

The Royal Society for the Prevention of Accidents



Bespoke Health and Safety Audit

**Derby Homes
839 London Road
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Derby,
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1. Executive Summary

The aim of the Bespoke Health and Safety Audit is to identify the current status of the Derby Homes Health and Safety Management System (HSMS) and workings practices carried out on an operational basis.

The Derby Homes HSMS is based upon a number of documents which were transferred with the operational sector of Derby Homes in 2010. Working practices are those which were transferred with the workforce.

The working and management practices observed and discussed were, in many areas, of a high standard with those involved clearly understanding the health and safety implication of their work.

The supporting documents unfortunately do not provide a framework for responsibility and accountability within Derby Homes and as such the probability of the current high standards of health and safety on site will be eroded.

The HSMS does provide a framework which will enable further development of the system. What was evident throughout the review was that numerous processes have been implemented previously, which have assisted in the foundations of a positive health and safety culture. These include risk assessments being carried out and training given.

The main concern regarding the existing documentation is that there is inadequate information regarding the “what, when, why, where, who and how” necessary to bring the health and safety management system to life and ensure the continuity of meaningful, timely improvements that have been made is not evident.

While this situation can be easily rectified through rewriting the existing procedures and introducing a number of new procedures; the current situation that exists is that actions to improve health and safety conditions are not widespread and are carried out through the application of experience opposed to being part of formalised allocated responsibilities.

Furthermore whilst the HSMS remains in this condition, the prioritisation of risk management resources, (time money and effort), in the workplace, while being well intentioned, will consequently be misplaced.

The key recommendations of this report are:

- *The production of written procedures to support the growth of the existing positive health and safety culture.*
- *Ownership of health and safety to be transferred to line management, calling on health and safety specialists for assistance when required.*
- *Within one month a full, comprehensive and prioritised risk assessment register should be produced for Derby Homes with target dates set for completion.*
- *A risk assessment procedure must be written and all involved trained in its requirements.*

To this end, further work on expanding the HSMS needs to be undertaken. This is illustrated in a range of actions identified by the audit which are described in more detail in this report.

These actions are clarified within a prioritised action plan which aims to ensure a sensible, risk based; approach is taken which ensures continuous improvement is achieved and a repeat of the recent enforcement action should be avoided. In addition Derby Homes will have the opportunity to achieve the internationally recognised OHSAS 18001 assessment standard.

2. Introduction

The Royal Society for the Prevention of Accidents ('RoSPA') was commissioned by Derby Homes to carry out a Bespoke Audit of its health and safety management system.

The Audit is primarily based on the HSE publication HSG 65 'Successful Health and Safety Management'. The system is also based on BS 8800 'Guidance on Occupational Health and Safety Systems', and the methodology of the review is that described in BS EN ISO 19011: 2002 for quality system auditing.

Traditional monitoring systems have focused on the reporting and investigation of accidents, together with detailed compliance inspections of workplaces. Research has shown, however, that in 70% of accidents the underlying causes have been failures in the health and safety management system (HSMS).

This review therefore concentrates on the HSMS, but also includes an examination of compliance with a number of key areas of legislation.

The traditional method of auditing paperwork was supplemented with a number of site visits to observe working practices within of Derby Homes

These visits were undertaken to Voids, Day to Day repairs including plumbing and joinery activities, Capital (kitchen refit) and Capital which included a visit to joiner carrying out work on a public building.

Interviews/discussions were held with a number of managers, staff, employees and Trade Union Health and Safety Representatives.

There is no intention to criticise individuals, but to examine and comment on the Derby Homes HSMS.

Although every effort was made to identify relevant documentation, it was the responsibility of the client to bring this to the attention of the Auditor.

Audits are by nature sampling exercises; therefore the Auditor cannot guarantee to identify all possible breaches of legislation or good practice.

Omission of any comment on particular issues should not be taken to imply full compliance with legislation.

The structure and aims of the review were presented at an opening meeting attended by Stuart Hufton, Senior Health and Safety Advisor.

The Audit was carried out using a question set which covers legal requirements and best practice approaches.

The Auditor obtained further evidence through considering existing organisational documents, observation of the workplace and discussion with staff. This rigorous approach allows the Auditor to obtain full appreciation of all aspects of the health and safety management system

Observations on the HSMS, together with detailed recommendations for improvement, follow in the body of the report. These are summarised into key recommendations in the form of an action plan.

3. Policy

The health and safety policy of an organisation is the lead document in the HSMS.

In addition to being a legal requirement; it should act as the mission statement for the organisation in describing its approach and commitment to health and safety, outlining responsibilities and arrangements.

The health and safety policy should consist of two levels of document; a short policy statement describing overall responsibility and commitments, followed by a larger document outlining specific responsibilities and general arrangements.

In the context of the latter, it may also either contain or refer to detailed health and safety arrangements (i.e. procedures).

