



# City of London Corporation Health and Safety Organisational Arrangements

## The Safety Management Framework (SMF)

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# 1. Overview

Health and safety management is an ongoing process, not a one-off task. It is not enough to just control the risks in the business, you must make sure that they stay controlled.

## Plan

- A corporate policy setting responsibilities and principles to be followed for health and safety
- A suite of key performance indicators (KPIs), both lead and lag, such as:
  - health and safety improvement plans completed
  - reviews of health and safety improvement plans completed
  - health and safety inductions completed
  - health and safety improvement groups in place
  - attendance and effectiveness of health and safety improvement groups assessed
  - accident and near misses reported
  - learning opportunities taken
  - risk assessments completed
  - 'Risks identified' v 'risks controlled' assessment completed
  - control effectiveness monitoring – hierarchy of controls
  - corrective actions completed
  - DSE workstation assessments completed
  - wellbeing surveys completed
  - training undertaken

## Do

Basic framework comprising governance, central and local arrangements, for example:

- Departmental verification structures (for performance monitoring)
- Corporate standards and key safety requirements (KSRs)
- Frameworks to give direction to all departments.
- Local health and safety arrangements needed to delegate tasks for how safety will be managed.
  - Identification of risk profile through risk assessment, identify what hazards in the workplace could cause harm, who it could harm and how, and what you will do to remove or reduce and manage the risk. Breaking this into tasks is the easiest way to do this.
  - Decide what the priorities are and identify the biggest risks.
  - Decide on the preventive and protective measures needed and put them in place.
- Health and safety improvement plans - organise activities and resources to deliver your plan. In particular, aim to:
  - Involve workers and communicate, so that everyone is clear on what is needed and can discuss issues. Develop positive attitudes and behaviours.
  - Provide adequate resources, including competent advice where needed.

- Implementation of your plan
  - Provide the right tools and equipment to do the job and keep them maintained.
  - Train and instruct, to ensure everyone is competent to carry out their work.
  - Supervise to make sure that arrangements are followed.

### Check

Measuring performance.

- Plans implemented – paperwork on its own is not a good performance measure.
- Assess how well the risks are being controlled and if you are achieving your aims. In some circumstances formal inspections or audits may be useful.
- Investigate the causes of accidents, incidents or near misses.

### Act

Review your performance.

- Learn from accidents and incidents, ill-health data, errors and relevant experience, including from other organisations.
- Revisit plans, corporate standards, documents and risk assessments to see if they remain valid or need updating.
- Act on lessons learned, including from audit and inspection reports.

