Head of Corporate Health and Safety	24 audits		15 Audit s comp leted	Audits will be on high/medium risk as determined by previous audits, use, size and incidents over the last two years of historical data. High risk area will be Passenger Transport, waste and recycling, Parks, Depot, Schools and children services.  The Covid pandemic and governments stay at home guidance led to low numbers of completed audits.  CA Site -98.61 Commercial Services-80.16 Trade Waste-81.81 Refuse-85

Section	<u>Objective</u>	Start	End	Lead	Target	Achieved		Remarks
		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
								Street Cleaning-95.95 Parks and open spaces- 90.43 Operations coordinator- 79.78 Grounds Maintenance- 79.27 FM-Hard& Soft Services Transport Traffic & Highways Asset Mgt (THAM) Parking enforcement Community & Public protection Waste
Schools & Children Centres General Audits  (Linked to priorities and Aims (A,B,H)	To start new cycle of audits a minimum of 24 audits, schools and children centres to attend to actions as required.	April 2020	Marc h 2021	Head of Corporate Health and Safety	24 audits	0	35	Audits will be on high/medium risk as determined by previous audits, use, size and incidents over the last two years of historical data.  Community Schools-Out of 33 community schools, 26 completed a health&safety audit  Children Centres- 9 out of 9 children centres

Section	Objective	Start	End	Lead	Target	Achieved	d	Remarks
		Date	<u>Date</u>			Six Months	End Perio d	
								completed a health and safety audit
Risk Assessments (Linked to priorities and Aims	All first line managers/supervisors to review their RA to ensure that they are suitable and sufficient for safe operations for their staff	April 2020	Marc h 2021	Line Managers/H OS	100%			Heads of Service to sign off all risk assessments associated with their service.
(A,B,F, H)	All RA to be signed off by Head of Service and recorded.							All Building Covid RA have been uploaded on to SHE.
								All operational Risk Assessments have been carried out however, not all are uploaded on SHE which is a corporate requirement.
								Currently on SHE, we have Operational RA from Environment&Waste Strategy, Transport, Housing, Libraries, Sports and Leisure,
								Children's services, Network Management.

Section	Objective	Start	End	Lead	Target	Achieved	4	Remarks
<u> </u>		Date	Date	<u> </u>	141.900	Six Months	End Perio d	<u>- Nomerno</u>
Corporate Policies/	Committees							
Corporate Policies (Linked to priorities and Aims (A,H,I)	Review Corporate Policies and Guidance documents in light of changing legislation, official guidance, good practice and Council priorities. Identifying where changes required, redate/reorganise library of documentation on SHE software system. Target minimum of 12 policies.	April 2020	Marc h 2021	Head of Corporate Health and Safety	12 fully revised or written policy/g uidance docume nts	2	8	Policies will be reviewed on a risk-based basis. All new or revised policies must be consulted through the Corporate H&S committee members.  - Asbestos policy - First aid code of practice - Eye care procedure - Lone working policy - Health&Safety Policy - Handbook - Accident/Incident Investigation Policy-Under Review - Accident reporting code of practice Due to the pandemic, resources have been prioritized in reviewing Covid RA

Section	Objective	Start	End	Lead	Target	Achieved	l k	Remarks
		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
Corporate Health and Safety Committees  (Linked to priorities and Aims (A,B,C,F,H,I)	Plan, organise and attend minimum of 8 H&S Committee Meetings	April 2020	Marc h 2021	Community Director (Chair) Head of Corporate H&S, Directorate representativ e's senior managers, and Union/safety Representati ves.	8	6	6	Chaired by Community Director
Fire Control System	(a) Conduct a <b>minimum of 10</b>	Anril	Marc	Head of	10	E	62	Audits will be on
Corporate Fire Safety Audits	audits of fire safety, identified as the top high risk corporate premises and managers	April 2020	h 2021	Facilities Management	10	5	02	high/medium risk as determined by previous audits, use, size and
(Linked to priorities and Aims (A,B,H,I)	actions within time scales							incidents over the last two years of historical data.

Section	<u>Objective</u>	<u>Start</u>	End	<u>Lead</u>	<u>Target</u>	Achieved	<u>1</u>	Remarks
		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
	(b) Conduct a minimum of 20 audits of fire safety on identified schools premises in support of external audit of schools, Head Teachers to address actions within time	April 2020	Marc h 2021	Head of Facilities Management	20	0	13	Interim contractor was appointed during Oct 2020 62 Fire Risk Assessments have been completed for corporate buildings Audits will be on high/medium risk as determined by previous audits, use, size and incidents over the last two years of historical data.  These are outstanding because FM relies on the schools to send in documentation after
								they have carried out their Fire Safety Audits. So far, only 13 schools have sent in their documentation.
Council Housing Fire Risk Assessment	(a) Carryout Fire Risk Assessments in all <b>High Risk</b> Priority common areas (4 or more stories/house) vulnerable persons/community halls	April 2020	Marc h 2021	Director of Council Housing.	435 FRAs	104	428	Up to today 428 (out of 433 required) have been completed. Appointments for remaining 5 sites are scheduled for w/c

Section	<u>Objective</u>	Start	End	<u>Lead</u>	<u>Target</u>	Achieved		<u>Remarks</u>
		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
(Linked to priorities and Aims (A,B,H,I)	and relevant team to attend to actions.							15/03/2021 and confirmed with the residents. Previously access letters were circulated and 2 further visits with no access.
	(b) Carryout Fire Risk Assessments in Low Risk Priority Common areas (Between 1 & 3 stories/purpose built and relevant team to attend to actions.	April 2020	Marc h 2021	Director of Council Housing	169 FRAs	169	350	Total number 350
Council Housing Fire Safety Audits	Carryout audits of fire safety at high priority sites:	April 2020	Marc h 2021	Director of Council Housing	30	30	30	Total number 30
(Linked to priorities and Aims (A,B,H,I)	(a) Audit Sheltered Housing Schemes and relevant team to attend to actions	April 2020	Marc h 2021	Director of Council Housing	21	21	21	Total number 21
	(b) Audit Community Halls and relevant team to attend to actions	April 2020	Marc h 2021	Director of Council Housing	9	9	9	Total number 9
Workplace Impleme		T	1	_	1			
Health & Safety Training	(a) Identify suitable Health & Safety training opportunities as identified by department	April 2020	Marc h 2021	Directors and safety Circle leads	100 Trained staff		112	21 employees completed Level 3 Health & Safety
(Linked to priorities and Aims (B,F,G,I)	Directors/ Safety Rep's/HOS/safety circle leads.							(Highfield accredited – 3-day course) 35 employees completed Level 3 Risk

Section	<u>Objective</u>	Start	End	Lead	Target	Achieved	1	Remarks
		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
								Assessment (Highfield accredited – 3-day course) 12 employees completed E-Learning mandatory H&S training part of induction 52 employees completed the SHE Assure software training
	Level 3 Award in Health and Safely  (b) First Line Managers and Supervisors that has been nominated by a director or head of service to attend the one day course.	April 2020	Marc h 2021	Directors/ HOS	100%			21 supervisors/first line managers completed Level 3 Health & Safety (Highfield accredited – 3-day course)
	Introduction to Incident Investigation (c) Identify 12 First Line Managers to complete this one day qualification course, jointly developed by the National Examination Board for Occupational Safety and Health (NEBOSH) and the Health and safety Executive (HSE)	April 2020	Marc h 2021	Directors/HO S	12 manage rs to complet e this qualifica tion			This will give managers the skills needed to conduct an incident investigation unaided, and then produce and implement an action plan to help prevent a recurrence.  Due to the Covid pandemic and stay at

Section	Objective	Start	End	Lead	Target	Achieved		Remarks
		Date	Date			Six Months	End Perio d	
								home directive, these trainings could not go on as scheduled
Learning POD Training and Development  (Linked to priorities and Aims (D,E)	All employees have to complete the following Training.  • Using a Workstation	April 2020	Marc h 2021	Directors / HOS/Head of Corporate H&S	100%			Due to the government's guidelines requiring people to work from home where they can, a DSE risk assessment has been carried out and returned to the line manager for records
Asbestos Managem								
Corporate Buildings Asbestos Surveys (Linked to priorities and Aims	To carry out asbestos surveys in all corporate buildings.	April 2020	Marc h 2021	Head Facilities Management	10			To meet employers statutory duties under Regulation 4 of CAR 2012.  No new asbestos survey
(A,B,C,H)								commissioned as no new buildings provided
	To carry out asbestos re-inspection survey to look at process and verify integrity of asbestos works by contractors, facilities Management to attend to any identified failings.	April 2020	Marc h 2021	Head of Facilities Management	10	49	51	This will ensure processes are working and that we are carrying out a due diligence check.
Community Schools and	(a) To review management plans and results from surveys and carry out actions identified.	April 2020	Marc h 2021	Head of Faculties Management	20 schools	3	10	To meet employers statutory duties under Regulation 4 of CAR

