

HEALTH & SAFETY INTERVENTION PLAN 2016-17

1. Introduction

The range of enforcement and advisory activities of the Health & Safety enforcement function contributes to and supports the Strategic Aim of City of London's [Corporate Plan 2015-2019](#) :-

- ***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***

and in particular its the Key Policy Priorities of the:-

KPP2 Improving the value for money of our services within the constraints of reduced resources

KPP3 Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health

2. Our Key Challenges for 2016-2017

- To maintain and develop officer skills and competency across PH&PP to effectively implement the Commercial Team service plan.
- Development of Commercial Team services in line with the changes that followed the Service Based Review including regulation at Smithfield Market.

3. PH&PP Business Plan KPI for 2016-2017

Key Performance Indicators for this year:-

- To complete a risk-based intervention programme for all cooling towers systems within the year.

4. City of London Priorities 2016-2017

Local and National Priorities which the City will be addressing in 2016-2017 are:

- **Legionella infection at premises with cooling towers** – through conducting inspections of cooling towers within the City. Premises are inspected at frequencies based on risk management performance, an approach supported by evidence and agreed by Members. Local intelligence on risk management performance has led to the development of reduced intervals between inspections.
- **Fatalities / injuries resulting from being struck by a vehicle and falls from height in wholesale, warehouses and distribution** – coordinating a programme of interventions, including inspections and advisory visits to stallholder areas, to address workplace transport at Smithfield Market.
- **Falls from height** related to cleaning and servicing buildings, based on local intelligence, promote compliance and best practice using inspections where appropriate, awareness raising by working with stakeholders and using bespoke briefings for facilities managers, networking, social and web based media to.
- **Workplace health and wellbeing** – mental health identified as a priority by local City-based research, City Joint Health and Wellbeing Strategy, and COL Suicide Strategy; working with other stakeholders to promote good practice and supporting businesses through advice, audits, London Healthy Workplace Charter, 'Business Healthy initiative', web and social media.
- **Event Safety / Crowd control at large public sports / leisure events** – through working with organisers, dutyholders and other City Corporation departments in the prior planning and permissioning of events.

The Health and Safety service targets for the year are provided in more detail below.

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:-

- **London LA's Enforcement Community and Partnership; London Partnership and Strategy Group, Association of London Environmental Health Managers (Alehm), All-London Boroughs Health & Safety Liaison Group, London SE Quadrant LA's** – through active involvement in this community, sharing of experiences and encouraging consistency and cross-LA working in London;

- **Health and Safety Executive (HSE)** – contribute to national policy, strategy and guidance; operational support; London Local Authority Liaison strategic support.
- **Regulatory Delivery** (ex-Better Regulation Delivery Office) – Primary Authority Partnership scheme and other local authority regulatory services projects, including further development of the Leisure Industry Expert Panel;
- **London Banks Health & Safety Forum / London Managing Agents Forum** - working with City financial and property management sectors to promote compliance and good practice, share best practice across the sectors, receive feedback on service delivery and consult on plans and projects.
- **The Legionella Control Association** - representing LA enforcement community, raise standards in service providers involved in the supply of goods and services relating to the control of Legionella bacteria in water systems.
- **HSE / Public Health England national working group** review of guidance on control of legionella in spa pools, supporting training for other health professionals on legionella control by facilitating site visits and contributing to video production
- **HSE Cleaning industry Liaison Forum** – representing LA enforcement community: working with industry trade associations, training bodies and trade unions to improve health, safety and welfare standards in the cleaning industry.
- **City of London Health and Wellbeing Board** – providing advice and linking health & safety into the public health agenda, in particular worker mental health issues.
- **London Healthy Workplace Charter** – supporting the GLA's charter scheme's development and sharing good practice.
- **Primary Authority Partners** – Virgin Active, CBRE, Pure Gym, Monsoon Accessorize and the Ornamental Aquatic Trade Association

9. Service Development

We will continue to develop and improve overall health & safety intervention capacity to help and support businesses and workers, and to take enforcement action where appropriate;

- **Skills for the new enforcement intervention landscape** – we will continue to improve officers' awareness and understanding of business' needs, how to effectively communicate health and safety messages using a broader range of intervention strategies.
- **The London Legionella Outbreak Plan** – we will work with other London Boroughs, PHE and HSE to lobby for review of the outbreak response plan to ensure it is fit for purpose;

We will continue to promote and publicise our Health & Safety Enforcing Authority work, as well as our role to provide high quality and authoritative advice to City businesses and workers in support of business growth.

