



**CITY OF LONDON CORPORATION  
DEPARTMENT OF MARKETS & CONSUMER PROTECTION  
PORT HEALTH & PUBLIC PROTECTION SERVICE**

## **HEALTH & SAFETY INTERVENTION PLAN 2013-2014**

### **1. Introduction**

The range of advisory and enforcement activities of the Health & Safety Team's 3.5 FTE staff continues to directly contribute to and support the [City of London sustainable Community Strategy 2008-2014](#) which, in its five themes, recognises that we are "**A World Class City**" and through the City Corporation's role as a Health & Safety Enforcing Authority, the team directly supports two of these themes:-

#### ***A World Class City which.....supports our communities***

- ***To improve people's health, safety and welfare within the City's environment through proactive and reactive advice and enforcement activities; and***
- ***To ensure through advice and enforcement, that the City's business community is legally compliant and that it continues to pose only minimal risks to the health and safety of all.***

#### ***A World Class City which.....is safer and stronger***

- ***To continue to ensure the City is a safe place in which to do business, work, visit and live.***

In terms of the City's [Corporate Plan 2012-2016](#), the Health & Safety Team supports the plan's Strategic Aim of:-

- ***To provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors with a view to delivering sustainable outcomes.***

through supporting the cross-cutting Key Policy Priorities of:-

- ***KPP2 - Seeking to maintain the quality of our public services whilst reducing our expenditure and improving our efficiency***
- ***KPP3 - Engaging with London and national government on key issues of concern to our communities including police reform, economic crime and changes to the NHS.***

### **2. Our Key Challenge for 2013-16**

The key challenge for the Health & Safety Team for the forthcoming years is to respond to the changes and challenges to health & safety enforcement following the Government's commissioning of Professor Löfstedt's independent review of

health & safety legislation<sup>1</sup>, the Government's response<sup>2</sup> and the resulting National Local Authority Enforcement Code<sup>3</sup> (the Code). However this is whilst the team continues to ensure that the health & safety risks in the City are not only managed effectively by dutyholders, but also that there is a reduction in the rates of work-related deaths, injuries and ill-health in the Square Mile; the Health & Safety Team is committed to focussing on the real risks to health & safety that City workers face and ensuring that dutyholders clearly understand what is required of them.

### **3. KPIs for 2013-2014**

The following are the team's Key Performance Indicators for this year:-

- To complete a risk-based intervention programme for all cooling towers systems within the year.
- To complete all Health & Safety Intervention Plan projects within the year.
- To respond to all Primary Authority requests for advice within 1 working day.

### **3. Ensuring Quality and Consistency**

In order to ensure that the service we offer to businesses and residents is competent and high quality we will ensure that:

- all officers carrying out enforcement work are appropriately authorised, according to their ability, qualifications, expertise and experience;
- officer's competence is continually assessed and that we support officers to develop their skills and widen their experience;
- we will ask for feedback from businesses and residents on the quality of the service we provide and strive to continually improve; and
- we will continue to participate in peer reviews with other local authorities to ensure consistency and promote best practice.

### **4. Health and Safety at Work etc. Act 1974 Section 18 Standard**

There is a statutory requirement that all Health & Safety Enforcing Authorities in the UK make adequate arrangements for enforcement and they must be properly managed, with adequate resources, policies and procedures and with competent officers. In order to comply with this requirement an Action Plan was implemented to achieve the Health & Safety Executive (HSE)'s [Section 18 Standard for Enforcing Authorities](#) which has the following four key themes:-

#### ***Make it happen.....***

To "make it happen" every Enforcing Authority shall have.....

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<sup>1</sup> [Reclaiming Health & Safety for All](#)

<sup>2</sup> [The Government's Response to the Löfstedt Review](#)

<sup>3</sup> [Consultation on proposals for a National Local Authority Enforcement Code – Health and Safety at Work, England, Scotland and Wales](#)

- set out their commitment, priorities and planned interventions.
- into place the capacity, management infrastructure, performance management and information systems required to deliver an effective service and to comply with their statutory duties
- operate systems to train, appoint, authorise, monitor, and maintain a competent inspectorate

### **Does it right.....**

To "do it right" every Enforcing Authority shall.....

