

<b>Committee(s):</b> Corporate Services Committee	<b>Dated:</b> 10 <sup>th</sup> April 2024
<b>Subject: Health &amp; Safety Update</b>	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	<b>1,2,3,4,5,8,9,10,11,12</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of:</b> Town Clerk	<b>For Information</b>
<b>Report author:</b> Oliver Sanandres, Director of Health & Safety and Head of Profession (Interim)	

### Summary

The purpose of this report is to provide Corporate Services Committee with a health & safety update, including progress on the implementation of the external Quadriga review recommendations. Key updates this month include the consultation on and officer-level approval of the Corporate Health & Safety Policy (which is presented for approval by Members elsewhere on today's agenda), the Safety Management Framework review, the completion of three pilot assurance audits in the Environment Department, and the Health & Safety forward work plan for 2024. This work plan will drive larger core pieces of work that will refresh our Safety Management System and will close off the remaining of the findings from the external audit, such as health & safety training and the review of safety documentation and guidance. To date, we are at 31% completion with regard to implementing the recommendations. This report also gives an update on the progress of the Building Safety Case progress.

### Recommendation(s)

This paper is for information. Members are asked to note the general update.

### Main Report

#### Background

- Following a red risk raised by internal audit, the Town Clerk engaged a review by Quadriga on the effectiveness of the second line of defence for health & safety. To realign the team into its original and correct second line of defence role, structural changes were made in December 2023. Of the 19 Quadriga recommendations, 31% percent of actions are now closed. Six are complete, 17 are in flight and two are yet to be started. Attached at **Appendix 1** is an updated tracker of the workstreams.

#### Current position

##### *Health & safety systems review*

- A key piece of work carried out by the team since January 2024 has been the review of the Health & Safety Policy and the organisational arrangements for managing health & safety, typically referred to as its safety management framework (SMF). The Policy has been reviewed and has been presented for approval elsewhere on your agenda today. The SMF sets out how the organisation will manage safety, instructions to operate the safety management system (SMS). The framework sets the broad operating structure

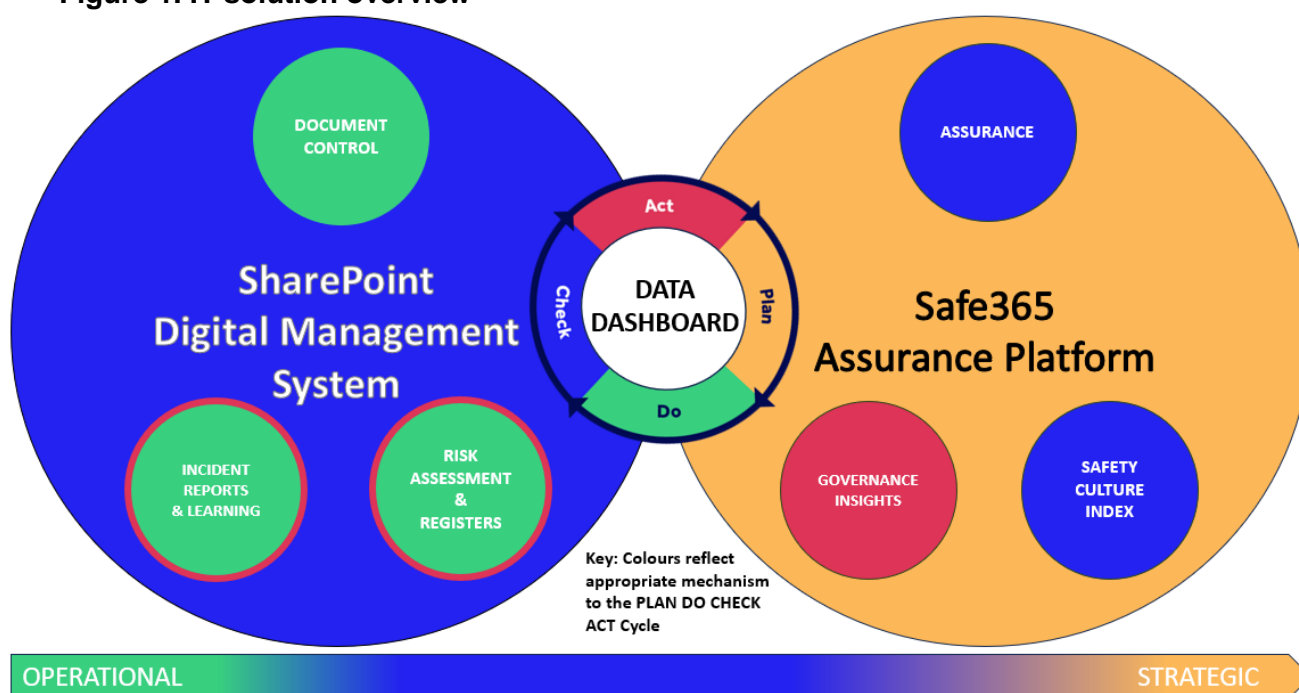
within which departments will manage their own health & safety management systems, as is expected of front-line operations in our policy. This is also consistent with first line of defence principles and the INSHPO (International Network of Safety & Health Professional Organisations) framework. It was work shopped on 29<sup>th</sup> February with our HSPN (Health & Safety Professional Network) colleagues from Departments. There was unanimous support for this approach and a real desire to collaborate on its implementation departmentally.