3.1 Policy (General)

As part of the HSMS, a health and safety policy statement exists; this has recently been reviewed and is signed and dated by *the Group Chief Executive and Managing Director*.

3.2 Policy Commitments

The policy statement while clearly committing Derby Homes to achieving high standards of health and safety does not include a small number of the commitments which that the HSE would expect to see (as outlined in HSG 65 ‘Successful Health and Safety Management’).

Notwithstanding the above comments the policy statement is, in the opinion of the reviewer, well on track to fulfilling its potential role in setting the tone and direction for the rest of the management system.

Best practice suggests that a named individual is identified from the Board as having overall responsibility for health and safety. Derby Homes has not taken this approach.

It is recommended that:

- *The policy statement includes a comment regarding the importance of health and safety with respect to other business objectives;*
- *An individual from the board is identified as the person with overall responsibility for health and safety*
- *All of Derby Homes should be made aware of the Policy statement*

4. Organising

Any company or corporate body requires effective methods of organising its activities, which should include assigning responsibilities and describing arrangements for carrying out those activities.

The management of health and safety is no exception.

There is also a legal requirement to have arrangements for the planning, organisation, control, monitoring and review of preventive and protective measures (i.e. a health and safety management system).

The objectives of this section of the review are to establish the extent to which the organisation has assigned clear responsibilities for the arrangements referred to above, and whether formal organisational procedures have been developed for the following elements:

- Control of the Safety Management System,
- Co-operation with employees,
- Communications, and
- Competence.

These are identified in HSG 65 as the ‘building blocks’ of a sound health and safety culture.

4.1 Roles and Responsibilities

HSG 65 specifies three levels of responsibilities that should be assigned in an organisation, which it describes as:

- Policy makers – typically directors
- Planners – typically senior/middle managers
- Implementers – typically supervisors

The current HSMS currently in place at Derby Homes does approach the basic role descriptions for each topic covered.

The allocations of duties are identified therefore specific health and safety responsibilities that would be expected have been made clear.

An organogram representative of the structure within Derby Homes is currently being reproduced; this should be placed within the roles and responsibilities section of the existing HSMS.

Duties of employees are also considered in this section of the review, and in this regard the management system makes clear reference to their duties under the Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999.

It is recommended that:

- *The introduction of an organogram linked to the roles and responsibilities section of the HSMS*
- *The allocation of responsibilities and consequent role descriptions to clarify their positions as policy makers, planners or implementers;*
- *The role for those functioning as planners should include in particular the requirement to keep abreast of legislation and management practices, and establishing health and safety performance standards;*
- *That those assigned as implementers be made responsible for ensuring the allocation of resources for health and safety, and providing feedback on performance to senior management;*
- *That the relative duties of the person responsible for providing Health and Safety Management to be clarified and reflect the current and desired duties, using the guidance of inset 9 of HSG 65;*

4.2 Organisational Procedures

Any management system requires well-established and formal procedures, often known as Arrangements.

These arrangements should provide comprehensive guidance for the establishment and maintenance of line management control of the system, co-operation/consultation with employee representatives, dissemination of health and safety information and the development and maintenance of competency standards.

These documents should contain and help communicate the standards of performance expected from person's assigned responsibilities for implementation.

They should also guide monitoring and review of performance, and hence the continuing development of these standards.

A basic set of Arrangements exist which were written prior to the merger, while providing some practical advice these Arrangements do not provide the framework required to ensure the successful management of health and safety.

Procedures for Control of the HSMS

Under this heading are included procedures for the formulation and development of the HSMS, supervision and document control.

Within a HSMS, there should be a mechanism or procedure for the formulation and development of that system to ensure that it meets the requirements of the organisation and continues to do so.

The provision and extent of supervision is a fundamental part of the control mechanism of any organisation, and should seek to ensure that employees are provided with a level of supervision that is appropriate to their activities, level of expertise and any special needs they have.

In order to better control this issue, a number of requirements should be detailed which are of direct relevance to the activities of the department.

The controlled production and distribution of procedures and guidance documents is essential to ensure that all employees of the organisation operate to the same system and standards.

It is a concept recognised in the field of quality systems, and the requirement for such a discipline is equally pertinent when dealing with health and safety systems.

The existing system is largely controlled by the Senior Health and Safety Advisor.

Procedures for Co-operation

A vital part of any HSMS is the degree of co-operation and consultation between staff to ensure the implementation of the health and safety policy and the continuous improvement of the HSMS.

Apart from harnessing the skills and experience of staff at all levels, such consultation is a legal requirement, both for unionised and non-unionised personnel. This is usually achieved through a formal health and safety committee.

A health and safety committee exists primarily for consultation, and should be focused on the employees of the organisation.

Specialists, either from the workforce or elsewhere, could be called in to help the discussion and consideration of particular issues, but this should be on an occasional and non-voting basis for these people.

Other means of co-operation, such as safety circles (in a similar fashion to quality circles) or team briefing sessions could be used to consult further within the organisation.