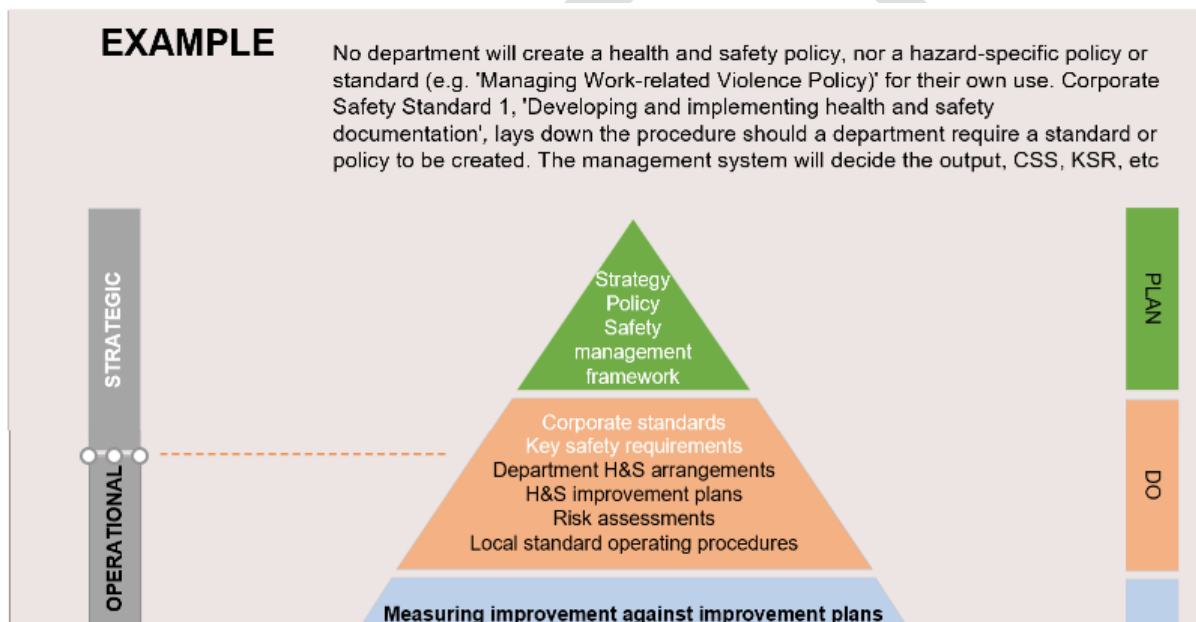


## 2. Health & Safety Policy

A corporate health and safety policy is in place. It is a corporation wide policy and 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 Chief Executive. It sets out expectations for the behavioural approach to health and safety required by our people and our leaders.

The corporate framework will provide high level corporate policy, corporate safety standards (CSS) and key safety requirements (KSR). These documents will give direction and set parameters for local implementation, to increase consistency of approach and ensure regulation of safety practice. The framework provides a link between these and this will guide and inform local practice.



### 2.1 Corporate Safety Standards (CSS)

While the SMF is flexible and arrangements adapted to individual departments through 'local arrangements,' there are several corporate standards that apply to the whole organisation. These must be followed to ensure compliance in critical risk areas and maintain legislative required corporate mechanisms, such as, incident reporting & risk assessment.

These standards will be created centrally, in collaboration with departments, through a governance process as established in Corporate Safety Standard 1: 'Developing and implementing health and safety documentation.'

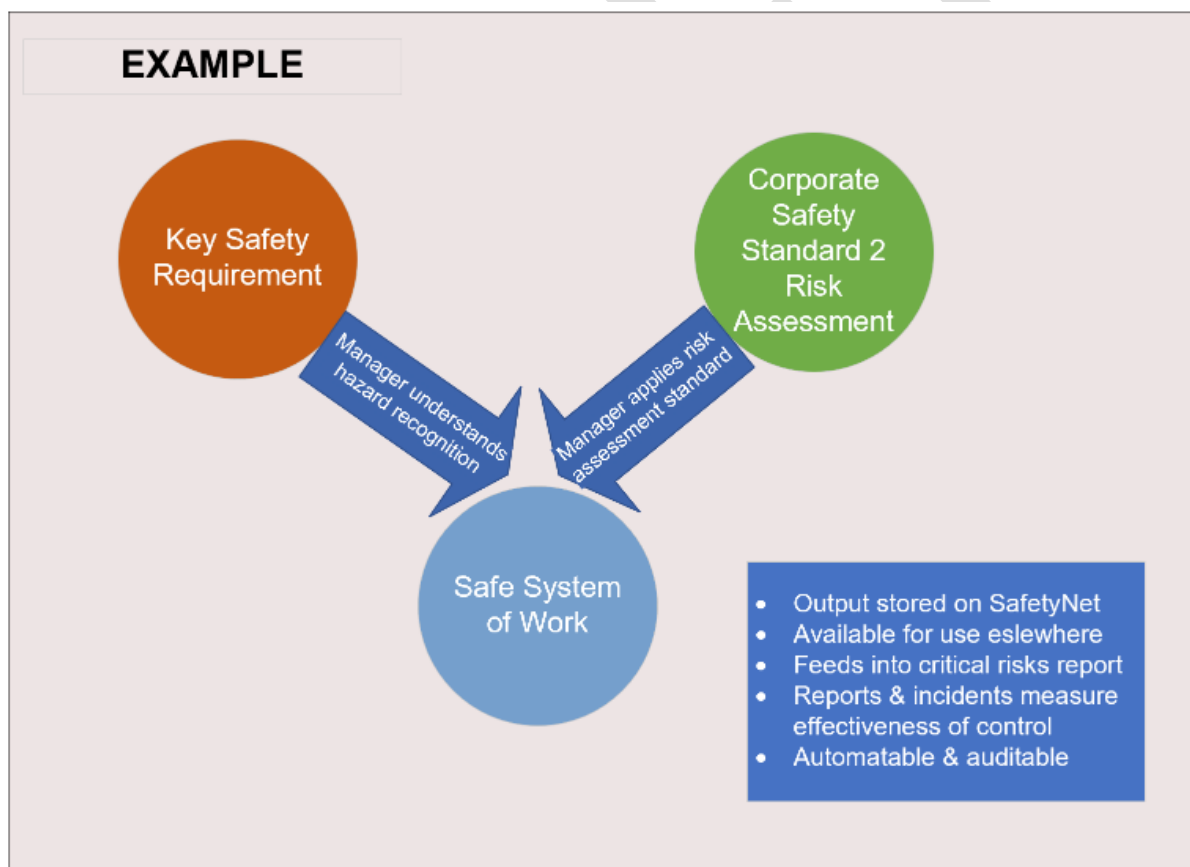
- CSS1 - Developing and implementing health and safety documentation.
- CSS2 - Risk assessment