- use interventions, including enforcement action, in accordance with their enforcement policy and within the principles of proportionality, accountability, consistency, transparency and targeting.

### **Works together.....**

To "work together" every Enforcing Authority shall.....

- work within their own organisation, in partnership with other Enforcing Authorities and with other regulators and stakeholders to make best use of joint resources and to maximize their impact on local, regional and national priorities.
- actively contribute to liaison, policy and governance arrangements at a local, regional and national level.

### **Sells the story.....**

To "sell the story" every Enforcing Authority shall.....

- promote sensible risk management

The Action Plan for achieving compliance with the standard commenced on 1<sup>st</sup> April 2011 and has now been implemented and the City of London will continue to comply with the 'Section 18 Standard' until this is superseded by the Code.

## **5. National Priorities for the UK**

Since early 2010<sup>4</sup> ['The Health and Safety of Great Britain'](#) has been the HSE's strategy and the City Health & Safety Team continues to demonstrate its commitment by developing its own delivery plans linked to the strategy themes.

Through all of its work, the team incorporates whenever possible, the strategy's themes of:-

- [Director Leadership](#) – through exploiting all opportunities it is presented with to engage face-to-face at senior management level, by encouraging leadership behaviours at all times and by promoting HSE guidance;

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<sup>4</sup> [www.hse.gov.uk/strategy](http://www.hse.gov.uk/strategy) published November 2011

- [Worker Involvement](#) – through promoting the importance of the improved involvement of workers/ reps and the ownership of H&S issues;
- [Vulnerable Workers](#) – through intelligence-led interventions with dutyholders, especially those employing [migrant workers](#); and
- [Competence and Consultancy](#) – by promoting competence in terms of basic, sensible and proportionate health & safety management, and good practice in the use of third parties and challenge and, where appropriate, enforce against, incompetent health & safety consultants.

Further sector specific strategies represent the focused approach required for the implementation of the overall health & safety strategy, ['Be Part of the Solution'](#). Their focus is upon the priority sectors with the highest actual health & safety problems or perceived threats, in terms of both incident rates and their severity. The evidence and analysis within these sector strategies is used to inform the specific delivery plan elements that the City Corporation will act on and will be included in its annual Health & Safety Intervention Plan.

## **6. Local Priorities for the City of London**

There are also specific City-related issues which the team will also be seeking to address and these are:-

- [Legionella Control](#) – through conducting risk-based audits because of the large number of water systems such as cooling towers within the City that require robust risk control.
- **Management of Contractors** – continuing with securing legal compliance by investigating the many RIDDOR accident reports received from the multitude of contractors in the overtly out-sourced world of the City of London.
- **New Building Design** – through promoting compliance with [CDM2007](#) and the principle of reducing risk "[As Low As Reasonably Practicable](#)", with our colleagues in Planning and Building Control

and in a combination of national priorities and City of London priorities, the team's service targets for the year are set out in detail in **ANNEX B**.

## **7. Working in Partnership**

In order to achieve its aims and objectives, the City of London will continue to work with a variety other agencies, stakeholders and intermediaries and these include:-

- [HSE](#) – to share good practice and expertise;
- The [City of London Police](#) – on violence and crime in the Retail and Hospitality sector and other area's detailed in the Memorandum of Understanding between the City Corporation and the Police;
- [Better Regulation Delivery Office](#)– on Primary Authority and other projects regarding Local Authority Regulatory Services ;
- **London Banks Health & Safety Forum** - to encourage consistency and share best practice across the Financial Services sector

- [The Legionella Control Association](#) - to raise standards in service providers involved in the supply of goods and services relating to the control of Legionella bacteria in water systems.
- [Cleaning Industry Liaison Forum](#) – to work with industry trade associations, training bodies and trade unions to improve health, safety and welfare standards in the cleaning industry.

There will be joint working on projects and interventions and in training between the Food Safety, Trading Standards, Pest Control and Health & Safety teams of the Port Health & Public Protection (PH&PP) Service so as to develop and encourage consistency and the exchange of advice and guidance.