<u>Section</u>	<u>Objective</u>	<u>Start</u>	End	<u>Lead</u>	Target	Achieved		Remarks
		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
Schools with SLA Asbestos Surveys (Linked to priorities and Aims (A,C,H)	There will be a minimum of 20 schools surveyed with Management Plans. Schools to attend to actions.			/Head Teachers				2012 - Community Schools LBE as the Duty Holder This information is requested from the schools and relies on schools to provide documentation for evidence of compliance
Council Housing Asbestos Surveys (Linked to priorities and Aims (A,B,C,H)	(a) To carry out and manage a Surveys on Housing stock This will be risk based and client directed. Council Housing to attend to required actions.	April 2020	Marc h 2021	Director of Housing	435 surveys	240	428	To meet employers' statutory duties under Regulation 4 of CAR 2012.  Up to today 428 (out of 433 required) have been completed. Appointments for remaining 5 sites are scheduled for w/c 15/03/2021 and confirmed with the residents. Previously access letters were circulated and 2 further visits with no access.
Communications								

Section	Objective	Start	End	Lead	Target	Achieved	ł	Remarks
		Date	Date			Six	<u>End</u>	
						<u>Months</u>	<u>Perio</u> d	
Occupational Health Service  (Linked to priorities and Aims (E,F,G,H,)	(a) To ensure the Occupational Health Service continues to provide adequate health surveillance, HEP B vaccination, return to work rehabilitation, health promotion and reduction of work- related sickness absence	April 2020	Marc h 2021	Directors/HO S	100% of staff identifie d by manage rs			Managers to identify staff and refer staff to OH either for Health Surveillance or HEPB or Both.
	(b) To promote and provide guidance about Occupational Health Service which will include EAP service.				One article per month			Monthly communication promoting the Occupational Health Service and EAP  Roll out of HEP B will - update on HEP B  This was suspended due to the covid-19 pandemic.
Communication Channels to promote key health and safety performance measures to employees.	(c) Safety Circle leads to provide dates and key risks of safety circles. Corporate Health and Safety to provide feedback on key risks to these safety circles.	April 2020	Marc h 2021	Safety circle Leads	At least one a quarter	2		This will be monitored on SHE Assure  Safety Circle was suspended due to the Covid pandemic, however, there are plans to re-structure meetings using the video conferencing platforms.

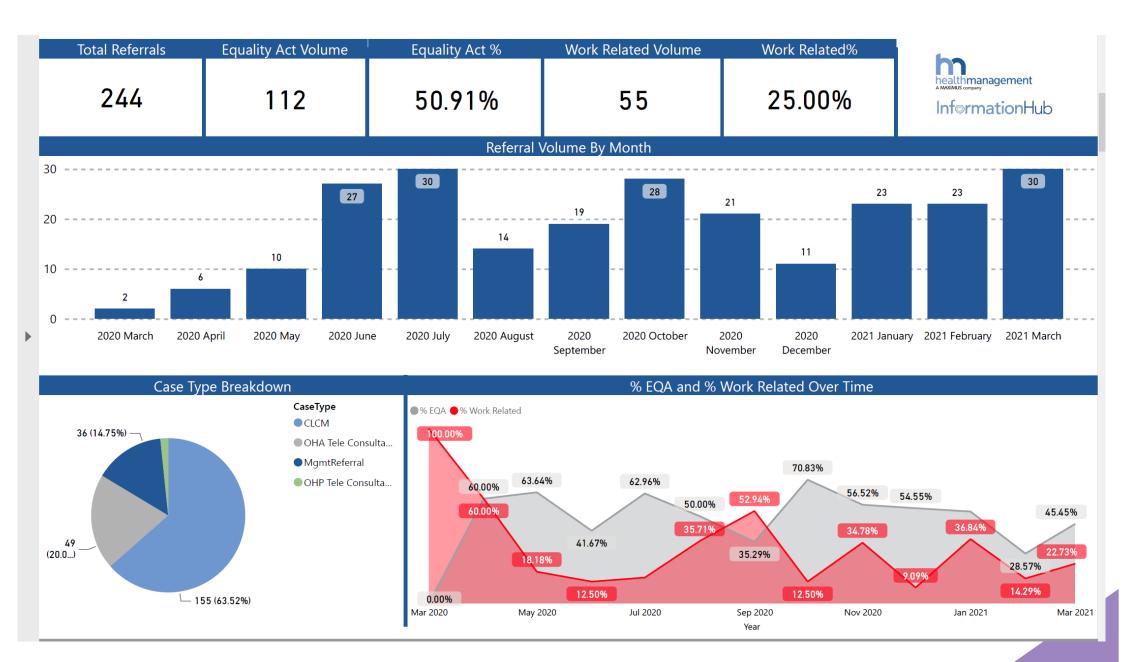
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		<u>Date</u>	<u>Date</u>			Six Months	End Perio d	
(Linked to priorities and Aims (F,G,H,I)								Resources sent out newsletters- Available on SHE Commissioning and Commercial division - Minutes available on SHE
	(d) Corporate Health and Safety to promote key health and safety initiatives via Communications each month by the corporate newsletters.	April; 2020	Marc h 2021	Head of Corporate Health and Safety	monthly			Communications sent out on Chief executive updates on Covid, Internal comms, seminars.
	(e) Corporate Health and Safety Board provide a report on key risks.	April 2020	Marc h 2021	Head of Corporate Health and Safety	Quarterl y			The corporate Health and Safety Board will meet on a quarterly basis and will discuss areas of concerns/risks to the organisation and agree future agenda items and areas of concern for DMT's and Safety Circles.  This is been managed Via accident statistics and RA Tracking. Significant risks are

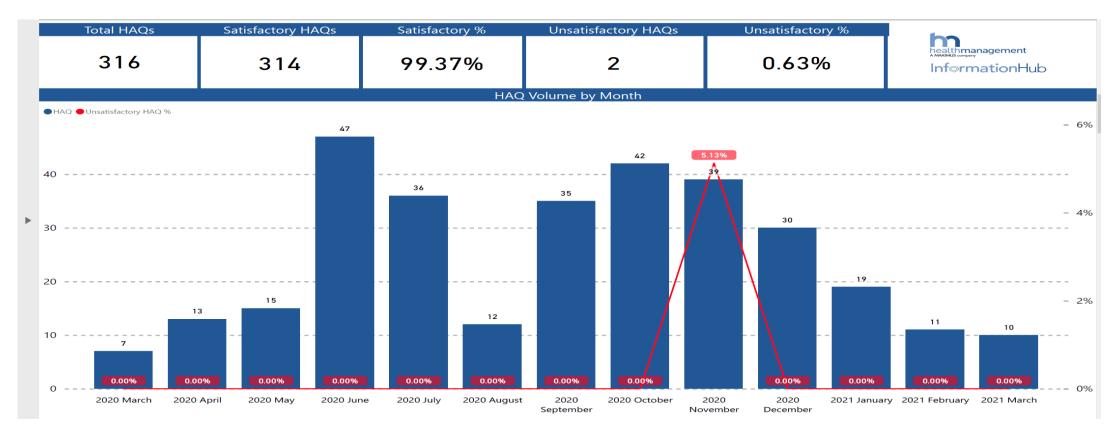
Section	<u>Objective</u>	Start	End	Lead	Target	Achieve	<u>d</u>	Remarks
		<u>Date</u>	<u>Date</u>			Six	End	
						<u>Months</u>	Perio d	
								identified and presented monthly at CHSB
Corporate Significat	nt Risks							
Action plan	(a) Produce an action plan for	April	Marc	Head of	Quarterl			Significant risks to be
detailing	Corporate Strategy Board	2020	h	Corporate	У			brought to the attention
significant risks to	(CSB) and Corporate Health		2021	Health and				of CEX and the CSB.
the organisation.	and Safety Board identifying			Safety				The potion plan is a
(Linked to	key risks to the organisation.							The action plan is a living document that
priorities and Aims	organisation.							stays in place until the
(A,F,G,H)								risk is addressed.
								Significant risks must tie in with insurance and
								also recognition that if
								the mitigation would
								cost more than benefit
								then this needs to be
								recognised and
								recorded.
								This is been managed
								Via accident statistics
								and RA Tracking.
								Significant risks are
								identified and presented
								monthly at CHSB

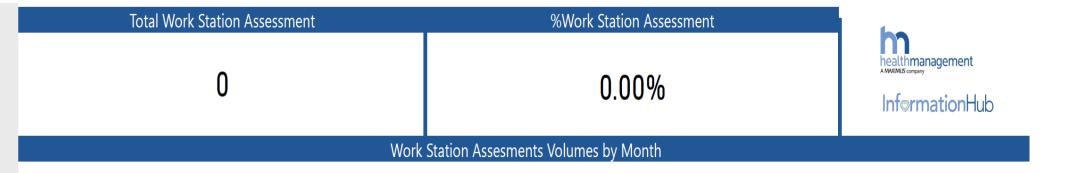
Section	Objective	<u>Start</u>	End	Lead	Target	Achieved	1	Remarks
<u> </u>	<u> </u>	<u>Date</u>	Date		14.90	Six	<u>End</u>	<u>rtomarito</u>
						<u>Months</u>	<u>Perio</u> d	
Top 5 Significant Risk to the organisation  (Linked to priorities and Aims (A,F,G,H)	(a) Update the CHSB and CSB quarterly on top 5 risks and provide improvement measures to reduce to low as reasonable practicable.	April 2020	Marc h 2021	Head of Corporate Health and Safety	Quarterl y			Significant risks to be brought to the attention of CHSB and CSB.  Significant risks must tie in with insurance and also recognition that if the mitigation would cost more than benefit then this needs to be recognised and recorded.  This is been managed Via accident statistics and RA Tracking. Significant risks are identified and presented monthly at CHSB
Report Data Analysis on Accidents, Incidents and near misses.  (Linked to priorities and Aims (A,F,G,H)	(a) Present monthly data analysis on all accident, incident and near misses at the CHSB.	April 2020	Marc h 2021	Head of Corporate Health and Safety	Monthly			Trend Analysis on accident data to be brought to the attention of CHSB.