- CSS3 - Reporting and learning from Incidents.
- CSS4 - Health & safety training
- CSS5 - Auditing & inspection

## 2.2 Key Safety Requirements (KSRs)

KSRs will be formulated by considering legal requirements, approved codes of practice and industry best practice. It will give people leaders and our people appropriate information on hazards, in a manner highly tailored to the City of London. KSRs are managed by the Corporate Health and Safety Team but can be created by any competent person and will be approved in line with CSS1 as part of the Safety Managers Forum.

A KSR has been designed specifically to be used with CSS2 (Risk assessment). The KSR provides the knowledge required by a manager to understand hazards and how hazards can occur, to then apply this knowledge using the risk assessment process. The outputs or controls from the risk assessment will then be used in the development of any standard operating procedure.



## 2.3 Risk Assessment & Risk Management

All local tasks and activities must be risk assessed and have controls identified. The application of CSS2 to this will allow for consistency of approach so that our risk scores can be measured in line with our broader corporate risks. The corporate risk matrix is used to assess risks.

All risk assessments must be recorded, managed, and escalated through the digital risk management system. They must remain 'live' (kept updated alongside the operational lifecycle) until the activity is no longer carried out.

Departments must maintain their risk assessments live through the Digital Safety Management System to be able to compile and maintain visibility of the organisational risk register. This register is critical for our SLT, Chief Officers to make decisions on safety. It will be regularly reviewed by the Corporate Health and Safety team, local health & safety improvement groups and the Strategic Safety Board.

## **2.4 Critical risks**

Our critical risks will be identified through the correct application of risk assessment at all levels. Critical risks are typically those with the potential to cause death or life-changing injury. It is vital that all departments apply risk assessment consistently and effectively. Once identified by the Corporate Health and Safety team, critical risks will be proactively managed, and a corporate risk assessment will be carried out to ensure consistent controls are applied as a minimum standard throughout the organisation. Further controls can and should be applied locally depending on the specifics of the task carrying the critical risk.

## **2.5 Critical risk management framework reporting (dynamic risk register)**

The risk registers will be kept at a local level, organised, and managed using the Digital Safety Management System which will allow our top risks to be reviewed, controls audited, and control effectiveness reported to the SLT, Strategic Safety Board, CORMG, Audit and Risk Committee and the CSC as required to ensure good proactive management and robust governance. The critical risk register will be reviewed quarterly. New high or extreme risks will be reported immediately to the SLT for review.

## **2.6 Mandatory health and safety training**

Given the key strategic importance of empowering our people to understand and apply health and safety, some mandatory health and safety training courses have been identified for all staff and appropriate managers and all senior leaders.

**Health & Safety Corporate induction:** this must be completed by all new staff, including temporary and contract, by the end of their first week at the City of London Corporation.

**Safety for Senior Executives:** All Tier 1 & 2 Chief Officers must complete this course and refreshed on a yearly basis. Elected Members will undertake this course as part of them taking up office and will be refreshed on a three yearly cycle or upon re-election, whichever occurs first.

**Managing Safely:** All people leaders will attend the Managing Safely course provided by the Corporate Health and Safety team. This must be completed within the first 3 months.

**Risk assessor and Incident Investigation training:** Under the HSWA, risk assessment is a key requirement and the foundation on which safety is managed. Anyone carrying out this task must attend the General Risk Assessors course based on our standard, CSS2.

