Finance and Resources Committee

10am, Thursday, 26 January 2023

New Health and Safety Strategy 2023-28

Executive/routine
Wards
Council Commitments

1. Recommendations

1.1 It is recommended that Committee approve the new Health and Safety Strategy 2023-28.

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Report

New Health and Safety Strategy 2023-28

2.   Executive Summary

2.1   The City of Edinburgh Council's current Health and Safety Strategy 2020-22 has been implemented and has reached the end of the period it was planned to cover. A new Strategy has been prepared covering the period 2023-28 for consideration and approval by the Finance and Resource Committee. The new Strategy seeks to build on the arrangements currently in place and to deliver an integrated health and safety management system.

3.   Background

3.1   The Council's current Health and Safety Strategy has come to the end of the period over which it was due to be implemented. The Council Health and Safety Strategy and Plan 2020 – 22 was approved by the Finances and Resources Committee on 3 December 2020. The current Strategy comprised three key aims:

- Consolidation, Adaption and Renewal
- Leading, Comparing and Learning
- Embracing New Technologies and Information Systems

3.2   This Strategy was designed to be achievable within the constraints of both the pandemic and Corporate Health and Safety resources. These aims were designed to ensure that the Council is a learning organisation and a leader, sharing new ideas and information with our partner Councils. Section 3.3 - 3.5 sets out the action against each of the Strategy's strands during the time frame of the Strategy 2020-2022.

3.3   **Consolidation, Adaption and Renewal**

3.3.1   **Delivery of an appropriately resourced Health and Safety team**

The Health and Safety Team operated throughout 2021 with depleted staffing levels in its senior roles, including the Lead Trainer role. This has only been sustainable given the reduction in face-to-face training delivery, as a result of the pandemic, and through the suspension of the health and safety workplace audit programme. While it has been possible to work with a reduced staffing compliment for a period, this does have an impact on the overall capacity of the team. In 2022 the team

successfully recruited a new Principal Health and Safety Adviser. The recruitment to vacancies within the team will be completed at the start of 2023 with the appointment of a Senior Health and Safety Adviser and Lead Trainer post and two vacant Health and Safety Adviser posts arising from an internal promotion and an external promotion of team members.

3.3.2 **Internal development and succession planning within CHS**

A review of the Health and Safety System in operation within the City of Edinburgh Council has taken place. This review has been used to inform a revision of the staffing structure of the team to support the future strategic and operation needs of the Council. The revised structure was implemented in 2022 in line with the Service support requirements. This will create the ability for team members to develop and provide opportunities for staff to grow and progress into more senior roles within the team in the future.

3.3.3 **Greater communication and collegiate working between CHS Directorates/divisions and trade union safety representatives**

The Council Health and Safety Team are operating with Health and Safety Advisers being allocated as Service Leads to individual Council Directorates. This is enabling strong working relationships to be established and maintained between the Advisers, Service Managers and Trade Union Officials representing employees within the associated Directorate. This is evident in consistent officer attendance at Health and Safety Consultative forums and management meetings where health and safety matters are the focus.

3.3.4 **Working with directorates/service areas to ensure that the Council's policies, procedures and activities remain fit for purpose**

This is delivered through a combination of discussion on the application and impact of policies along with a focus on items which are resulting in higher levels of incident reporting by Service. This work has helped inform the review of the Council's Health and Safety Management System.

3.3.5 The review of the Council's Health and Safety Management system has in turn informed the areas for development in the new Health and Safety Strategy 2023-2028.

3.3.6 **Fully operable, supportive, governance and assurance**

The current model of testing assurance of health and safety arrangements in individual workplaces has been to carry out a programme of workplace health and safety audits. This programme was paused during the pandemic to create capacity for wider ranging COVID workplace inspections and to enable members of the Council Health and Safety team to respond promptly to COVID related enquires.