HEALTH & SAFETY INTERVENTION PLAN TARGETS 2016-2017

PRO-ACTIVE INTERVENTIONS – National Priorities

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority ¹	Rationale for intervention	Activities in 2015-2016	Planned activities and intervention types ² and resources
Control of legionella interventions: cooling towers and other at risk water systems.	<p>National and local priority.</p> <p>140 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>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>Past experience and analysis of risk ratings has demonstrated that site management changes can quickly translate into poorer risk management performance.</p> <p>Established intervention protocol utilised.</p>	<p>The inspection and enforcement of 73 cooling tower sites in the City</p> <p>Assisted the Public Health England by providing site visits for national Legionella outbreak investigation and control courses to demonstrate risk assessment in practice for cooling towers and spa pools</p> <p>Written and teleconference discussions and advice to USA CDC (Federal Government Agency: Center for Disease Control and Prevention, Georgia) and New York City authorities on legionella control arrangements in the UK.</p> <p>Key role in PHE working group to review national</p>	<p>Risk-based audit of 75 Cooling Tower sites; revisits and enforcement action taken as necessary</p> <p>Estimated Time: 75 sites at 5hrs per site = 375 hrs;</p> <p>Advice to Principal Designers and Designers including at the pre-application or Planning Application stage of development.</p> <p>Estimated time: 40 hrs</p> <p>Work with others: London Boroughs, PHE and HSE to review the London outbreak response plan; LCA meetings; Spa Pool Guidance working group;</p> <p>Working with intermediaries, Legionella Control Association (LCA),</p>

¹ Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev4

www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid

² Planned Intervention Types detailed in Annex A of LAC 67-2 rev4 www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types

			guidance on controlling Legionella risks from spa pools.	<p>London Banks H&S Forum, Managing Agents Forum</p> <p>Estimate time: 25hrs</p> <p><u>Estimated Total Time:</u> 440hrs</p>
<p><i>Health and Safety interventions at Smithfield Meat Market: Fatalities / injuries resulting from being struck by a vehicle and falls from height.</i></p>	<p>Workplace transport and associated activities in wholesale environments are national priority for local authorities and features on HSE's list of activities for intervention in the Nation Enforcement Code.</p> <p>Risk rating, past performance, FSA / CoL Authorised Officer intelligence from food safety inspections, and confidence in management.</p>	<p>The City Corporation has responsibilities as both the Health & Safety Enforcing Authority in certain areas of the markets (the traders' stalls) and a duty of care as the market provider.</p>	<p>8 Full inspections of Smithfield Market businesses</p> <p>Audit of the use of and risks posed by the use of fork Lift Trucks</p> <p>Matters of evident concern raised and dealt with</p>	<p>Interventions focusing on the highest risk hazard and matters of evident concern with enforcement action taken as necessary</p> <p>Inspection (Cat A), and enforcement</p> <p>Premises to be targeted where Fork Lift Trucks operates inside those premises, also focussing on falls from height risks associated with storage racking.</p> <p>Remaining premises – Matters of Evident Concern or advisory visits</p> <p>Working with Smithfield Market Superintendent, Smithfield Markets Tenants Association and the HSE.</p> <p><u>Estimated Total = 25hrs</u></p>