Derby Homes carries out consultation with Unionised employees; this process should include representatives of Employee Safety from within the non-unionised section of the workforce.

Procedures for Communication

Another important element of any HSMS relates to obtaining and disseminating health and safety information. This can come from a variety of sources, internal and external, but arrangements for communication should cover information:

- a) Flowing into the organisation;
- b) Circulating within the organisation;

c) Flowing out of the organisation (to authorities, the public etc.).

The general health and safety information received comes through from the Senior Health and Safety Advisor.

A procedure, which allocates specific responsibility in this regard, is not in place.

Improvements in disseminating health and safety information could be made via the consultation groups referred to above, or other forms of regular briefings.

Procedures for Competence

This section of the review is not an examination of the actual level of competence of individuals, but rather the ability of the HSMS to develop and maintain the high level of personal competence required to meet organisation and personal responsibilities.

It looks at the procedures for identifying training needs, providing training, and the role and competence criteria for health and safety assistance (i.e. advisors/specialists).

Organisations need to systematically assess the training needs of their employees to maintain and develop personal competencies, and allow for specific needs to be addressed.

Unfortunately there was no evidence of a written procedure covering this topic.

Training should be provided in a structured manner, based on the needs of the organisation and any specific needs of individuals within it, to assist the effective implementation of policy and procedures.

The appointment of competent persons to assist the organisation in meeting its health and safety responsibilities is a legal requirement.

This is described as health and safety assistance, and can be provided by external or internal people.

Their profile and remits are detailed in inset 9 of HSG 65, and include the provision of advice and co-ordination on health and safety matters.

Procedural guidance given in a management system should address some specific duties that would be expected from safety advisors.

The competency criteria for health and safety specialists should include the ability to work with management, staff and employees throughout Derby Homes.

It is recognised that many of the following recommendations are typically Human Resource issues, however they do link into health and safety management.

It is recommended that:

- *Further development of the existing HSMS is undertaken with the production of Arrangements including roles and responsibilities as a priority;*
- *A procedure to be written to guide and control the formulation and development of the health and safety management system, to ensure that due account is taken of all*

factors involved to enable the required adaptation of the Health and Safety Management System to be accomplished.

- *Competency standards should be established for those undertaking supervision, where these are not adequately covered by the nature of the duties: (e.g. Permit to Work*
- *That required levels of supervision, identified by risk assessment, are detailed for all categories and circumstances of employees.*
- *A procedure, which allocates specific responsibility for health and safety communication is put in place.*
- *Improvements in disseminating health and safety information are made via the consultation groups referred to above, or other forms of regular briefings.*
- *A procedure be written to control the activities of recruiting or placing staff;*
- *This procedure should cover issues such as;*
 - *The training and competence of interviewers;*
 - *The criteria against which interviewees are assessed;*
 - *The keeping of accurate records;*
 - *The use of job descriptions or other similar documents;*
 - *Medical examinations before employment/resuming work after absence.*
- *A procedure, covering all staff, is developed to ensure that health and safety training needs, both initial and refresher, are identified;*
- *This procedure should specify the sources of information to be used in this assessment, which should be relevant to health and safety;*
- *The procedure should also address the various categories of employees in terms of any special or particular needs they might have;*
- *The procedure requires that training needs are prioritised according to risks encountered, and brought together in a training plan.*
- *Competencies are identified for health and safety roles within Derby Homes and to include the ability to work at all levels within the organisation.*

5. Planning and Implementation

5.1 The Planning Process

Planning is a key activity in the process of putting policy into effect and effectively managing risk control activities. Unfortunately it is often the weakest link in a HSMS. The review distinguishes between two categories of planning, i.e. corporate and operational.

Corporate Planning

Corporate planning is concerned with establishing and maintaining the policy, organisation and culture necessary for effective risk control at management level. It also includes actions to get the long term objectives integrated at functional and individual level. These objectives should encompass the following:

- a) Defining, developing and maintaining the health and safety policy;
- b) Developing and maintaining organisational arrangements; and
- c) Developing and maintaining systems of risk control to meet defined performance criteria.

It is envisaged that the Board of Derby Homes will introduce Annual Health and Safety objectives.

It is recommended that:

- *A formal procedure be developed for health and safety planning, including the following factors;*
 - *Assignment of responsibility for planning;*
 - *Establishing sources of information and advice;*
 - *Establishing planning priorities;*
 - *Outcomes from the planning process (strategy, objectives, and targets).*
 - *Production of annual health and safety objectives for Derby Homes*

Operational Planning

Operational planning is concerned with the implementation of corporate plans through the assessment of the risks arising from work activities, plus the establishment and maintenance of suitable control measures.

The system does not formally consider the assessment of health risks, defining the competencies of assessors and referring to relevant sources of information, or specifying the use of specialised techniques in certain case (e.g. Display Screen Equipment, Manual Handling and Noise etc).