3.3.7 While planning has been taking place to resume audits/assurance work, the Council Health and Safety team carried out a review of the health and safety system in place against the regulatory framework the City of Edinburgh

Council operates within. Following this work, the team have been exploring ways of making greater use of the electronic health and safety management system in place to support the recording of key workplace activities in relation to health and safety obligations which will directly support the auditing process and streamline the face to face element of the audit approach. The further embedding of the Health and Safety Management System will be considered as part of the re-procurement process for the system in 2023.

3.4 Leading, Comparing and Learning

3.4.1 Subject to buy-in from other authorities, the formation of a Scottish Councils' Health and Safety Forum (or other like body), led by this Council initially

The Head of Health and Safety has sought through the Chair of the Society of Personnel Directors Scotland (SPDS) Health and Safety Forum to re-establish the local forum through which to drive forward health and safety benchmarking across Scotland's local authorities in the first instance. This work resumed in 2022 with benchmark data being captured across the East of Scotland SPDS group.

3.4.2 The establishment of consistent reporting data set and definitions

The Council Health and Safety team have produced health and safety dashboard reports for services throughout 2022 in a consistent manner. The dashboard information has been well received, recognising there is scope to develop active indicators in the future to create a balance between the activity to manage health and safety and the resultant incident figures. More detailed reporting has been generated for Education and Children's Services as part of the Directorate's management response to the number of violent incidents reported.

3.4.3 Consulting on consistent approaches to health and safety issues throughout Scotland

The Head of Health and Safety has engaged with the Chair of the local SPDS Health and Safety forum to re-establish the group with the purpose of discussing and sharing approaches to managing health and safety locally but also through the associated national forum. The SPDS Health and Safety forum has begun meeting on a regular basis in 2022.

3.4.4 Using Scottish Councils' data to compare performance with this Council
Ahead of the pandemic, the principle of comparing health and safety performance, reactive indicators, with other Councils to establish how the City of Edinburgh's Council's performance compared was reasonable. In the current climate where the routine of work has been so disrupted over the past 2 years that our own year on year performance comparison has more limited value the benefit to be gained by comparing with partners is also more limited at this time. This was progressed during 2022 as Service delivery in our own and other Councils stabilised.

3.4.5 **Introducing identified best practices to directorates/service areas**

The review of the Council's Health and Safety system against the regulatory framework it operates within has clarified areas where the Council have well established arrangements and areas where arrangements require to be refreshed. The refresh of subject specific arrangements from 2023 on will create the opportunity to reflect on current practice and apply best practice approaches taking account of legal requirements and industry standards.

3.5 **Embracing New Technologies and Information Systems**

3.5.1 Many areas of health and safety in the workplace could benefit from deploying new technologies. Areas such as communications with employees who work in isolation (lone working) access to onsite best practice information and guidance when needed, immediate reporting of accidents, production of suitable and sufficient risk assessment, etc. could have a profound effect on how the Council operates services.

3.5.2 During 2021 the City of Edinburgh Council made a number of enhancements to the system it uses to capture details of workplace accidents and incidents, 'SHE Assure'. These developments were made following consultation with trade union officials. The adaptations made in 2021 included, combining three forms and revising the listing for violence at work and harassment incidents. Reports of unidentified fire alarm signals (UFAS) and fire incidents are now captured on SHE Assure also.

3.5.3 It is recognised that technological advances in a wide range of areas and sectors have the potential to support managing workplace risk. The Council Health and Safety team continue to make use of the health and safety management information system to measure aspects of health and safety performance. Many of the strides forward in use of technology which impact employees on a day-to-day basis will come through assessment of workplace risk and deployment of workplace controls. In support of the wider application of the current platform a mobile app was introduced in 2022 making the system available to Services to deploy to those who are often out of the office.

4. Main report

4.1 Following a review of the Council's Health and Safety Management System, the Council's Health and Safety Team reported to the Council Leadership Team, The Council Health and Safety Group and the Council Health and Safety Forum.

4.2 The review of the Council's Health and Safety Management System reflected on the work undertaken to date to manage health and safety by the City of Edinburgh Council and highlights areas where the Council could build on the work previously undertaken, in order to more successfully manage all aspects of health and safety.