## **8. Governance**

The City of London as a Health & Safety Enforcing Authority looks towards the following for guidance on both technical and legal matters and on policy and intervention approaches:-

- the **Health & Safety Executive** – for national guidance and London operational assistance;
- the **London Partnership and Strategy Group**, the [Association of London Environmental Health Managers](#) and the **All-London Boroughs Health & Safety Liaison Group** – so as to encourage consistency across London through being actively involved in a variety of London-wide health & safety initiatives; and
- **Neighbouring London Boroughs** – both in the **South East London Quadrant** (the City of London plus the London Boroughs of Bexley, Bromley, Croydon, Greenwich, Lewisham, Southwark and Westminster) and through cross-border working with its central London neighbours of Kensington and Chelsea, Camden, Hackney, Islington, Tower Hamlets, Southwark and Westminster in areas of mutual and local concern;

PH&PP will seek to ensure all its enforcement decisions are consistent with:-

- with the current PH&PP Policy Statement on Enforcement; and
- the HSE and Local Authorities' Enforcement Management Model

and will continue to train and develop its staff to be competent using the current [Regulators' Development Needs Assessment \(RDNA\)](#) tool so as to ensure proportionate, consistent, transparent and accountable enforcement as part of the Better Regulation agenda.

## **9. Service Development**

PH&PP will also seek to develop and improve its overall health & safety enforcement through a number of improvement projects as set out below in support of the above theme of "**Works together.....**".

The Health & Safety Team will continue to actively contribute to the development of health & safety across London local authorities and the HSE by helping ensure

the role of the HSE's Enforcement Liaison Officers and their teams both in London and across the UK are protected and developed.

As part of this, it will work through the All-London Boroughs' Health & Safety Liaison Group and nationally with the HSE, the Better Regulation Delivery Office and other regulators on the development of Better Regulation standards and initiatives whenever possible.

The team will actively support all London local authority health & safety events, and continue to host training courses for the HSE and the All-London Boroughs' H&S Liaison Group whenever possible to ensure that the City of London maintains its position at the forefront of health & safety regulation in the capital and the UK as a whole. In support of this it will continue to attend and support national industry groups such as the Legionella Control Association and the Cleaning Industry Liaison Forum where these are closely linked to the City's local health & safety priorities.

We will develop and increase the level of competency and confidence of the officers in the Food Safety Team and Smithfield Enforcement as health & safety regulators through a assessing their current level of competency using the generic RDNA tool to identify areas for further learning and development.

The Food Safety Team will be included in all health & safety project working and competency development initiatives and whenever possible, representatives from both teams will attend the All-London Boroughs' Health & Safety Liaison Group.

***Sells the story.....***

Finally, the Health & Safety Team will take every opportunity to promote and publicise The City Corporation's work as both a Health & Safety Enforcing Authority and the providers of quality and authoritative advice and information to City businesses and workers.

**Jon Averbs**  
**Port Health & Public Protection Service Director**

**March 2013**

## **HEALTH & SAFETY TEAM SUCCESSES 2012-2013**

Last year, the Health & Safety Team undertook the following wide range of activities.

### **London 2012 Olympic Games Delivery**

- Advised on and intervened where necessary at City-based Olympic activities such as the Olympic and Paralympic marathons, test events, the Torch Relay, the Athletes Parade and the running of the various National Olympic Committee Houses, to ensure overall, a safe and successful London 2012 Olympic Games.
- 12 high risk hotels hot and cold water systems, cooling towers and spa pools targeted for Legionella sampling prior to the Olympic Games. One positive sample gained and was followed through to compliance.