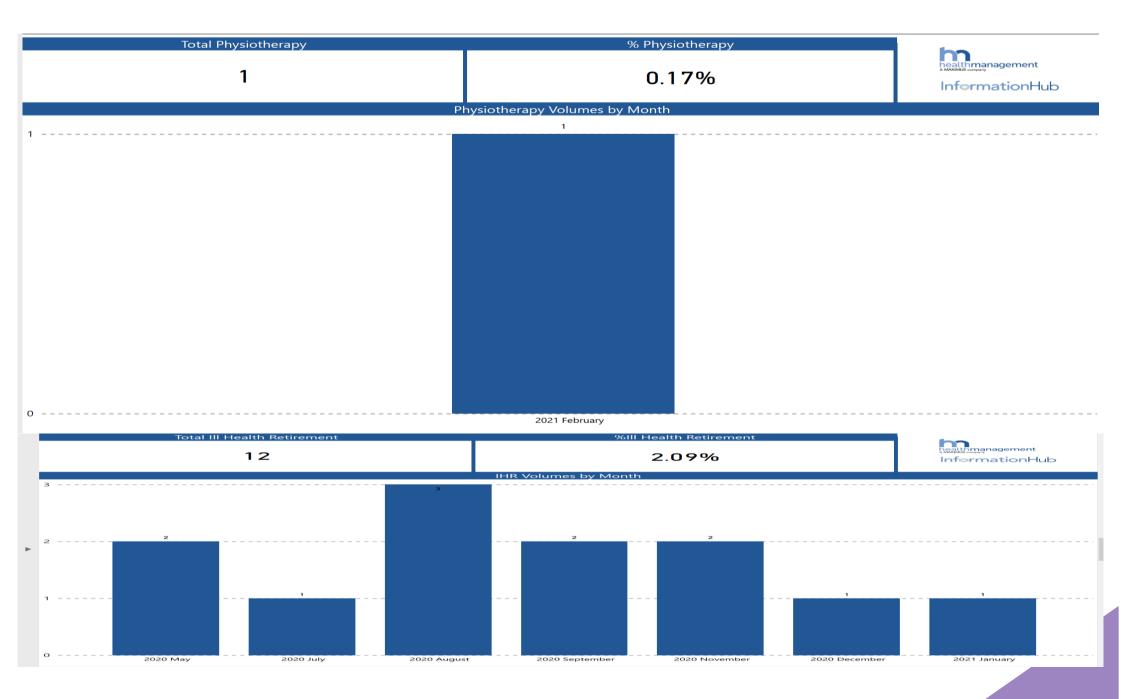
# **APPENDIX 4- OCCUPATIONAL HEALTH OVERVIEW** 2020/2021