The results of the risk assessments need to be clearly linked into issues such as training and equipment and work design. It is as important to make these links as to carry out the assessments so that the exercise is meaningful, rather than just be seen as a bureaucratic necessity.

There was evidence of previous implementation, albeit a number of years ago, and progress is required in ensuring the assessments are “suitable and sufficient”.

It is recommended that:

- *As part of the overhaul of the HSMS suggested throughout this report, a risk assessment procedure is written.*
- *Within this process, procedures are designed to specify the use of the results of the risk assessments (e.g. training, inspections, maintenance);*
- *Workshops or other forms of training are used to inform and train those charged with carrying out risk assessments;*
- *The existing risk assessments are reviewed following introduction of the re-written risk assessment procedure.*
- *Review dates are set for all risk assessments*
- *A full risk assessment register is produced across all business departments.*

5.2 Implementation of Organisational Procedures

This section of the review examines the way in which the organisation has put procedures (Arrangements), into practice. It is therefore concerned with what people actually do, rather than what is written to guide them.

It is important to bear in mind that the intention of the reviewer was to consider both procedures and their implementation, comparison is made to legal requirements and best practice. The methodology differs from quality auditing in this respect.

Implementation of Procedures for Control

This section of the review examines the implementation of the control procedures identified in the ‘Organising’ section of the Audit.

The production and implementation of Procedures ensuring the control of all activities must be given a high priority to ensure that progress does not stall.

Implementation of Procedures for Co-operation

Progress must be made in ensuring that legally required consultation issues are addressed. Consideration should be given to employee representation at health and safety meetings.

Implementation of Procedures for Communication

Health and safety information is obtained principally through Senior Health and Safety Advisor. The breadth of health and safety information should be expanded with completion of the risk assessments, enabling the results of these to be disseminated

Implementation of Procedures for Competence

A structured procedure for this topic would help to better control this process, and ensure that training needs are highlighted for all categories of staff, including those with special needs. The defining of health and safety competencies (based on the findings of risk assessments) would also assist in the selection of staff, their promotion or re-deployment.

Adopting a more structured and consistent approach than at present such as the use of, training plans and reviewing the effectiveness of such training could improve provision of health and safety training.

The reviewer considers that sufficient technical safety competence already exist, however experience and the skills required for working with front line employees and targeting improvements in such a working environment were not clearly displayed.

It is recommended that:

- *The outputs from the planning process recommended earlier are fed into the controlled development of the health and safety management system along the lines suggested above.*
- *A wider range of staff are involved in the implementation and review of procedures;*
- *Employee consultation procedures and processes are introduced.*
- *Implementation of competence matrices is carried out*
- *General Health and Safety awareness training is completed*
- *Identification of specific training needs is carried out*
- *Competence criteria are defined for safety assistance to help ensure a consistent approach.*
- *Further health and safety assistance is sought to assist in ensuring improvements are implemented within the workforce.*

5.3 Risk Management Samples

As part of the Audit, several areas of legislative requirements are considered in relation to the client. These are selected on the basis that they should apply to all organisations to some extent, and therefore provide a measure of how well the organisation is managing specific legal requirements. They can be equated to the Risk Control Systems referred to in HSG 65, which are systems designed to address particular areas of risk that may not be adequately covered by the general health and safety management system.

The risk management samples are examined in terms of both procedural control and actual implementation. As is stated earlier many more managerial actions to ensure good levels of health and safety are carried out, however these do not formally form part of the HSMS.

Apart from the issue of the management of Contractors specific legal requirements exist for the other identified areas which must be met.

Risk Assessment

The Management of Health and Safety at Work Regulations 1999 key requirement is to carry out risk assessments.

The process of risk assessment has not been pursued since the merger in 2010. The introduction of specific targets for each department, the first target being the production of a prioritised risk assessment register with target dates for completion of the assessments, should be implemented.

It is recommended that;

- *the production of a prioritised risk assessment register with target dates for completion is produced by BI, Milling and Engineering*
- *Training is provided to risk assessors as necessary*
- *Revised guidance is used when carrying out the risk assessments*

Manual Handling

Limited procedural guidance on manual handling is given in the HSMS, incorporating some of the requirements of legislation. There was some evidence available of manual handling assessments having been carried out, mainly within the general risk assessment process.

Manual handling training has been provided previously in some areas of Derby Homes; however records of this training were not available.

It is recommended that;

- *Procedural guidance is increased to ensure legal compliance with the Manual Handling Operations Regulations (as amended)1992;*
- *A full survey of manual handling tasks is carried out;*
- *Manual Handling Assessments based on the survey are completed/carried out.*
- *Manual handling assessors are trained in the manual handling risk assessment process.*
- *Training records are kept and maintained.*

The Control of Substances Hazardous to Health (COSHH)

Limited procedural guidance is available on the requirements of CoSHH. CoSHH assessments have been produced in the past, these should be reviewed.

