CITY OF LONDON

Corporate Services Committee

Date:	**WEDNESDAY, 23 OCTOBER 2024**
Time:	**1.45 pm**
Venue:	**COMMITTEE ROOM - 2ND FLOOR WEST WING, GUILDHALL**

Members:	
Deputy Alastair Moss (Chair)	Alderwoman Dame Susan Langley
Florence Keelson-Anfu (Deputy Chair)	Gregory Lawrence
	Deputy Edward Lord
Deputy Randall Anderson	Catherine McGuinness
Deputy Keith Bottomley	Timothy McNally
Alderman Sir Charles Bowman	Benjamin Murphy
Deputy Henry Colthurst	Mandeep Thandi
Anthony David Fitzpatrick	James Tumbridge
Steve Goodman	Philip Woodhouse
Deputy Christopher Hayward	

Enquiries:	**John Cater**
	John.Cater@cityoflondon.gov.uk

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https://www.youtube.com/@CityofLondonCorporation/streams

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

Whilst we endeavour to livestream all of our public meetings, this is not always possible due to technical difficulties. In these instances, if possible, a recording will be uploaded following the end of the meeting.

Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

NB: Certain items presented for information have been marked * and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These for information items have been collated into a supplementary agenda pack and circulated separately.

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**
   To agree the public minutes and non-public summary of the meeting held on 11th September 2024.

   For Decision
   (Pages 5 - 10)

4. **HEALTH & SAFETY UPDATE**
   Report of the Deputy Town Clerk.

   For Information
   (Pages 11 - 42)

5. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

6. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

7. **EXCLUSION OF THE PUBLIC**
   MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

   For Decision

Part 2 - Non-Public Agenda

8. **NON-PUBLIC MINUTES**
   To agree the non-public minutes of the meeting held on 11th September 2024.

   For Decision
   (Pages 43 - 46)

9. ***CASUAL WORKERS PENSIONS ARRANGEMENTS**
   Joint Report of the Chamberlain and the Executive Director of Human Resources & Chief People Officer.

   For Information

10. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Part 3 - Confidential Agenda

12. **CONFIDENTIAL MINUTES**
    To agree the Confidential minutes of the last meeting held on 11th September 2024.

    For Decision

13. **CITY BRIDGE FOUNDATION STAFFING**
    Report of the Acting Managing Director, City Bridge Foundation.

    For Decision

14. **DESTINATION CITY STAFFING**
    Report of the Deputy Town Clerk.

    For Decision

15. **MANSION HOUSE STAFFING**
    Report of the Executive Director of Mansion House, Private Secretary to the Lord Mayor.

    For Decision

16. **MUSIC EDUCATION ISLINGTON DEPARTMENT (GUILDHALL SCHOOL OF MUSIC AND DRAMA) STAFFING**
    Report of the Principal, Guildhall School of Music & Drama.

    For Decision

17.   **AMBITION 25**
       Report of the Executive Director of Human Resources & Chief People Officer.

                                                          For Information

18.   **TOWN CLERK'S UPDATE**
       The Town Clerk to be heard.

                                                          For Information

CORPORATE SERVICES COMMITTEE
Wednesday, 11 September 2024

Minutes of the meeting of the Corporate Services Committee held at Guildhall on
Wednesday, 11 September 2024 at 1.45 pm

Present

Members:
Deputy Alastair Moss (Chair)
Florence Keelson-Anfu (Deputy Chair)
Deputy Randall Anderson
Deputy Keith Bottomley
Deputy Henry Colthurst
Anthony Fitzpatrick
Steve Goodman
Deputy Christopher Hayward
Alderwoman Dame Susan Langley
Gregory Lawrence
Deputy Edward Lord
Catherine McGuinness
Mandeep Thandi
James Tumbridge
Philip Woodhouse

Observer
Benjamin Murphy

Officers:

Ian Thomas	-	Town Clerk
Gergory Moore	-	Deputy Town Clerk
Dionne Corradine	-	Chief Strategy Officer
Alison Littlewood	-	Executive Director of Human Resources & Chief People Officer
Simon Gray	-	Chamberlain's Department
Mark Javis	-	Chamberlain's Department
Sonia Virdee	-	Chamberlain's Department
Alix Newbold	-	City of London Police
Robert Murphy	-	City Surveyor's Department
Matthew Cooper	-	Communications Department
Dan Sanders	-	Community and Children's Services Department
Frank Marchione	-	Comptroller & City Solicitor's Department
Colette Hawkins	-	Human Resources Department
Fay Johnstone	-	Human Resources Department
Thomas Kennedy	-	Human Resources Department
Adeola Lawal	-	Human Resources Department
Kaye Saxton Lea	-	Human Resources Department
Cindy Vallance	-	Human Resources Department

Dionne Williams-Dodoo	-	Human Resources Department
Polly Dunn	-	Town Clerk's Department
Oliver Sanandres	-	Town Clerk's Department
John Cater	-	Town Clerk's Department

1. **APOLOGIES**

In advance of the meeting, formal apologies were received from Timothy McNally and Benjamin Murphy.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations of interest.

3. **MINUTES**

RESOLVED – that the draft public minutes and non-public summary of the meeting of the Committee held on Wednesday, 3 July 2024 be approved as an accurate record.

4. **WORKPLACE ATTENDANCE**

The Committee considered a Report of the Executive Director of Human Resources & Chief People Officer concerning the City Corporation's Workplace Attendance Policy.

After opening remarks from the Town Clerk and the Chief People Officer & Executive Director of Human Resources, several Members issued their support for the paper and the retention of the minimum three day per week (60%) workplace attendance frequency for City employees in the hybrid and academic categories. It was clear that, post-pandemic, the norms around working patterns had changed fundamentally across the world and, in order to operate successfully in a highly competitive market for talented individuals, the organisation had to provide a competitive offer, both to retain and recruit the right people.

It was also vital, given that the amended workplace attendance policy had only been implemented on 2 September, to provide some stability to members of staff on a matter which had attracted a substantial amount of uncertainty over the past couple of years. In addition, the recent Staff Survey results had indicated significant opposition from the workforce for any further increases to the workplace attendance rate at this time. Members did, however, note the unfortunate wording in paragraph 18 of the Report concerning the potential for damage to staff engagement and member reputations should the recommendations in the Report be rejected and suggested that it was inappropriate to cast Members against Staff in this manner.

Whilst accepting the rationale for retaining the workplace attendance policy frequency, a Member highlighted that a large number of City Corporation staff, often on the operational frontline, were attending their designated workplace five days per week, whilst often being managed by individuals in the hybrid category (i.e., attending the workplace three days per week and working remotely for the remaining two days), this imbalance needed careful and

thoughtful consideration, particularly around managing performance and fostering an inclusive culture.

Members were also cognisant of the government's potential changes to employment legislation, particularly around flexible working rights and the likely knock-on impact these changes would have on the volume of flexible working requests should the policy for the Hybrid/Academic category be increased from a minimum of three days per week. Further updates on legislative changes will be submitted to the Corporate Services Committee in the coming months.

Several Members expressed their unease with the minimum three-day frequency, citing the recent employment statistics which indicated a slowdown in the jobs market, a Member suggested that the City would be operating in a less competitive market in the coming year and that the organisation should therefore be more bullish in bringing people back to the workplace. In addition, the Member pointed out. it was apparent that excessive home working was damaging to mental wellbeing and the City had a duty of care to employees to specify a greater degree of workplace attendance. The Member suggested that the Policy should be reviewed again in six months' time.

Separately a Member queried officers about when there would be more productivity data available for the Committee to consider and suggested that, fundamentally, the Workplace Policy should sit alongside Ambition 25 as a way in which the organisation could retain and recruit the best people.

A Member stressed the importance of monitoring the market to ensure that the organisation was able to shift to changes to patterns and norms.

In summary, the Committee was minded to retain the Policy as it stood; on behalf of the Committee, the Chair expressed his gratitude to all members of staff for their patience with these matters and thanked them for continuing to go above and beyond and consistently providing an excellent and world-class service.

RESOLVED – that the Committee:

- Made no changes at this time to the current Workplace Attendance Policy which was implemented on the 1 September 2024.