4.3 The report highlighted the need to enhance governance in response to the wide range of regulatory obligations placed on the Council and develop a range of tools to support implementation of agreed standards. The report also identified the need to enhance the monitoring of health and safety performance, with the development

of a range of active indicators in addition to the current lagging indicators used as part of quarterly dashboard reports and within the annual report.

4.4 In response to the above a medium-term approach was required to address the findings of the above review. Therefore, a new Health and Safety Strategy aimed at building on the progress to date has been developed.

4.5 The proposed strategy sets out 6 main objectives:

- To ensure that Health and Safety management is an integral part of managing resources and providing services.
- To raise the profile of health and safety across the range of Council services, with the aim of further developing a positive safety culture.
- To improve Health and Safety performance through the development and implementation of agreed standards.
- To promote the occupational health of employees.
- To improve the quality of information provided to management on Health and Safety performance, in order to drive a performance-based health and safety culture.
- To support the individual development of employees to improve understanding and practice in matters relating to Health and Safety

4.6 This strategy will seek to build a health and safety management system-based approach for the City of Edinburgh Council, based around the Health and Safety Executive's model for successful health and safety management.

4.7 It is further proposed that this Strategy will be supported by an annual delivery plan which would be the subject of approval and oversight by the Finance and Resource Committee. This will run from the 1 April -31 March and will coincide with an annual health and safety reporting period which will cover the same period.

5. Next Steps

5.1 In line with the proposal at 4.7 above the Council Health and Safety Team would prepare an annual delivery plan for agreement by the Finance and Resources Committee covering the period 1 April 2023 – 31 March 2024.

5.2 The Strategy and delivery plan would then be promoted internally to ensure there was a clear understanding by stakeholders about how the Council's Health and safety Management System would be further developed through the years 2023-2028.

6. Financial impact

6.1 There is no additional financial impact associated directly with this Strategy; there will be management arrangements developed in response to legislative obligations which the City of Edinburgh Council operates within. Any financial impact associated with these will be highlighted individually as part of the management arrangement approval process.

7.   Stakeholder/Community Impact

7.1   Directorate Health and Safety Committee presentations were provided as part of the Strategy Consultation process, in addition to consultation through the Council Health and Safety Group and Council Leadership Team. A Trade Union consultation meeting was held with the recognised trades unions. A presentation on the proposed strategy was provided along with the opportunity to provide feedback. Trade Union Representatives fed back on being keen that their role in supporting the effective management of health and safety management is clear. Therefore, as health and safety policies and management arrangements are reviewed and developed the trade union role will be clarified.

8.   Background reading/external references

8.1   Health and Safety Strategy 2020-2022

9.   Appendices

9.1   Appendix one - Health and Safety Strategy 2023-28

THE CITY OF EDINBURGH COUNCIL

HEALTH AND SAFETY STRATEGY

2023-2028

1. INTRODUCTION

1.1. In support of The City of Edinburgh Council's Health & Safety Policy, this Strategy ("Strategy") has been developed for years 2023 to 2028, with the aim of building on the current health, safety and wellbeing arrangements within the Council.

1.2. This Strategy demonstrates the Council's commitment to its employees and service users. The Strategy specifically recognises the important role managers and employees have to play in the Council's successful management of Health & Safety. While it is underpinned by legislation, primarily the Health, and Safety at Work Etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, the wider business benefits of managing health, safety and wellbeing effectively are widely recognised.

2. HEALTH AND SAFETY AIMS AND OBJECTIVES

2.1. The principal aim of the Council's Health and Safety Policy is to ensure the health, safety, wellbeing of employees at work and to ensure that services are provided to the citizens of Edinburgh in a manner that avoids or reduces the risk of injury or illness; damage to property/equipment; and financial loss, to the lowest level reasonably practicable.

Key Objectives

2.2. In support of the principal aim outlined in 2.1, the following key objectives have been set:

(a) To ensure that Health and Safety management is an integral part of managing resources and providing services.