### **Legionella Control Activities**

- Developed and hosted a pan London exercise to embed the London Legionella Outbreak Protocol with the HSE, local authorities and the Health Protection Agency (HPA).
- Delivered 'Cooling Tower Inspection' training to over 47 Environmental Health Officers and Health & Safety Executive Inspectors across London and the UK, an important contribution to improving knowledge and competence on Legionella issues for regulators.
- Hosted site visits to spa pools and cooling towers for consultant medical practitioners from the European Centre for Disease Control.
- Assisted the HPA by providing site visits for a national *Legionella* outbreak investigation and control course to demonstrate risk assessment in practice for cooling towers and spa pools
- Showcased our work on *Legionella* control to leading businesses from the water treatment industry at a number of conferences and events, promoting the City of London and key public health messages concerning managing this risk.

### **Health and Safety Information Campaign**

The team began a campaign around current key issues in health & safety as they affect the wide variety of City businesses from SMEs to multinational organisations and across different industry sectors. This included:-

- Redesigning and launching the team's webpages
- Launch of a Twitter account [@SafeSquareMile](#) - "*The City of London Corporation's Health & Safety Team, signposting the way to safety, health and well-being for all who work in the historic "Square Mile"*"
- Ran a stall promoting Health & Safety work at the City-wide "Love Health" event in Guildhall

## Interventions and Inspections

- 70 'control of legionella in cooling tower' interventions.
- 66 project visits carried out including:-
  - 25 Asbestos Project interventions.
  - 8 'Seasonal Overstocking' project interventions
  - 12 higher risk sites targeted for Legionella sampling
  - 21 Decommissioned cooling tower risk audit interventions

with the team successfully completing all its planned projects for the year.

## Complaints and service requests

232 complaints and service requests were received and investigated to including:-

- 9 Asbestos notifications
- 60 LOLER lift inspection reports
- 27 Pressure vessels inspection reports
- 72 Health & safety complaints
- 51 special events applications reviewed and advised upon
- 13 Massage and Special Treatment license applications reviewed and visited

## Accidents, Ill-health and Dangerous Occurrences

- Investigated 284 reportable accidents (inc. 109 in food premises) comprising:-
  - 1 fatal accident
  - 3 cases of work-related ill-health
  - 9 dangerous occurrences
- Provided regulatory advice to businesses and evidence in Coroner's Court cases following a number of high profile suicides in the Square Mile.

## Primary Authority Partnership Work

Up until the end of March 2013, 207 chargeable hours were spent on advising the team's Primary Authority partners, **CBRE** (50 hours) and **Virgin Active** (157 hours) on health & safety management systems, auditing of performance, speaking at conferences and training events and dealing with regulatory queries and challenges from other local authorities.

## Legal Action

- A Prohibition Notice was served under Section 22 of the Health & Safety At Work Etc. Act 1974 preventing unsafe window cleaning activities at a City office building following the death of a window cleaner.
- Two prohibition notices were served in respect of an electrical supply in a food business that presented a risk to its workers.
- Legal proceedings were concluded against a property management company for failing to take lifts out of use following a statutory notification of defects that posed a danger to persons using them. The company was fined a total of £7,000 and ordered to pay £19,052 costs.



## **Other Activities**

### ***Operational Development***

To ensure optimum operational effectiveness, the team:-

- worked with the Better Regulation Delivery Office to further develop its two Primary Authority agreements with **CBRE** and **Virgin Active**, in order to continue provide streamlined and improved regulation in line with the Government's better regulation agenda;
- continued to foster close working relationships with the London Fire Brigade through joint working on the Seasonal Overstocking Project and through the improved sharing of intelligence;
- successfully piloted the **London Workplace Wellbeing Charter** to improve workplace health in City businesses, resulting in one City business, Deloitte, receiving the highest "Excellent" award;
- ensured that all outdoor events in the City ran safely and including advice and assistance given to all the Olympic and Paralympic Marathons, the Lord Mayor's Show, the London Marathon, and the Smithfield Nocturne as well as smaller events such as corporate charity fundraisers – e.g. abseiling.

### ***Systems Development***

To ensure increased operational efficiencies, the team also:

- completed an Action Plan which detailed the work needed for the team to fully comply with the HSE's Section 18 Standard for health and safety enforcing authorities;
- identified training needs across the service using the RDNA tool and other methods and provided training to meet those needs; and
- continued to develop our intranet-based operational procedures for greater consistency in all our health & safety work.