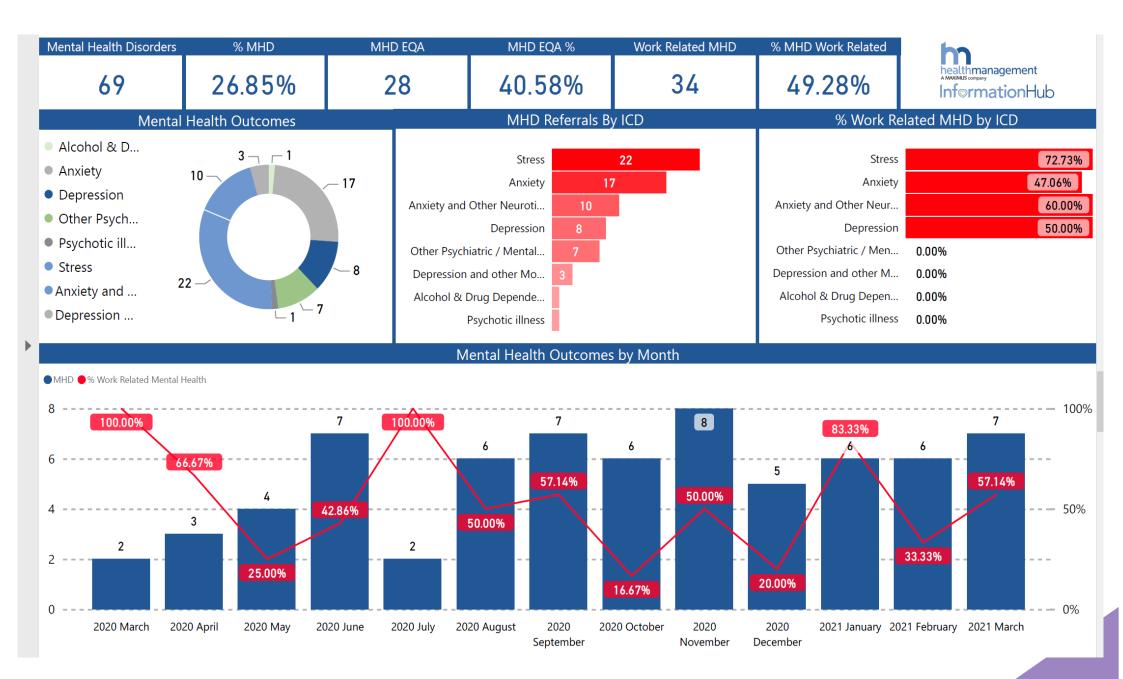


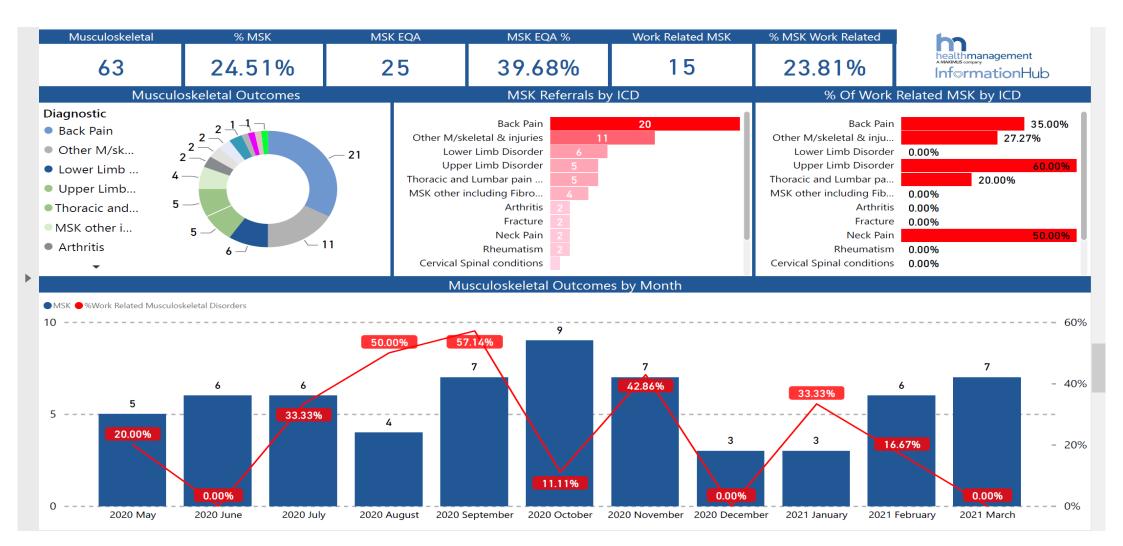


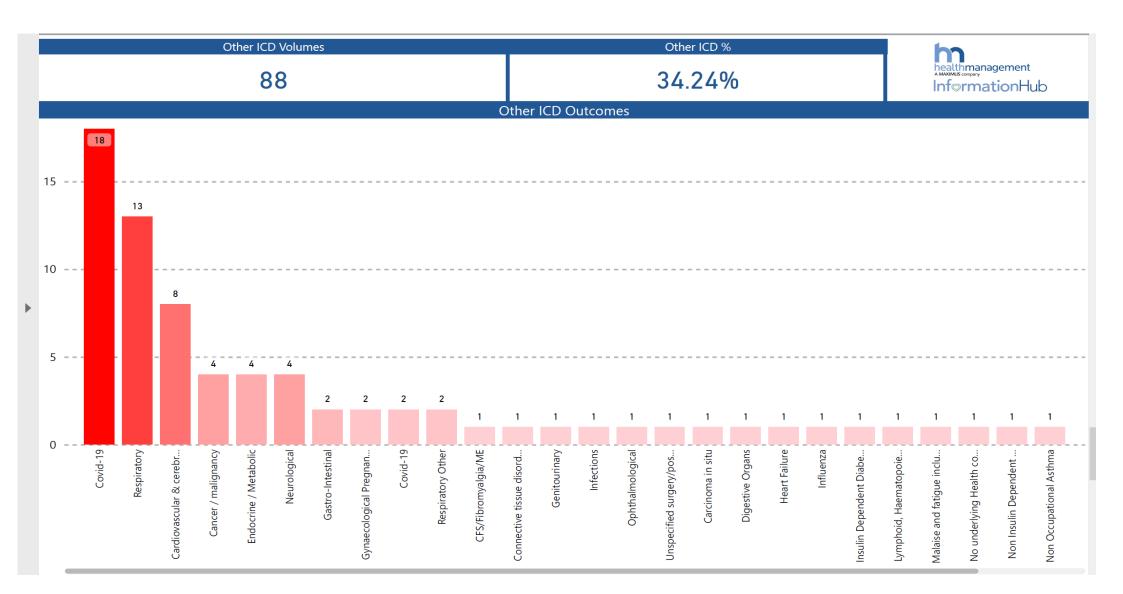


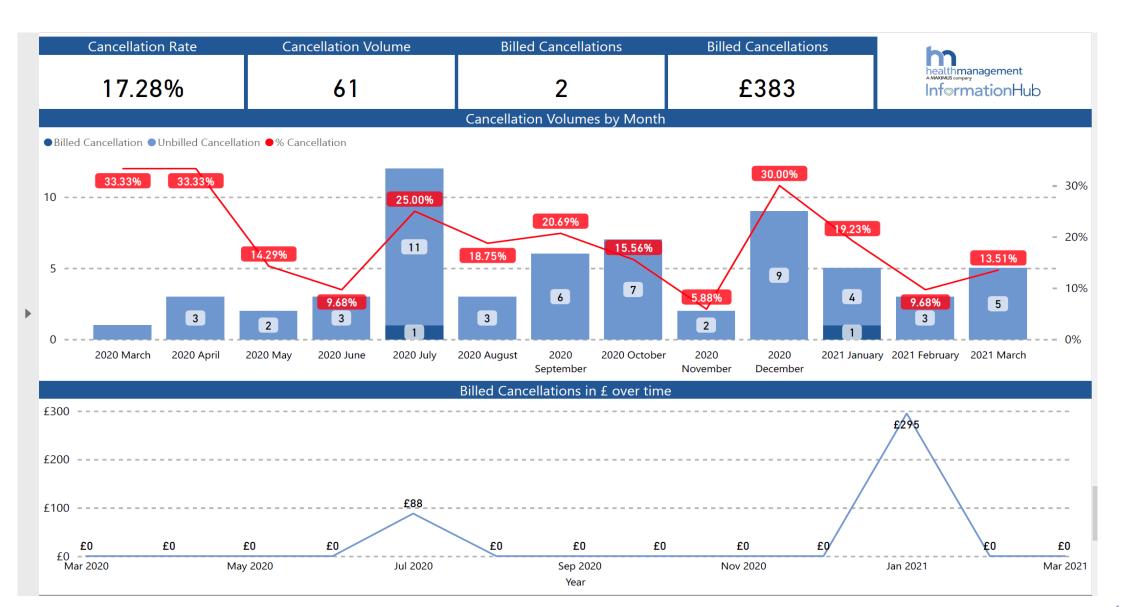


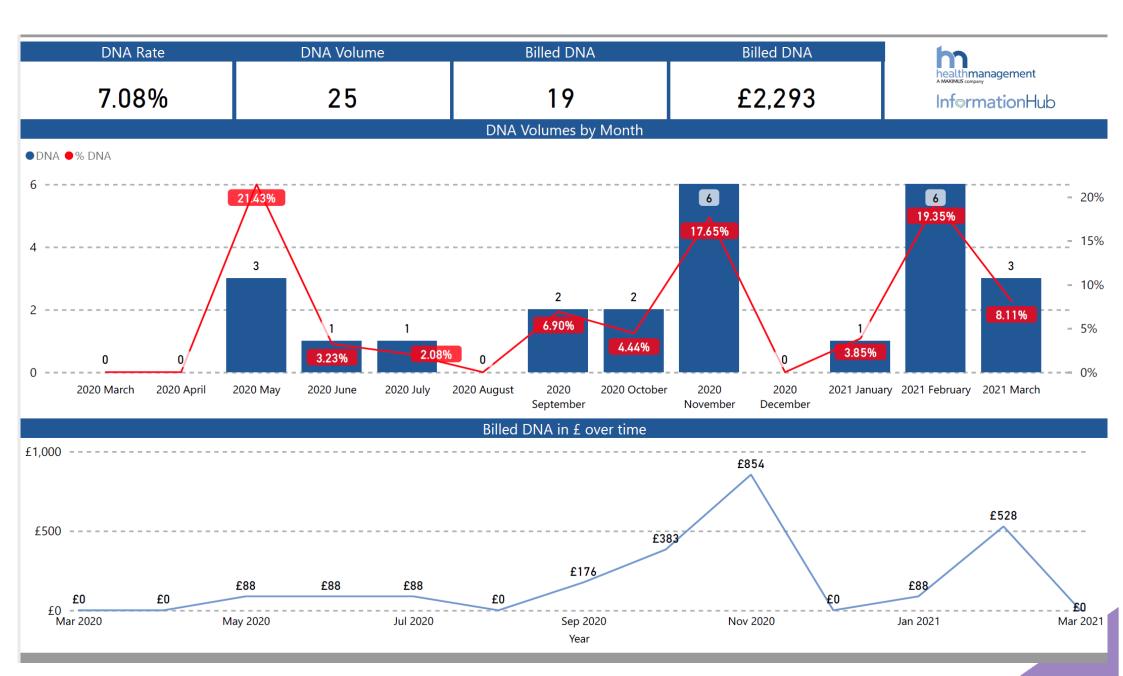


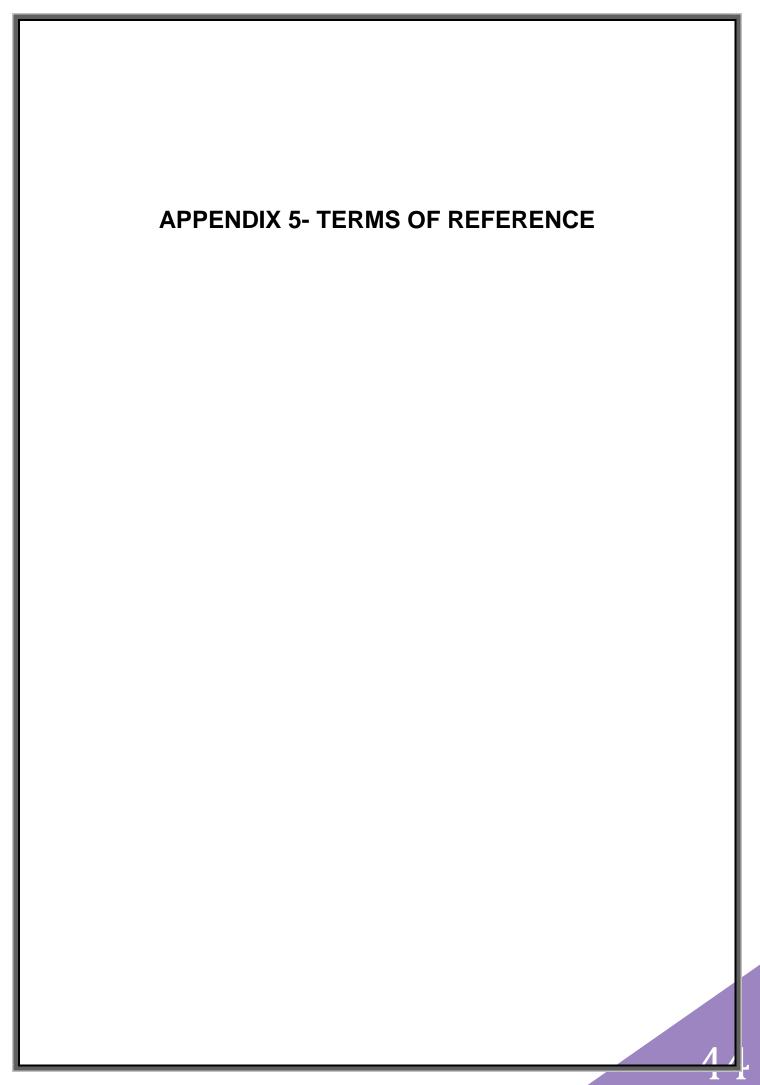














#### **Corporate Health and Safety Board**

#### Terms of Reference Aim

The Corporate Health and Safety Board will act on behalf of the Chief Executive as the strategic focus for Health and Safety across the corporate estate, using the Health and Safety Policy Statement as framework for decision making. The Board will ensure the implementation of the policy statement through agreed best practice and development of a Health and Safety management system.

#### **Accountability**

The Corporate Health and Safety Board will provide progress reports to the Corporate Strategic Board (CSB).

