

Governance, Risk and Best Value Committee

10:00am, Tuesday, 20 February 2024

Response to Motion 8.2 Internal Audit Update Report: Quarter 2 2023/24

Executive/routine
Wards

1. Recommendations

- 1.1 Members are requested to note the response to Motion 8.2 Internal Audit Update Report Quarter 2 2023/24.

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Report

Response to Motion 8.2 Internal Audit Update Report: Quarter 2 2023/24

2. Executive Summary

- 2.1 This report responds to the [Motion 8.2 Internal Audit Update Report: Quarter 2 2023/24](#) raised at the Governance Risk and Best Value Committee on 28 November 2023. The report responds to each of the points raised in the motion in order to provide assurance with regard to the approach to the management of health and safety with the City of Edinburgh Council and the Corporate Resourcing of the same.

3. Background

- 3.1 As part of the 2023/24 Internal Audit plan the internal audit team carried out an audit of Outdoor Infrastructure. During this audit the external auditor carrying out this audit on behalf of the internal audit team made a number of health and safety related observations. These findings were recorded and presented in the Cross Directorate Health and Safety Findings only Audit.
- 3.2 When this [audit report](#) was presented to Governance Risk and Best Value Committee on 28 November 2023 a Motion was raised requesting a response to a number of points relating to audit findings. Section 4 sets out the response to these points.

4. Main report

4.1 Capacity of the Corporate Health and Safety Team

- 4.1.1 The Health and Safety team has been operating with a reduced staffing complement since before the pandemic. This has been a result of difficulties in recruiting candidates. While some new Advisers were brought in during the Pandemic and a new Head of Health and Safety was appointed, the recruitment market has been very challenging. Following a number of recruitment campaigns we are pleased that the team have returned to full capacity on the 11 December 2023 when the new Senior Health and Safety Adviser (training) joined the team.

- 4.1.2 The role of the Health and Safety team as part of the wider health and safety management approach is set out within the Council Health and Safety Policy. The Health and Safety team provide line 2 function (helpers) providing advice and guidance on all aspects of health and safety. Through this work the team lead on the development and maintenance of organisation-wide arrangements to respond to the wide range of health and safety obligations affecting the activities carried out by the Council across the city.
- 4.1.3 The Head of Health, Safety and Risk carried out a review of the health and safety team and structure of the team in 2022 which led to the current structure being deployed as set out in appendix 1. This provides for regular officer contact with Services through the Lead Officer model, but is flexible enough to allow the movement of resource to support particular initiatives or service pressures. This structure also provides for specialist training development for the Council.
- 4.1.4 The resourcing of the Health and Safety team is not only about the number of officers but also the way the team works and is resourced to perform its role. During 2023 the Corporate Leadership Team approved increasing the resourcing of the Corporate Health and Safety team in its role through funding for Health and Safety Management Information System accessible to all people managers.

4.2 Higher risk areas within the Council

- 4.2.1 Fire Risk was highlighted as part of the Life Safety Audit carried out in 2020. As a result a programme of Fire Risk Assessments, carried out by Fire Safety Professionals, has been undertaken with any actions arising for Duty Holders or Facilities Management appropriately assigned. In addition, following a review by Facilities Management a new team Health and Safety Operations Manager post has been created to provide operational oversight and management of Fire Safety, Legionella Management and Asbestos Management. This post was appointed to in December 2023.
- 4.2.2 The Health and Safety Team support workplace inspections as required, however it has not been the intention to resource these from the Health and Safety Team on an ongoing basis as local managers and Trade Union Safety Representatives are capable of carrying these out.
- 4.2.3 The Health and Safety Team carried out Assessment of polling sites ahead of relevant elections, with re-assurance visits on the day.
- 4.2.4 The Health and Safety Team have also supported COVID Safe Workplace assessment visits to compliment the template COVID Risk Assessment developed to support Duty Holders.
- 4.2.5 The Health and Safety team have carried out a risk profiling exercise across the organisation, but targeted to risks associated with health and safety and in particular linked to regulatory obligations. This work will support targeting of new and enhanced arrangements to control particular risks being communicated to the right people/services but also support assessing the

potential impact and resource demand required to support new health and safety management initiatives.