- Approved a further review in line with established policy review processes.

5. **REVENUE OUTTURN 2023-24**
   The Committee received a Joint Report of the Deputy Town Clerk, the Chief Strategy Officer, the Comptroller & City Solicitor, the Executive Director of Human Resources & Chief People Officer, and the Chamberlain concerning a comparison between the revenue outturn for the services overseen by the Corporate Services Committee in 2023-24 with the final budget for the year.

RESOLVED – that the Committee noted the Report.

6. **ENTERPRISE RESOURCE PLANNING (ERP) PROGRAMME UPDATE**
The Committee received a Joint Report of the Chamberlain and the Executive Director of Human Resources & Chief People Officer concerning an update for the Enterprise Resource Planning (ERP) Programme.

RESOLVED – that the Committee noted the Report.

7. **UPDATE ON MANDATORY TRAINING**
The Committee received a Report of the Executive Director of Human Resources & Chief People Officer concerning the proposed changes to mandatory training at the City Corporation.

RESOLVED – that the Committee noted the Report.

8. **UPDATE ON WELLBEING AND BELONGING WORKSTREAM INITIAL ACTIVITIES**
The Committee received a Report of the Executive Director of Human Resources & Chief People Officer concerning the initial activities for the Wellbeing and Belonging Workstream of the People Strategy.

RESOLVED – that the Committee noted the Report.

9. **COMMITTEE'S FORWARD PLAN**
The Committee receive a Report of the Executive Director of Human Resources & Chief People Officer outlining the Forward Work Plan for the Committee.

RESOLVED – that the Committee noted the Report.

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no public questions.

11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There were two items of additional business which the Chair considered urgent whilst in public.

1. The Executive Director of Human Resources & Chief People Officer informed the Committee that an article had recently been posted on the MyLondon news website which highlighted some of the results from the City Corporation's 2024 Staff Survey, namely, that 10% of Survey respondents had said that they had experienced bullying, harassment or discrimination over the past year and "that just 27 per cent of respondents agreed with the sentiment: 'Members demonstrate our values and behaviours including leading for Equity, Equality, Diversity and Inclusion', with 26 per cent disagreeing and 46 per cent neutral".

Officers assured Members that a great deal of work was going into rectifying the challenges which were highlighted in the Survey; the People Strategy would

be at the vanguard of efforts to build an inclusive culture, and all were committed to making the Corporation the best employer it could be.

2. The Executive Director of Human Resources & Chief People Officer informed the Committee that the City Corporation's Employee Assistance Provider (EAP), Health Assured, had recently had their British Association for Counselling and Psychotherapy (BACP) accreditation suspended due to a BBC investigation carried out in the summer which had found that Health Assured allowed strangers to "eavesdrop" on confidential calls by listening in to the helpline without the knowledge or permission of callers.

In response, and as a priority, the City Corporation had sought information from Health Assured, it was unfortunate that Health Assured had not been more proactive in reaching out to the City Corporation and it was apparent that they were not a partner that the City would wish to continue to partner with; communications about next steps would be going out to colleagues imminently. A Member reminded officers that Health Assured had also provided assistance to elected Members and asked that the rest of the Court was kept informed going forwards.

12. **EXCLUSION OF THE PUBLIC**
RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

13. **NON-PUBLIC MINUTES**
RESOLVED – that the draft non-public minutes of the meeting of the Committee held on Wednesday, 3 July 2024 be approved as an accurate record.

14. **AMBITION 25**
The Committee considered a Report of the Executive Director of Human Resources & Chief People Officer concerning the Ambition 25 project.

15. **DELIVERING THE PEOPLE STRATEGY PROGRAMME PROCUREMENT**
The Committee considered a Report of the Executive Director of Human Resources & Chief People Officer concerning the People Strategy.

16. **SAFETY 365 HEALTH & SAFETY ASSURANCE UPDATE**
The Committee considered a Report of the Deputy Town Clerk concerning the Safe 365 tool and a wider Health and Safety update.

17. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
Three non-public questions were raised.

18. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were no items of urgent business.

19. **CONFIDENTIAL MINUTES**
The confidential minutes of the meeting held on Wednesday, 3 July 2024 were approved as an accurate record.

20. **BARBICAN ESTATE OFFICE**
The Committee considered a Report of the Executive Director of Community and Children's Services concerning the Barbican Estate Office.

21. **REAL ESTATE INVESTMENT STRATEGY**
The Committee considered a Report of the City Surveyor concerning the City's Real Estate Investment Strategy.

22. **RECRUITMENT OF ASSISTANT TOWN CLERK**
The Committee considered a Report of the Executive Director of Human Resources & Chief People Officer concerning the Member-led recruitment process for the appointment of a permanent Assistant Town Clerk.

23. **MANAGED SERVICE TEMPORARY AGENCY RESOURCE - PROCUREMENT STAGE 2 AWARD**
The Committee considered a Joint Report of the Chamberlain and the Executive Director of Human Resources & Chief People Officer concerning the award for the Managed Services for Temporary Agency Resources contract for the City of London Corporation.

24. **ANNEX TO ITEM 4 (WORKPLACE ATTENDANCE)**
The Committee received a confidential annex to Item 4 (Workplace Attendance Policy)

25. **TOWN CLERK'S UPDATE**
The Town Clerk provided the Committee with several updates.

The meeting ended at 4.35 pm

Chair

Contact Officer: John Cater
John.Cater**@cityoflondon.gov.uk**

Committee(s): Corporate Services Committee	Date: 23rd October 2024
Subject: Health & Safety Update	Non-Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,4,5,8,9,10,11,12
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Greg Moore, Deputy Town Clerk	For information
Report author: Oliver Sanandres, Director of Health & Safety and Head of Profession	

Summary

The purpose of this report is to provide the Corporate Services Committee with a health and safety update. The Safe365 assurance profile assessments conducted during the summer are being shared with Departmental leaders along with providing training on use of the system. This will ensure departmental risk owners use the acquired data to begin improving their safety management systems. As part of Phase three of the assurance process we also completed assessments at three of the four schools. We have started to close out the red risk on Director Knowledge identified by the assessments, i.e. our Tier 1 & Tier 2 Officers. Our team has also started to collaborate with business analysts from the ERP implementation team, ensuring safety will be 'baked' into the new HR and finance processes going forward. This month at the Strategic Health & Safety Board we commence the approval process for adoption of the Safety Management Framework that will apply throughout the Corporation, a key piece of work to guide and set standards upon all departments on safety management. This will help us close out the remaining findings from the original Quadriga audit's work plan. This overall plan too has progressed, and we are now up to 64% complete up from 50% at the last update in June, an increase of 14%. Under the updates of note section we want to inform committee that the Building Safety Regulator has called in our building safety case for Petticoat Tower, Shakespeare Tower & Cromwell Tower.

Recommendation(s)

Note the report for information only.

Main Report

Safe365 Improvement Actions

1. Following endorsement of the summer programme's Safe365 assessment results discussed at Committee last month, we have now started to communicate results to Departments while delivering Safe365 training to ensure our leaders understand the findings and the organisational expectation to reach 65% compliance by April 2025. Training sessions have been progressing smoothly with 75% of the Departments profiled having attended to date.

2. One of the items identified as requiring immediate action following the Safe365 assessments was the need for an induction process for our Tier 1 & Tier 2 Officers, collectively known as ELB, as it was clear no specific safety training had been given to this key leadership group. In the last month ELB decided that the IIRSM-accredited Safety for Senior Executives course will be delivered on 26th November. The Town Clerk has mandated attendance on this training. To sustain this, we now have a process to ensure all Chief Officers and Executive Directors are aware of their legal responsibilities, understand the health & safety risk profile of their departments and their safety risk exposure. This process consists of an accountability letter to each senior officer from the Town Clerk and a face-to-face meeting with the Director of Health & Safety. This process was implemented last month and was successfully trialled with the appointment of the new Executive Environment Director. It will be added to the onboarding process for new Tier 1 & Tier 2 Directors.