#### **Objectives**

The Corporate Health and Safety Board has the following objectives:

- To provide a forum in which officers and others with specific responsibilities for health and safety, as set out in the Health and Safety Policy, are held accountable for and supported in their actions. These actions are:
- To ensure compliance with the requirements of health and safety legislation and regulations. throughout the Council.
- To ensure arrangements for developing health and safety competencies among managers and staff are in place and are being followed.
- To review and approve Council-wide objectives for health and safety, policy and strategies and initiatives for their delivery, in consultation with the Governance, Audit and Risk Management Committee (GARMC).
- To promote engagement with, and the integration of, health and safety considerations into everyday working practices in Council services.
- To lead on Occupational Health initiatives to promote well-being and stress management as part of the wider health & wellbeing agenda.
- To develop and oversee the development, implementation and regular updating of the Council's strategic and operational health & safety risk register.
- To set and monitor performance indicators/standards for health and safety and monitor the Council's arrangements for monitoring
- To commission audits and reviews of health and safety management systems, policies and procedures.
- To receive reports and feedback from Directorate Health and Safety Meetings or other relevant forums, groups or committees, as well as provide direction and information back to them as relevant.
- To consider reports on accidents and/or incidents, complaints and work related ill health statistics in order to identify any emerging trends or patterns.
- To consider reports on visits, inspections or any enforcement action taken by the Health and Safety Executive, the London Fire & Emergency Planning Authority and other enforcing authorities.

#### Representatives

The Corporate Health and Safety Board will be chaired by the Corporate Director Community with responsibility for establishing and implementing a strategic framework for the Health and Safety committees in each Directorate to achieve the aims set out above.

The Board shall consist of a nominated Divisional Director representative from each Directorate, a nominated Senior HR representative, representatives from the Unions and supported by the Corporate Health and Safety Team.

All representatives on the Board will have a voice in decision making. The chair / vice chair shall have the casting vote if the matter cannot be resolved by unanimous agreement. In matters that cannot be resolved, they will be passed to the Corporate Strategic Board, as the most senior strategic forum chaired by the Chief Executive, or Employee Consultative Forum (ECF) should it not be feasible to make a decision. The Unions retain the right to escalate matters of concern to an ECF Sub-Group / ECF in line with the consultative framework of the Council and Trade Union Recognition Agreements.

When a representative cannot make the meeting, a nominated person of sufficient grade shall attend and represent them

**Duties of the chair** 

• Schedule regular Board meetings.

- Develop written agendas for conducting meeting.
- Maintain and action plan and log of decisions
- Conduct the meeting.
- Approve Board correspondence and reports.
- Supervise the preparation of meeting minutes.

#### **Duties of the vice-chair**

- In the absence of the chair, assume the duties of the chair.
- Perform other duties as directed by the chair.

#### **Conduct of the Board**

The Chair is responsible for ensuring that the Board meets on a monthly basis to resolve issues and take forward the objectives and aims as set out in this document.

The Board should not be canceled or postponed except in exceptional circumstances. If any member of the Board cannot attend a deputy shall attend in their absence. If the meeting has to be postponed, a date for the next meeting should be agreed and announced as soon as possible by the Chair.

The minutes of each meeting will be supplied to every Board member once agreed by the Chair as soon as possible after the meeting, and be made available on the intranet once agreed.

A copy of the agenda and any accompanying papers should be sent to all members at least one week before each meeting.

#### Consultation

The Board actively supports and participates in the consultative arrangements in line with Safety Representatives and Safety Committee Regulations 1977 as amended by the Health and

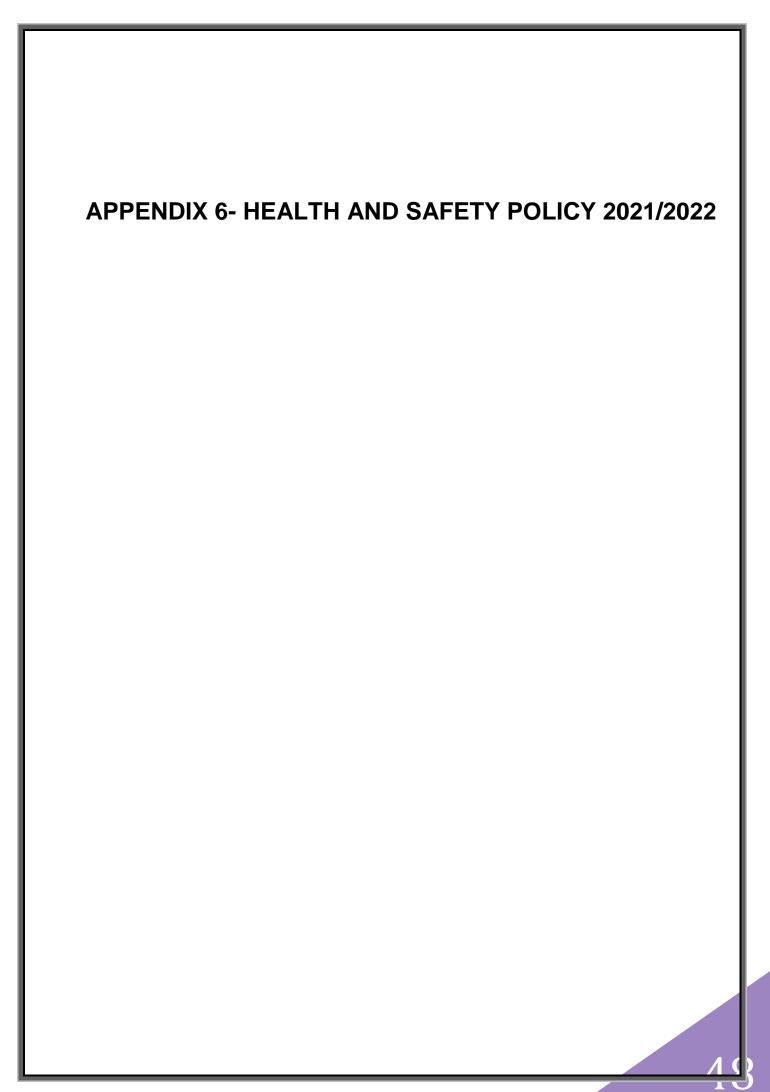
Safety (Consultation with Employees) Regulation 1996 and the Management of Health and Safety at Work Regulations 1999

All Corporate Health and Safety Policies and Procedures shall be presented to the Corporate Board for consultation and agreement of any other party that needs be involved. Comments will be provided within a 4 week consultation period, will be collated by the Corporate Health and Safety Team, and discussed at the next Corporate Board for final sign off.

#### **Directorate Health & Safety Board**

The Corporate Health & Safety Board will feed into, and receive information and referrals from, the Directorate Health & Safety Boards, of which there will be three. The three Directorate Health & Safety Boards shall be chaired by Director (Environment & Culture) for Community Directorate, Head of Finance for Resources Directorate and Divisional Director (Educational Services) for People Directorate.

These Directorate Health & Safety Boards shall be held quarterly and minutes and actions fed back to the Corporate Health & Safety. Key themes / agenda items will be determined from the Corporate Health & Safety Board, as well as be influenced by the needs of the services. These Directorate Boards shall be run as per the principles of the Corporate Health & Safety Board Terms of Reference.



# Corporate Health and Safety Policy 2021/22



#### **Control Schedule**

Prepared By John Griffiths, Corporate Health and Safety 22/03/21

**Compliance Manager** 

Checked By Richard Lebrun, Head of Service for Public Protection 22/03/21

Approved By Paul Walker, Corporate Director for Community 26/03/21

Review Date 1st April 2022

**Signature** 

Date

Topph

Paul Walker

#### **Version Control**

Version	Date	Prepared By	Comment
11	01/04/2021	John Griffiths	This version supersedes all previous ones

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#### 1. Preface

Harrow Council, as an employer, recognises its legal responsibility to secure as far as is reasonably practicable the health, safety and welfare of its employees, service users, contractors, and visitors. The Council aspires to achieve excellence in this by implementing and effectively maintaining a robust safety management system that will permit safe work practices without compromising the health, safety and wellbeing of employees, the general public and the environment.

This Policy and in conjunction with local documents, Codes of Practice (CoP) and Guidance Notes (GNs) will highlight how health and safety is managed across the Council as well as define Senior Management roles and responsibilities.

#### 2. Statement of Intent

Harrow Council is committed to ensuring the health and safety of our employees, our residents, and others who may be affected by our work activities and will take all reasonably practicable steps to minimize the incidence of all workplace risks.

This policy reflects our intent to comply with health and safety legislations in our work and behaviours thereby demonstrating an ongoing and determined promise to continuous improvement of health and safety.

Our employees, contractors and stakeholders will be made aware of and provided adequate resources to implement this policy even as we all share a personal responsibility in complying with the Councils policy and procedures. The health and safety policy will be implemented by the corporate health and safety performance plan.

The councils' approach to satisfying this commitment will be driven by;

- a. Implementing the HSG65 'Managing for Health and Safety' Management System to ensure compliance with health and safety legislations.
- b. Establishing active and open dialogue between all employees, residents, contractors, trade unions and other stakeholders. Health and safety will be integrated into our communications, wherever appropriate.
- c. Ensuring health and safety roles and responsibilities are defined as necessary within job descriptions.
- d. Provision and allocation of adequate resources to health and safety at all levels
- e. Provision of comprehensive and relevant information, instruction, training, and supervision to ensure employees have the knowledge and competence required to meet their individual and collective responsibilities
- f. Carrying out suitable and sufficient risk assessments for all work activities, ensuring appropriate control measures are established, communicated, and implemented.
- g. Monitoring of accident/incidents/near miss and other cases of work-related ill- health, prioritizing investigations, and taking corrective actions to prevent a reoccurrence.
- h. Demonstration of leadership in health and safety by senior management

ensuring systems are in place and people within their services are empowered to freely raise health and safety concerns with management.