It is recommended that;

- *Further CoSHH procedural guidance is produced;*
- *A survey of hazardous substances in use is carried out;*
- *A register is kept and maintained of hazardous substances;*
- *Further CoSHH assessments are carried out as necessary.*
- *Ensure all Local Exhaust Ventilation systems are maintained on a minimum of a 14 month period.*
- *CoSHH assessments should be requested from Contractors*

Management of Fire Risk and Other Emergency Situations

This topic appeared to be well managed; however a comprehensive fire risk assessment must be carried out for the London Road Depot.

Induction arrangements are used to introduce new workers to all emergency procedures. As in other areas of the review the existing guidance requires improvement. Regular tests and inspections and practice of emergency procedures are carried out, however the recording and record keeping of these activities are not sufficient.

First aid is also covered in the Audit question set, similar standards were identified. The only improvement required currently is to re-write the First Aid guidance and to implement the new procedure.

It is recommended that:

- *The Fire procedure is rewritten and implemented*
- *The First Aid procedure is rewritten and implemented*

Control of Contractors, Agency Staff and Visitors

The methodology of controlling such work appeared to largely comply with legislation; however this control appeared successful through the excellent knowledge of the managers involved.

A more systematic assessment of Contractor safety system and performance prior to award of contracts should be carried out.

It is recommended that;

- *The procedure for contractor and visitor management is enhanced to ensure all persons responsible for contractors and visitors are aware of and satisfy their duties. (i.e. induction, inspections, PTW application, performance review etc)*

Other Legislative and Best Practice Requirements

During the audit a number of procedures were considered, all of which offered excellent practical guidance, however the documents did not provide a structured approach to ensure consistent management of health and safety issues. The following is an overview of the situation with regard to legislative and best practice requirements.

A number of legislative and best practice requirements need to be addressed through the introduction and implementation of new procedures, these are, with a brief overview of the practical needs and current actions being taken;

- Health and Safety (Display Screen Equipment) Regulations 1992 – requirement to assess all DSE user workstations and equipment. Minimal action has been taken so far, although self assessment forms are used by employees.
- Workplace (Health, Safety and Welfare) Regulations 1992- requirement to ensure the workplace is kept in good condition with regard to issues such as temperature, lighting and welfare facilities. Practical application appears to be well covered in these areas although housekeeping issues were identified particularly in external areas.
- Electricity at Work Regulations 1989 – requirement to ensure the safety of all fixed and portable electrical systems or equipment. Portable appliance testing has been undertaken and the Engineering Manager has made arrangements for the testing of fixed systems.
- Noise at Work Regulations 2005- requirements to carry out noise assessments. While the use of hearing protection is widespread formal noise assessments have not been undertaken, this should be rectified.

- Provision and Use of Work Equipment Regulations 1998- requirement to ensure safety in the provision and use of work equipment, this includes maintenance. Ladders, Lift Trucks, Machinery, Racking and hand tools are covered by these regulations. Formal procedures must be written to support the practices already carried out such as ladder inspections.
- Work at Height Regulations 2005- Assessment required of all work at height. Minimal procedural action noted in this area, although ladder safety notices are posted and safe systems of work in place for some activities. It was noted that harnesses and gantries are used for access in a number of areas.
- Control of Asbestos at Work Regulations 2006 – assessment of the location of asbestos in all workplaces. Asbestos register is in place for public buildings and other information is communicated as required. Asbestos training should be given/completed and records maintained..
- Health and Safety (Personal Protective Equipment) Regulations 1992- actions taken need to be supported by written guidance. Practical application was noted as very good.

Other best practice areas to address are:

- Workplace Transport – a workplace transport risk assessment is required for the London Road Depot. This is a recognised high risk is within industry and as such risk assessments of vehicular movement should be undertaken. This action should be considered a high priority.

Lone working – procedure to be enhanced and all involved to adhere to its requirements.

The above list is not exhaustive and it is expected that following implementation of the risk assessment procedure further issues may be identified.

It is recommended that;

- *Each of the legislative requirements identified in this report are addressed through the writing and implementation of procedures.*
- *Those procedures requiring risk assessments are produced and implemented first.*
- *The existing procedures are re-written and include managerial and staff roles and responsibilities to ensure consistent management of all health and safety issues.*
- *Best practice requirements identified in this report are addressed through the writing and implementation of procedures.*

- *Workplace Transport – risk assessment are carried out on London Roadt.*

5.3 Operational activities

During the visits to site a variety of issues were discussed which require consideration for inclusion in the HSMS. It should be clearly stated that during the visits to site the standards of behaviour of all involved was exceptional.

Lone working – when tasks are identified via risk assessment as required to be covered by a lone worker policy, those involved should not have a choice as to participating with the requirements, but are legally obliged to do so.

Housekeeping on tenants properties- more effort needs to be made on behalf of Derby Homes in ensuring that those tenants requiring the services of Derby Homes employees are given every opportunity to ensure the rout to the working area and the immediate working area are free of slip, trip and fall hazards as well as keeping children and animals clear.

