

Executive Summary from National Britannia H&S Audit 2008

1.0 Executive Summary

This report contains the results of a health and safety audit of Nottingham City Homes' current health and safety arrangements.

The audit was carried out between 17th April and 23rd June 2008. The aim of the audit was to evaluate the existing arrangements for health and safety and make recommendations for improvement. This report makes recommendations in relation to the overall management of health and safety.

During the course of the audit many examples of good health and safety practices were found within the organisation, many of which are highlighted below. An action report is contained in section three of this report. The key findings of the audit are summarised below:

1.1 Health and Safety Policy

- The organisations health and safety policy is overdue for review.
- There is no nominated board member and director with specific responsibility for health and safety.
- The Company Secretary is assigned very broad coordinating duties under the health and safety policy but has neither the training nor resources to effectively discharge these duties.
- There is a lack of a consistent policy on the provision (and paying for) personal protective equipment.
- There is no commitment in relation to health and safety standards in the organisation's statement 'Our Mission, Our Vision, Our Values'.

1.2 Planning and Organisation

- The majority of the risk assessments hosted on the company's intranet are overdue for review.
- Specific budgetary provision is not made for health and safety.
- Health and safety action plans have been prepared for each division however clear responsibilities for actioning the recommendations in these plans have not been assigned.
- A new Head of Health and Safety position has recently been appointed to however there is still one vacant safety advisor post within the health and safety team.
- The health and safety team does not have any dedicated administrative support.
- Emergency cover by the health and safety team is provided by informal arrangement.
- It is unclear as to what extent members of the health and safety team have the authority to stop work where they observe a potentially dangerous situation.
- It is understood that the CDM Coordinator often becomes aware of 'notifiable' works only once they have started.

- Contractor approval is in its' early stages and many contractors used by the organisation have not been 'vetted' against predetermined health and safety criteria.
- The Asset Data Manager is responsible for managing the building-related aspects of health and safety in the organisation's 29,000 domestic properties however there appears to be no single parallel role for buildings occupied by Nottingham City Homes as workplaces.
- The health and safety training matrix/table in appendix D of the health and safety policy is not being applied.
- The health and safety committee is chaired by the Director of Organisational Development with no participation from other divisional directors.

1.3 Implementation

- The health and safety project group has identified eight "quick wins" where improvements can be made speedily either at comparatively little cost and/or using savings already identified elsewhere.
- Recorded workplace health and safety inspections are not being carried out in many areas.
- Completion of the fire logbook was also noted to have lapsed in the two area housing offices visited during phase two of the audit.
- Fire risk assessments were completed for twenty-one high-rise blocks in 2007, but the findings have not yet been actioned.
- Fire risk assessments have not been carried out for warden-controlled or sub-four-storey premises.
- Nottingham City Homes has a contract with Nottingham City Council for Legionella testing in tower blocks, but the Asset Data Manager was unable to confirm whether this contract also covered communal kitchens in sheltered schemes.
- No water risk assessments were available.
- Savills have been contracted to carry out type two asbestos surveys and stock surveys in all 29,000 properties in the next two years. While this programme includes garage blocks, there would appear to be no inspection strategy for communal areas.
- Having surveyed approximately fifteen percent of the stock for asbestos and 'cloning' data for properties of the same construction, no health and safety information has yet been issued to tenants.
- The Asset Data team has very little information on the condition of fixed electrical installations in the buildings that it manages.
- There is no universally applied system for controlling high-risk work.
- Lone working procedures were generally good in all sites visited however some areas for improvement were noted.
- Overdue alerts for refresher training are not visually distinct from other jobs on the corporate training database.

1.4 Monitoring Performance

- No data was available to quantify how the health and safety team's work is split between reactive and proactive work.
- A copy of the risk register was not held within the health and safety team and it is understood that the risk management group has not met for a considerable time.

1.5 Auditing and Reviewing Performance

- The health and safety team carries out very little auditing work. Of the small amount of auditing work done, most is in response to incidents.
- The corporate training database's 'oracle discoverer' function cannot generate monthly reports and there is no routine audit of health and safety training records.
- With the exception of craft operatives, annual employee performance and development reviews do not cover health and safety.
- Currently, Nottingham City Homes does not compare its' own health and safety performance with that of other similar organisations within the same sector.

