



London Borough
of Hounslow

Health and Safety Policy

October 2015



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Foreword

The health, safety and wellbeing of residents, other members of the public, staff and contractors, is important to the council. Our commitment to health and safety forms part of the council's wider agenda of social responsibility, sustainability, risk management, corporate governance and ultimately quality of service.

The basis of our health and safety policy is to create a climate in which a positive health and safety culture can develop. This will enable the council to operate effectively and allow residents, customers and staff to carry out their activities without detriment to their health, safety and wellbeing.

This is why the council's health and safety policy sets out our overall commitment to managing health and safety, supported by clear roles and responsibilities, and details the arrangements for managing health, safety and wellbeing along with the standards that the council is determined to meet.

Good health and safety practice will only be achieved if everyone gives their full support to the actions outlined within the policy.



Cllr Katherine Dunne
Lead Member for Equalities and Inclusion
1 October 2015

Introduction

This health and safety policy details how the council will manage health and safety.

This policy defines the operational arrangements and identifies the key roles and responsibilities, that will enable the council to meet the aims and objectives of the Health, Safety and Wellbeing Strategy 2014 to 2019.

This health and safety policy of the London Borough of Hounslow consists of three parts:

Part One – Health and safety policy statement: This sets out the council’s commitment to managing health and safety.

Part Two – Organisation for managing health and safety: This outlines the governance arrangements and identifies roles and responsibilities for implementing the policy.

Part Three – Arrangements for managing health and safety: This provides an overview on the procedures and guidance for managing health and safety, including the health and safety management system as well as risk management, monitoring and review processes.

There are directorate health and safety policies and plans which should be used in conjunction with this policy. The health and safety manual which provides the detailed guidance and standards is available on the intranet.

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Date of issue	1 October 2015
Last reviewed	First issue
Next review due	1 October 2016
Owner	Head of Occupational Health, Safety and Wellbeing

Part One: Health and safety policy statement

I and the Corporate Leadership Team are fully committed to providing services which are safe for residents, the public and all those who work for the London Borough of Hounslow.

We believe managing safety effectively is an essential part of the way we work. It helps to deliver excellent customer services, value for money for local residents, and creates a strong working environment for staff.

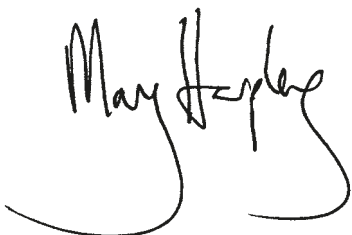
The Corporate Leadership Team will, on the basis of risk assessment, meet our aim through the following objectives:

- Leading by example and encouraging the integration of sensible health and safety management within the business of the council.
- Making adequate provision of resources for measures required to eliminate or control unacceptable risk.
- Regularly reviewing health and safety performance across the council.

Whilst the Corporate Leadership Team and I have overall responsibility for ensuring the council meets all of its health and safety responsibilities, this policy places explicit duties upon Directors, Heads of Service, managers and supervisors to maintain and develop adequate health and safety arrangements in all aspects of their service. This responsibility also extends to where the council's services are delivered via a contractor. Whilst the primary safety responsibilities may fall to the contractor, the council still has a duty, as the commissioning body, to ensure that the contractor delivers services safely and appropriately that match or exceed the requirements laid down by the council.

I and the Corporate Leadership team are keen to ensure that staff approach safety management as an integral part of delivering effective services and providing value for money to our customers. Failure to manage safety effectively can result in harm to our customers and employees, increase costs and disrupt services. To be effective, health and safety must not only involve managers and employees, but contractors, volunteer workers, customers and the public.

This policy will be reviewed as necessary in consultation with the affected staff and the workplace representatives. Any changes to it will be made available to all contracting agencies, partners and others affected by its provisions. I look to all of you to play your part in making the London Borough of Hounslow a safer and healthier place to live and work.