- Provision and maintenance of plants and a place of work or (premises under council control) that is safe and without risks to health with safe access and egress and appropriate facilities to maintain welfare at work
- j. Ensuring Managers are proactive in managing sickness absence using the Occupational Health Service (OHS) and Health surveillance is conducted as appropriate
- k. Promoting Health and Wellbeing at Work by encouraging a work life balance and healthier lifestyles such as
  - walk or cycle to work
  - provision of healthy eating options
  - discounts for staff at local leisure centre
  - support to employees who want to guit smoking.

The Health and Safety Policy will be reviewed at least every year, or more frequently should there be a significant incident or any major changes to legislation, operations, or personnel.

The Chief Executive has overall responsibility for health, safety, and welfare. Their day-to-day management is the responsibility of management and supervisory personnel.

Employees share a responsibility to co-operate with management, and in accordance with the Health and Safety at Work etc. Act 1974, to ensure their own safety and the safety of those affected by their activities. This includes not intentionally or recklessly interfering with or misusing anything provided for their health or safety.

3....

Sean Harris
Chief Executive

Date: 26th March 2021

Graham Henson Council Leader

Date: 26th March 2021



# 3. Scope

Harrow Council's Health and Safety policy applies to all employees and premises under the Councils control. This is inclusive of school and agency staff. This policy also extends to third parties who interact with the council such as consultants, contractors, service users and volunteers.

# 4. Responsibilities for Health and Safety

The council will coordinate its health and safety arrangements around existing corporate structure with clearly defined roles and responsibilities for efficient health and safety management.

#### **Harrow Council**

Harrow council, as an employer has the overall statutory responsibility for occupational health and safety. Consequently, the council will

- Recognize significant health and safety risks faced by the Council
- Have oversight over strategic decisions and their implication on health and safety
- Establish appropriate communication and assurance systems to support this policy including its review and council uptake.

#### **Elected Members**

The Leader of the Council and Harrow Council Cabinet Members have overall responsibility for the control, direction and allocation of resources that are made available to manage health and safety. Where necessary, they will ensure that they take competent advice when considering matters relating to health and safety matters. Members are legally responsible for health and safety matters. Failure to comply with the requirements of current health and safety legislation will render them liable to prosecution under section 37 of the Health and Safety at Work etc. Act 1974.

#### **Chief Executive**

The Chief Executive has delegated authority from Harrow Council for the delivery, management and performance of this health and safety policy and ensuring that all health and safety matters are brought to the attention of the Elected Members.

Specifically, the Chief Executive shall.

- a. Implement and endorse this policy as a visible demonstration of ownership and ensure its values are communicated
- b. Appoint the Corporate Director-Community with responsibility for overseeing the day-to- day management of health and safety on behalf of the Council
- c. Allocate suitable resources for the management of health and safety
- d. Agree on how this policy will be measured, monitored, and reported through the setting of appropriate key performance indicators and to review such performance data, celebrating achievement and taking corrective action where targets are not being met
- e. Determine a health, safety and wellbeing risk profile for the Council and agree an appropriate internal auditing program to reflect this profile

- f. Ensure that the statutory requirement to monitor health and safety issues affecting all directorates are carried out through the Corporate Strategy Board(CSB) AND THE Corporate Health and Safety Board(CHSB) which should incorporate Trade Union representatives
- g. Continually review health and safety performances, make decisions where required and communicate results to staff

#### **Corporate Director-Community**

The Corporate Director-Community is responsible for leading the council's vision for a safe, secure, and healthy work environment.

Specifically, the Corporate Director-Community shall.

- Act as the person with responsibility for overseeing the delivery of the day-to-day management of health and safety on behalf of the Council
- Advise the Council on the preparation and revision of the its Policy Statement for Health and Safety; the appropriate organisation and arrangements necessary to meet the policy's aims and objectives
- c. Ensure that the Corporate Health and Safety Performance Plan is implemented and suitably disseminated
- d. Ensure that a safety management framework is in place, to enable the appropriate healthand safety policies and procedures to be developed, maintained, monitored, and reviewed
- e. Encourage a practical approach to managing health and safety and imbue a positive health and safety culture among employees
- f. Ensure that all employees have access to competent health and safety advice
- g. Ensure that the required level of 'competent' persons are maintained within the directorate given the higher operational risk levels within certain areas of the directorate.
- h. Act as Chairperson for the Corporate Health and Safety Board (CHSB) and ensure that health and safety information is disseminated throughout the organisation and to escalatehealth and safety matters to the Corporate Strategic Board (CSB) and to the Employees Consultative Forum (ECF), if required
- i. Ensure that health and safety is promoted throughout all services and at all stages, including recruitment selection and training
- j. Regularly consult with employees through their Trade Union or other representatives with respect to changes that may affect their health, safety, and wellbeing.
- k. Coordinate the preparation of the Corporate Health and Safety Board (CHSB) meetings and management reports and ensure effective consultation with the ECF.

#### **Corporate Directors**

Corporate Directors are responsible for implementation and compliance with this Policy within their Directorates along with any specific health and safety Policies, Codes of Practice and Safe Systems of Work (SSoW) where required. Specifically, the Corporate Director shall,

- a. Act as the person with responsibility for overseeing the delivery of the day-to-day management of health and safety on behalf of the Council
- b. Have oversight of health and safety performance in their areas of responsibility and actively contribute to achieving the overall health and safety strategic aims, including the delivery of the Corporate Health and Safety Performance Plan
- c. Support the Corporate Director-Community with responsibility for the lead health and safety role and champion Directorate employees with health and safety remits, to ensure that the Health and Safety Management System is adequately monitored and is effective.
- d. Ensure that a Health and Safety Board for their Directorate is in place, which should have a chairperson appointed and comprise of relevant Trade Union representatives. The Board should also incorporate the Terms of Reference agreed by the CHSB.
- e. Agree with Divisional Directors and Heads of Service targets for health and safety performance, in support of the Council's overall strategy, the Corporate Health and SafetyPerformance Plan and Health and Safety Management System.
- f. Designate a named officer (Premises Manager) to be responsible for management of those buildings occupied by them or by more than one Directorate or agency and ensure that these responsible persons are adequately trained.
- g. Determine the health and safety responsibilities and safety critical roles of all employees in their Directorate are identified and incorporated within the employees' role profile or jobdescriptions.
- h. Ensure suitable and sufficient consultation with the appropriate employee representatives with regards to health and safety matters.
- i. Be responsible for ensuring that this Policy and the Directorate Policy are communicated and understood by all employees in their Directorate
- j. Ensure adequate resources are available for health and safety measures in order to meetcorporate responsibilities.
- k. Ensure that the appointed Safety Champion attend the Corporate Health and Safety boardcommittee.

#### **Divisional Directors and Heads of Service**

Divisional Directors and Heads of Service have responsibility for ensuring that health and safety risks are managed in such a way as to meet Council aims and to ensure legal compliance as the minimum standard.

Specifically, the Divisional Directors and Heads of Service shall.

- a. Prepare, implement, monitor, and periodically update their Divisional and Service Health and Safety Plans and ensure that the Council's Health and Safety Management System ismaintained.
- b. Carry out suitable and sufficient risk assessments of the existing & new premises, plant, machinery etc. and appropriate action taken to effectively control the identified hazards.
- c. Deliver the agreed targets on health and safety performance, including the Divisional Health and Safety Performance Plan, in support of the Council's overall strategy, the Corporate Health and Safety Performance Plan and the Health and

- Safety management system
- d. Ensure that all accidents involving or have the potential to cause injury or harm to personsor damage to property are reported and investigated and any corrective action is taken to prevent recurrence.
- e. Ensure all contracts are adequate in terms of health and safety provisions and that contractors are monitored to ensure they meet corporate standards.
- f. Ensure that the appropriate information, instruction and supervision are provided to enableall employees to avoid hazards and contribute positively to their own and others safety, health and welfare at work.
- g. Ensure liaison with other employers, including contractors and occupiers of shared premises to ensure effective cooperation for the exchange of "user" information to permit compliance with Corporate Policy.
- h. Ensure compliance with Site Fire and Security Plans and allocating sufficient resources tomeet the requirements of those plans in their work area and ensuring that emergency arrangements are in place to protect employees and others against risk of imminent danger
- Ensure that employees are competent and capable of performing their duties to the required standard with the provision of adequate training to ensure that competency is assured and maintained.
- j. Make suitable arrangements for consulting with employees on health and safety matters and in accordance with legal standards i.e. through regular recorded team meetings and ensuring that health and safety is a standard item on the agenda at these meetings.
- k. Obtain advice and support from the Corporate Health and Safety Team and / or the Occupational Health Service as may be needed.

## **Corporate Health, Safety and Compliance Manager**

The Corporate Health, Safety and Compliance Manager (CHSCM) is the councils appointed 'competent person' regarding health and safety management.