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Rationale for intervention	Activities in 2015-2016	Planned activities and intervention types and resources
Event Safety / Crowd control at large public sports / leisure events	<p>Large scale events are a National Priority.</p> <p>City Corporation is host to many high profile events.</p> <p>City are the enforcement authority for approximately 6 large higher risk events.</p>	<p>Involved at planning stages of events through the City's Safety Advisory Group (SAG) and discussion with event organisers.</p> <p>Intelligence is shared between the Met and City of London Police, LFCDA, London Ambulance, Highways, etc.</p>	<p>Officers attended the City's Safety Advisory Group (SAG) and intervened at the planning stages of events through discussion with event organisers.</p> <p>Reviewed selected event plans and risk assessments Visited sites / main events and monitored compliance</p>	<p>Review event plans and risk assessments of high risk events.</p> <p>Visits to site as necessary. Follow-up action taken as necessary</p> <p>5 large events and 10 smaller ones</p> <p><u>Estimated Total = 25 hrs</u></p>

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Rationale for intervention	Activities in 2015-2016	Planned activities and intervention types and resources
<p>Falls from Height related to external building cleaning and servicing</p> <p>Building on valuable work carried out in 2014-16 and in response to demand from businesses and intermediaries.</p>	<p>Local intelligence and observations made by CoLC officers in 2014-16; others in the facilities management, 'access' design and operations community,</p>	<p>Large number of sites where external working at height (WAH) carried out. Hazards and risks high: Poor practices, poor design, poor awareness by duty-holders: information from:-</p> <ul style="list-style-type: none"> - findings of advisory visits and training sessions; - views of reputable members of the building access industry through 1-2-1 discussions, meetings and training events. <p>Building managers usually keen to understand the risks and receptive to awareness raising - e.g. popularity of recent videos by H&S Team</p> <p>Some sites may need direct enforcement intervention on MOEC or where non-compliance on follow up to advisory visits</p>	<p>Used observations during street walks, dealing with matters of evident concern and LOLER Thorough Examination reports to target inspections of poorly controlled activities.</p> <p>Awareness raising by working with stakeholders and using social and web-based media; 1 x video produced</p> <p>Responded to Planning applications and use of applications to trigger advice to designers and CDM Coordinators</p> <p>Four innovative and very well received briefings to City facilities managers and contractors concerning legal compliance of managing falls from height risks in associated with window cleaning and maintenance of external building structures</p> <p>Contributed to new HSE web based guidance on safe working at height for</p>	<p>Observations during street walks, dealing with matters of evident concern : 10 interventions Estimated time, = 50hrs</p> <p>3 Training events and briefings to facilities managers Estimate time = 30hrs (2 FTE x 5hrs x3)</p> <p>Contribution to London Work at Height Seminar; Estimated time = 20hrs</p> <p>Awareness raising by working with stakeholders and using social and web-based media - e.g. Twitter account and promoting videos produced by PH&PP. Estimate: 50hrs</p> <p>Advice to Principal Designers and Designers including at the pre-application or Planning Application stage of development. Estimate: 40hrs</p>

			the cleaning industry Produced an awareness raising video for facilities and contract managers on assessing window cleaner contractor competence when working at height	Estimated Total Time = 190hrs
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Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Rationale for intervention	Activities in 2015-2016	Planned activities and intervention types and resources
<p>Workplace health and wellbeing: Including Workplace Wellbeing Charter</p> <p>Building on work carried out in 2015-17</p>	<p><i>Identified as a local priority by City-based research and the City & Hackney's Joint Health and Wellbeing Strategy, including mental health.</i></p> <p><i>City of London Suicide Strategy and Action Plan</i></p> <p><i>Labour Force Survey</i></p> <p><i>'Business Healthy' initiative outputs and intelligence</i></p>	<p>There is 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> <p>As part of the steering group working with the Department of Health / GLA to promote engagement and business uptake with the London Healthy Workplace Charter and to help further develop the scheme.</p>	<p>Further development of engagement strategy using existing networks and resources</p> <p>Worked with stakeholders to promote good practice and supporting businesses through advice, , London Healthy Workplace Charter, web and social media.</p> <p>London Healthy Workplace Charter Excellence level awarded to Lloyds of London with Health and Safety Team support</p> <p>Responded to two suicides associated with City buildings</p>	<p>Engagement with potential businesses using existing networks and resources such as City Business Library and CoLC Economic Development Office, Dept. of Community & Children Services Public Health Team.</p> <p>Working with other stakeholders to promote good practice and supporting businesses through advice, audits, London Healthy Workplace Charter, 'Business Healthy' initiative, web and social media.</p> <p>Working with any interested businesses towards an award. Estimate 5 Charter assessments = 60 hrs</p> <p>Working with the Health & Wellbeing Board and Business Healthy and intermediaries such as Managing Agents and London Banks Health and Safety forums. Meetings and activities = 70 hrs</p>