Under the HSWA, incident investigation is a key requirement and the foundation on which safety is managed. Anyone carrying out this task must attend the Incident Investigation Course based on our standard CSS3. This reflects and supports the internal incident reporting mechanism.

## **2.7 Digitising Health & Safety**

### **Digital Safety Management System - SharePoint site**

Use of the safety systems are mandatory across the organisation.

All local safety outputs, e.g. risk assessment, audits, inspections, investigations, etc, must be input into the appropriate module in SharePoint to ensure compliance, provide vital safety data, drive our risk registers and allow visibility to leaders for assurance and governance purposes.

### **Safe365**

Understanding departmental ability to manage health & safety, their efficiency and effectiveness at doing so, allows us to gauge safety maturity. This will in turn allow us to provide assurance. Insights generated by this tool will allow us and departmental leadership to diagnose and continuously improve their approach to safety.

Safe365 offers a consistent approach and a 'common language' to evaluate safety maturity across the organisation. The dashboard aggregation feature allows an 'organisational' view of safety management for our SLT, Town Clerk, and the Corporate Services Committee, as well as the assurance view at departmental level, for Chief Officers and their committees. This tool will also automate the health & safety improvement planning process required annually as part of the Business Planning Framework.

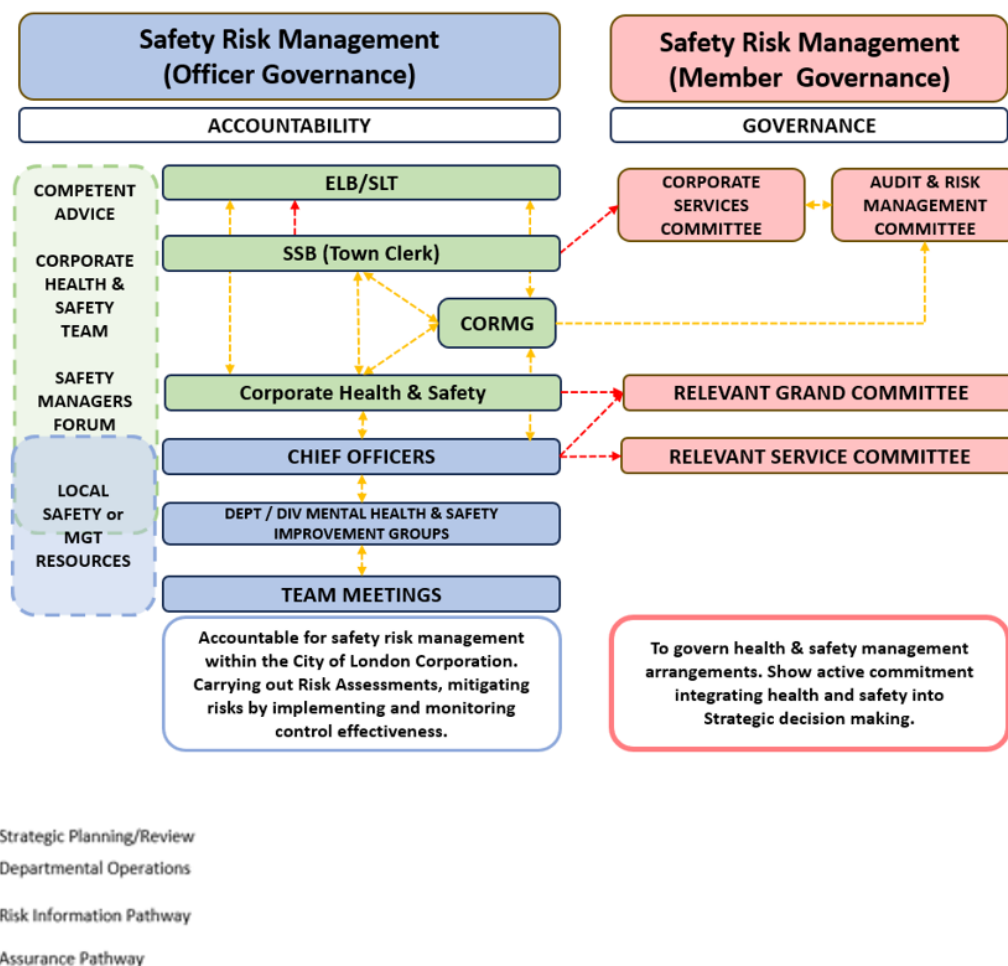
### **City Learning**

City Learning is our learning and development system. It must be used to record all health and safety training material.