3. The SMF has been designed to create a 'freedom within a framework', specifically to allow enough freedom of movement, within boundaries, to departments given our organisational complexity and variation between departments. The boundaries set are: a) compliance and b) risk. It is designed to be proportionate based on departmental risk profile, dictated by size, complexity, safety maturity and hazard loading. In other words, lower risk departments will not be required to spend disproportionate resources on safety, however setting a clear expectation that compliance with the law is a minimum requirement. This proportionality allows for 'safety bureaucracy' to be kept to a minimum and supports safety as a dynamic business enabler, rather than a bureaucratic activity.
4. The framework builds on the responsibilities within the health & safety policy and sets out our assurance framework. It mandates key expectations for departments i.e. the nomination of safety leads and directing minimal competence requirements for roles and people (matched to risk profile). It sets minimum organisational training requirements and introduces the standards that will allow us to maintain control of the system, diagnose its efficiency and, critically, allow us to monitor compliance and provide assurance, specifically on the key legal aspects of work: risk assessment, accident investigation and lessons learnt, and making reports to the regulator, the HSE (Health & Safety Executive) under RIDDOR (Reporting of Injuries Diseases & Dangerous Occurrences Regulations 2013). The draft framework is attached. It is attached only as an example to show the detail involved. It is hoped it will give Members a feeling for the complexity and the controls we are setting organisationally to support in safety being a deliberate outcome of work. This will remain a living document and as such will consistently evolve to support the organisation.

#### **IT Infrastructure & Assurance**

5. The health and safety team has completed scoping its requirements for an IT system, in line with recommendation 17 of the Quadriga audit. We have identified and shortlisted two solutions now being taken through the IT & procurement process. They are, a SharePoint Digital Management System, expected to be built for us by a specialist external vendor, under our guidance but leveraging our organisational investment into the existing Microsoft SharePoint infrastructure. Using an external provider allows us to prototype a compliant solution at speed and shorten the design iteration cycle. This solution will digitise our safety management system and set the foundations for central visibility, oversight of key documents and the gathering key data points to enable performance reporting.
6. The second solution is a third-party SaaS (Software as a Service) assurance platform which will enable us to diagnose and understand our departments' ability to manage health & safety and their efficiency and effectiveness in doing so, i.e. their safety maturity. This will in turn allow us to provide assurance to the Town Clerk and Members from across the Corporation.
7. Together, these will become the City of London Corporation's health & safety IT solution. An overview of the solution architecture is shown below at Figure 1.

