



SOUTH
KESTEVEN
DISTRICT
COUNCIL

For All Your Assurance Needs

Internal Audit Report Health and Safety

Date: 03 March 2023

What we do best...

Innovative assurance services

Specialists at internal audit

Comprehensive risk management

Experts in countering fraud

...and what sets us apart

Unrivalled best value to our customers

Existing strong regional public sector partnership

Auditors with the knowledge and expertise to get the job done

Already working extensively with the not-for-profit and third sector

Distribution List

Phil Swinton – Health and Safety, Emergency Planning and Business Continuity Lead

Phil.Swinton@southkesteven.gov.uk

Craig Spence - Acting Director of Housing

Craig.Spence@southkesteven.gov.uk

Tracey Elliott – Governance & Risk Officer

Tracey.Elliott@southkesteven.gov.uk

Contacts

Lucy Pledge - Head of Internal Audit and Risk Management

Lucy.Pledge@lincolnshire.gov.uk

Alastair Simson - Principal Auditor

Alastair.Simson@lincolnshire.gov.uk

Dan Newens - Assistant Director – Client Delivery (SWAP)

Daniel.Newens@swapaudit.co.uk

Jodie Bromell - Principal Auditor (SWAP)

Jodie.Bromell@swapaudit.co.uk

Background and Scope	Page 1
Executive Summary Assurance Opinion and Key Messages	2
Managing your Risks	5
Management Response	6
Action Plan	7
Advisory Points	14
Appendices Appendix 1 – Assurance Definitions	15



Background and Scope

Background and Context

Health and Safety within the Council is regulated by the Health and Safety Executive (HSE), which is a non-departmental public body in the United Kingdom responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare and for research into occupational risks in England, Wales and Scotland.

South Kesteven District Council (SKDC) has a health and safety advisory function responsible for providing health and safety guidance, drafting policies and procedures, carrying out generic risk assessments and health and safety audits. The management of health and safety itself and on-going specific risk assessments sits within the services areas and is managed by the heads of service or equivalent.

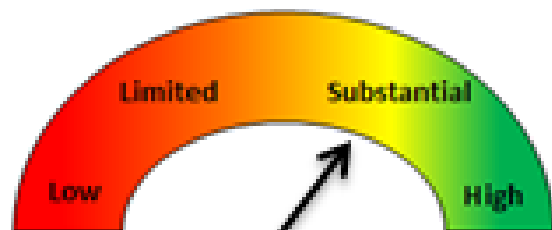
Scope

The review sought to provide independent assurance that the Council's governance of health and safety is effectively managed to ensure that it delivers the required outcomes. We assessed the effectiveness of the following controls:

- Policies and procedures;
- Risk identification and assessment;
- Governance structures;
- Audit framework;
- Monitoring and measuring performance against defined KPIs; and
- Incidents and near misses reporting and investigation.

We met with the Health and Safety, Emergency Planning and Business Continuity Lead and a sample of Head of Service to obtain an understanding of each of the above areas. Supporting documentation/reports were reviewed and procedures examined to determine the effectiveness of the arrangements.

Executive Summary



Our critical review or assessment on the activity gives us a substantial level of confidence (assurance) on service delivery arrangements, management of risks, and operation of controls and / or performance.

There are some improvements needed in the application of controls to manage risks. However, the controls have been evaluated as adequate, appropriate and operating sufficiently so that the risk of the activity not achieving its objectives is medium to low.

Risk	Current Rating (R-A-G)	Recommendations	
		High	Medium
Reputational damage and potential for financial loss where the authority's Health and Safety Policy and procedures do not comply with applicable legislation; are not comprehensive; are not available to all interested parties.	Green	-	-
Risk identification, assessment, action planning, reporting, inspections and recording of Health and Safety risks are not conducted in-line with policy and procedural guidance, leading to reputational damage and the potential of financial loss for the authority.	Medium	-	1
The Council has inappropriate governance structures in place to manage Health & Safety, including insufficient capacity and capability levels and no defined measures and targets in place.	Medium	-	2
There is inadequate monitoring activity applied to oversee and direct Health and Safety activities, leading to reputational damage for the authority.	Medium	-	1
Totals		0	4

Executive Summary

Key Messages



Overall, the health and safety controls are robust and are operating effectively and efficiently. From the work undertaken, the following good practices were observed and these have contributed to the Substantial audit opinion provided:

- A comprehensive suite of health and safety policies are in place, which clearly define health and safety roles and responsibilities across the Council.
- Risk assessments are completed by service areas in line with legislation. We reviewed a sample of generic risk assessments, and service specific risk assessments, from Street Scene, Housing Services and Housing Repairs.
- Periodic health and safety audits are undertaken in each service area.
- Quarterly dashboard reports and an annual report are produced by the Health and Safety, Emergency Planning and Business Continuity Lead, which outline health and safety performance.
- Incident and accident reporting and investigation has a defined process and is effectively managed.
- The Health and Safety, Emergency Planning and Business Continuity Lead ensures that the Council stays up to date with legislative changes and is suitably qualified to fulfil this role. He is currently doing a health and safety degree and is part of a countywide Health and Safety Group.
- Health and safety responsibilities were included in a sample of job descriptions reviewed.
- A Health and Safety Working Group has been established and will meet for the first time on 9 March 2023.
- The health and safety advisory function has been expanded to provide further assistance across the Council.