Mary Harpley - Chief Executive
1 October 2015

Part Two: Organisation for managing health and safety

2.1 Roles and responsibilities

2.1.1 Chief Executive

The Chief Executive is the officer who has overall and final responsibility for all matters of health and safety across the council, and for ensuring that mechanisms are in place for the implementation, maintenance, monitoring and revision of safety management systems. Operationally, most of these duties have been delegated to Executive Directors, Directors, Heads of Service and the Head of Health and Safety. The Chief Executive will also nominate one member of the Corporate Leadership Team to act as the Health and Safety Champion.

2.1.2 Executive Directors

Executive Directors have overall responsibility for health, safety and wellbeing within their directorate. In maintaining a general oversight of the policy and its arrangements, the director will:

- Lead by example and promote a positive health and safety culture.
- Produce and maintain a current health and safety policy statement.
- Produce an updated health and safety plan for their Directorate each year.
- Appoint a member of the senior management team to the role of Management Appointee to act as the executive co-ordinator for health and safety within the directorate.
- Provide within the directorate a working mechanism for consultation with the staff side and workplace safety representatives on health and safety issues.
- Ensure that the directorate's health and safety performance is reviewed on a six-monthly basis.

- Take into account the resources necessary to maintain health and safety standards, when compiling budgetary requirements.
- Define roles, allocate responsibilities and delegate authorities to facilitate effective health and safety management.

2.1.3 Directors

Directors are responsible for the health, safety and wellbeing of the staff and all those affected by the work of their division. In addition they will:

- Lead by example and promote a positive health and safety culture, including regular inspections of their areas of responsibility.
- Ensure the council's health and safety management system is adopted in the division.
- Assign safety responsibilities for all levels of management.
- Regularly monitor safety performance and the progress of planned improvements and objectives in their division.
- Include actions within the individual work plans of Service Heads and Managers that will contribute to the achievement of the objectives in the divisional health and safety plan.
- Regularly review health and safety performance within their division.
- Give assistance to their managers when they bring matters to their notice which they are unable to resolve, including the completion of remedial actions following internal departmental health and

safety audits, inspections and incident investigations.

- Ensure that new contractors, agencies and consultants are only employed after they have been assessed for their health and safety competence.
- Bring to the attention of the Executive Director any health and safety matters which they are unable to resolve.
- Allocate necessary resources to undertake health and safety related work.
- Ensure that all work-related hazards are identified and controls are risk-assessed using the council's risk assessment framework.
- Ensure that all required health and safety records are maintained and regularly reviewed.

2.1.4 Heads of Service

Heads of Service are responsible for ensuring that the health and safety procedures are implemented within their area of responsibility. In addition, Heads of Service will:

- Ensure that health and safety responsibilities are defined within individual job descriptions and performance is monitored as part of individual PDA reviews.
- Integrate within their work programmes specific health and safety objectives where appropriate.
- Regularly review health and safety performance at least every six months, including a full annual review.
- Communicate with their teams on all safety-related issues and make health and safety a standing item on team meeting agendas. Set a personal example and promote a positive health and safety culture within the workplace.
- Ensure that staff have the appropriate health and safety or relevant technical training and qualifications required for their roles.
- Evaluate the competency of contractors prior to their appointments in accordance with the relevant corporate procedures.
- Bring to the attention of the Divisional Leadership Team any health and safety issues they are unable to resolve.
- Support the council's health and safety audit process.

2.1.5 Specific responsibilities for managers or officers in control of premises / facilities

Managers or officers with responsibilities for premises and/or facilities are responsible for the health and safety management of their premises including ensuring that statutory maintenance and inspection is carried out as well as any identified remedial works required. The manager / officer will ensure that:

- A suitable and sufficient fire risk assessment has been completed for the premises concerned.