(b) To raise the profile of health and safety across the range of Council services, with the aim of further developing a positive safety culture.

(c) To improve Health and Safety performance through the development and implementation of agreed standards.

(d) To promote the occupational health of employees.

(e) To improve the quality of information provided to management on Health and Safety performance, in order to drive a performance-based health and safety culture.

(f) To support the individual development of employees to improve understanding and practice in matters relating to Health and Safety

3. OBJECTIVES

3.1. **Objective 1: To ensure that Health and Safety management is an integral part of managing resources and providing services**

3.2. The management of Health, Safety & Wellbeing in the city of Edinburgh Council is the responsibility of all employees and managers and therefore forms an integral part of managing resources and providing services. The aim is to ensure the work of the Council is carried out in such a way that any risk to the Health, Safety & Wellbeing of employees, service users, visitors and others are avoided or reduced to the lowest level reasonably practicable. This will require:

(a) The development and implementation of a framework for managers to demonstrate that they are working towards agreed standards; and

(b) The development, review and revision of effective policies, procedures and guidance, which aim to ensure that the Council complies with all relevant Health, Safety & Wellbeing best practice and legislation as set out in appendix 1.

Performance Indicators

- Risk assessments identifying significant workplace hazards.
- Development and implementation of 'Health, Safety & Wellbeing arrangements' within defined timescales.
- Managers working within Health, Safety & Wellbeing management framework.
- Reduction in accident/Occupational ill-health rates.

3.3. **Objective 2: To raise the profile of Health and Safety across the range of Council services, with the aim of further developing a safety culture.**

3.4. The Health & Safety Consultative Groups will have a pivotal role in working towards meeting this objective. It will be necessary for these groups to develop clear strategies that aim to ensure that the health and safety message is communicated across relevant Services. In addition, employees will need to be provided with improved information on safety and wellbeing measures and encouraged to maintain standards through increased publicity. Specific measures will include:

(a) A review of the functions/terms of reference for Consultative Groups, with the aim of ensuring their role is clearly defined, in-line with the safety Representatives and Safety Committee Regulations 1977 & the Health and Safety (Consultation with Employees) Regulations 1996 and Council requirements.

(b) Encouraging employees, as stakeholders, to adopt safe approaches to work, through the provision of information relating to Health, Safety & Wellbeing matters.

(c) Participation in the European Agency for Safety & Health at Work, European Health and Safety Week (annual event), supported by HSE, which is aimed at promoting Health, Safety & Wellbeing in the workplace.

Performance Indicators

- Health & Safety Consultative Groups meeting and operating in-line with agreed constitution, within Council wide framework.
- Increased awareness of stakeholders indicated by attitude surveys.
- Reduction in accident/Occupational ill health rates.

3.5. **Objective 3: To improve Health and Safety performance through the development and implementation of agreed standards.**

3.6. In the current climate of Best Value, performance management is a key component in seeking to attain a high standard of service delivery. The standards relating to Health, Safety & Wellbeing are founded in legislation and interpreted into Council policy, management arrangements and guidance. The aim is to ensure that workplaces are maintained in a safe condition; work equipment is suitable and maintained in a safe condition; and safe working practices are developed, implemented and followed by employees, adopting the risk control measures identified through the systematic risk assessment of work activities.

3.7. The contribution each employee makes towards meeting this objective is crucial. It is therefore important to ensure that they are aware of the need to meet organisation, team and individual objectives. Managers, therefore, will need to consider the following elements:

(a) Ensure employees understands the Council's Health, Safety & Wellbeing aims and objectives;

(b) Set out clear team and individual objectives, taking into account levels of competency when allocating tasks to ensure they are within the individual's capabilities;

(c) Support employee personal development, ensuring alignment with the Health, Safety & Wellbeing needs of the organisation; and

(d) Provide constructive feedback to employees on the standards achieved.

3.8. It will clearly be important for managers to ensure that Health, Safety and Wellbeing performance in their operational area is monitored. This will require regular workplace inspections by line managers and observations of working practices.