The following four recommendations have been raised which are areas and processes that can be strengthened further:

- The completion of risk assessments and corresponding actions raised are effectively monitored and reported and it is clearly defined and understood who is responsible for doing this.

Executive Summary

- The health and safety governance structure is reviewed and enhanced by establishing health and safety champions within the service areas.
- Health and safety training for those with key health and safety responsibilities should be strengthened to ensure each person has completed the IOSH Managing Safely training. The Council should ensure that all staff completing risk assessments have completed the Council's risk assessment training so that there is a consistent approach and understanding of the risk management procedures.
- The audit methodology should be clarified to define how often an area should be reviewed. Actions raised in each audit should be assigned action owners and deadlines and the results of the audits should be reported on and regularly monitored by management.

Additionally, an advisory point has been suggested in relation to clarifying wording in the Health and Safety Policy.

We would like to thank all of the staff involved in the audit for their help in undertaking the review.

Executive Summary

Managing your risks



Good risk management, including maintaining risk registers, helps you to identify, understand and reduce the chance of risks having a negative impact on achievement of objectives.

It is pleasing to note that during our audit work we did not identify any significant risks that we feel should be considered for inclusion on the service risk register.

Management Response

Management Response



The substantial assurance for this audit provides confidence in the positive work that has been undertaken in this key strategic area of business over the last year.

The revised team structures enhances the value and higher emphasis corporately on this key function.

The newly formed Health & Safety Working Group will provide structure and resilience to the cascading of information and the continuous improvement methodology the Council is aiming to embed.

Implementation of the identified actions will put us in a strong position moving forwards. The lack of any significant risks identified through this audit is testament to the current focus provided by the team.

Action Plan

	Risk Description	Current Rating	Target Rating
1	Risk identification, assessment, action planning, reporting, inspections and recording of Health and Safety risks are not conducted in-line with policy and procedural guidance, leading to reputational damage and the potential of financial loss for the authority.	MEDIUM	GREEN

Findings

We reviewed the Council’s ongoing risk identification and a risk assessment process for health and safety matters and found generic risk assessments are completed by the Health and Safety, Emergency Planning and Business Continuity Lead, but in the main, specific risk assessments are completed and managed within the individual service areas. Whilst risk assessments are being completed, we found there is not a central schedule of risk assessments outlining what health and safety risk assessment should be completed across the Council. We also reviewed the process followed in Street Scene, Housing Services and Housing Repairs and found that none of those maintained a documented risk assessment schedule locally. The Health and Safety, Emergency Planning and Business Continuity Lead explained they are currently looking to implement some health and safety management software and would like to include a dashboard of each service area’s risk assessments with due dates and automated reminders for when they fall due.

In addition to this, we reviewed a sample of generic risk assessments and service area risk assessments and found the following issues:

Service Area Risk Assessments:

- The Heads of Service believed it was the role of the Health and Safety, Emergency Planning and Business Continuity Lead to decide what risk assessments should be completed, their frequency and monitor their completion. However, we noted that it is stipulated in the Health and Safety Policy that this role sits with the Heads of Service.
- Actions from the risk assessments were not recorded in a standalone action log with clear owners and deadlines.

Action Plan

Implications		
Without central or clear monitoring there is a risk that risk assessments are not completed in line with an agreed frequency and or actions from the risk assessments are not addressed.		
Recommendation		Priority level
1.1 A schedule of health and safety risk assessments which need to be completed across the Council should be collated. 1.2 The completion of the risk assessments and actions should be recorded and monitored.		Medium
Agreed Action(s)	Responsibility	Implementation date
1.1 Service areas will complete and retain a risk assessment log and provide to Corporate H&S for oversight 1.2 As above. Risk assessments have an identified section for action owners and completion should be noted on the log. Corporate Risk Assessment guidance will be amended to include this requirement and circulated to Heads of Service	Service areas with Corporate H&S support	June 2023