### 3. Health and Safety Governance framework

A governance framework comprises of systems to direct and monitor an organisation. Allocating responsibility drives action: in this case, safety management. A governance framework is fundamental to an organisation's overall risk management function, which is a key responsibility of our Chief Officers, Senior Leaders and our elected Members.



A diagram of our governance framework showing information flows into and out of the corporate mechanisms to manage health and safety.

#### 3.1 Strategic Safety Board

The boards 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.

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 Chief Executive will chair the board. The board allows the City of London Corporation to establish a meaningful governance framework for safety decision-making. It also allows the organisation to provide 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 Safety Board and terms of reference can be found on COLNET.

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. Moreover, 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.

### **3.2 Health & Safety Managers Forum (HSMF)**

This is a functional group chaired by the Director of Health & Safety or Head of Health and Safety. The HSMF will be a critical working group where many of the operational obstacles and cross-functional issues can be collaborated upon 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 of practice through which best practice and direction can be shared across City of London Corporation departments.

It will meet quarterly. Low risk departments can attend as required but at least once a year or when requested.

### **3.3 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.

### **3.4 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 successful resolution.

A health and safety improvement group will be formed at the department level. Health and safety improvement groups will be set up to best reflect the operation of their department.

It is expected the group is chaired by a senior manager or director of the department. Health and safety management, performance and issues should be discussed within this framework. 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 regards 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 the SafetyNet (SharePoint)

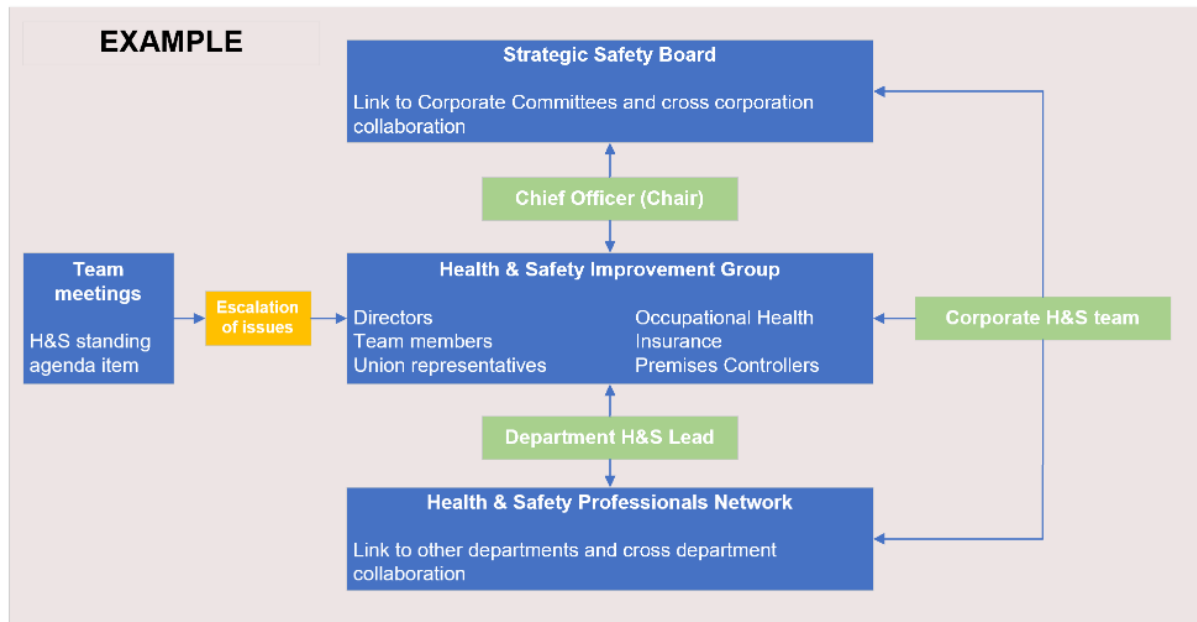
Accident and incident statistics will be monitored by this group and reviewed as necessary, to ensure departmental learning and prevention of recurrence.