3.9. Similarly, measuring the performance of the health and safety management system, through systematic auditing is an essential part of the Council's strategy for seeking continuous improvement of Health, Safety and Wellbeing arrangements. In addition, it provides a format in which the Council can demonstrate to stakeholders, including the Health and Safety Executive, as the enforcing authority, the measures being taken that aim to ensure the Council, and its officers, are complying with the statutory duties placed on them by legislation. This will require:

(a) Further development of the health and safety auditing system based on the Council's current Health & Safety Policy, together with supporting management arrangements.

(b) The implementation of a planned programme of audits, undertaken by the Council's Health & Safety Team with reporting to the Corporate Management Team and Corporate Health & Safety Consultative Committee.

Performance Indicators

- Development of Employee Health and Safety Competency Framework
- A minimum of one workplace inspection carried out annually by managers; accompanied by Trade Union appointed Safety Representatives/ representatives for employees where practicable.
- Implementation of health and safety review programme, aligned to Management Arrangement application, with agreed completion targets. (Cross reference with Objective 5)
- Overall improvement of Directorate and Service Health and safety review results
- Reduction in accident/occupational ill health rates.

3.10. **Objective 4: To promote the occupational health of employees**

It is recognised that employee health and wellbeing is equally as important as their safety in terms of legislative compliance and best practice and, similarly, this should not be compromised as a result of work. The Health and Safety Executive's strategy document '*The Health and Safety of Great Britain \\ Be part of the solution'* endorses this view and encourages employers to ensure that, through risk assessment, health and wellbeing risks are identified and controlled. In working towards this aim, the following actions have been identified:

(a) The development of a management arrangement aimed at controlling the health risks associated with hand/arm, whole body vibration, noise and hazardous substances

(b) The development and implementation of a management arrangement relating to safe manual handling practices, which supports the adoption of the Scottish Manual Handling Passport scheme.

(c) The review of policy and guidance relating to occupational stress.

Performance Indicators

- Implementation of Management Arrangements for the management of vibration and noise.
- Implementation of manual handling and display screen equipment Management Arrangements.
- Attendance levels.
- Health surveillance programme is implemented & monitored in each Directorate/Service.

3.11. Objective 5: To improve the quality of information provided to management on Health and Safety performance, in order to drive a performance based health and safety culture.

3.12. The provision of accurate information on the Health, Safety & Wellbeing performance of the Council is an important part of the decision-making process, particularly in the allocation of resources. This will include:

(a) Feedback on monitoring and auditing safety and wellbeing performance, seeking to inform senior management of short falls in the agreed standards for ensuring Health, Safety & Wellbeing, in order that these can be modified prior to there being any detriment.

(b) Analysis of incident data providing information regarding the incidence, type and severity of incidents, which have occurred, and are likely to be as a result of failings in the system of work and as a consequence, may have resulted in a loss to the Council or the individual.

(c) The number and effectiveness of development programmes provided and those proposed for the ensuing period. (Cross – reference with Objective 6)

(d) Information regarding the performance of the employee health support services

(e) The Council's Health & Safety team will continue to develop the reporting arrangements with the aim of providing useful information for the management teams on a quarterly basis. In addition, the Corporate Health & Safety Adviser will provide an annual report to the Corporate Management Team.

Performance Indicators

- Production of regular performance reports summarising the findings of health and safety reviews.
- Production of quarterly health and safety performance dashboard reports, incorporating employee health surveillance findings.
- Production of reports relating to the effectiveness of training provided.

3.13. **Objective 6: To support the individual development of employees to improve understanding and practice in matters relating to Health and Safety**

3.14. A major component of successful Health, Safety & Wellbeing management is ensuring that managers and employees have the necessary competencies to undertake the tasks allocated to them. One way of improving competence is through the provision of health and safety training in line with both Service and employee needs, as expressed through the Performance Management Framework. This will require:

(a) An analysis of health and safety development needs, with the aim of developing a coherent strategic approach to the provision of health and safety training. This will be carried out in conjunction with the Council's Organisational Development professionals.