1.6 Summary

Health and safety is being generally well managed however a cohesive health and safety management system is required to bring everything together into something that works effectively and meets the requirements stated in HSE guidance HS(G) 65 'Successful Health and Safety Management' and the requirements of the Management of Health and Safety Regulations 1999. During the course of the audit many examples of good health and safety practice were found and these are referred to throughout section three of this report. Of particular note are:

- The quality of guidance produced by Nottingham City Homes' health and safety team.
- The content of the Operative Health and Safety Handbook.
- The diligent manner in which training is monitored despite the functional shortcomings of the training database.
- The design and management of the asbestos database and the procedures in place for alerting employees and contractors to the presence of asbestos-containing materials in properties.
- The violent incident database.
- The 'P' order coded alert procedure used by the gas engineering team for raising the alarm in situations that could become potentially violent.
- Recently implemented training programme for caretakers.

Table of H&S Legislation and Interdependence of the Health & Safety Strategy

Legislation	Summary	Application at NCH	H&S Strategy
Health and Safety at Work etc Act 1974	<p>This is an “enabling act”, i.e. provides legal status to subsequent regulations. Places general duties on employers and self employed, e.g. provide safe place of work, safe access and egress, safe equipment, suitable supervision, training & information, look after safety of others, prepare a health & safety policy etc. Also contains duties on employees such as look after self and others, co-operate with employers and not to misuse or damage safety equipment. Provides for prosecution of directors, managers and other officers. Requires consultation with employees.</p>	<p>All areas of health & safety - specific areas are addressed in more detail by the specific regulations that are enabled by this Act, e.g. asbestos management is covered by the Control of Asbestos Regulations, but a breach of these Regulations will also be a breach of the Health & Safety at Work Act. Health and Safety Policy.</p>	<p>Entire H&S Strategy 2.1</p>
Construction (Design and Management) Regulations 2007	<p>Combines most previous construction legislation into one set of regulations. Places duties on clients, designers, contractors and CDM Co-ordinator. Requires that all parties are competent, that H&S information is available to those who need it and that construction work is properly planned and supervised. Requires that certain projects are notified to HSE .</p>	<p>Contractor management. Contract worksite inspections. Contractor competence assessments. Permit to work procedures. Work at height.</p>	<p>12.1 12.4 12.2 12.3 13.9</p>
Control of Asbestos Regulations 2006	<p>Require that ‘duty holder’ manages asbestos in non-domestic properties. Minor work on asbestos to be risk assessed and restricted to trained employees, major work to be carried out by licenced contractor. At risk persons to be provided with suitable training & information.</p>	<p>Management of asbestos.</p>	<p>13.4</p>

Legislation	Summary	Application at NCH	H&S Strategy
Control of Substances Hazardous to Health Regulations 2002	Require risk assessment and control of work involving or emitting harmful substances.	Management of hazardous substances. Management of legionella.	- 13.7
Control of Vibration at Work Regulations 2005	Require risk assessment and control of work which may expose employees to harmful levels of vibration.	Management of vibration.	4.1,13.1
Electricity at Work Regulations 1989	Relate to work with and testing of electrical systems and equipment. Require work to be carried out by competent persons, and to be carried out with circuit isolated or other controls in place.	Permit to work procedures. Portable appliance testing. Testing of electrical systems (managed by Electrical and Mechanical Services Team)	12.3 13.8 -
Gas Safety (Installations and Use) Regulations 1998 (as amended)	Relate to work with and testing of gas systems and equipment. Require work to be carried out by competent (Gas Safe Registered) persons, and places duties on landlords in relation to safety checks in tenanted properties.	Gas appliance servicing (managed by Gas Team)	-
Health and Safety (Display Screen Equipment) Regulations 1992	Relate to work with computers and other relevant equipment. Require that risk assessment is carried out for people who habitually use such equipment for work.	Management of work with computers. Mobile working (Property Services)	8.3,13.1 8.3
Health and Safety (First Aid) Regulations 1981	Require assessment of first aid requirements for employees and measures to be put in place to deal with likely first aid emergencies.	First aid provisions.	-
Lifting Operations and Lifting Equipment Regulations 1998	Relate to the provision, use, inspection and testing of equipment for lifting people and loads, e.g. lifts, fork lift trucks, hoists etc.	Purchasing of work equipment.	13.1