- Fire safety records are kept up to date including record-keeping of all fire drills, maintenance of any fire-fighting equipment, fire alarms, and any necessary remedial works.
- Arrangements are in place for the safe evacuation of employees and visitors, including holding regular evacuation drills.
- There is an up to date asbestos management survey, risk assessment and management plan for the premises.
- There is a process in place to inform any person carrying out work on the premises concerned of the asbestos survey and risk assessment.
- Before any intrusive building work takes place, a refurbishment / demolition asbestos survey is carried out.
- Annual visual monitoring of the condition of any asbestos-containing material is carried out and any significant changes are reported.
- A suitable and sufficient water hygiene survey and risk assessment have been completed for the premises concerned.
- Temperature checks, monitoring and flushing through as recommended in the water hygiene assessment are carried out and recorded.
- All portable electrical appliances are tested and inspected for electrical safety by a competent person.
- Fixed electrical systems are tested for safety every five years.
- All gas systems, equipment and pipe work are safe and tested regularly.
- The maintenance and repair of premises is undertaken in a safe way by competent personnel.
- Building works are risk-assessed and suitable safety control measures are put in place, and are adequately segregated from building occupants.
- Occupants are adequately briefed / advised of the planned work, and any changes in routine activities that will affect their health and safety.
- A process is in place to identify building-related hazards on a regular basis and to put measures in place to reduce them.
- Storage of chemicals and other hazardous substances is secure and does not pose a risk to users of the site.
- Remedial action is carried out and contractors are advised of any known hazards they may encounter while undertaking works.
- Appropriate action is taken to control access to the premises, to prevent unauthorised access, vandalism and arson.
- There are an adequate number of trained first aiders to provide first aid cover arrangements.
- Regular health and safety workplace inspections take place.

2.1.6 Managers

Managers, team leaders and supervisors are responsible for ensuring that the health and safety policy and procedures are implemented and monitored in the work places and amongst the work groups for which they are responsible.

In addition the manager will:

- Ensure that all risk assessments are undertaken, completed, and regularly reviewed.
- Produce and review, as necessary, local operational safe-working procedures and codes of practice based on risk assessments and other related occurrences.
- Ensure that all required health and safety records are maintained.
- Induct all new permanent, temporary and agency staff in required health and safety procedures and risk assessments and keep these refreshed to accommodate any significant changes.
- Ensure that all safety-related incidents and injury accidents are recorded and reported promptly and accurately.
- Investigate accidents, incidents and contributory factors and review risk assessments and implement remedial actions to prevent a recurrence.
- Ensure that all accidents and incidents are recorded on the council's online accident reporting system, and that appropriate investigations are carried out.
- Ensure that staff have the appropriate health and safety or relevant technical training and qualifications required for their roles.
- Regularly review health and safety arrangements and contribute to service health and safety reviews.
- Provide necessary levels of supervision to staff for safety-critical operations under their control.
- Bring to the attention of their line managers any health and safety issues they are unable to resolve.
- Set a personal example and promote a positive health and safety culture within the workplace.

2.1.7 Employees

The support of all employees is essential if high standards of safety are to be achieved. Employees must be familiar with the local health and safety arrangements for their place of work and activities. In addition employees will:

- Take reasonable care of their own safety and of others who may be affected by their activities or for whom they may have a special duty of care.
- Co-operate with the council's health and safety arrangements and procedures and to adhere to all safe-working methods as instructed.
- Report promptly and accurately all incidents, accidents, hazards or defects that they are aware of that may cause accidents.
- Report any safety-critical failures of work equipment or safety procedures to their line managers.
- Always use work equipment, dangerous substances, means of transport or safety devices in accordance with training and instructions.

- Not interfere with or misuse anything provided for their health, safety and welfare.
- Remove themselves and those in their charge from any situation in which there is an imminent risk of significant accident or injury and report this as soon as practicable to their line managers.

2.1.8 Health and safety advisers

Health and safety advisors are responsible for all strategic aspects of health and safety for the council on behalf of the Corporate Leadership Team, and for promoting a safer environment for all council employees and others on council premises. Specific duties include:

- Acting as professional advisers to the council on all aspects of health and safety, particularly from a corporate and strategic management perspective.
- Providing support and advice to directors, working with them to develop solutions to local problems.
- Developing, maintaining and monitoring a suitable and sufficient safety management system.
- Monitoring, on behalf of the Corporate Leadership Team, the council's health and safety performance and providing regular performance reports to directorate and corporate leadership teams, as well as members.
- Reviewing and developing council strategy and policy detail on health and safety matters for presentation to the Corporate Leadership Team and the Health and Safety Committee.
- Keeping up to date with changes in legislative requirements and to ensure their satisfactory adoption by the council on behalf of the Corporate Leadership Team.
- Investigating fatalities and serious incidents, particularly where evidence suggests that a failure in health and safety management was a contributory factor, and providing reports identifying causes and preventative measures.
- Monitoring health and safety training and developing and implementing new training as necessary.
- Ensuring council services, at appropriate intervals, review operational health and safety arrangements, and assisting in the preparation of policy and organisational procedures arising out of such reviews.
- Reviewing and producing procedures and guidance notes in liaison with Heads of Service and Trade Union representatives as appropriate.
- Assisting in the presentation of appropriate information for health and safety consultation purposes including at the Health and Safety Committee and other meetings relating to health and safety.
- Coordinating the council's contact with the Health and Safety Executive, the London Fire and Emergency Planning Authority, and other health and safety organisations as appropriate.

2.1.9 Elected members

Elected members not only represent their communities and residents, they also help to make and shape the policies of the council. They do not directly manage services but they do make the decisions on what those services will be like.

Elected members provide the council with leadership, direction and strategy both individually and collectively, including health and safety. Responsibilities for elected members include:

- Allocating appropriate resource to ensure health and safety is managed properly across the authority.
- Ensuring a Cabinet member is appointed as portfolio holder with responsibility for health and safety, including chairing the Health and Safety Committee.
- Ensuring that the council has an effective health and safety strategy and associated management system, and measuring performance of this management system.
- Ensuring that the council has access to competent health and safety advice.
- Ensuring that employees and their representatives are fully engaged on health and safety matters.
- Championing health and safety throughout their term as an elected member.
- Elected members should also understand their roles and responsibilities as employees of the council and refer to section 2.1.7.

2.1.10 Contractors and partners

The council procures a range of services and also provides services in partnership with many other service providers. The council recognises the joint responsibility it has to safeguard the health, safety and wellbeing of its own employees, those working on behalf of the council, service users, and members of the public who may be affected by the work of council partners and suppliers.

The council will ensure that suitable and sufficient health and safety information is provided to its contractors and partners prior to any contract commencing.

All service providers are required to maintain an appropriate health and safety management system to comply with all relevant health and safety legislation and control the risks associated with the service provided. As part of its contract management process, council officers will monitor contractor health and safety performance.



2.2 Health and safety governance arrangements

The council has established processes for ensuring the effective oversight of health and safety management across the authority, as well as consulting and communicating with staff. These arrangements are summarised below and in the diagram on page 13.

2.2.1 Health and Safety Committee

The Health and Safety Committee meets twice annually and comprises of five councillors and five Staffside representatives. The committee approves and ensures the strategic oversight of the Health, Safety and Wellbeing Strategy and health and safety management performance across the council.

The aim of the committee is to improve health and safety compliance in the council and across the borough, and identify any general health and safety issues or concerns which may affect employees and residents.

2.2.2 Health and Safety Operational Management Group

The Health and Safety Operational Management Group is primarily concerned with the health, safety and wellbeing of all persons employed or affected by the undertakings of the council at a functional and operational level. The group meets every two months and comprises representatives from the staff side and each directorate.

2.2.3 Consultation

Consultation takes place in a number of formal and informal ways. Formal consultation takes place via the Health and Safety Committee and the Health and Safety Operational Management Group. Safety advisers also participate in Directorate Consultative Committees.

Consultation also takes place at a more local level via team meetings and regular supervision.

Consultation with employees must be carried out on matters to do with their health and safety at work, including:

- Any change which may substantially affect their health and safety at work, for example in procedures, equipment or ways of working.
- The employer's arrangements for getting competent people to help him or her satisfy health and safety laws.
- The information that employees must be given on the likely risks and dangers arising from their work, measures to eliminate or reduce these risks and what they should do if they have to deal with a risk or danger.
- The planning of health and safety training.
- The health and safety consequences of introducing new technology.