3. Phase three of the Safe365 roll out included the schools. This was delivered as planned except for the Freemen's School who asked for a deferment to January 2025. The results are attached at Appendix 1. Overall, the results are consistent with the rest of the organisation which found systems being broadly in place but an overall lack of leadership commitment and consistency of application. The Junior School has the most scope for improvement with a score of 47%, placing them in the lower quartile of results organisationally. A need for focus was identified across Module 4 (Health & Safety Management System). These results have been passed back to the schools for action as they will also be required to reach a Safety Index score of 65% by April 2025. The City of London Boys school performed best across the three schools (57%), correlating well to other areas of the organisation that have a competent safety professional embedded within their structure.

ERP (Enterprise Resource Planning) Collaboration

4. Ensuring Health & Safety processes are hard baked into all appropriate corporate processes is critical for risk reduction, consistency of application and data gathering. As a result, the team has been proactively working with the Enterprise Resource Planning Project to ensure safety is fully considered as we set up the new system. We look to the system to be able to provide appropriate onboarding, absence and injury management processes in the context of our safety management responsibilities.

Health & Safety Management Framework

5. A key piece of work undertaken has been a review of the Safety Management procedures across the organisation. As per the Quadriga report's recommendation this review has now been completed and the resulting body of work embedded into a new Organisational Health & Safety framework. The framework acknowledges our Health & Safety Policy and operationalises it. It encapsulates some of the Quadriga audit's more

significant findings, embedding these into our operational practice. We will be able to measure and report on how the organisation records and investigates incidents, and how we carry out risk assessments, in a move to make these more consistent across the organisation. The framework sets the criteria for Departments to set their organisational arrangements, i.e. their systems to manage safety, roles & responsibilities etc. It has four key principles i. Structure ii. Proportionality (driven by operational context) iii. Minimise bureaucracy and documentation and iv. improving attitudes and behaviours.

6. Given our size, complexity and departmental variance of activities it is not practical to manage health and safety arrangements centrally, and as such, under our Corporate Health & Safety Policy, each Chief Officer is expected to implement 'local arrangements' sufficient to manage safety risk in their areas. This approach offers flexibility; however, to maintain 'control' and 'oversight' the policy makes certain processes mandatory, such as how risk assessments are carried out, so we can govern and assure compliance.

7. We have also taken the opportunity to embed fixes for some of the larger Quadriga findings, for example, setting minimum standards in terms of the number of health & safety advisors and their qualifications and ensuring sufficient competent people. Through a data and risk-based approach minimum numbers of competent individuals have been identified and set. The framework allows Chief Officers to decide how to set their 'safety' structures and use budget allocations accordingly. The framework is attached for information at Appendix 2. The framework has commenced the approval process, and we are targeting approval and adoption from November 2024.

Updates of note

8. The Building Safety Act 2022 (BSA) introduced new responsibilities on housing providers, who own and manage buildings over 18m in height (7 Stories). Amongst other key responsibilities introduced as part of this legislation, the act requires that a "Building Safety Case" is developed and maintained for each building. The basis of each case is to evidence to us and other bodies that we fully understand the homes in question, and how we manage it to keep residents safe.

9. The Building Safety Regulator has called in our building safety case for Petticoat Tower, Shakespeare Tower & Cromwell Tower. We have been directed by the regulator to submit the cases and apply for a Building Assessment Certificate by the end of October. The Department of Children & Community Services has been steadily working to ensure these are ready. We believe we are in a good position to meet the deadline.

Corporate & Strategic Implications

10. **Strategic implications** – The strategic safety plan remains in flight. This framework, once approved by ELB will further support the closure of corporate level gaps identified in the Quadriga Audit. With Safe365 as the overall tracker and the framework as the standard setting parts of the system we will be able to support the building of a stronger corporate safety culture as per the People Strategy and embed safety as the brilliant basic expected in the Corporate Plan.

11. **Financial implications** – There are no direct implications within this report in and of itself, but departments will have to consider their resourcing arrangements and prioritise

funding where appropriate to meet compliance gaps, as indicated by the new number of competent people identified.

12. **Resource implications** – None at this stage.

13. **Legal implications** – There may be some exposure of potential regulatory enforcement from an outside agency where we potentially fail to meet our regulatory requirements as an organisation, especially should an incident occur at this current time. There are points of exposure in some Departments by virtue of the low maturity of the safety management system meaning there are potential compliance risks, especially should an incident occur at this current time.

14. **Risk implications** – None at this stage

15. **Equalities implications** – None at this stage.

16. **Climate implications** – None at this stage.

17. **Security implications** – None at this stage.

Conclusion

18. In conclusion, the Safe365 initiative continues to progress steadily, with significant milestones achieved in training delivery, leadership engagement, and system implementation across the City of London Corporation. The commitment of our senior leadership, including the mandatory induction processes for Tier 1 and Tier 2 Officers, reflects a strong organisational focus on health and safety. The roll-out to schools, while identifying areas for improvement, underscores the importance of consistent leadership action required to achieving a proactive safety culture. Looking forward, our collaboration with ERP and the establishment of a comprehensive Health & Safety Management Framework will further embed safety into our operational practices, ensuring a systematic and measurable approach to managing this risk. Empowering departments to own safety while setting some key corporate standards and supporting central governance, we are well-positioned to meet the target of 65% compliance by April 2025, fostering a safer working environment across the organisation.

Recommendation(s)

Note the report for information only.

Oli Sanandres
Director of Health & Safety

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Appendices

Appendix 1 - Safe365 – Phase three School Results (non-public, circulated separately to Members)
Appendix 2 - Health & Safety Organisational Framework

City of London Corporation
Health and Safety Organisational Arrangements

The Safety Management Framework (SMF)

VERSION number	01-02 DRAFT
DATE	September 2024
REVIEW DATE	September 2026
AUTHOR	Corporate Health and Safety
Approved by	Corporate Services Committee

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Foreword

In a world of constant change and increasing complexity, the responsibility to ensure the safety and wellbeing of our people and service users, the public, has never been more critical. This responsibility is not a choice, neither is it a mere recommendation—it is an absolute mandate set by our Town Clerk, Ian Thomas, and outlined in the Corporation's Health, Safety, and Policy Statement. The statement represents not just policy, but a personal commitment from our Chief Executive to ensure safety remains a key priority in all our endeavours.

The message is unequivocal: safety is a leader-led obligation. From Chief Officers to line managers, every leader within the City of London must understand that safety is not an optional consideration—it is a core duty. The policies outlined in our safety framework are not static documents; they demand active engagement, rigorous enforcement, and continuous application across all operations. Our leaders must not only embrace safety as a fundamental value but also integrate it into every decision, every process, and every action they take. This is the bedrock of our desired safety culture, where accountability is non-negotiable, and the highest standards are not merely achieved but consistently upheld.

Safety is the 'golden thread' running through our People Strategy and Corporate Plans, applied as one of our "Brilliant Basics." As the functional owner of this safety framework, I will ensure its alignment with the Corporation's overall strategic direction. We will guarantee that our safety strategy remains future-focused, our governance remains uncompromising, and our execution remains consistent. This is not just about ticking boxes; it's about embedding a people first mindset that empowers every leader to prioritise the well-being of their teams while driving successful outcomes for the organisation.

As we move forward on this journey, let this document stand as a clear declaration: safety leadership is not only a responsibility—it is a privilege. It is the bedrock of our strength, enabling us to deliver the highest standards of service to the communities and people we serve. With unwavering commitment and shared accountability, we will uphold a culture of safety that defines the City of London, ensuring excellence in everything we do. Together, we will lead with safety at the heart of our mission.

Oli Sanandres
Director of Health & Safety
City of London Corporation

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Overview

This health and safety management system is the documented reference point for all health, safety and wellbeing operations for the City of London Corporation, our arrangements as per our Health & Safety Policy. It is a legislative requirement for all organisations to provide and these arrangements. The health and safety management system is the basis for how we identify, assess, evaluate and manage health and safety risks.

The Corporation is a complex organisation and so must use a structured approach to managing safety. This is achieved by using the PLAN, DO, CHECK, ACT approach.