				<p>Business Healthy activities – developing coordination and participation in events and initiatives = 40hrs</p> <p>Implementing Suicide Action Plan – reviewing existing protocol = 10hrs</p> <p>Investigation into 1 or 2 suicides = 10hrs</p> <p>CoLC Charter assessment activities = 20 hrs</p> <p>Sustainable City Awards = 3hrs</p> <p><u>Estimated Total = 213hrs</u></p>
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Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Rationale for intervention	Activities in 2015-2016	Planned activity and intervention types and resources
<p>Health and safety interventions in food premises: Slips, trips and Falls; falls from height; gas safety; manual handling; burns.</p>	<p>RIDDOR and enforcement data on M3 for 2015-16; EHO intelligence from food safety inspections, confidence in management.</p> <p>FHRS (Food Hygiene Rating Scheme) scores of 0, 1 and 2 may indicate poor management of the more serious health and safety risks associated with catering and licensed premises.</p>	<p>Some of the highest risk activities in premises enforced by City of London are catering premises; they also contain highest proportion of SMEs where risk management is likely to be weakest.</p>	<p>Advice and information given whilst carrying out Food Safety-related inspections,</p> <p>Interventions when matters of evident concern were encountered with enforcement action taken as necessary</p>	<p>Advice and information during food safety or standards inspections.</p> <p>1000 x 10mins = 165hrs (includes MOEC activities)</p> <p>Inspections of 10 sample premises: 40hrs</p> <p>Interventions when matters of evident concern (MOEC) encountered with enforcement action taken as necessary.</p> <p>Observations and intelligence gathered during visits will used to inform our overall business planning for 2017-18</p> <p>Estimated Total = 205hrs</p>

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Rationale for intervention	Activities in 2015-2016	Planned activities and intervention types and resources
<p>Primary Authority: CBRE, Virgin Active, Pure Gym, Monsoon, OATA</p> <p>Explore opportunities for increasing the Primary Authority Partnership Portfolio</p> <p>Leisure Industry Expert Panel Membership</p>	<p>Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation.</p>	<p>Partnerships established as part of the Better Regulation Delivery Office's initiative.</p> <p>Motivating Senior Managers can help to develop and improve the safety management of their organisations</p> <p>Expert Panel membership and promotion</p>	<p>Initiated 2 new primary authority partnerships – Monsoon and Pure Gym. Charges for Primary Authority work increased to account for full cost recovery.</p> <p>Audited, reviewed and reported on the health & safety arrangements at Virgin Active's Top 5 and Bottom 5 performing sites in the UK</p> <p>Advised all partners upon new developments in health & safety legislation and best practice</p> <p>Respond to challenges to each company from other health & safety regulators.</p>	<p>Developing Assured Advice, advising on new H&S developments, respond to challenges from other local authorities, visits to regulated premises where required</p> <ul style="list-style-type: none"> - Virgin Active: Estimate = 50-75 hrs - CBRE: Estimate = 50hrs - Pure Gym – Estimate 100hrs - Monsoon – Estimate: 100hrs - OATA : Estimate 10hrs - Leisure Industry Expert panel: - Meeting and Steering Committee attendance, conference: 70hrs - Enquiries and development of new PAP's : Estimate: 20 Hrs <p><u>Estimated Total = 425hrs</u></p>