This can be better achieved through inclusion of health and safety information on the initial appointments letter; this can be followed up via text nearer the time of the appointment. The employee carrying out the work should ring prior to the visit and reiterate the need to ensure good housekeeping. Apart from the enhanced safety provision the likelihood of Derby Homes employees making unnecessary journeys will decrease.

Specific Risk Assessments- In many situations such as kitchen fitting the supervisor must make every effort to risk assess this planned work. Generic assessments are unlikely to satisfy legal requirements when adequate time has been available to plan the work. These risk assessments should be supported by the provision of information to the employees via the production of safe systems of work, team briefings etc

It is recommended that:

- *Lone working is part of the core health and safety function and all employees effected by it should work to the policy.*
- *More effort is made by Derby Homes in requesting good housekeeping at properties near the time of the visit.*
- *Specific risk assessments are carried out for longer duration work such as kitchen refits amd work on public buildings*

6. Measuring Performance

In order to monitor health and safety performance to identify strengths and weaknesses, and areas for improvement, an organisation needs to operate systems to collect relevant data and statistics. This will also provide crucial information for planning and review activities. Such systems are, in addition, a legal requirement.

6.1 Active Monitoring

Active monitoring systems, deal with the assessment of the state of the HSMS and the identification of deficiencies through active processes. They include:

- a) Inspections of premises;
- b) Safety tours by senior managers;
- c) Examination of documentation;
- d) Health and safety attitude and behaviour questionnaires.
- e) Occupational Health Monitoring

Involvement of workforce representatives in the monitoring process is crucial to identifying improvements at London road and on work sites around the city. As discussed earlier in this report worker involvement is crucial in ensuring a positive health and safety culture exists in the workplace. This role is traditionally fulfilled by a Trade Union health and safety representative.

It is recommended that:

- *Procedures for active monitoring are introduced and the production of checklists relevant to and, based on the results of risk assessments including occupational health aspects;*
- *Basic awareness training is conducted for those people charged with the responsibility of undertaking inspections;*
- *A system for monitoring the correct use and completion of health and safety documentation including the “closing out” of issues to be developed.*
- *Involvement of workforce representatives in inspections etc*

6.2 Reactive Monitoring

Reactive monitoring includes the identification and reporting of:

- a) Accidents causing injury or property damage;
- b) Occupational ill health;
- c) Near-miss incidents and unsafe situations;
- d) Other incidents causing loss to the organisation.

Reactive monitoring systems at Derby Homes are in place and include accident reporting. The success of the reporting system has not been measured.

A detailed reporting and investigation procedure is required to move this issue forward. Accident and investigation reporting still have a significant part to play in the whole HSMS.

It is recommended that:

- *A formal procedure for accident reporting and investigation is produced.*

7. Audit and Performance Review

The last two elements of the health and safety management system structure examined in the review relate to the activities of the organisation in auditing its HSMS and reviewing its overall performance.

7.1 Audit

In the context of HSG 65, an audit is the systematic examination of the efficiency and effectiveness of the health and safety management system, identifying strengths and areas for improvement.

In a similar way to a quality system audit, it examines not only how well the system is operating but also how suitable that system is for addressing health and safety requirements.

It is the umbrella activity that may include workplace inspections, but operates at a higher and more systemic level.

It is thus important to make the distinction between audits and inspections when considering this issue.

Audit protocols will differ between organisations, but the methodology described in ISO 19011 for quality auditing provides a good benchmark.

Regular system auditing is recognised by HSG 65 as being essential to monitor the operation of the HSMS and ensure that any organisational deficiencies are identified and addressed.

It is recognised at Derby Homes that Auditing will be required as the HSMS develops.

Consideration of applying for accreditation to OHSAS 18001 could form part of the continuous improvement programme with additional benefits through gaining this recognised standard.

It is recommended that:

- *A procedure is generated and added to the management system for auditing the HSMS, which follows the methodology of ISO 19011, and examines the elements of the system (policy, organising, planning and implementation, measuring performance, audit and review);*
- *Regular audits of the HSMS are undertaken to monitor its operation and identify any areas for improvement or resolution (intervals of two years are suggested for full audits);*

7.2 Review

A review is a formal process of examining the various data collected by the HSMS monitoring and auditing activities, the achievement of objectives, the development and current state of the HSMS, and any other information to assess where the organisation is now, and where it should be.

This can then be fed back into policies, procedures and plans to ensure not only compliance with legislation and standards, but to promote the continuous improvement recommended in HSG 65.

In this context, review covers:

- a) Assessment of the degree of compliance with organisational procedures;
- b) Identification of activities where procedures either do not exist or provide inadequate guidance;
- c) Assessment of the achievement of specific objectives;
- d) Examination of accident, ill health and incident data, accompanied by the analysis of both immediate and underlying causes, trends and common features.

The HSMS does not identify a form of review of the procedural system, with (at least) annual review of legislative requirements.

