

Committee(s): Corporate Services Committee	Date: 23 rd October 2024
Subject: Health & Safety Update	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)

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Appendices

Appendix 1 - Safe365 – Phase three School Results (non-public, circulated separately to Members)

Appendix 2 - Health & Safety Organisational Framework