<b>HEALTH &amp; SAFETY INTERVENTION PLAN TARGETS 2012-2013</b>				
<b>PROACTIVE INTERVENTIONS</b>				
<b>Sector, premises type or specific cross sector activity</b>	<b>Evidence that identified the concern and set its priority<sup>5</sup></b>	<b>Planned intervention type<sup>6</sup></b>	<b>Rationale for intervention</b>	<b>Planned activity or resource</b>
<b>Control of legionella interventions: cooling towers and other at risk water systems.</b>	<p>Local priority.</p> <p>151 cooling towers sites within the City</p> <p>Risk of Legionnaires' disease outbreak affecting the square mile is considered an unacceptable reputational risk</p> <p>Poor performers identified via established risk ratings and local intelligence</p>	<p>Inspection and enforcement</p> <p>Education and awareness</p>	<p>Due to the complex nature of the water systems involved it is essential to carry out a detailed audit in order to make a competent assessment of risk</p> <p>Established intervention protocol utilised</p> <p>Outputs measured via decreased risk rating following intervention</p>	<p>Risk-based audit of highest risk of a population of 151 City sites</p> <p>Revisits and enforcement action taken as necessary</p> <p>Approximately 80 premises at 5 hours per site = 57 days or 400 hours</p>
<b>Health and safety interventions in food premises</b>	<p>Risk rating, past performance, EHO intelligence from food safety inspection, confidence in management</p>	<p>Inspection (Cat A), and enforcement</p> <p>Matters of evident concern</p> <p>Education and awareness</p>	<p>In accordance with the <a href="#">Joint Guidance for Reduced Proactive Inspections</a> <sup>7</sup></p>	<p>Interventions focusing on the highest risk hazard and matters of evident concern with enforcement action taken as necessary</p>

<sup>5</sup> Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev3  
[www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf](http://www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf)

<sup>6</sup> Planned Intervention Types detailed in Annex A of LAC 67-2 rev3  
[www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf](http://www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf)

<sup>7</sup> Health and Safety Executive and Local Government Group Joint Statement  
[www.hse.gov.uk/lau/pdfs/reduced-proactive-inspections.pdf](http://www.hse.gov.uk/lau/pdfs/reduced-proactive-inspections.pdf)

<b>Sector, premises type or specific cross sector activity</b>	<b>Evidence that identified the concern and set its priority</b>	<b>Planned intervention type</b>	<b>Rationale for intervention</b>	<b>Planned activity or resource</b>
<b>Health and Safety interventions at Smithfield Meat Market</b>	Risk rating, past performance, FSA / Meat Inspector intelligence from food safety inspection, and confidence in management	Inspection (Cat A), and enforcement  Matters of evident concern  Education and awareness	Targeting uncontrolled risks in the stallholder areas	Interventions focusing on the highest risk hazard and matters of evident concern with enforcement action taken as necessary
<b>Massage and Special Treatment License Inspections and revisits</b>	Massage and Special Treatment (MST) Licensing Scheme  Provision of licence implies that premises have been 'approved' to public  Hazards and risks within industry accepted across UK and therefore inspection justified	Inspection and enforcement  Education and awareness	Requests for inspection and advice on compliance with license conditions by City Licensing Team.	Inspections focusing on highest risk hazard  Revisits and enforcement action taken as necessary  Inspection of 15 premises at 4 hour per site = 60 hours (8.5.days)
<b>Special Events Consultations</b>	City Corporation is host to many high profile events such as the Lord Mayor's Show and it is a local priority to mitigate reputational risks and negative publicity on health & safety grounds  Officers sit on the City's Safety Advisory Group (SAG) and intelligence is shared at the SAG from Met and City of Police, London Ambulance, Highways, etc	Education and awareness	Requests for competent advice by City Corporation's Highways service	Review all event plans and risk assessments Visits to site as necessary  Follow-up action taken as necessary  50 events at 3 hours per event = 21 days or 150 officers hours