This collection of processes, structures and feedback mechanisms is known as a Safety Management System. This Safety Management Framework is split into two main parts: **Strategic** and **Operational.**

> **Strategic (Second Line)**
>
> The Corporate Safety Management Framework – Corporate H&S Policy, Corporate Standards, health and safety guidance, risk assessment tool, accident reporting tool, Safe365 maturity assessment tool and governance processes, for example the Strategic Health & Safety Board
>
> **Operational (First Line)**
>
> The local 'arrangements' – local charters, local roles and responsibilities, local procedures for managing health and safety risk areas. For most departments these include, plant and equipment risks, third-party risks, process related risks and occupational health and wellbeing risks, including workplace stress and display screen equipment use.

Figure.1 – Visual representation of the Safety Management System for the CoL

Due to our size, complexity and departmental variance of activities it is not practical to manage health and safety arrangements centrally and as such, each Chief Officer under our Corporate Health and Safety Policy is expected to implement 'local arrangements' of their own to manage safety risk locally. This expectation cascades down to each Director, Assistant Director.

This framework sets **four** principles that will apply to all Departments:

- Structure
- Proportionality (operational context)
- Minimise bureaucracy and documentation
- Safe attitudes and behaviours

1. **Structure**
   Structure leads to clarity. Our framework is split into two, which provides a **strategic framework** and an **operational management framework**, often known as 'local arrangements' (Section 4b) aligned to the 'Plan, Do, Check, Act'

methodology and the Safe365 systems structure. These local arrangements must be in place locally and tie into the strategic framework.

This can help provide a structured framework for ensuring a safe and healthy workplace with clear responsibilities and processes to be followed tying in the local and central systems, particularly important from a governance perspective.

The diagram below shows the overall structure and example documents required at each level and their relationship to corporate owned requirements outlined at the strategic level.
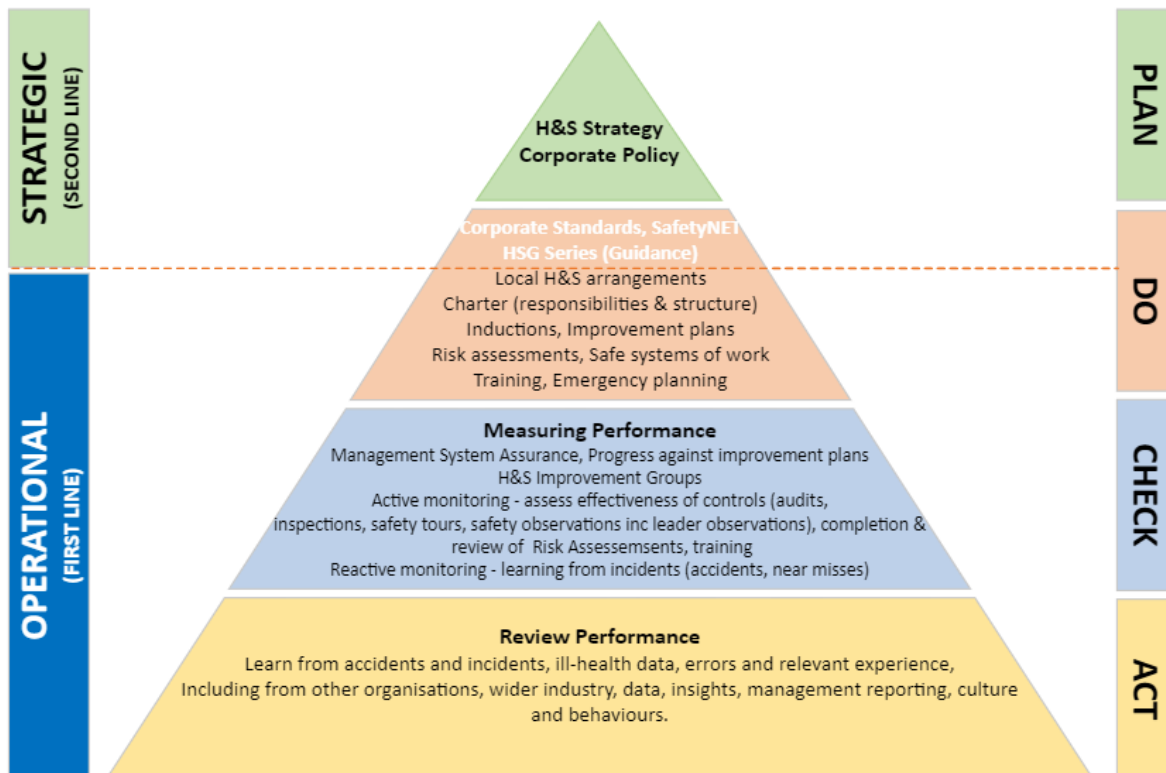
Fig 2. Components of the Safety Management Framework

How you locally structure your arrangements is also important, it needs to align to how you work. Align safety to operational meetings as much as possible to avoid extra meetings, after all 'Safety is simply an outcome of well-planned work'.

2. Proportionality
If your business area is low complexity and low risk, you should be able to demonstrate effective risk management without this sort of detailed system. You will still need to follow Corporate Standards, but a simpler and less bureaucratic approach may be more appropriate. Low risk departments are typically office-based roles, with minimal to no exposure to the public, industrial chemicals, operation of heavy mechanical equipment and property infrastructure. These roles typically are exposed to office-based risks (slips, trips), workstation associated risks and psychosocial risks.

3. **Minimise documentation**

   Concentrating too much on the formal documentation of a health and safety management system will distract leaders from addressing the human elements of implementation. This creates opportunity for 'drift', where work as 'imagined' differs from work 'as done' and increases risk. The focus becomes the process of the system itself rather than controlling risks. Keep any documentation proportionate to the complexity of the risks concerned. Keep it to the minimum needed for effectively demonstrating something has been done. Our safety SharePoint site – SafetyNet has a section where templates and guidance can be found.

4. **Safe attitudes and behaviours**

   Effectively managing health and safety is not just about having systems in place. The success of whatever process or system is in place hinges on the attitudes and behaviours of people in the organisation (sometimes referred to as the 'safety culture'). Here, at the CoL safety is Leader Led. We expect all people leaders to 'lead proactively, our Safety Leadership Guide offers guidance on how this can be achieved. This is measured as part of the overall performance management process and achievement of safety objectives and presence of 'live' safety will be aligned to the organisational disciplinary and performance process, (1:1s, appraisals etc)

Section 1 | Director Knowledge | Tier 1 & Tier 2 Officers

Our safety performance at the City of London Corporation is influenced by our collective behaviours and leadership. Leaders need to communicate the safety behaviours, expected of themselves and those they lead. Responsibilities are captured in detail in the Health and Safety Policy.

A safety culture builds slowly, but behaviours are influenced quickly through strong leadership, messaging, expectations, and clear examples. We call this the '**tone from the top'**.

All directors are expected to:

- have a good operating knowledge of UK health and safety legislation, and international legislation as required by our overseas operations.
- the City's broad health and safety arrangements,
- understand their own specific and 'personal' responsibilities
- understand specific legal requirements for the industries they represent
- develop and maintain knowledge on an ongoing basis.

All Directors will complete:

Health and Safety Corporate induction: This is specific to each Chief Officer on appointment and will be delivered by the Health and Safety Director or their deputy within one month of starting in role.

Safety for Senior Executives: All Tier 1 & 2 Directors (ELB) must complete this course. This will be refreshed every three years.

Risk Profile specific training: Training on specific hazard information as required for the duty holder to discharge their responsibilities will be offered at various opportunities. It's an expectation that core knowledge items are mandated and completed relevant to the risk profile of each department.

The Induction process for Tier 1 & Tier 2 is managed centrally by the Director of Health & Safety.

Elected Members

In order to reflect the leadership role of our elected members they will also be offered this course in order to understand their governance responsibilities and the systems in place organisationally so as to better enable them to govern safety as part of the Corporate Services Committee or their other service committee responsibilities.

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Section 2 | Management Knowledge

Management knowledge involves any senior employee with daily decision-making authority, fully understanding the organisations operations, the associated hazards and risks of their department and teams and how the organisation effectively manages its health, safety and wellbeing system.