	Risk Description	Current Rating	Target Rating
2	<p>The Council has inappropriate governance structures in place to manage Health & Safety, including insufficient capacity and capability levels and no defined measures and targets in place.</p>	MEDIUM	GREEN
<p>Findings</p>			
<p>The Council has a Health and Safety, Emergency Planning and Business Continuity Lead who is responsible for providing health and safety guidance, drafting policies and procedures, carrying out generic risk assessments and health and safety audits. The management of health and safety itself and on-going specific risk assessments sits within the service areas and is managed by the Heads of Service.</p> <p>We reviewed the job descriptions for a sample of roles within the service areas and whilst we noted that health and safety management was incorporated within the job descriptions, the Council has not got a clear and defined structure of Health and Safety Champions. In addition to this, we met with the Heads of Service for Housing Repairs, Housing Services and Street Scene and each expressed concern about the Health and Safety, Emergency Planning and Business Continuity Lead being a single point of failure within the Council, being the only person within the Council with in-depth health and safety knowledge. We have subsequently been advised that the Health and Safety Advisory Function now has two more IOSH trained members and health and safety knowledge will be shared amongst the team, therefore reducing the single point of failure risk.</p> <p>We were advised that the Council plans to form a Health and Safety Working Group to provide central oversight over health and safety matters. The first meeting for this group is scheduled for 9 March 2023.</p>			
<p>Implications</p>			
<p>Without a robust health and safety governance structure, which includes clearly defined roles and oversight there is a risk that the Council's health and safety matters are not sufficiently and or consistently managed.</p>			

Action Plan

Recommendations		Priority level
2.1 The Council should establish and document a clear governance structure for health and safety which includes health and safety champions for each service area. The roles and responsibilities for a health and safety champion should be defined and documented.		Medium
Agreed Action(s)	Responsibility	Implementation date
2.1 The Health and Safety Champions role will be evaluated as suggested in 3.1 and added to the Policy once evaluated and extent of the roles potential evaluated within the group	Health and Safety, Emergency Planning and Business Continuity Lead	September 2023

	Risk Description	Current Rating	Target Rating
3	<p>The Council has inappropriate governance structures in place to manage Health & Safety, including insufficient capacity and capability levels and no defined measures and targets in place.</p>	MEDIUM	GREEN
Findings			
<p>We reviewed the health and safety training completed by key people with health and safety responsibilities in Street Scene, Housing Services and Housing Repairs and found inconsistencies in who had completed the Institution of Occupational Safety and Health (IOSH) training. Whilst this was not documented by the Council, we were advised that those with key health and safety responsibilities should complete this training as the training delivers the knowledge needed for those in positions of responsibility to identify, evaluate and control workplace health and safety risks.</p> <p>We also reviewed a sample of risk assessments completed in the same service areas and found the risk assessments were not always undertaken by someone that had received the Council’s required risk assessment training. However, assurance was provided that completion was supported by the Health and Safety, Emergency Planning and Business Continuity Lead. Training has been scheduled for members of staff that will be completing risk assessments going forward.</p>			
Implications			
<p>There is a risk that health and safety risks are not effectively managed and mitigated if those in key health and safety roles do not have the appropriate knowledge and capability.</p>			
Recommendation			Priority level
<p>3.1 Once a governance structure with defined health and safety champions has been established, the training requirements for each health and safety role should be agreed.</p> <p>3.2 Risk assessment training should be completed by the members of staff who will be completing risk assessments going forward.</p>			Medium

Action Plan

3.3 The completion of the required training should be monitored.		
Agreed Action(s)	Responsibility	Implementation date
3.1 The Health & Safety Working Group will initially be ambassadors raising the profile of health and safety at service level. The role will be evaluated after 6 months with any relevant training identified at that point.	Health and Safety, Emergency Planning and Business Continuity Lead	September 2023
3.2 Completion of risk assessments will be undertaken by those who are trained.		June 2023
3.3 Completion of risk assessment training will be monitored.		Ongoing

Action Plan

	Risk Description	Current Rating	Target Rating
4	There is inadequate monitoring activity applied to oversee and direct Health and Safety activities, leading to reputational damage for the authority.	MEDIUM	GREEN
Findings			
<p>The health and safety advisory function undertake audits of health and safety management across the Council. We reviewed the audit framework and noted that there is not a clearly defined audit methodology to determine how often a service area should be audited. We were advised that those service areas deemed to be higher risk due to the number of reported incidents were audited annually and those with fewer incidents reported were audited every two years.</p> <p>We reviewed a sample of audits and noted that there were no deadlines for the recommendations raised in the audit reports and no action owners. The health and safety advisory function do not monitor the completion of actions until that area is audited again. We were advised that the service area should monitor the completion of their own actions. However, the service areas were not able to evidence that a log of audit actions with deadlines and actions owners was maintained.</p> <p>We recommend that audit actions be monitored by the Health and Safety Working Group.</p>			
Implications			
There is a risk that health and safety risks are not identified in a timely manner and, if they are identified, actions are not implemented to help manage the risk.			
Recommendation			Priority level
4.1 The defined audit methodology should be documented and agreed by Corporate Management Team. 4.2 Actions arising in health and safety audits should be assigned action owners and deadlines. 4.3 The completion of audit actions should be monitored by the Health and Safety Working Group.			Medium