Performance Indicator

- Development and implementation of health and safety training to meet service needs.
- Evaluation of training provided.
- Effectiveness of the training i.e. transfer of skills into the workplace.
- Reduction in accident/Occupational ill health rates.

4. PLAN OF WORK

4.1. A detailed work plan will be developed for the Health & Safety Team and will be revised annually to ensure progress is made towards achieving each of the strategic objectives detailed in section 3 above.

4.2. The Corporate Health & Safety Adviser will liaise with Service Management Teams in relation to the implementation of the plan and the integration of Council Health, Safety & Wellbeing objectives into Service Plans and performance indicators to be used.

5. ROLE OF THE HEALTH & SAEFTY TEAM

5.1. The aims and objectives of the Health & Safety Team are to contribute to the Council's aims and strategic objectives by:

- Providing a professional occupational health and safety advisory and support service;

- Encouraging managers to adopt a risk management approach to health and safety management, which aims to ensure the Services are provided in a manner that reduces risk, to the lowest level reasonably practicable; and

- Encouraging managers to support employee wellbeing initiatives.

5.2. In seeking to achieve these aims, it is necessary to outline some key service objectives:

- Development of health and safety management arrangements, which aim to ensure that the Council complies with all relevant legislation.

- Provide advice and support to managers on health and safety matters affecting their particular Service.

- Promote health and safety across the range of Council Services, with the aim of encouraging a safety and wellbeing culture.

- Delivery of Health and Safety Management and assessment based training.

- Assist in the provision of health and safety training.

- Monitor health and safety performance in Services, actively by reporting on service progress across a range of metrics, carrying out audits of health and safety arrangements and reactively through incident investigation (in conjunction with line management).

- Provide information to senior management teams on the health and safety performance of the Council Services and strategies to tackle the causes of incidents.

6. MANAGEMENT ROLE

6.1. As stated in 3.2, the management of Health, Safety & Wellbeing in The City of Edinburgh Council is the responsibility of each and every employee, manager and supervisor. Therefore, this must form an integral part of managing resources and providing services. The aim is to ensure that the work of the Council is carried out in such a way that risks to the Health, Safety & Wellbeing of employees, service users and others are avoided or reduced to the lowest level reasonably practicable.

7. PERFORMANCE INDICATORS

7.1. A set of key performance indicators will be used to confirm the measures taken by the Council to achieve the required outcome, to prevent unwanted losses. These KPIs are set out below:

- ○ The City of Edinburgh Council's compliance with applicable Health & Safety legislation

- ○ Accident/ill health levels reduced to as low a level as reasonably practicable and low in comparison to benchmarking groups

- ○ Action by external enforcement bodies (HSE, Fire & Rescue Service), target no formal enforcement action.

8. REVIEW

8.1. The Health and Safety Strategy will be kept under review annually by the Corporate Leadership Team and revised as required.

8.2. An annual progress report on the implementation of the strategy will be provided to the Health and Safety Group by the Head of Health & Safety.

Management Arrangements for Review/Development
1. Asbestos
2. Confined Spaces
3. Construction (Design and Management)
4. Control of Lead at Work
5. Control of Electromagnetic Fields at Work
6. Control of Substances Hazardous to health
7. Control of Vibration
8. Display Screen Equipment
9. Driving
10. Electricity at Work
11. Fire Safety
12. First Aid
13. Gas Safety
14. Health and Safety Consultation
15. Health and Safety (Safety Signs and Signals)
16. Health Surveillance
17. Incident reporting, investigation and response
18. The Ionising Radiations
19. Lifting Operations and Lifting Equipment
20. Lone Working
21. Manual Handling
22. New and Expectant mothers
23. Noise
24. Personal Protective Equipment
25. Pressure Systems Safety
26. Provision and Use of Work Equipment
27. Risk Assessment
28. Smoke Free
29. Violence and Aggression
30. Working at Height
31. Workplace safety
32. Water Safety – Legionella
33. Young Persons