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:



### 3.5 Premises Controllers

Premises Controllers are responsible for implementing the Corporations Health & Safety Policy and guidance relevant to the safe operation of any demised premises, including:

- Managing suitable health and safety inspections of site operations in accordance with guidance documents
- Managing any inspection, audit, or assessment recommendations for areas of operation under their control or bringing to the attention of the relevant party, including tenants or contractors
- Managing contractor and visitor safety when attending site
- Managing First Aid provision and fire evacuation procedures
- Escalating any appropriate health & safety incident, defect or compliance gap through their organisation.

### 3.6 Local Departmental health and safety arrangements

Each department is required to ensure appropriate arrangements for managing health and safety are in place. The arrangements will be implemented according to the complexity and risk profile of the department.

Departmental health and safety arrangements will not duplicate existing or proposed corporate policy, corporate standards or KSRs.

Local arrangements will tie into the corporate system through various touch points:

- Safety Management Framework
- health and safety governance framework
- policy, corporate standards and KSRs
- auditing frameworks

A local charter from each Chief Officer should be provided, reinforcing each Officers commitment to health and safety and their areas of focus. The charter allow directors to set their own tone, set expectation for managing health and safety and communicate what they want to achieve, e.g. from a culture perspective.

### **3.7 Divisional/Group arrangements**

Directors are required to develop and implement their own departmental health and safety arrangements. These should tie back into the wider Departmental arrangements for ease of monitoring and control.

In designing local arrangements, risk profile and departmental complexity should be used as guiding elements. The Corporate Health and Safety team can advise in this respect.

#### **Example**

It would be appropriate for each department/institution to review their risk profile and identify if local health and safety arrangements are required at this level or at division/group/team level, depending on the risk associated with the work being undertaken.

It may also be appropriate for the higher risk departments/institutions to have their own competent health and safety lead to manage and monitor these arrangements.

Lower risk departments with less complex risks can be managed by following this SMF and corporate documents.

Arrangements will clearly set out who is responsible for specific actions. They must secure ownership and accountability. The arrangements should also highlight the governance and procedural arrangements within the department and how these map to the department and people in resource positions, i.e. DSE assessors / first-aiders etc. They must be tailored to meet the needs of the department, taking into consideration the nature of work and associated risks. Local arrangements form a key component of the City of London Corporations Safety Management Framework and shall be maintained as a live document.

## **Guidance**

This key part of the framework will establish a structure for managing health and safety. It will detail what departments are going to do in practice, to achieve the aims set out in the Chief Officers charter and how health and safety will be managed within the department. The additional actions departments take to manage health and safety should be set out under this arrangements section. They could include:

- staff training
- local inductions
- health and safety improvement groups
- general rules for risk assessors, strategies and numbers of assessors, etc
- use of safety equipment and personal protective equipment (PPE), including goggles, safety boots or high-visibility clothing
- testing of plant
- health surveillance
- safety inspections, tours or audits

### **3.8 Health and safety leads**

The generally low risk Departments, such as those with predominantly office-based risks, will all nominate a departmental lead, who will help coordinate health and safety issues and liaise with the wider Health & Safety Network and Corporate Health & Safety team for support. The Business Support Manager will typically be given this responsibility.

### **3.9 High Risk Departments**

Complex and high-risk departments must nominate an appropriately competent person to act as their departmental health and safety lead. Some departments, given their risk profile and complexity, may align this role to a health and safety professional.

## Example

Each AD / Head is accountable for the health and safety of their staff to their director and each Director accountable to their 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 & safety risks, and so could have a competent health and safety lead

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

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. High risk departments' leads will be expected to be trained to a minimum of NEBOSH Certificate (recognised health and safety qualification) standard, or equivalent.

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

## 4. Departmental health and safety improvement plans

Like business plans, health and safety improvement plans are a key planning and communication tool, both within and between departments, for identifying priorities, tracking performance, peer learning and support.

Health and safety improvement plans must be produced by each department. Safe365 will provide a tool to do this.