REACTIVE INTERVENTIONS				
Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Rationale for intervention	Activities in 2015-2016	Planned activity and interventions types and resources
<p>Notifications under RIDDOR:</p> <ul style="list-style-type: none"> • Accidents and Dangerous Occurrences • Occupational Disease cases 	Not applicable	<p>In accordance with the Incident Selection Criteria Guidance LAC 22/13³</p> <p>Where there is evidence obtained during the investigation that health and safety management compliance by the duty holder is of concern across a broader range of higher risk activities.</p> <p>Investigation and inspections</p> <p>Education, advice and awareness</p>	<p>Notifications received under RIDDOR:</p> <ul style="list-style-type: none"> - Accidents and Dangerous Occurrences = 221 of which 25 were investigated - Occupational Disease cases = 5 cases investigated <p>Successful Prosecution of Blades (London) Ltd under the Health and Safety at Work Etc. Act 1974 in connection with a window cleaning fatality in 2012 at Laurence Pountney Hill. Company fined £45000 plus £7500 towards costs</p>	<p>Establishing or verifying key facts or obtaining further information to inform decision on whether to investigate</p> <p>Follow-up enforcement action taken in accordance with Enforcement Management Model (EMM)</p> <p>Estimate 100 hrs</p> <p>Additionally an investigation related to a fatality in 2012 may progress to a prosecution; anticipated resource: 50 hrs</p> <p><u>Estimated Total = 150</u></p>

Sector, premises type or specific cross sector activity	Evidence that identified the concern and set its priority	Rationale for intervention	Activities in 2015-2016	Planned activity and intervention types and resources
Complaints & Service Requests <ul style="list-style-type: none"> • Complaints • Requests for advice • Asbestos notifications • LOLER reports⁴ • Pressure vessels • Massage and Special Treatment (MST) Licensing Inspections 	Not applicable	Local response policy Guided by Incident Selection Criteria Guidance LAC 22/13 ⁵	Complaints & Service Requests received and/or work undertaken:- <ul style="list-style-type: none"> - Complaints and Requests for advice = 74 - Asbestos notifications = 2 - LOLER reports = 45 - Pressure vessels = 9 - Massage and Special Treatment (MST) Licensing Inspections = 78 	Establish key facts of complaints and adverse reports; investigate selected complaints and reports. Provision of advice or follow-up enforcement action in accordance with the Enforcement Management Model. All complaints and service requests estimate = 220 hrs ; 70 MST inspections = 140hrs Work to develop MST Licensing conditions and procedures / protocol: 12hrs <u>Estimated Total = 372hrs</u>

⁴ Reports of statutory Thorough Examinations made of lifts and lifting equipment such as window cleaning cradles by specialist engineers under the Lifting Operations & Lifting Equipment Regulations 1998

⁵ Health and Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria 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	Rationale for intervention	Activities in 2015-2016	Planned activities and intervention types and resources
<p>Provision of training / work experience / contribution to regulatory and educational community</p> <p>General Networking</p>	Not applicable	<p>Contribute to professional development and collaboration within and between EH related professions;</p> <p>Contribute to student EHP training.</p> <p>Contribute to the profile of the CoLC and M&CP</p> <p>CoLC offers unique experience and competencies re legionella risks associated with building management.</p>	<p>Various Student EHPs and Public Health Consultant trainees given practical training inc. cooling towers inspections and working at heights</p> <p>Trained Scottish LA enforcement officers on inspection of cooling towers.</p> <p>Attended 2 meetings of national HSE supported Cleaning Industry Liaison Group</p> <p>Attended three Legionella Control Association meetings to advise on water systems management and regulatory matters</p> <p>Attended four City H&S Banking Forum meetings to promote health & safety generally and in particular, workplace health and wellbeing</p> <p>Hosted:-</p> <p>- PHE Legionella</p>	<p>Hosting of miscellaneous educational and fact finding visits or communications e.g. PHE training schemes, PHE Legionella Outbreak course, EUGLI event, provision of training to M&CP and other LA's / enforcement officers.</p> <p>On and off site training (2 events)</p> <p>Consistency Training exercise for Commercial Team on MOEC and appropriate enforcement</p> <p>Organising and participating in visits to CoLC premises. – groups (2) and individuals (8)</p> <p><u>Estimated Total = 66hrs</u></p>

			<p>Outbreak course; - European Working Group on Legionella Infections Annual Conference event.</p>	
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