- 4.2.6 The traditional approach to health and safety auditing is resource intensive and can result in extended periods in between audits with limited ongoing oversight of progress against actions at a central point. The Corporate Health and Safety team recognised this and set out measures to address this as part of the Health and Safety Strategy approved by Finance and Resource Committee on 26 January 2023. The team have procured a new Health & Safety Management Information System to replace the existing incident reporting system. The new platform will enable incident reporting but also capture details of workplace inspections, confirmation fire drills are taking place, that risk assessments are in place and being reviewed and that actions raised against any aspect of health and safety management are able to be tracked and reported on, in much the same way Team Central does for audit actions. This will support the ongoing development of a health and safety performance culture where performance is reported as part of regular quarterly dashboard reports.
- 4.2.7 In 2023 operational sites across the city had the Duty Holder formally identified with details of those fulfilling these roles recorded and published on the Health and Safety Orb pages for the first time. This is updated regularly throughout the year in-line with the record of leavers from the Council. The Health and Safety team also produced guidance for Duty Holders on the activities which need to be carried out in order to successfully manage health and safety of a premises. This is also reflected within the Education Service Self Assurance process which Head Teachers complete through the academic year. A Duty Holder briefing session has also been delivered, recorded and made available through mylearninghub to support Duty Holders in their role.
- 4.2.8 The Health and Safety team have carried out a number of actions to investigate adherence to health and safety policies and procedures and provide support to services in achieving this. Examples include:
- Support with workplace inspections to service areas re-opening premises during COVID pandemic:
 - Re-opening of Libraries (pre and post second lockdown).
 - Re-opening of Community Centres.
 - Re-opening of Corporate Premises, Buildings and Depots.
 - Support with workplace inspections at various higher risk premises, including ATEC24 (Health and Social Care) and Waste Transfer Stations (Bankhead and Seafield).
 - Working with the various Place Health, Safety and Wellbeing Groups to ensure service-led workplace inspections are re-established at buildings, offices, workshops and depots.

- Site inspections to support the safe reopening of 14 sheltered housing community rooms in Edinburgh.
- A programme of reviewing and guiding the care home Fire Safety and Evacuation process, through observing practical fire drills and supporting with feedback and follow-up training.
- Assessment of polling sites ahead of Councillor elections and re-assurance visits on the day of voting.

4.3 Current Health and Safety Policies/procedures and management/ownership of these

- 4.3.1 The Council currently has a Health and Safety Policy, required in writing in response to the Health and Safety at Work Act. This is supported by a range of health and safety guidance documents all available through the Orb. The Health and Safety Policy is subject to 3 yearly revisions, the latest revised policy was approved by the Policy and Sustainability Committee on 9 January 2024.
- 4.3.2 The Corporate Health and Safety Team ensure the Health and Safety Policy and supporting guidance are kept up to date from an administrative perspective. The Responsibility for health and safety within the Council ultimately rest with the Chief Executive and Executive Directors as set out in the Health and Safety Policy.
- 4.3.3 A review of the arrangements in place and what more was required to build a comprehensive health and safety management system was carried out ahead of the development of the current health and safety strategy which was approved by the Finance and Resource Committee on 26 January 2023. This strategy has set out an ambitious programme of Management Arrangement development in order to set out a prescriptive approach to the management of each of the key health and safety regulatory requirements placed on the City of Edinburgh Council. These will provide clearer direction to all regarding what is required to meet the Council's legal obligations and who is responsible for specified activities including health and safety monitoring by the Corporate Health and Safety Team.

4.4 Identified training and development needs, including training programmes on health and safety and risk management

- 4.4.1 The Council have previously reviewed and assessed training needs across the Council which resulted in a range of role specific essential learning being identified. Some of this training is arranged and delivered through the Corporate Health and Safety Team, such as health and safety management and assessment based learning. The Learning and Development Team arrange training such as First Aid and Manual Handling courses. Many job skill related training is provided in the workplace and arranged at a service level such as induction training and practice of Fire Drills.