**Figure 1. IT solution overview**



**Assurance**

8. Our assurance framework has also been scoped, we have identified 55 teams organisationally whose task complexity and risk loading (hazard potential x severity) would merit a regular assurance deep dive. The proposed SaaS system, outlined in paragraph six, will make the corporate health & safety team more efficient by reducing audit time from 2 days to 4 hours and the assurance process more effective and comparable by using one audit methodology. Moreover, it accelerates the assurance cycle, allowing us to deliver a systems audit for all departments annually. Under these plans, 10% of departments will be externally audited by a third party, conforming to best practice. When implemented, this solution will generate 430 extra data points, 23,650 new data points across the 55 profiles.
  
9. Using this assurance platform three pilot audits have been undertaken in the Environment department. Heathrow Animal Reception Centre (HARC), North London Open Spaces (NLOS) and City Gardens & Cleansing. The team would like to recognise the Director of Environment and his SLT for championing this, volunteering to go first, modelling excellent safety leadership. The results have been encouraging, showing they are all operating a live safety management system, the key requirement of safety legislation. None of the three pilot sites met the 65% score, indicating full system compliance, scoring in the 53-58% range. As an aggregated score this gives the Environment Department an overall score of 55%, so far.

Division Audited	Outcome (Compliance >65%)	Div. Areas of improvement
City Gardens & Cleansing	<b>58%</b>	Verification & Audit
Heathrow Animal Reception Centre	<b>55%</b>	Verification & Audit
North London Open Spaces	<b>53%</b>	Verification & Audit Emergency Preparedness

10. A common area identified for improvement are our corporate processes for Director inductions. This process ensures our senior leaders have the right knowledge and understanding of what is required from them in the safety context, setting them and their departments up for success. Improving this area alone will increase scores by 3% across divisions, bring us closer to the 65% target. The insights gathered allow us to formulate interventions to fix the gaps. Our aim is to carry out this exercise across the entire organisation, unlocking vital insights for SLT and the new Strategic Safety Board (SSB) to direct priorities and giving visibility of the management system and its effectiveness. **Appendix 2** provides a breakdown of audit performance in the pilot areas visualised through the starburst indicator.

### Next Steps: Year of Foundations

11. To build back in 2024 we will focus on embedding the basics. This programme will allow us to re-instate the SMS, update it, communicate it, and assure necessary corporate mechanisms (training, documents and master procedures are fully in place). The Corporate Health & Safety team will support Departments by right sizing their local SMS with them through a series of implementation workshops. One key outcome is to specifically scope the need for safety resources, as per the Quadriga audits first recommendation and align any resource uplifts to our medium-term financial strategy. This decision must be supported by data, using parameters such as safety maturity, hazard loading, departmental complexity, knowledge, structures etc. The aim is to set solid foundations for a strong safety culture. We have identified five key objectives for implementation in 2024.

Objectives	Key Results
1. Develop the Safety Management Framework and align to City of London Corporation by EOY 2024	1.1 Complete initial draft of the Safety Management Framework by June 2024. 1.2 Obtain feedback from relevant stakeholders and incorporate necessary revisions by September 2024. 1.3 Finalise and roll out the Safety Management Framework with City of London Corporation by December 2024.
2. Digitise our Safety Management System and approach to assurance by building a Safety Portal on COLNET by July 2024	2.1 Assess existing systems and requirements for digitisation by April 2024. 2.2 Develop and launch the prototype version of the Safety Portal on COLNET by June 2024. 2.3 Complete testing and debugging, ensuring full functionality by July 2024. 2.4 Procure Safe365 Assurance tool by May 2024 2.5 Complete Safe365 audits across 55 Risk Profiles by August 2024
3. Design and deploy a bespoke IOSH accredited managing safely and leading safely course for the CoL by October 2024	3.1 H&S governance update session for Directors & Members by June 2024 3.2 Develop course curriculum and materials by August 2024. 3.3 Pilot the course with a select group of leaders and gather feedback by September 2024. 3.4 Refine the course based on feedback and deploy it across the City of London Corporation by October 2024.
4. Develop a performance reporting mechanism for SLT and CSC by April 2024	4.1 Identify key performance indicators (KPIs) for safety management by April 2024. 4.2 Develop a reporting framework, cadence and report template to feedback safety performance to leadership by April 2024.