All managers are expected to:

- Receive a management level induction that outlines their roles and responsibilities as part of the health and safety management system
- All managers understand what the City of London 'duty of care', known as the general duties, they have under health and safety legislation
- Have health and safety as permanent – 'always on' agenda Item at all team meetings
- Understand the City's risk management methodologies and frameworks
- Understand their critical risks across their area of responsibility and the work being undertaken to measure, review and improve these risks
- Take practical steps to understand the operations of the organisation and the impact of those operations on health, safety and wellbeing

All Managers will complete:

Health and Safety Corporate induction: This is the standard health and safety induction all staff complete when joining the CoL

Everyday Safety Management: All managers will compete the Everyday Safety Management Course offered centrally. This will be refreshed every three years. This course will be provided centrally.

Managers in **Low-Risk Departments** can complete the (lite) version of this training.

The above courses are considered part of our corporate induction and are managed centrally.

Risk Profile specific training: Training on specific hazard information as required for the duty holder to discharge their responsibilities will be offered at various opportunities. It's an expectation that core knowledge items are mandated and completed relevant to the risk profile of each department.

To do this the departments / institution may identify a basic competency framework which identifies courses that will give them knowledge of hazards in their operating environments. This training will be locally driven. The Corporate Health and Safety team can and will support with identification of training, training providers and course suitability.

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Section 3 | Worker Knowledge (our People)

Worker knowledge can be defined as all workers understanding the nature of the operations of their work relative to their role and the hazards and risks associated with those operations. All workers and contractors must have the knowledge they need to stay safe and healthy at work. 'Workers' includes employees, casuals, fixed term contractors, subcontractors, labour-hire workers, apprentices, trainees and volunteer workers.

All our people will complete:

Health and Safety Corporate induction: This is the standard health and safety induction all staff complete when joining the CoL

A Local Operational induction: This should outline their roles and responsibilities as part of the health and safety system. They must:

- understand how to access health and safety system information, such as guidance, incident reporting, risk assessments, training and other tools.
- understand their duties under health and safety legislation
- understand what immediate safety actions to take when they encounter hazards / unsafe situations in the workplace i.e. reporting an incident.
- understand the health, safety and wellbeing risks in their work environment, the controls that must be in place to manage these risks and how to escalate concerns
- As per Section 4b of this document inductions must also be held locally and informed by their tasks, roles and responsibilities and risk assessments carried out by their line managers.

This area is co-owned across the Management framework. The corporate induction is owned and managed centrally as part of the general staff onboarding.

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Section 4 | Health and Safety Management Framework

Section 4a | The Strategic Framework

Corporate Health and Safety Policy

A corporate wide health and safety policy is in place, which sets the principles, accountabilities, and responsibilities for safety at all levels, and acknowledges that this City of London Safety Management Framework determines how health and safety will be managed.

A policy statement has been made and signed by the Town Clerk, which sets out expectations for the behavioural approach to health and safety required by our people and our leaders.

Corporate Safety Standards

The SMF is flexible and designed to permit local arrangements to be owned and created locally by individual departments. To maintain legal compliance and provide assurance a number of mandatory Corporate Safety Standards (CSS) will apply to the whole organisation, such as incident reporting and risk assessment**.**

These standards will be created and set centrally Corporate Safety Standard 1: 'Developing and implementing health and safety documentation. 'Sets down this process. It is intended to be collaborative but managed by the Corporate Health and Safety Team.

The standards currently in place are:

- CSS1 - Developing and implementing health and safety documentation
- CSS2 - Reporting and learning from Incidents
- CSS3 - Risk assessment

Health and Safety Guidance (HSG's)

HSGs have been written by considering legal requirements, approved codes of practice and industry best practice. They will give all staff, especially leaders appropriate information on hazards, in a manner contextualised to the City of London Corporation's activities. The Corporate Health and Safety team will manage the process of creating and approving safety documentation. Any competent person can create an HSG, and it will be approved in line with the process identified in CSS1 and include the wider HSPN to minimise duplication and enhance collaboration.

HSGs are specifically to be used with CSS3 (Risk assessment). The HSG provides the knowledge required by a person designing a task to understand hazards and how they may arise, this can be used in the risk assessment process. The outputs or controls from the risk assessment will then be used to develop a written procedure to encourage safe work, these written procedures are often called Risk Assessment

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Method statements (RAMs), Safe Systems of Work or Safe Operating Procedures (SOPs) as per used in Departments.
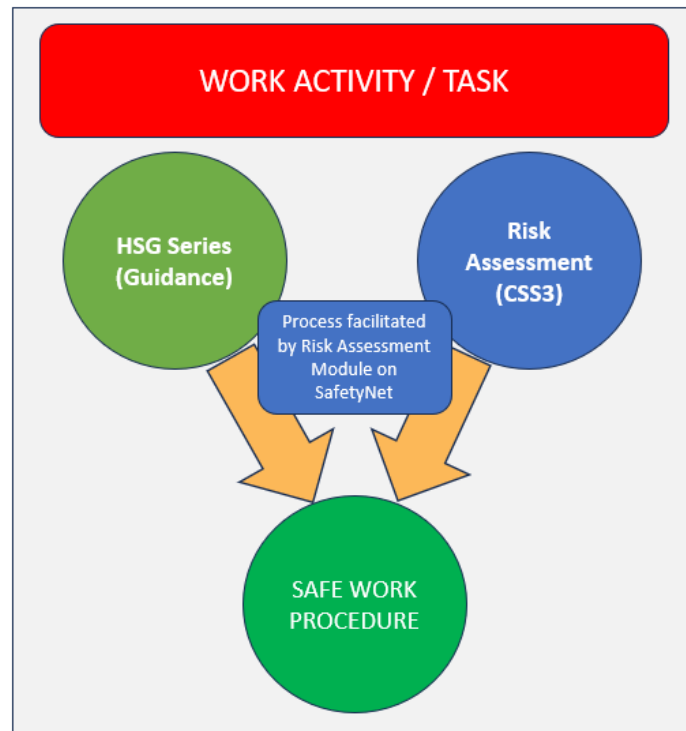
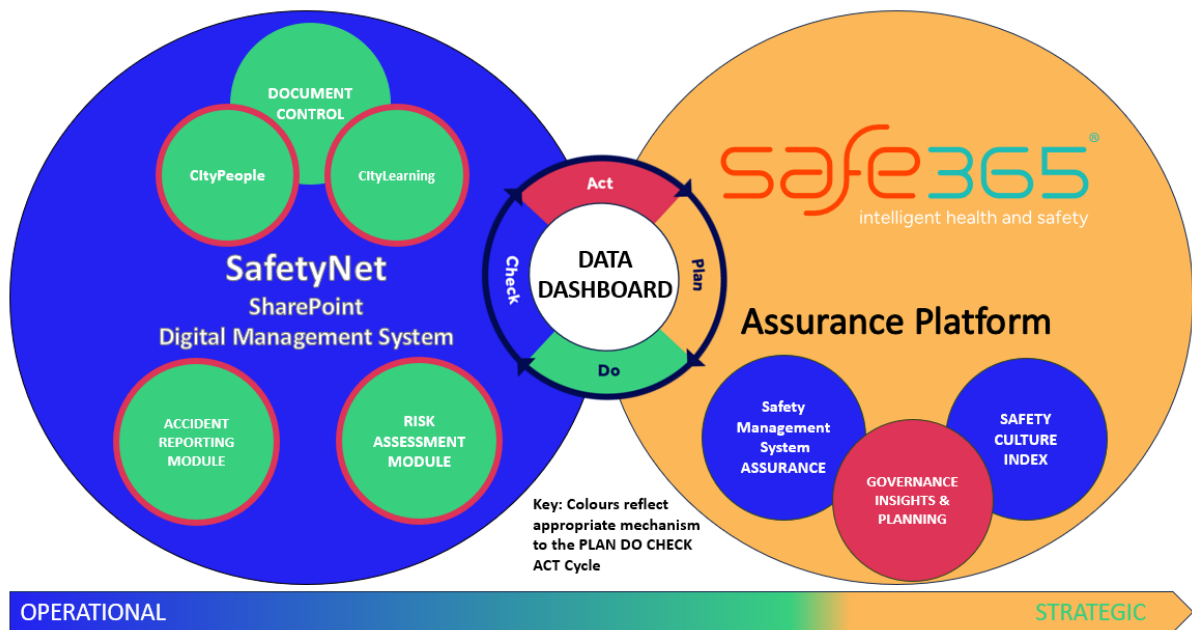**Fig 3. HSG working in practice example**

Digitising Health and Safety

SafetyNet, the CoLC digital safety management system

SafetyNet is the intranet site for the City of London Corporation. It comprises:

- The Risk Assessment module
- The Accident reporting module
- Safe 365 – Assurance platform
- H&S Management System documents
- City People / City Learning - L&D System

Use of the systems is mandatory across the organisation.