- 4.4.2 The approach to managing health and safety is not static and as outlined above the Health and Safety team had initiated a risk profiling exercise for all service areas, this will directly contribute to confirming the arrangements required for each and every team, but will also direct the training requirements for the same. The new Senior Health & Safety Adviser (Training) will take this forward through the development of a health and safety training strategy.
- 4.4.3 It is worth noting that prior to the pandemic a large volume of health and safety training took place in person. With many colleagues working from home for extended periods during the pandemic a wide range of training provided has moved online. This can be resourced efficiently and flexibly for the trainee, although is not suitable for all subject matter or audiences. Therefore, a range of courses will continue to be provided in person where this is the most appropriate option.

4.5 Oversight of risk assessment and risk control within high-risk areas of the council

- 4.5.1 The historical approach to the review of localised health and safety management has relied on an audit cycle which resulted in a Health & Safety review of material a number of years apart. While this provided a useful localised report, it made it difficult to determine a definitive position of performance on specific aspects of health and safety organisation wide. Therefore, traditional auditing in health and safety is being complimented with the introduction of Health & Safety Management System based approach where there will be on going tracking of risk assessment practice within teams with reports on performance provided to Directorate Health & Safety Committees on a quarterly basis for oversight and action.
- 4.5.2 This will provide oversight of the quantity of assessments in place and the frequency at which they are reviewed. Through this system-based approach this will facilitate review of sample assessment material remotely by the Corporate Health and Safety Team which will be more resource efficient removing the need for travel to review this alone but will also allow for feedback on newly developed assessments for new processes/activities. The Corporate Health and Safety team will continue to carry out site visits and observe activities being undertaken in order to provide full advice and support to managers.

5. Next Steps

- 5.1 The Corporate Health and Safety Team will progress with the Implementation of the new Health and Safety Management Information system across all Council areas.
- 5.2 Initial implementation will be directed to higher risk Service Areas based on the nature of the activities undertaken and therefore potential for injury/ill health.

- 5.3 The Corporate Health and Safety Team will complete a Risk Profiling exercise across the Council to inform the above and support the direction of Management Arrangement Implementation and review of training needs.
- 5.4 Health and Safety Performance monitoring will be developed to coincide with the implementation of the Health and Safety Management Information System and incorporated within quarterly Health and Safety Dashboard reporting.

6. Financial impact

- 6.1 This report does not affect existing financial arrangements.
- 6.2 Failing to manage health and safety effectively can create financial and other risks.

7. Equality and Poverty Impact

- 7.1 The requirement to protect all people irrespective of their characteristics is clearly set out within health and safety law. The Council therefore seeks to respond accordingly. Where there is a need to make special provision to ensure all employees are protected and supported this will be set out within supporting Management Arrangements and supporting guidance.

8. Climate and Nature Emergency Implications

- 8.1 N/A

9. Risk, policy, compliance, governance and community impact

- 9.1 This report is concerned primarily with management of health and safety risk. The report sets out the broad principles of the approach taken by the City of Edinburgh Council in order to protect its employees, citizens and others who can be affected by the way it works.
- 9.2 This report and supporting arrangements will directly contribute to the successful management of health and safety, through setting out clear governance associated with the management of key health and safety risks and the means to measure and report on its performance on an ongoing basis using live data.

10. Background reading/external references

- 10.1 [Health and Safety Policy](#)
- 10.2 [Health and Safety Strategy 2023-28 – The City of Edinburgh Council Intranet](#)
- 10.3 [health-and-safety-duty-holder-guide-may-2022 \(edinburgh.gov.uk\)](#)

- 10.4 [Workplace inspection - Health and safety directory – The City of Edinburgh Council Intranet](#)
- 10.5 [Risk assessment resources toolkit – The City of Edinburgh Council Intranet](#)

11. Appendices

- 11.1 Appendix 1 Corporate Health and Safety Team Structure

Health, Safety & Risk Management Structure