Legislation	Summary	Application at NCH	H&S Strategy
Management of Health and Safety at Work Regulations 1999	Relate to the management of Health and Safety at work. Set out requirements for risk assessments, prevention and control of risk, H&S management systems, health surveillance, H&S assistance, emergency planning, contact with emergency services, employee information, co-operation with other organisations, capabilities and training, employee duties, temporary workers, new and expectant mothers and employment of young persons.	Risk assessment procedure. Incident reporting procedure. First aid provisions. Contractor management. Employment of young persons and pregnant women. Management of violence / lone working procedures. H&S training strategy. Health and Safety planning, monitoring and review (H&S management system). Health & Safety audits. Occupational health and health surveillance. Management of work related stress. Driving at work.	1.3 9.1,9.2,9.3 - 12.1 1.3 9.1,13.3 8.1,8.2,8.3 2.1,3.2,3.4,3.5, 6.1,6.2,7.2, 11.2,11.3 3.3 4.1 4.2 13.6
Manual Handling Operations Regulations 1992	Set out requirements for management of tasks involving movement of goods by hand, including repetitive handling tasks. Require prevention of risk, or assessment and control of risk that cannot be prevented.	Manual handling.	4.3
Noise at Work Regulations 2005	Require risk assessment and control of work which may expose employees or other persons to harmful levels of noise.	Purchasing of work equipment.	13.1
Personal Protective Equipment Regulations 1992	Relate to the provision, use, maintenance and replacement of personal protective equipment, i.e. equipment issued to protect an individual against a specified risk. Also provide for training and information as appropriate.	Purchasing of PPE Use of PPE	13.1 13.5
Provision and Use	Relate to the provision, use, inspection and	Purchasing of work equipment.	13.1

Legislation	Summary	Application at NCH	H&S Strategy
of Work Equipment Regulations 1998	testing of all equipment (other than lifting equipment) provided for use at work, including computers, vehicles, furniture, stationery, woodworking machines etc.	Inspection and test of work equipment.	13.2,13.6,13.8
Regulatory Reform (Fire Safety) Order 2005	Combines most previous fire safety legislation. Requires that duty holder assesses and controls fire risks, provides and maintains fire prevention detection, fire fighting and fire escape equipment, plans for emergencies and appoints competent persons to deal with them, provides relevant training, information and signs. Note that requirement for fire certificate removed.	H&S training strategy. Management of fire risks. Evacuation planning. Fire safety inspections. Fire investigations.	8.2 5.1 5.2 5.3 5.4
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	These regulations specify injuries, diseases and dangerous occurrences that have to be reported to the Health and Safety Executive, including the timescales for and methods of reporting in each case.	Incident reporting procedure.	9.1
Work at Height Regulations 2005	Require that management of work that has to be carried out above ground level. Require prevention of work at height, or assessment and control of work that cannot be carried out from ground level. Cover planning of work by competent persons, provision of suitable access equipment, inspection of access equipment, training and information, planning for emergencies.	Work at height. Permit to work procedures. Purchase of access equipment Inspection and test of access equipment.	13.9 12.3 13.1 13.9
Workplace (Health, Safety and Welfare) Regulations 1992	Relate to health, safety and welfare provisions in permanent and temporary workplaces, including access and egress, cleanliness, lighting, temperature, ventilation,	Workplace conditions Smoking policy. Traffic routes	13.6 - 13.6

Legislation	Summary	Application at NCH	H&S Strategy
	working space, toilet and washing facilities, drinking water, changing, rest and eating facilities, condition of floors and traffic routes, fall prevention, windows, doors and gates etc.		
Safety Representatives and Safety Committees Regulations 1977	Relate to consultation with employees, formation of safety committees and appointment and rights of safety representatives.	Consultation with employees. Involvement of Safety Representatives. Terms of Reference of Safety Committee Health & Safety inspections Incident reporting procedure.	10.1 10.3 10.2 3.2 9.1
Health & Safety (Consultation with Employees) Regulations 1996	Add to 1977 SRSC Regulations, and extend H&S consultation rights to all employees.	As above	As above
Civil Contingencies Act 2004	Places duties on statutory bodies to manage civil emergencies and to promote business continuity planning.	Although this Act does not directly apply to NCH, the company has some involvement in the NCC emergency plan, and needs its own emergency and business continuity plans.	7.1,7.2,7.3