Capturing local safety outputs, e.g. risk assessment, audits, inspections, investigations, etc, into the appropriate module on SafetyNet helps ensure compliance, drive our risk registers and enable visibility to leaders providing vital safety data for assurance and governance purposes. Exceptions can be made for some departments, however the final decision rests with the Director of Health and Safety.

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Fig 4. SafetyNet and its components

Document Control System – will manage the process of creating new safety documentation in response to organisational needs under a controlled approach managed the corporate team. Document control is vital for maintaining consistency, accuracy, and compliance with regulations and standards. To ensure the safety of our people, enable collaboration, and maintain compliance with regulations, our employees and external contractors need to work from the most accurate and up-to-date documents.

City People and City Learning is our learning and development system. All health and safety training records, including those gained on external courses, must be uploaded onto CityPeople. Any eLearning through City People will automatically be recorded.

The Risk Assessment module – all risk assessments will be captured into this module. Note this is not the same as Pentana. This module is specifically provided to facilitate, record and manage safety risk assessments as they require more detail.

Risk management is a continuous process that involves identifying, analysing, and responding to risk factors, risk assessment focuses on detecting safety hazards, analysing all potential safety risks in the workplace and ensuring controls are in place to mitigate risk. Please refer to Corporate Standard 3 to understand more on safety risk assessment process at the City Corporation.

The Incident reporting module – all accident, incident and near miss reports will be captured into this module. The module can be accessed by all staff. It will also manage and track actions for completion following accident, incident investigations to assure lessons learnt.

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Safe365 Assurance Platform - offers a consistent approach and a 'common language' to evaluate safety system maturity across the organisation. It will allow the organisation and departments to set, track and improve standards of its safety management system and therefore its cultural maturity. This tool will also automate the health and safety improvement planning process required annually as part of the business planning framework. It will only be allocated to high-risk departments.

Health and Safety 'Governance' framework

The City of London H&S governance framework comprises of systems that direct and are able to monitor the organisation. Allocating responsibility drives action: in this case, safety management. A governance framework is fundamental to our organisation's overall risk management function, which is a key responsibility of our Chief Officers, senior leaders and our elected Members.
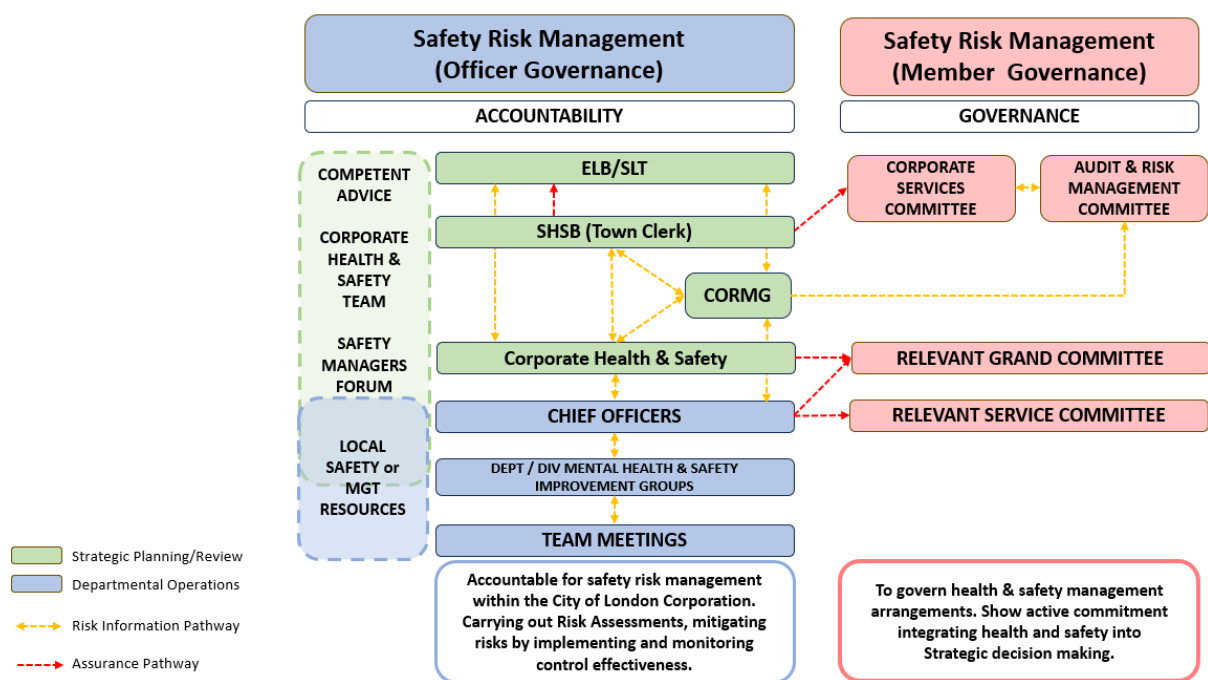
Fig 5. A diagram of our governance framework showing information flows into and out of the corporate mechanisms to manage health and safety.

Strategic Health and Safety Board

This officer led board's function is:

- to set strategic direction for safety and the management of emerging and critical cross organisational risks
- to set values, objectives, with clear standards and targets for the management of occupational health and safety.
- Provide a tie in and escalation mechanism for departmental governance groups though to local health and safety improvement groups

The board will oversee and ensure accountability within the various departments for their safety performance as well as directing on matters relating to the overall management of health and safety throughout the organisation.

The Deputy Town Clerk will chair the board. The board allows the City of London Corporation to establish a meaningful governance framework for safety decision-making and a clear communication and escalation pathway for safety issues, through its alignment to health and safety groups at the operational level and committees at the governance level. It is particularly important for addressing critical risk issues.

The board will help to:

- Elevate health and safety standards across the City of London Corporation, ensuring corporate visibility and compliance in all activities.
- Promote and share best practices, key learnings, and success stories in health and safety.
- Ensure suitability of organisational arrangements for implementing the health and safety policy and statutory requirements.
- Develop and oversee the implementation of a comprehensive health and safety strategy for the City of London Corporation.
- Monitor and learn from enforcement actions taken by relevant agencies against the City of London Corporation.
- Review and update specific health and safety policies, incorporating best practices.
- Resolve escalated issues within or between departments that cannot be resolved at a local level.
- Monitor the implementation of health and safety strategies and improvement plans.
- Track key performance indicators for health and safety, making recommendations for improvement as needed.
- Evaluate and recommend the effective use of financial, human, physical, and information resources for health and safety management.
- Establish and periodically review organisation-wide health and safety targets for the City of London Corporation.

The Strategic Health and Safety Board and terms of reference can be found on SafetyNet.

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In defining the strategic objectives for the organisation, the board will gain significant value from a foundational comprehension of the role that health and safety plays in the overall performance of the organisation. Also, their leadership role and influence in establishing clear values and standards for successful work, along with holding people leaders accountable for actively engaging with our systems, are pivotal in shaping the safety culture within our organisation.

Corporate Risk Profile

Risk should play a key part in how safety is managed. Our organisation is complex and whilst we have many departments managing complex high-risk activities, such as third-party contractors we also have low risk activities, such as office work. Whilst we acknowledge the duty of care to all colleague's safety in the office environment is easier to manage and in the spirit of this document following our second principle of proportionality and the third principle of minimising documentation this framework allows for low-risk teams to adopt a more appropriate approach to managing their risks. The bottom-line expectation is that we will always ensure compliance with the law.

It is understood that within high-risk departments there may be teams that are low risk, i.e. typically office based, policy roles. In these cases, these lower risk teams can be managed as part of the overall wider management system in their parent department.

The table below serves as a starting point for understanding what risks departments carry. This will be kept under review by the Director of Health and Safety.