This role is to ensure that the health and safety of employees and those that engage with Councilare not adversely affected by Council activities or processes, so far as is reasonably practicable, whilst promoting the highest quality of health and safety practice and continuous improvement across the Council's wide spectrum of activities; so meeting all its legal and moral obligations in this regard

Specifically, the Corporate Health, Safety and Compliance Manager shall.

- Define the content of this Policy, additional corporate health and safety related policies and guidance documents, which will be reviewed yearly or earlier, if required.
- b. Design, plan, and execute the Corporate Health and Safety Performance Plan (CHSPP)
- c. Provide adequate advisory support to ensure compliance throughout the Council
- d. Ensure that Senior Management are aware of their responsibilities in meeting

- health andsafety objectives and targets
- e. Manage the corporate accident / incident database; preparing accident statistics; producing management reports and disseminating these as may be required
- f. Produce an action plan for Corporate Strategy Board (CSB) and Corporate Health and Safety Board identifying key risks to the organisation
- g. Set corporate performance standards and key performance indicators
- h. Be the primary point of contact with external health and safety regulatory bodies and agencies

#### **Head of Property and Facilities Management**

The Head of Property and Facilities Management has overall accountability for Corporate property related health and safety matters, except for properties managed by third party contractors on behalf of the Council, and leased properties, as appropriate.

Specifically, the Head of Property and Facilities Management shall.

- a. Be responsible for managing the design, construction, installation, security, maintenance (including cleaning), inspection, decommissioning, demolition and refurbishment, as appropriate, of the Council's non-domestic property portfolio, ensuring compliance with health and safety requirements including statutory obligations, i.e. asbestos management, fire safety compliance arrangements, control of legionella etc.;
- b. Conduct and compile a comprehensive suite of records of fire risk assessments/inspections, asbestos; registers/management/demolition/refurbishmentsurveys and plans, water quality control inspections and reports, etc. to be held both centrally and onsite for property and facilities management, duty holder and enforcing authority purposes.
- c. Ensure that suitable communication methods are established for liaison with all Premises Responsible Person who have been delegated with the day-to-day management of individual sites & properties and that these managers receive suitable information, supportand assistance to effectively manage these buildings safely and in the decision making process when planning any changes to buildings
- d. Ensure that roles and responsibilities are set out and adhered to in lease and sublease agreements, including maintenance and repair obligations, fire safety, asbestos and legionella management, etc.
- e. Ensure adequate 'control of contractors' arrangements, including access to, permit
  to workand confined space working systems, etc. are in place to discharge (a) –
  (c) above; and,
- f. Act as temporary duty holders, ensuring that roles and responsibilities are set out for let agreements and out of hours access to Council premises to third parties.

For the purposes of the corporate estate, this role falls to the Facilities Management Team within Community.

#### **Head of Human Resources**

In terms of this Health and Safety Policy, the Head of Human Resources supports employee wellbeing and has responsibility for ensuring:

- a. The adequate provision of Occupational Health Services, including preemployment health screening, medicals, vaccinations, health surveillance, etc. in consultation with Corporate Health and Safety.
- b. The adequate provision of Employee Assistance support
- c. Appropriate people policies and procedures are developed, maintained and monitored forwork-related stress, driving at work and alcohol and drugs.
- d. The provision of health promotion initiatives within the Council to promote employee healthand wellbeing.

#### Responsible Person/Site Health and Safety Duty Holder

In additional to normal managerial duties, employees who have control of premises or sites as part of their role (duty holders) shall undertake statutory health and safety related duties. Technical support for these duties will be provided by the property and facilities management team but the management of the duties are the responsibility of the Duty Holder.

In order to ensure that responsible person/site health and safety duty holders can fulfil their duties and responsibilities under the corporate health and safety policy, the tasks involved in managing these premises may be delegated to other persons e.g. head teachers in schools, members of staff, managing agents or other external organisation, provided that they have the necessary competence, resources and have Council approval to perform these roles.

Specifically, responsible person/site health and safety duty holders shall ensure that.

- a. All health, safety and welfare risks under their management are identified, assessed, and controlled, with specialist input from corporate health and safety advisers and others, where required.
- b. That the requirements in this Policy are communicated and followed by all employees andthird parties, including service users.
- c. Health and safety training needs analysis is carried out, and suitable training is deliveredwithin appropriate timescales, including induction training.
- d. That workplace inspections are carried out each quarter (termly in schools), and that these are documented and, where required, remedial action is acted upon and delivered within appropriate timescales, that workplace inspections are carried out each quarter (termly in schools), and that these are documented and, where required, remedial action is acted upon and delivered within appropriate timescales
- e. Ensure compliance with Site Fire and Security Plans and sufficient resources are allocated to meet the requirements of those plans in their area, ensuring emergency arrangements are in place to protect all employees and others against risk of imminent danger
- f. Report and primary investigation of adverse events or conditions injuries, work-related ill health, diseases, dangerous occurrences ('near misses'); and any premises/plant/equipment hazards, damage or defects (corporate health and safety shallconduct significant adverse event investigations, as appropriate).

#### **Community Schools Governing Body and Headteachers**

#### Governing Body

The governing body's responsibility is to approve the strategic vision for the school, working in partnership with the Headteacher and promoting continuous improvement in the performance of the school health and safety performance. The governing body has legal duty under the Health and Safety at Work etc. Act 1974.

#### Headteachers

In accordance with Health and Safety legislation, the Employer is accountable for the Health and Safety of school staff and pupils. The day to day running of the school is delegated to the Headteacher and the school management team. In most cases they are responsible for ensuring that Health and Safety risks are managed effectively.

Schools must seek competent advice and support to ensure they meet their health and safety duties. The provision of competent health and safety advice and support from qualified healthand safety professionals is offered to schools through the Service Level Agreements (SLA's).

Specifically, Headteachers shall.

- a. Put in place suitable organisational arrangements for implementing, monitoring, and controlling the health, safety and welfare of staff and pupils.
- b. Undertake suitable and sufficient risk assessment on all school activities, where there is no relevant model risk assessment, obtain competent advice to undertake a suitable and sufficient risk assessment.
- c. Appoint an educational visit coordinator from their staff to advise and co-ordinate offsite educational visits and ensure that risks to pupil health and safety during off-site visits areadequately assessed and controlled.
- d. Appoint a designated person for fire safety to ensure there are adequate fire safetyarrangements, including a written fire emergency plan.
- e. Make arrangements for the security, repair, and maintenance of the premises, including the proper selection and control of contractors, and ensure any defects are made safe without delay.
- f. Make arrangements for machinery, plant, and equipment to be maintained in a safecondition, including tests and inspections required by law, and keep records.
- g. Provide adequate information and instruction to employees, including the first aidprovision and the fire evacuation procedure.
- h. Arrange for appropriate training in health and safety, and certification where required, and keep this up to date. Health and Safety must be a standard part of any new employee's induction.
- i. Make sure that staff that supervise hazardous activities are suitably qualified and experienced.
- j. Undertake regular inspections of the workplace and working practices and report thefindings to the Governing Body.
- Keep a record of accidents and report all accidents to the Harrow Council corporate health and safety team using the online <u>SHE Assure</u> incident reporting system
- I. Undertake prompt investigation of major accidents and take immediate action to prevent a recurrence. Record your investigation using the online <a href="SHE Assure">SHE Assure</a> incident reporting system.

#### **Managers and Supervisors**

Employees that manage staff in any capacity are responsible for ensuring that activities carried out under their control are in accordance with Corporate Policies and procedures and incompliance with statutory provisions.

Specifically, managers and supervisors shall.

- a. Deliver targets on health and safety performance as agreed with their Divisional Director or Head of Service, including their Service's Health and Safety Performance Plan, and where required, their Directorate Health and Safety Performance Plan, the Corporate Health and Safety Performance Plan and Health and Safety Management System
- b. Managers and supervisors to develop, amend and review all their operational Risk Assessments and that managers communicate those risk assessments to their staff for understanding of those risks and what control measures are required to undertake their duties safely.
- c. Ensure all health and safety risk are identified, assessed, controlled/mitigated, and reviewed, as appropriate, with specialist input from corporate health and safety advisorsand others including the Council occupational health provision, where required.
- d. Use and promote systems of communication to ensure all employees are involved in contributing to the safety of their work and workplace by giving feedback on existing safetyrules and procedures
- e. Provide suitable and sufficient information, training, and supervision to ensure that all employees avoid injury / ill-health and contribute positively to their safety, health & welfareand that of others and monitor compliance
- f. Inspect the workplace at least quarterly; taking appropriate action to remedy the identified hazards; reporting those hazards that cannot be remedied to the line managerso that further action is carried out as may be required
- g. Ensure timely involvement of Occupational Health support to promote health at work and, where appropriate, to enhance the effective return to work of absent employees
- h. Ensure that Safe Systems of Work are devised and put in place and that staff have been suitably and sufficiently trained. Ensuring that the distinction between Safe Systems of Work (SSW) and Standard Operating Procedures (SOP) is fully understood.
- Ensure that Corporate Directors and Divisional Directors / Heads of Service are aware of any shortfalls in relation to a lack of resources, training requirements and support that maybe required

#### **Employees**

All employees have a duty to take reasonable care whilst at work, ensuring not to endanger themselves or others that may be affected by their acts or omissions and to cooperate with management so as a high standard of health and safety throughout Harrow Council is achieved. Specifically, employees shall.