Review at the various management levels, and using certain monitoring information, is the preferred method for undertaking this activity.

It is recommended that:

- *A procedure for formal review of the HSMS be developed, taking into account the following factors;*
 - Review at the different levels of safety management;*
 - Utilising information from monitoring and auditing systems, internal feedback mechanisms and appropriate external sources;*
 - Specifying key performance indicators, as per page 74 of HSG 65, to be used in the review process;*
 - The facility for bench-marking;*
 - How remedial actions should be managed;*
- *This procedure should then be implemented, using this report as the basis for the first review.*

8. Action Plan

Although there are many recommendations made they are prioritised as following:

Priority	Implementation Time
High	0-3 Month
Medium	3 Months – 1 year
Low	1 - 3 years
Continuous	On-going actions required to ensure the HSMS is adapted as necessary.

It may be found that various issues may be completed well within the above criteria due to ease of implementation.

Recommendations for policy	Priority
➤ The policy statement includes a comment regarding the importance of health and safety with respect to other business objectives;	H
➤ An individual from the board is identified as the person with overall responsibility for health and safety	H
➤ All of Derby Homes should be made aware of the Policy statement	H

Recommendations for organising for Health and Safety	Priority
➤ The introduction of an organogram linked to the roles and responsibilities section of the HSMS	H
➤ The allocation of responsibilities and consequent role descriptions to clarify their positions as policy makers, planners or implementers;	H
➤ The role for those functioning as planners should include in particular the requirement to keep abreast of legislation and management practices, and establishing health and safety performance standards;	M
➤ That those assigned as implementers be made responsible for ensuring the allocation of resources for health and safety, and providing feedback on performance to senior management;	M
➤ That the relative duties of the person responsible for providing Health and Safety Management to be clarified and reflect the current and desired duties, using the guidance of inset 9 of HSG 65;	M

Recommendations for Organisational Procedures	priority
➤ Further development of the existing HSMS is undertaken with	M

the production of Arrangements including roles and responsibilities as a priority;	
➤ A procedure to be written to guide and control the formulation and development of the health and safety management system, to ensure that due account is taken of all factors involved to enable the required adaptation of the Health and Safety Management System to be accomplished.	M
➤ Competency standards should be established for those undertaking supervision, where these are not adequately covered by the nature of the duties: (e.g. Permit to Work)	M
➤ That required levels of supervision, identified by risk assessment, are detailed for all categories and circumstances of employees.	M
➤ A procedure, which allocates specific responsibility for health and safety communication is put in place.	M
➤ Improvements in disseminating health and safety information are made via the consultation groups referred to above, or other forms of regular briefings.	C
➤ A procedure be written to control the activities of recruiting or placing staff;	M
<u>This procedure should cover issues such as;</u>	
<i>-The training and competence of interviewers;</i>	
<i>-The criteria against which interviewees are assessed;</i>	
<i>-The keeping of accurate records;</i>	
<i>-The use of job descriptions or other similar documents;</i>	
<i>-Medical examinations before employment/resuming work after absence.</i>	
➤ A procedure, covering all staff, is developed to ensure that health and safety training needs, both initial and refresher, are identified;	M
➤ This procedure should specify the sources of information to be used in this assessment, which should be relevant to health and safety;	M
➤ The procedure should also address the various categories of employees in terms of any special or particular needs they might	M

<p>have;</p> <p>➤ The procedure requires that training needs are prioritised according to risks encountered, and brought together in a training plan</p>	M
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Recommendations for Planning and Implementation	priority
<p><u>Corporate</u></p> <p>➤ A formal procedure be developed for health and safety planning, including the following factors;</p> <p>-Assignment of responsibility for planning;</p> <p>-Establishing sources of information and advice;</p> <p>-Establishing planning priorities;</p> <p>-Outcomes from the planning process (strategy, objectives, and targets).</p> <p>-Production of annual health and safety objectives for Derby Homes</p>	M
<p><u>Operational</u></p> <p>➤ As part of the overhaul of the HSMS suggested throughout this report, a risk assessment procedure is written.</p>	H
<p>➤ Within this process, procedures are designed to specify the use of the results of the risk assessments (e.g. training, inspections, maintenance);</p>	M/L
<p>➤ Workshops or other forms of training are used to inform and train those charged with carrying out risk assessments;</p>	M
<p>➤ The existing risk assessments are reviewed following introduction of the re-written risk assessment procedure.</p>	H/M
<p>➤ Review dates are set for all risk assessments</p>	H

Recommendations implementation of Organisational Procedures	Priority
<p>➤ The outputs from the planning process recommended earlier are fed into the controlled development of the health and safety management system along the lines suggested above.</p>	C

➤ A wider range of staff are involved in the implementation and review of procedures;	C
➤ Employee consultation procedures and processes are introduced.	H
➤ Implementation of competence matrices is carried out	M
➤ General Health and Safety awareness training is completed	M
➤ Identification of specific training needs is carried out	M
➤ Competence criteria are defined for safety assistance to help ensure a consistent approach	H
➤ Further health and safety assistance is sought to assist in ensuring improvements are implemented within the workforce.	H