Low risk divisions may produce a plan as per the risk parameters discussed above. They are used to outline the top work streams of a department to help it achieve its safety objectives.

Progress monitoring shall be regular and as a minimum, on a quarterly basis.

## 5. Monitoring, assurance auditing and due diligence

### 5.1 Departmental assurance

It will be the responsibility of directors to provide adequate mechanisms for the proactive monitoring of safety performance, including an inspection programme in line with first line of defence principles.



### 5.2 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.

The result of the annual audit will be summarised into a report which will be reviewed by the Strategic Safety Board, SLT and the appropriate Committees.

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

Assurance will be demonstrated by:

- documentation
  - departmental health and safety plans
  - risk registers
  - risk assessments
  - safe working methods
  - local training records.
  - proactive inspections



- Incident Investigations, and actions completed
- These will be produced and kept electronically in SafetyNet. It is essential that working documents such as risk assessments are easily available to all employees.
- Practice / Inspections - managers will ensure that active monitoring is carried out in their areas, based on their health and safety plans and standard operating procedures (SOPs) in order to protect against 'drift.'
- The assurance process should involve a form of peer review and contain some cross-departmental audits. This is seen as an opportunity to break silos, share best practice and improve consistency of approach: an assurance exercise with a fresh pair of eyes.

Compliance with assurance programme should be discussed as part of individual performance monitoring within staff appraisals conversations.

### 5.3 Reporting

KPIs are in place to monitor organisational wide safety performance. Indicators are proactive (lead) and reactive (lag). They will be used to monitor general compliance with health and safety at team, divisional, departmental, and corporate level and to drive improvement activity. Monthly performance reports will be taken to SLT monthly.

## 6. Glossary

Accountability – the obligation to take ownership for the result of actions required by yourself or another person

Audit and Risk Management Committee – oversees the City of London Corporation's systems of internal control, to ensure that the City of London Corporation's risk assurance framework accurately reflects the risk environment.

Chief Officers Risk Management Group (CORMG) – This is a sub-committee of the Executive Leadership Board that supports it in its overall responsibility for risk management.

Corporate Safety Standard (CSS) – documented standards to ensure a consistent and evidence based process for the development, agreement and distribution of strategies, standards and key safety requirements to support adherence to the health and safety framework.

Corporate Services Committee (CSC) – responsible for personnel and establishment matters throughout the City of London, including negotiations with the recognised trade unions. In addition it is the service committee for Town Clerk's Department and Comptroller and City Solicitor's Department.

Hazard – something which can cause harm such as asbestos or a fall from height

HSWA – Health and Safety at Work etc Act 1974 which is the primary piece of legislation covering occupational health and safety in Great Britain.

Key Performance Indicator (KPI) – measurable values used to monitor and evaluate the progress toward the strategic health and safety business objectives, such as number or risk assessments completed.

Key Safety Requirement (KSR) – documented information on key health and safety hazards, providing clear guidance on how to manage the associated risk

Lagging indicator – a type of reactive monitoring through investigation of incidents and accidents to identify ‘what went wrong’ and identify failure of current controls.

Leading indicator – a type of proactive monitoring through routine checks on key actions or activities which focus on improving health and safety performance, such as completion of risk assessments or training.

NEBOSH – National Examination Board in Occupational Safety and Health

Responsibility – the duty to complete a task

Risk – the likelihood that a hazard can cause harm to somebody and how serious this could be

Risk assessment – the process for any task of identifying the hazards present, who may be harmed and how, the current controls and identifying any additional controls needed to prevent or minimise the risk. These should all be recorded and reviewed regularly as required.

Safe365 – a software tool for measuring current health and safety maturity

Safety maturity – a measure of the progress in improving safety culture in a business, often defined as “how sophisticated your organisation’s health and safety program, procedures and workflows are”

Digital Safety Management System – the City of London Corporation health and safety intranet site

Senior Leadership Team (SLT) – chaired by the Town Clerk and Chief Executive and is the leadership team for the City of London Corporation and is comprised of Chief Officers. It plays a key role in ensuring the organisation and its institutions are aligned with the City Corporation’s strategic framework and Corporate Plan.

Strategic Safety Board – replaces the Corporate Health & Safety Committee.

Standard Operating Procedure (SOP) – an agreed written process to be followed for undertaking a task

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