- a. Ensure they are aware of, understand and follow those parts of the health and safety management system, Codes of Practice and Guidance Notes which relate to their area ofwork.
- b. Also ensure that they are familiar with and understand the following.
  - o Any necessary action concerned with fire and fire drills at their place of work
  - The first-aid arrangements and facilities available at their place of work.
  - The corporate accident / incident / near-miss reporting procedures.
- c. Avoid conduct that would put themselves and others (including visitors, contractors, the public and persons on work experience) safety, health, and wellbeing at risk of injury
- d. Attend any training provided and putting into practice all instruction intended to ensure safety whilst at work
- e. Not miss-use safety equipment and protective clothing provided, utilizing these in accordance with instructions or training received and immediately reporting any defects totheir supervisor / manager
- f. Operating only those items of plant / equipment for which they have received training andare authorized to use
- g. Following any control measures identified within the risk assessments relevant to their work
- h. Complying with disciplined work procedures as detailed either in writing or verbally by theirmanager or supervisors and to ensure such instructions and training that is given is fully understood before commencement of work
- i. If in doubt, to query any matters regarding health and safety by contacting corporate healthand safety service
- j. Using the correct tools and equipment for the task/s and ensuring that these tools are maintained in good working order therefore reporting any defects immediately to their supervisor / manager
- k. Report all accidents, incidents and near misses, in accordance with the corporate accident / incident reporting procedure
- I. Cooperating with management in evaluating risks and suggesting ways to improve healthand safety performance
- m. Refraining from 'horseplay', cutting corners, and taking unnecessary risks whilst undertaking their tasks
- n. Assisting management by ensuring that other employees, particularly new employees, areaware of the procedures, Safe Systems of Work and any

- potential hazards that are likelyto be created during the work activity
- o. Ensuring that, where vehicles are used for work purposes, then these must be maintainedin a safe and roadworthy condition and any materials and equipment carried in the vehicleshould be appropriately secured thus in compliance with the related statutory regulations
- p. Not consuming any alcohol, recreational drugs or any other substances that may impedetheir mental and physical state of mind

If you have any doubts about your health and safety responsibilities in your workplace, you must seek clarification from your supervisor or line manager. You may also seek guidance from your Trade Union Safety Representative or the Corporate Health and Safety Team.

#### **Safety Representatives**

Safety Representatives have legal recognition under the SRSC Regulations 1977. They are elected by Trade Union members recognised by the Council and have a duty to represent their members (employees). Functions of a Safety Representative include:

- Conducting investigations of potentially significant hazards and dangerous occurrences in the workplace and to examine the cause/s of an accident
- b. Investigating complaints raised by any employee they represent relating to the employee'shealth, safety or welfare.
- c. Making representations to management on matters arising from the two above duties orany other legitimate health and safety concerns
- d. Carrying out inspections of the workplace at agreed intervals, having given reasonable notice to the responsible manager
- e. Reviewing information from Health and Safety Inspectors and others on behalf ofemployees whose health and safety they represent
- f. Attending health and safety meetings and where necessary, ensuring that their membersare adequately represented.

#### **Third Parties**

This policy also relates to third parties who interact with the council such as consultants, contractors, service users and volunteers.

Specifically, they are to.

a. Act in accordance with the council's guidance on third parties with respect to the management of their health and safety

# 5. Arrangements for the Management of Health and Safety

#### **Training**

Health and safety training will be provided for all staff as part of their induction and subsequently, repeated periodically as part of their mandatory training through Training Academy and E- Learning Pool. Other specialist training necessary for staff with specific health and safety responsibilities in each workplace will be identified through the risk assessment process and staff appraisals. This includes e.g. Fire Warden, First Aider, Legionella and Asbestos Awareness.

The Health and Safety training matrix can be referred to as an aid to help identify mandatory and recommended health and safety training for your staff. This can be found on SharePoint <a href="http://our.harrow.gov.uk/worksites/corporateHS/Lists/training/AllItems.aspx">http://our.harrow.gov.uk/worksites/corporateHS/Lists/training/AllItems.aspx</a>

#### Risk assessment

Risk assessment is the key to effective and sensible health and safety management. The findings from risk assessments will be used to identify, prioritise and control risks at all levels in the company.

Managers will ensure that all significant hazards in their workplace / work activities under their control have been suitably risk assessed and that any subsequent risks are adequately controlled. Risk assessments will be reviewed at least every year, or more frequently should there be a significant incident or any major changes to legislation, operations, or personnel.

Risk assessments should be uploaded or carried out using the councils health and safety management software, SHE Assure

#### Risk Register

If a risk has been identified as being high or may have a major impact and/or be detrimental to service users, staff and the organisation, the Corporate Risk Register must be updated. All high risks that have been placed on the risk register should be reviewed regularly until resolved.

The risk register is managed by the Corporate Risk Management team they update it quarterly for the Corporate Strategic Board (CSB). The Corporate Health and Safety Compliance manager updates the Risk Register on health and safety risks quarterly.

#### Accident / incident reporting and investigation

All accidents / incidents and 'near-misses' should be recorded, reported, and investigated in accordance with the company's Incident Reporting Policy.

Reporting of accident/incidents/near misses is carried out using the council's health and safety management software <a href="https://www.software-software-new-color: blue, color: blue, c

All RIDDOR reportable incidents will be reported to the HSE by the Corporate Health and Safety team. However, as RIDDOR Reportable incidents are time bound, the corporate health and safety team must be notified of such incidents the same day they occur.

#### First Aid at work

Harrow Council will prioritize adequate first aid provision to ensure employees get immediate medical attention when required.

The level of provision provided will be appropriate to the risks identified in each workplace risk assessment.

All First Aiders will be competent in either First Aid at Work (FAW), Emergency First Aid at Work (EFAW), or Mental Health First Aid course (MHFA) and hold a valid certificate of training and their names and locations will be prominently displayed in each workplace. First aiders will also be responsible for first aid kits.

More specific details are contained in the first aid at work code of practice HSCOP 12-00

#### **Occupational Health Service**

Harrow Council is committed to promoting physical and psychological wellbeing of all its employees thereby undertaking appropriate measures to prevent ill-health and injury that may arise from any work activities. The Occupational Health Service (OHS) and Employment Assistance Programme (EAP) are services provided by the Health Management Limited (HML), providing expert advice, specialist counselling and support to all Harrow Council employees when required.

Employees can access the EAP service 24 hours a day, 7 days a week, either online or by the telephone. The range of topics covered by EAP include legal, bereavement, bullying and harassment advice etc.

Employees requiring the Occupational Health Service can receive this following initial referral by their line manager

Further advice / information can be obtained from Human Resources Department, email - AskHR <u>AskHR@harrow.gov.uk</u> as these services sit separate to the Corporate Health & Safety function, but will liaise with, and contribute to, any corporate health & safety plan for the purpose of ensuring the welfare of all.

#### Supporting Documentation

The council has several supporting documents which provide employees with more detailed practical arrangements regarding health and safety issues. These are available on SharePoint -Corporate Health and Safety Documents

#### **Communicating Health and Safety Information**

The council uses a variety of methods to ensure suitable and sufficient health and safety information is disseminated to all staff; these are:

- Health and safety law poster and local contact notices e.g. first aiders, fire marshals.
- SharePoint
- Health and safety policies, guidance documents and handbook which can be found on <u>Share point</u> or on <u>SHE</u> ASSURE document Library
- Safety Circles
- COMMS
- Team briefings which may contain occasional health and safety information.

All other arrangements for health and safety can be found in the councils' health and safety staff handbook. This will be given to staff during induction, can be requested from your manager or accessed using either <a href="Share Point">Share Point</a> or <a href="SHE Assure">SHE Assure</a> document library Reference 133

### 6. Assurance

In order for this policy to be effectively implemented there needs to be an assurance process. Assurance will be established by.

- Documentation Divisional Health and Safety Plans including copies of risk assessments and safe working methods will be in writing and kept either electronically or as hard copy. It is essential that working documents such as risk assessments are readily available to all employees
- Reporting Ensure key indicators are in place to monitor performance and include data to identify trends that will be fed back to Senior Management
- Independent Review The Corporate Health and Safety
  Team will undertake assurance work of all Directorates.
  Directors and Heads of Service will ensure that active
  monitoring is carried out in their areas, based on the
  Corporate Health and Safety Performance Plan. In
  addition, Inspectors of the enforcing authorities and health
  and safety representatives appointed by recognized Trade
  Unions will / may conduct independent inspections and
  audits.

# 7. Sign off of Policies and Procedures

The responsibility for producing, updating, and communicating corporate policies and procedures rests with the corporate health & safety team under the Corporate Health, Safety Compliance Manager.

All Policies are presented at the Corporate Health and Safety Board where the board committee is represented by Corporate Director, Divisional Directors, Human Resources, Corporate Health Safety and Compliance Manager and Trade Unions. All members of this board have responsibility to review and encourage feedback before final sign-off

Health & Safety requires the proactive, timely production of relevant and required policies and procedures to ensure the safety of those in the organisation. To this end, such policies and procedures final sign off rests with the Corporate Director-Community and will be reported to the Corporate Health & Safety Board for information and cascading as necessary

#### **Senior Management Structure**