Recommendations for Planning and implementation of Risk Management Samples	Priority
<p><u>Risk Assessment</u></p> <ul style="list-style-type: none"> ➤ the production of a prioritised risk assessment register with target dates for completion is produced by BI, Milling and Engineering ➤ Training is provided to risk assessors as necessary ➤ Revised guidance is used when carrying out the risk assessments <p><u>Manual Handling</u></p> <ul style="list-style-type: none"> ➤ Procedural guidance is increased to ensure legal compliance with the Manual Handling Operations Regulations (as amended)1992; ➤ A full survey of manual handling tasks is carried out; ➤ Manual Handling Assessments based on the survey are completed. ➤ Manual handling assessors are trained in the manual handling risk assessment process. ➤ Training records are kept and maintained. <p><u>The Control of Substances Hazardous to Health (CoSHH)</u></p>	<p>H</p> <p>M/C</p> <p>C</p> <p>M</p> <p>M</p> <p>M/L</p> <p>M</p> <p>C</p>

<ul style="list-style-type: none"> ➤ Further CoSHH procedural guidance is produced; ➤ A survey of hazardous substances in use is carried out; ➤ A register is kept and maintained of hazardous substances; ➤ Further CoSHH assessments are carried out as necessary. ➤ Ensure all Local Exhaust Ventilation systems are maintained on a minimum of a 14 month period. ➤ CoSHH assessments should be requested from Contractors. 	<p>M</p> <p>M</p> <p>C</p> <p>C</p> <p>C</p> <p>C</p>
<u>Management of Fire Risk and Other Emergency Situations</u>	
<ul style="list-style-type: none"> ➤ The Fire procedure is rewritten and implemented ➤ The First Aid procedure is rewritten and implemented 	<p>M</p> <p>M</p>
<u>Control of Contractors, Agency Staff and Visitors</u>	
<ul style="list-style-type: none"> ➤ The procedure for contractor and visitor management is enhanced to ensure all persons responsible for contractors and visitors are aware of and satisfy their duties. (I.e. induction, inspections, PTW application, performance review etc) 	<p>M</p>

Recommendations for Planning and implementation of other legislative requirements	Priority
<ul style="list-style-type: none"> ➤ Each of the legislative requirements identified in this report are addressed through the writing and implementation of 	M

procedures.	H
➤ Those procedures requiring risk assessments are produced and implemented first.	M
➤ Best practice requirements identified in this report are addressed through the writing and implementation of procedures.	H
➤ The PTW process is reviewed as part of the continuous improvement process.	H
➤ Workplace Transport – risk assessment are carried out including loading areas and vehicular movement.	H
➤ Lone working is part of the core health and safety function and all employees effected by it should work to the policy.	H
➤ More effort is made by Derby Homes in requesting good housekeeping at properties near the time of the visit.	H
➤ Specific risk assessments are carried out for longer duration work such as kitchen refits amd work on public buildings	

Recommendations for Measuring Performance	<i>Priority</i>
<p><u>Active Monitoring</u></p> <ul style="list-style-type: none"> ➤ Procedures for active monitoring are introduced and the production of checklists relevant to and, based on the results of risk assessments including occupational health aspects; ➤ Basic awareness training is conducted for those people charged with the responsibility of undertaking inspections; ➤ A system for monitoring the correct use and completion of health and safety documentation including the “closing out” of issues to be developed. ➤ Involvement of workforce representatives in inspections etc. <p><u>Reactive Monitoring</u></p> <ul style="list-style-type: none"> ➤ A formal procedure for accident reporting and investigation is produced. 	<p>H</p> <p>H</p> <p>H</p> <p>H</p> <p>H</p>

Recommendations for Audit and Review	priority
<p><u>Audit</u></p> <ul style="list-style-type: none"> ➤ A procedure is generated and added to the management system for auditing the HSMS, which follows the methodology of ISO 19011, and examines the elements of the system (policy, organising, planning and implementation, measuring performance, audit and review); ➤ Regular audits of the HSMS are undertaken to monitor its operation and identify any areas for improvement or resolution (intervals of two years are suggested for full audits); <p><u>Review</u></p> <ul style="list-style-type: none"> ➤ A procedure for formal review of the HSMS be developed, taking into account the following factors; <ul style="list-style-type: none"> -Review at the different levels of safety management; -Utilising information from monitoring and auditing systems, internal feedback mechanisms and appropriate external sources; -Specifying key performance indicators, as per page 74 of HSG 65, to be used in the review process; -The facility for bench-marking; -How remedial actions should be managed; ➤ This procedure should then be implemented, using this report as the basis for the first review. 	<p>M/L</p> <p>C</p> <p>M</p> <p>C</p>

9. Acknowledgements

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