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<p><b>Primary Authority CBRE and Virgin Active</b></p>	<p>Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation</p>	<p>Partnerships  Motivating Senior Managers  Supply Chain  Design and supply  Best practice</p>	<p>Partnerships established as part of the Better Regulation Delivery Office's initiative</p>	<p>Appraisal of each company's health &amp; safety policies, procedures and practices</p> <p>Appraisal of each company's contractors and management arrangements</p> <p>Audit and review the health &amp; safety arrangements, to including strategy and organisational implementation.</p> <p>Advising on related documentation as required</p> <p>Advising the Company upon new developments in health &amp; safety legislation and best practice</p> <p>Respond to challenges to each company from other health &amp; safety regulators</p> <p>CBRE = 50 hrs pa Virgin = 100 hrs pa</p>

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<b>Joint London Fire Brigade Seasonal Overstocking Project</b>	Based on intelligence from London Fire Brigade	Partnerships  Education and awareness  Inspection and enforcement	Issues such as blocked fire exits, impeded access / egress are immediate and serious issues best identified by site visits	Joint inspections with City & Islington LFB In December 2013  Inspect for hazards relating to overstocking around Christmas  Provision of advice to business  Enforcement as necessary to achieve compliance  2 days (14 hours)
<b>London Banks Health and Safety Forum</b>	There are over 3,000 Financial Services sector businesses in the City of London  The banks are dutyholders for a large proportion of the contracted services industry that takes place in the City which makes up a significant proportion of the RIDDOR reportable accidents that are received	Partnerships  Motivating Senior Managers  Supply Chain  Sector and industry wide initiatives  Education and awareness  Best practice	An important opportunity to build relationships and influence 12 of our key City stakeholders  The Forum aims to share knowledge and experience of managing health and safety issues in London based banking environments  Working collectively, the forum benchmarks performance, policy and best practice to reduce risks and add value to their individual organisations	4 meetings pa + preparation time = 6 officer days pa

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<b>Legionella Control Association Management Committee</b>	The risk of Legionnaires disease is one of the City's key health and safety risks	Partnerships Motivating Senior Managers Supply Chain Design and supply Sector and industry wide initiatives Education and awareness Intermediaries Best practice	An important opportunity to build relationships and influence the water treatment industry, key to influencing City stakeholders	4 meetings pa + preparation time = 5 officer days pa
<b>Cleaning Industry Liaison Forum<sup>8</sup></b>	RIDDOR reportable accidents in the cleaning sector make up a large proportion of those received by the City  CILF recognises the following key identified risks to cleaning workers and members of the public as a result of cleaning operations:  <ul style="list-style-type: none"> <li>• Musculo-skeletal disorders</li> <li>• Slips and Trips</li> <li>• Falls from Height</li> <li>• Dermatitis</li> </ul>	Partnerships Motivating Senior Managers Supply Chain Design and supply Working with those at risk Sector and industry wide initiatives Education and awareness Intermediaries Best practice	The Cleaning Industry Health and Safety Liaison Forum (CILF), comprises representative bodies from all parts of the cleaning industry together with the HSE. CILF is committed to a cleaning industry that is safe and healthy for both workers and members of the public  An opportunity to build relationships and influence the Cleaning Industry, key to influencing City stakeholders	2 meetings pa + preparation time = 4 officers days pa

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8 Members include the Federation of Windows Cleaners and the Worshipful Company of Environmental Cleaners

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<b>Healthy workplaces / Workplace Wellbeing Charter</b>	<p>The Charter is an opportunity for employers to demonstrate their commitment to the health and well-being of their workforce</p> <p>The positive impact that employment can have on health and wellbeing is well documented</p> <p>There is also strong evidence to show how having a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity - this is good for employers, workers and the wider economy</p>	Recognising good performance	As part of the steering group working with the Department of Health / GLA to promote engagement and business uptake with the Charter post pilot.	<p>Engagement strategy utilises resources such as City Business Library contacts database.</p> <p>Promotional event with focus on workplace wellbeing / stress.</p> <p>Working with any interested businesses towards an award.</p>
<b>Health and Safety Information Campaign</b>	<p>Requested by Members in order that:-</p> <p>Businesses will have a better understanding of key health &amp; safety issues and consequently be able to manage their risks with greater knowledge and confidence</p> <p>Businesses will be more comfortable with approaching the City Corporation and the HSE for future health &amp; safety information needs</p>	Education and awareness	To continue the promotional campaign, began in 2012, around current key issues in health & safety as they affect the wide variety of City businesses from SMEs to multinational organisations and across different industry sectors	<p>Daily Twitter tweets updates</p> <p>Training / Seminars</p> <p>New CoL website kept up-to-date and visitor usage analysed using Google Analytics</p> <p>Specific information on 'work at height' produced for briefings</p> <p>Trialling the video / audio presentation of health &amp; safety information via the CoL website</p>