Action Plan

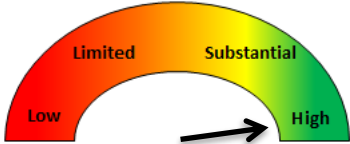
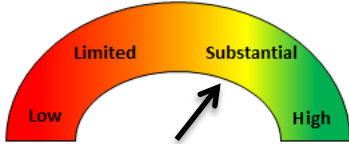
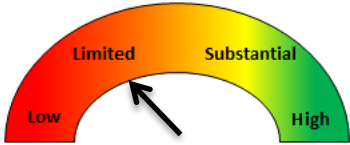
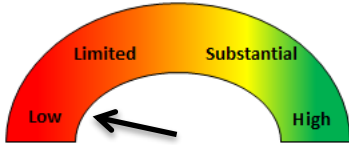
Agreed Action(s)	Responsibility	Implementation date
4.1 The defined methodology will revert to an annual assessment of all. This will be reviewed as and when the management system can be implemented	Health and Safety, Emergency Planning and Business Continuity Lead	April 2023
4.2 Actions arising from the health and safety audits will be assigned owners and deadlines		April 2023
4.3 Actions will be monitored by the Corporate H&S Team and also feed into the working group. The Corporate H&S Team hold the professional competence to consider and support progress		June 2023

Advisory Points - Adding Value through Efficiencies

The following item is an advisory recommendation / comment arising from the audit, which management may wish to consider implementing to improve efficiency of the system or performance.

Ref	Finding	Advice
AP1	<p>The Health and Safety Policy split out the roles for the Corporate Management Team and Heads of Service however upon further discussion we found these were the same and as such should be combined.</p> <p>The Health and Safety Policy states that the Corporate Management Team should provide leadership to the Council's Health and Safety Group. We found this should be reworded as the Health and Safety Group will be advising the Management Team.</p>	<p>The Health and Safety Policy should be amended to combine Corporate Management Team and Heads of Service responsibilities.</p> <p>The section regarding the role of the Health and Safety Group versus Corporate Management Team (highlighted in AP1 finding) should be reworded.</p>

Appendix 1 – Assurance Definitions

High	Substantial
<p>Our critical review or assessment on the activity gives us a high level of confidence on service delivery arrangements, management of risks, and the operation of controls and / or performance.</p>  <p>The risk of the activity not achieving its objectives or outcomes is low. Controls have been evaluated as adequate, appropriate and are operating effectively.</p>	<p>Our critical review or assessment on the activity gives us a substantial level of confidence (assurance) on service delivery arrangements, management of risks, and operation of controls and / or performance.</p>  <p>There are some improvements needed in the application of controls to manage risks. However, the controls have been evaluated as adequate, appropriate and operating sufficiently so that the risk of the activity not achieving its objectives is medium to low.</p>
Limited	Low
<p>Our critical review or assessment on the activity gives us a limited level of confidence on service delivery arrangements, management of risks, and operation of controls and / or performance.</p>  <p>The controls to manage the key risks were found not always to be operating or are inadequate. Therefore, the controls evaluated are unlikely to give a reasonable level of confidence (assurance) that the risks are being managed effectively. It is unlikely that the activity will achieve its objectives.</p>	<p>Our critical review or assessment on the activity identified significant concerns on service delivery arrangements, management of risks, and operation of controls and / or performance.</p>  <p>There are either gaps in the control framework managing the key risks or the controls have been evaluated as not adequate, appropriate or are not being effectively operated. Therefore the risk of the activity not achieving its objectives is high.</p>

Appendix 1 – Assurance Definitions

Action Priority	
High	<p>Immediate management attention is required - an internal control or risk issue where there is a high certainty of:</p> <ul style="list-style-type: none"> • substantial loss • non-compliance with corporate strategies, policies or values • serious reputational damage • adverse regulatory impact and/or material fines (action taken usually within 3 months).
Medium	<p>Timely management action is warranted - an internal control or risk issue that could lead to:</p> <ul style="list-style-type: none"> • financial loss • reputational damage • adverse regulatory impact, public sanction and / or immaterial fines (action taken usually within 6 to 12 months).



Disclaimer

The matters raised in this report are only those which came to our attention during our internal audit work. Our quality assurance processes ensure that our work is conducted in conformance with the UK Public Sector Internal Audit Standards and that the information contained in this report is as accurate as possible – we do not provide absolute assurance that material errors, fraud or loss do not exist.

This report has been prepared solely for the use of Members and Management of SKDC and details be made available to specified external organisations, including external auditors, but otherwise the report should not be used or referred to in whole or in part without prior consent. No responsibility to any third party is accepted as the report has not been prepared and is not intended for any other purpose.