	4.3 Implement the performance reporting mechanism and push down into Departments by August 2024.
5. Raise profile of Health & Safety amongst City of London Colleagues in 2024	<p>5.1 Launch a health &amp; safety communications campaign to increase awareness of health and safety by April 2024.</p> <p>5.2 Organise workshops (future strategy) sessions to canvass colleagues on their perceptions of safety and gather data for medium to long term strategy by June 2024.</p> <p>5.3 Measure and evaluate the effectiveness of the awareness campaign and target improvement measures for 2025.</p>

A Roadmap and Timeline is included at **Appendix 3**.

### **Live Issues: Building Safety Case**

12. In terms of live issues, there is one specific item to which the committee's attention should be drawn, namely, the Building Safety Act.
13. Under the Building Safety Act 2022, a number of new roles and responsibilities have been introduced relating to high-rise residential properties. These duties relate to the management of risk and prevention strategies to avoid and reduce the impact of potential incidents. The Building Safety Act aims to limit the consequences should an incident occur relating to fire safety (which includes smoke, heat, fumes and any form of combustion) or structural failure of a high-rise building.
14. One of the new responsibilities is the requirement to produce and maintain a BSC (Building Safety Case) Report. The new building regulator may call these in for review from the 1<sup>st</sup> of April. Organisationally we were lagging with progressing these BSCs (of which there will be 34 in total). At the beginning of March, we set up a working group to ensure we are actively driving and tracking the safety cases through to completion. The Director of Community & Children's Services has been chairing this group and, at the time of writing, we are now expecting all our highest risk buildings, the residential towers, to be fully complete by this date. Work will continue to ensure the others are progressed at pace.

### **Corporate & Strategic Implications**

- **Strategic implications** – None at this stage
- **Financial implications** – Quotations received to implement the identified assurance system is £180,000 for a three-year period. This is currently being scoped by procurement and IT.
- **Resource implications** – None at this stage.
- **Legal implications** – None at this stage.
- **Risk implications** – None at this stage.
- **Equalities implications** – None at this stage.
- **Climate implications** – None at this stage.
- **Security implications** – None at this stage.

### **Conclusion**

15. Significant strides have been made in the implementation of the 19 Quadriga recommendations, with 31% of actions already closed and good progress evident across various fronts. Notably, the reviews of our Health & Safety Policy and Safety Management Framework have been conducted, aligning them with our current organisational structure and strategic direction. Endorsement for these elements and

our forward plan is imperative, as it sets the stage for enhancing safety management practices within our organisation.

16. The proposed IT solutions hold promise in streamlining our safety management processes and providing robust oversight to leadership. The pilot assurance audits conducted in the Environment department exemplify proactive engagement with safety initiatives, despite the need for further improvement to achieve the 65% target. A measure of assurance should be taken away from the fact that they are operating a live management system, they key legal requirement. These findings will inform our ongoing efforts to strengthen safety practices across all departments.
17. Looking ahead, our focus for 2024 is centred on laying solid foundations for safety management, encompassing objectives ranging from framework embedding to the development of performance reporting mechanisms and heightened awareness campaigns. By diligently pursuing these objectives, we aim to cultivate a culture of safety excellence and fulfil our commitment to safeguarding the wellbeing of our employees and other stakeholders.
18. Members are asked to receive this report for information and note that:
  - Good progress is being made on closing the findings from the Quadriga Health & Safety Audit, 31% of these have now been completed.
  - The Health & Safety Policy is in the process of being approved and a plan is in place to refresh our safety management processes.
  - The Environment Department's pilot audits have revealed areas for improvement in verification and audit processes, as well as Director Knowledge mechanisms, necessitating enhancements to bolster safety performance and compliance.
  - The working group mechanism to track and ensure that our building case submissions are available if called in by the regulator by 1<sup>st</sup> April has ensured that eight of our highest risk buildings will have been completed.

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**Appendices**

Appendix 1 – Quadriga Action tracker

Appendix 2 – Safe 365 Audit Profiles breakdowns of the piloted area

Appendix 3 – Roadmap & timelines

Appendix 4 - City of London Corporation Health and Safety Organisational Arrangements:  
The Safety Management Framework (SMF)