<b>Reactive Interventions</b>				
<b>Sector, premises type or specific cross sector activity</b>	<b>Evidence that identified the concern and set its priority</b>	<b>Planned intervention type</b>	<b>Rationale for intervention</b>	<b>Planned activity or resource</b>
<b>Accident AND Dangerous Occurrence Notifications under RIDDOR</b>	Accidents and Dangerous Occurrences are indicators and intelligence of both common safety risks and areas of non-compliance across both industry sectors and City businesses as a whole	Incident and ill health investigation	In accordance with the <a href="#">Incident Selection Criteria Guidance LAC 22/13<sup>9</sup></a>	Establish key facts and available evidence  Determine whether further investigation is required in accordance with LAC 22/13  Follow-up action taken as necessary
<b>Ill-health Notifications under RIDDOR</b>	Work-related ill-health are indicators and intelligence of both common health risks and areas of non-compliance across both industry sectors and City businesses as a whole	Incident and ill health investigation	In accordance with the <a href="#">Incident Selection Criteria Guidance LAC 22/13</a>	Establish key facts and available evidence  Determine whether further investigation is required in accordance with LAC 22/13  Follow-up action taken as necessary

<sup>9</sup> Health and Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria [www.hse.gov.uk/lau/lacs/22-13.htm](http://www.hse.gov.uk/lau/lacs/22-13.htm)



Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<p><b>Complaints &amp; Service Requests</b></p> <ul style="list-style-type: none"> <li>• <b>Complaints</b></li> <li>• <b>Asbestos notifications</b></li> <li>• <b>LOLER reports</b></li> <li>• <b>Pressure vessels</b></li> </ul>	<p>Statutory Adverse Insurance Reports (AIR's) may indicate poor management and /or maintenance practices</p>	<p>Dealing with issues of concern or complaints</p> <p>Incident and ill health investigation</p>		<p>Establish key facts and available evidence</p> <p>Determine whether further investigation is required in accordance with local policy</p> <p>Follow-up action taken as necessary</p> <p>Typically 230 + pa</p>
<p><b>To review planning applications and make representations where appropriate</b></p>	<p>Working with architects, designers, planners and engineers at planning stage is essential to design-out issues that can become a risk to health and safety on completion of the build</p> <p>Discussions are primarily held on the subjects of work at height i.e. window cleaning, legionella control, prevention of slips and trips</p>	<p>Education and awareness</p>	<p>Requested by CoL Planning Department as part of the planning process</p>	<p>Scrutinise and comment on applications where appropriate</p> <p>Advise on CDM regulations &amp; workplace regulations</p> <p>Visits to premises as necessary.</p> <p>15 applications per annum at 2 hours per application = 4.3 days or 30 hours</p>

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Planned intervention type	Rationale for intervention	Planned activity or resource
<p><b>Provision of expert speakers on health or safety topics.</b></p>	<p>The team receives requests from a wide variety of bodies to speak on key issues</p> <p>Priority is dependent on topic requested and the audience to whom it will be delivered</p>	<p>Partnerships</p> <p>Motivating Senior Managers</p> <p>Supply Chain</p> <p>Education and awareness</p> <p>Best practice</p>	<p>To utilise available opportunities to promote the CoL</p> <p>To maintain constructive relationships with our stakeholders</p>	<p>Approximately 6 engagements per year – dependent on demand</p>