

<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 Decision</b>
<b>Report author:</b> Oliver Sanandres, Director of Health & Safety and Head of Profession (Interim)	

### Summary

This report presents an overview of the updated Health & Safety Policy of the City of London Corporation. The policy underwent a thorough review by the safety team following an external review by Quadriga, which emphasised alignment with legal requirements and organisational restructuring. Key revisions include the removal of the Chief Operating Officer and the repositioning of the Health & Safety function within the Deputy Town Clerk's function. Notable changes have been made, such as the addition of the Town Clerk's personal statement on health and safety, the creation of a Strategic Safety Board to supersede the current officer led Corporate Health & Safety Committee and the integration of the Chief People Officer and Commercial Director, acknowledging their organisational safety risk management responsibilities. The policy enhancements also feature refreshed diagrams illustrating the Health & Safety Management System and governance pathways within the Corporation. This comprehensive update underscores the commitment of the City of London Corporation to ensure a safe and healthy working environment for all and in support of the People Strategy.

### Recommendation

Members are asked to approve the updated and reviewed Health & Safety Policy set out at Appendix 1.

### Main Report

#### Background

1. 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. One finding was that our Policy was out of date. the current Policy is dated 2018 and should have been reviewed in 2021.

#### Current position

##### ***Health & Safety Policy review***

2. This Policy was thoroughly reviewed by the Quadriga audit, which recommended as follows: *'The draft Health, Safety and Wellbeing Policy is well written and should be finalised and adopted taking account of the changes needed following the removal of the Chief Operating Officer. References to the relevant legal requirements that the Policy*

*is intended to fulfil should be included, specifically Section 2(3) of the Health and Safety at Work etc. Act 1974, Regulation 7 of the Management of Health and Safety at Work Regulations 1999 and Regulation 4 of the Construction (Design and Management) Regulations 2015.'*

3. The draft Policy is attached at Appendix 1. The Policy was approved by ELB on 22<sup>nd</sup> March 2024.
4. On page 4 of the Policy, the Chief Operating Officer (COO) role has been removed and the departments listed reflect the current structure. Specific reference to Section 2(3) of the Health & Safety at Work Act 1974 is now made at Page 3 under the Scope section of the Policy. Reference to Regulation 7 has now been aligned to the role of the Health & Safety Director, Page 14, Para 7.2. and Regulation 4, Construction (Design and Management) Regulations 2015 has been encompassed as a general responsibility of Chief Officers.
5. The Policy has also changed in line with the December 2023 organisational restructure, repositioning of the Health & Safety function into the Deputy Town Clerk's Department. The Policy acknowledges the Department now responsible for the strategic direction of health & safety at the City of London Corporation. The most significant change is the move away from an officer led Health & Safety Committee to creating a 'Strategic Safety Board' as outlined in the Policy at page 8, paragraph 5.6. This clarifies and aligns to the position and Terms of Reference of the Corporate Services Committee as the responsible Member-led Committee with oversight of Health & Safety across the City of London Corporation.
6. The Unions have been consulted and have agreed to collaborate on safety issues working as our strategic partners on the Strategic Safety Board, and if successful in practice, as is the intent of all parties this will negate the requirement for a separate consultative mechanism under the Safety Representatives and Safety Committees Regulations 1977.
7. Health & Safety responsibilities were also reviewed in the Members and Chief Officers Schemes of Delegation. This partly closes off another key finding of the Quadriga report concerned with safety responsibilities not being embedded in Job Descriptions. This workstream will be fully closed off as we partner with HR during the Ambition 25 work.
8. There are typically three main channels for safety risk to enter an organisation: Departmental work processes and tasks, the people employed to do the work and external risk imported from the procurement of goods and services. Previous policies highlighted and focussed on the responsibilities of Chief Officers and Managers under the first channel. In recognising this gap, the Chief People Officer has been specifically included in this review for the risk generated by human resource processes and reflects the importance of occupational health, learning & organisational development and wellbeing in mitigating these risks. Page 10, para 6.2. Contractor Management and Procurement of goods and services is another key risk channel for an organisation. To mitigate these safety risks, this Policy now highlights the role and responsibilities of the Commercial Director, shown at Pages 10-11 Paragraph 6.3.
9. The Policy has also refreshed some key diagrams illustrating how the health & safety management system operates, as supported by the Policy. At Paragraph 8, Figure 1, we include an updated, simplified diagram of the governance and escalation pathways within the Corporation of London, integrating the new Strategic Safety Board and critically emphasising each departmental committee's own governance oversight responsibility for health & safety, along with how each Chief Officer manages these

committees. It also shows how health & safety must be aligned into every team meeting at every hierarchical level to connect the coal face to the organisation's decision makers and how the safety management system is the key mechanism for this to happen. This integration forms the backbone of risk escalation and communication pathways in both directions. The Chief Officers' Risk Management Group (CORMG) has also been incorporated to ensure that 'safety' as another business risk is visible to this group following feedback from the Corporate Strategy team.

10. Figure 2 on Page 16 shows a diagram of the Plan, Do, Check Act Cycle. This cycle is the universally adopted model for successful health & safety management. The diagram clearly shows the roles people, processes and governance mechanisms play at the City of London Corporation and how they are expected to work together, not simply to deliver safe work, but to continuously improve safety processes and outcomes.

### **Corporate & Strategic Implications**

11. **Strategic implications** – Development of the SSB will allow us to plan and collaborate on work programmes to effectively support the Corporate Plan or reinforce health & safety as a cultural belief of the People Strategy.
12. **Financial implications** – None at this stage.
13. **Resource implications** – None at this stage.
14. **Legal implications** – This Policy closes off a major compliance gap as was identified by the Quadriga audit. Our current Policy is three years overdue with its review.
15. **Risk implications** – None at this stage.
16. **Equalities implications** – Based on all available data there is no evidence at this time to suggest that there is any adverse impact in relation to any protected characteristics.
17. **Climate implications** – none.
18. **Security implications** – none.

### **Conclusion**

19. The thorough review and update of our Corporate Health & Safety Policy, as detailed in this report, reflects our commitment to ensuring the health, safety and wellbeing of all employees and stakeholders within the City of London Corporation. The changes made, including alignment with relevant legal requirements, following organisational restructures, and identifying all risk safety channels are crucial steps towards enhancing the effectiveness of our health and safety risk mitigation and governance.
20. The introduction of the Strategic Safety Board signals a strategic shift towards proactive safety risk management and collaboration with our union and HR partners, further emphasising our dedication to continuous improvement in health and safety practices.
21. Members are asked to approve the updated and reviewed Health & Safety Policy.

### **Oli Sanandres**

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### **Appendices**

Appendix 1 – Draft Reviewed Health and safety Policy