Table1:

High Risk	Low Risk
Barbican Centre	Chamberlains
City Bridge Foundation	Communications & External Affairs
City of London Police	Comptroller
City of London School for Boys	Corporate Strategy & Performance
City of London School for Girls	Human Resources
City Surveyors	Town Clerks
DCCS	
Environment	
Freemen's School	
GSMD	
Innovation & Growth	
Remembrancers	
Town Clerks (LA & DC)	

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Competent Occupational Safety & Health Professionals

Health & Safety Manager

Complex and high-risk departments must appoint at least one health and safety professional as their departmental health and safety manager or advisor as part of their first line operation. This role should be able to influence effectively, and consideration should be given to this in deciding where to position the role. They should own and set the overall management systems in place for Health & Safety processes to be effectively managed and operationally aligned, they must be able to influence leaders and hold them to account as required.

The Departmental risk profile, size and structure will dictate how they should work and how many competent people are required to support them.

- Any Health & Safety Manager in a high-risk role must be NEBOSH Diploma Qualified and have the right level of experience in a similar industry to the Departments focus of work.
- Any health and safety professional roles must be appropriately qualified, i.e. NEBOSH Certificate / Diploma or equivalent.
- Registered with IOSH[1] (to at least CertIOSH).
- They must also have suitable experience and knowledge of the industry sector they are supporting.

IOSH membership grades are aligned to IOSH's Competency Framework and reflect differing levels of OSH experience and qualifications. The Competency Framework is a set of core technical and behavioural skills that IOSH considers are essential for OSH professionals.

The table below breaks down the Departments and identifies specific locations where we suggest numbers of competent people, based on risk profile and size as calculated by the Director of Health and Safety and Head of Profession. This can and should be discussed and agreed by each Chief Officer as part of their local arrangements in consultation with the Director of Director of Health and Safety.

Department	Minimum expected number of competent* persons
Barbican Centre	3
City Bridge Foundation (Tower Bridge)	1
City of London Police	3
City of London School for Boys	1
City of London School for Girls	1
City Junior School	1
Freemans School	1
City Surveyors	5
Markets	3
Central Criminal Court	1

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[1] IOSH – Institute of Occupational Safety & Health

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DCCS	2
Environment (throughout their operations)	8
GSMD	1
Innovation & Growth	1
Remembrancers	1
Destination City	1
London Archives	1

* Competence – This is defined as having the right training, knowledge and experience to be able to support operations. Not all of the above need to be safety professionals but must have a NEBOSH Certificate at least and must be involved in the local management of operations and safety systems implementation. In other words, appropriately trained current managers can be considered in meeting these minimal set standard.

Example

Each AD is accountable for the health and safety of their staff to their director and each Executive Director or Chief Officer. They must ensure they have the right resources and competencies in place to assure safety management.

Generally, the Town Clerks, Chamberlain and Comptrollers for example, carry lower risk operations. However, depending on the individual risk profile of their department, the system can and should flex up. For example, Remembrancers are an office-based department but have responsibility for high profile events with potential for significant health and safety risks, and so have must competent health and safety professional.

High risk areas like Natural Environment, City Surveyors or Barbican due to their risk profiles and operational complexity, will find benefit in the health and safety manager role being made into a senior leadership role and their competency level should reflect this as appropriate. As such a health and safety specialist should be considered.

A reduction in numbers may be considered if alternate arrangements are made, but must be agreed by the Director of Health and Safety and Head of Profession

Recruitment of Health & Safety Professionals

All recruitment exercises for Safety roles must be supported by the Corporate Health and Safety team. They must make up part of the final decision-making panel. All qualification will be verified though IOSH.

Low risk departments – health and safety leads

Within the low-risk departments the Business Support Manager role is suggested to take role of the health and safety lead, unless otherwise notified to the Corporate Health and Safety team. They will coordinate health and safety issues and liaise with colleagues within the Health and Safety Professionals Network and Corporate Health and Safety team for support.

The leads, through the coordination of local monitoring, inspection and audits, will help assure that their local safety arrangements:

- are embedded into the everyday operation of the department's work
- are effective and maintained as directed by the director and as required across the organisation.

They will provide a critical conduit and be a key single point of contact between the departments and the Corporate Health and Safety team, for:

- policy creation and guidance consultation
- exploiting local communication systems
- accident reporting and Investigation

- safety specific training procurement
- local compliance (inspection and auditing)
- health and safety risk management
- end of year assurance process

They must be competent in accordance with the risk profile of their department, and it is recommended a NEBOSH certificate is attained.

Health and safety leads must be an active member of the HSPN (Health and Safety Professionals Network) as detailed in the SMF.

Health and Safety Professionals Network (HSPN)

This is a functional group chaired by the Director of Health and Safety or Head of Health and Safety (Property). The HSPN will be a critical working group which will collaborate to resolve operational obstacles and cross-functional issues with oversight and guidance from the Corporate Health and Safety team, and vice versa, without hindering the strategic focus of the Strategic Safety Board. It will become a community through which best practice and direction can be shared across the City of London Corporation departments and institutions.

It will meet quarterly, and low risk departments will attend as required when relevant topics are on the agenda, but at least twice a year or when requested.

Union Consultation

As agreed with the Unions, separate arrangements will not be undertaken as their continuing invitation to health and safety meetings at departmental and corporate level will provide a proactive route for continuous engagement and improvement.

Corporate assurance

To provide assurance to the chief executive and SLT on our safety management systems and legislative compliance across the organisation, the Corporate Health and Safety team will provide an auditing and monitoring function.

Safe365 will provide the tool for assurance of our high-risk functions ensuring that a suitable safety management system in place as per this framework. Safe365 progress and the departmental safety index will be reviewed quarterly by the Strategic Health and Safety Board. A Safe365 assessment audit will be undertaken by the corporate health and safety team, annually of each area. The result will be summarised into a report which will be reviewed by the Strategic Safety Board, SLT and the appropriate Committees.

For health and safety to be successfully integrated into our business operations there needs to be an active, continuous improvement process in place.

From time to time it may be necessary to functional audits into the management of typical hazards.

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Assurance will typically be demonstrated through documentation, examples are:

- departmental health and safety plans
- risk registers (SN)
- risk assessments (SN)
- safe working methods
- local training records
- proactive inspections
- Incident Investigations, and actions completed (SN)

These will be produced and kept digitally and on SafetyNet as shown (SN).

Reporting

KPIs are in place to monitor organisational wide safety performance using proactive (lead) and reactive (lag) indicators. Performance reports will be taken to SLT monthly. KPIs will be formulated monitor organisational wide safety performance using proactive (lead) and reactive (lag) indicators. Performance reports will be taken to SLT monthly.

Section 4b | Operational Framework – Local Arrangements

The local 'arrangements' – Local Charters, roles and responsibilities, procedures for managing health and safety risk areas for most organisations include, local inductions, plant and equipment risks, third-party risks, process related risks and occupational health and wellbeing risks, including workplace stress.

Health and Safety Objectives and Planning

As part of the corporate business planning process each organisation within the CoL needs to undertake an annual planning exercise to unlock desired health, safety and wellbeing outcomes.

Planning involves the setting of measurable objectives to be achieved, this could be anything linked to improve safety performance for example, increasing the reporting of near misses, improve engagement with workers, improving the time taken to investigate accidents etc.

For high-risk departments one key goal is to ensure their safety management system is effective. High risk departments with a Safe365 profile must meet the required Safety Index set organisationally. Currently, this is 65%. This will readjust as necessary to ensure there is organisational stimulus towards continual improvement.

Low Risk Departments can follow this guidance on managing their safety risks.

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Local Health and Safety Charter

There is no requirement for departments to formulate another health and safety policy. Departments can achieve the same aim by creating a simple local charter. This can be tailored to each area. Three key outcomes of this process must be:

- to allocate key roles and responsibilities,
- describe the safety context of the department, its risk profile
- Outline the expectations for how their safety management system will operate and tie into the overall governance processes as described in the previous section 'Health and Safety Improvement Groups'
- Be a visible in the work environment such as a poster

Our policy sets the expectation that safety is leader led. As such responsibility for safety is given to leaders in control of tasks and or people. This should be made very clear to our people and regularly 'felt' by them, i.e. safety should be an always on agenda item, safety should be regularly mentioned in any newsletters or communications, people should be regularly recognised for positive safety behaviours and also people should be held to account for unwanted behaviours.

Risk Assessment

Due to the legal and functional importance of this process this element is subject to a mandated corporate standard, Risk Assessment Standard. Implementing this standard will provide a consistent approach in Risk Assessment across the City Corporation.

- All local tasks and activities carrying a significant risk of harm (physical or mental) must be risk assessed and have controls. identified.
- Risk Assessment must only be carried out on the CoL approved template – this is critical to ensure the correct risk parameters are being applied, i.e. risk evaluation matrix and that risk scores align to our wider risk tolerance levels set organisationally.
- Risk assessments must also be captured on the Risk Assessment tool on SafetyNet, they must remain 'live' and kept updated until the activity is no longer carried out.

It is vital to ensure risk assessments are maintained live and regularly reviewed to compile the organisational safety risk register and provide visibility of these risks for SLT and Chief Officers to make decisions on safety. The Corporate Health and Safety team, local health and safety improvement groups and the Strategic Health and Safety Board will regularly review the risk register.

Critical risks

Critical risks will be identified through the risk assessments process being applied at all levels. It is vital that all departments apply risk assessment methodology consistently and effectively. Once identified by the Corporate Health and Safety team, critical risks will be proactively tracked, managed and reported upon. Further

controls can and should be applied locally depending on the specifics of the task carrying the critical risk. It may be necessary to create a corporate standard to ensure consistent controls are applied to set a minimum standard throughout the organisation on topics such as violence or working at height.

Critical risk management framework reporting (dynamic risk register)

Using SafetyNet to manage the risk assessment process will allow for creation of a digital safety risk register. This will allow the top risks, to be reviewed, controls audited, and control effectiveness at local and central levels verified. It will enable reporting to lead teams and committees as required to ensure good proactive management and robust governance. The critical risk register will be reviewed quarterly, and new high or extreme risks will be reported immediately to SLT for review.

Health and safety improvement groups

At the smallest unit level (e.g. team meetings), health and safety management must be discussed as a regular agenda item. Any issues captured can then be escalated as necessary through the organisational layers until successfully resolved. This is not merely to capture personal concerns, but to review risk assessments, review controls and creatively eliminate or reduce hazards in the department's work.

Departments must form their own health and safety improvement group and these should be set up to best reflect their operations.

It is expected the group is chaired by a senior manager or director of the department to discuss health and safety management, performance and issues. The purpose of this group is to drive the governance processes into each operational business unit.

It is expected these groups will meet as necessary in accordance with the departmental risk profile, but at least twice a year. Agendas for the meeting must be appropriate with regard to the department's work or risk exposure. Action reports will be published on the intranet and made available to all staff and stored on SafetyNet.

The group will monitor accident and incident statistics and review as necessary, to drive departmental learning from these incidents and prevent reoccurrence.

A member of the Corporate Health and Safety team will be invited to all meetings and will attend as necessary to:

- provide central updates and information on health and safety matters
- provide guidance as required
- facilitate information sharing and corporate learning
- monitor the effectiveness of the group and support its work by supporting resource requests or connecting to other departments in order to solve any cross-cutting issues.

A suggested structure for this group and the interaction of any safety subgroups is shown below:

Section 5 | Verification and Audit

Verification and audit activities involve checking that health and safety requirements outlined in the legislation, regulations, codes of practice and this organisational health and safety management system are being implemented in practice and are effective. They must be carried out regularly and proportionally to the level of risk. As per the strategic section of this framework the Corporate Health and Safety team will carry out regular audits, these will be specifically focussed on the operation of the management system but may also be directed at specific hazard areas.

Localised internal audits and inspections must be completed to check that control measures identified in your risk assessments or as part of your local safety management system are in place. The results of localised internal audits and inspections must be reviewed to assess the overall effectiveness of control measures.

Areas must implement a locally directed inspection programme to check that control measures identified in risk assessments are:

- in place
- assess the overall effectiveness of control measures

There should be more than one person involved in identifying and analysing risks at work, peer assessments are a good way of achieving this. A fundamental premise of safety management is engagement and consultation, and this should be visible in processes such as these:

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- Proactive inspections - managers will ensure that active monitoring is carried out in their areas, based on their health and safety plans and work procedures to protect against 'drift.' In other words, do the behaviours and practices in the workplace reflect the policies, processes, systems and expectations documented

- The assurance process should involve a form of peer review and contain some cross-departmental audits. This is considered an opportunity to break up silos, share best practice and improve consistency of approach: an assurance exercise with a fresh pair of eyes.

Section 6 | Emergency Preparedness

Emergency preparedness can be defined as your capability to be prepared for, and respond effectively to, health and safety emergencies. This includes medical or trauma incidents and other emergencies that may occur at work, such as natural or man-made disasters. There will almost certainly be overlap between your business continuity plans. There is an expectation that you will have:

- an emergency response plan that outlines the actions to take in the event of a significant health or safety incident at work – i.e. accident, up to and including a fatality.
- An ability to provide first-aid capability (equipment, training and information) relative to the size, scope and risks in the workplace, if you are reliant on others for this, how assured are you this is effective?
- undertaken emergency scenarios so that all personnel know what to do in an emergency or crisis at work with all staff knowing what their role is should be in a major emergency or crisis at work

Section 7 | Health and Safety Data Collection

Collecting and responding to health and safety information is a critical component to achieving continuous improvement in health and safety performance. Building intelligence in your organisation using health and safety data will support all levels of your organisation to exercise their duties under legislation and support evidence-based decision making. It is important the people know how to report accidents and more so, Near Misses. Locally all leaders must be aware the correct action to take in responding to reports and must instil confidence in staff that appropriate and proportionate action will be taken on items reported, trustworthy leadership.

Section 8 | Management Reporting

The sharing of health and safety insights and performance indicators through effective reporting is part of a critical communication loop, ensuring management and directors have access to ongoing information regarding health and safety in the organisation allowing them to take steps to manage health and safety risk to levels as low as reasonably practicable. This isn't simply about incident statistics and trend

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analysis, but it is also understanding how processes or controls are working that can impact on safety, i.e. time pressures leading to shortcuts for example or equipment failures impacting on work rounds being developed.

Centrally we track incidents accidents including RIDDOR and Risk Assessments. Locally departments must tie into the corporate system in place to alert and track these.

Section 9 | Worker / Engagement

Well-developed health and safety engagement is a key component in developing a positive health, safety and wellbeing culture. UK safety legislation is based on the premise of consultation and collaboration. Workers must be engaged about health, safety and wellbeing issues likely to directly affect them and be given reasonable opportunities to participate in the ongoing improvement of health, safety and wellbeing of the organisation they work for. Health and Safety Improvement Groups as discussed earlier are one way of doing this, using Safety Champions or nominated leads is another way. Departments should think about how they're communicating with their people on safety, i.e. newsletters, town hall events, safety campaigns etc. What opportunities do workers get to speak to decision makers on matters of safety and how empowered do they feel to the right thing.

Section 10 | Culture and Behaviours

Health and safety culture and behaviours can be considered as "how we do it around here" and will be unique to each Department, Institution even team! Elements to consider here are:

- Recognition - are workers that exhibit / role-model desirable health, safety and wellbeing practices and behaviours recognised?
- Accountability - are workers that do not behave consistently with the documented health, safety and wellbeing requirements or expected behavioural standards held to account?
- Safety Leadership - do senior managers including Directors and Chief Officers in your organisation demonstrate health, safety and wellbeing leadership?
- Safety as a value - is health, safety and wellbeing important to all workers / contractors in your organisation? Is it communicated by leaders as a value in their Local Charters?
- Willingness to report - do workers feel comfortable reporting health, safety and wellbeing concerns to management?
- Participation - do workers support health, safety and wellbeing initiatives in your organisation?
- Resourcing - are adequate resources made available to implement health, safety and wellbeing initiatives at work?
- Safety vs Productivity - do management personnel value health, safety and wellbeing performance over business performance? Do workers / contractors feel empowered to stop work if they recognise unsafe behaviours or conditions?

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