2.2.4 Trade Union and nominated safety representatives

The role of the Trade Unions and the nominated safety representatives is an important one in managing health and safety across the council. Aside from the formal consultation arrangements via the Health and Safety Committee, there are a number of other key areas where close working with safety representatives is extremely useful. This includes:

- Consulting and agreeing on local or service specific-risk assessments and procedures. Often safety representatives will be able to provide practical and pragmatic solutions to issues and

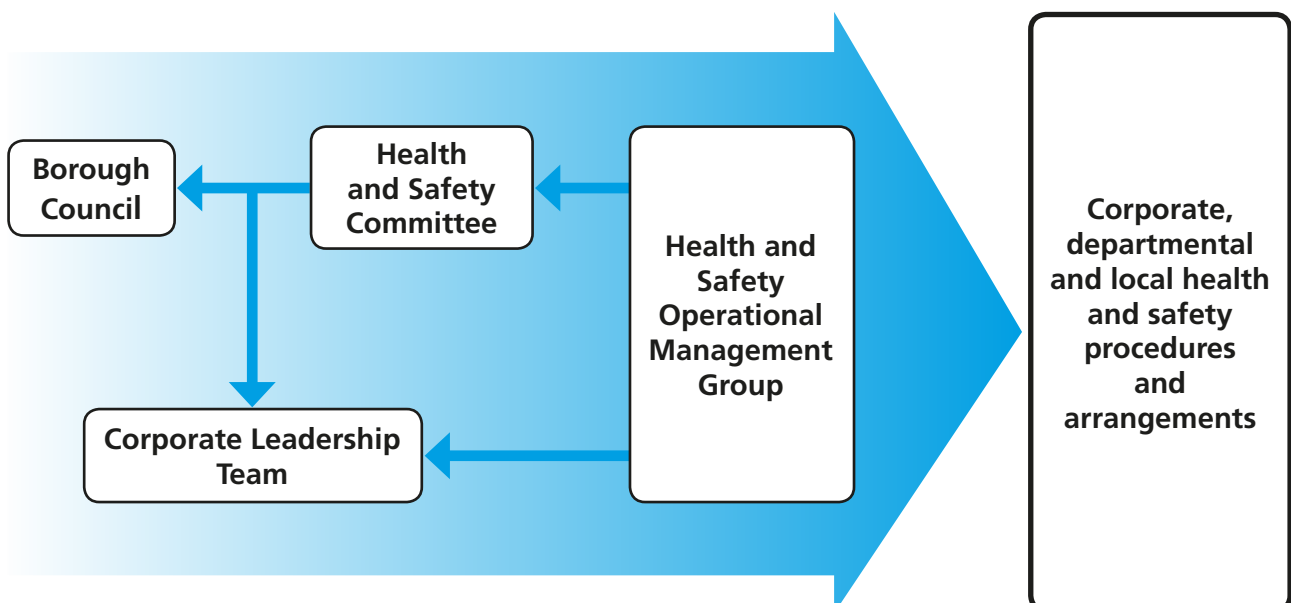
have a good level of understanding of employee's safety concerns.

- Carrying out ad hoc workplace inspections and providing feedback to managers on any issues that need addressing. These inspections can be a useful extra check that safety precautions are operating as expected as well as identifying further ways to improve systems.
- Carrying out formal joint inspections with council health and safety advisers on request. This is an extremely positive approach and demonstrates to all persons in the workplace how seriously health and safety is taken. Issues raised will be dealt with at the appropriate level and resolution monitored at the Health and Safety Operational Management Group.
- Undertaking joint awareness raising and promotional activities to address particular health and safety concerns.

2.2.5 Communication

Effective communication is important to ensure that all staff are aware of key health and safety messages and understand any significant implications for them in their tasks. Key information and changes to policies are communicated to all staff via Cascade (the fortnightly CLT briefing), 7 Days (weekly all staff e-newsletter) and the intranet.

At a service and team level, managers are responsible for communicating and cascading important information to their staff. Health and safety advisers, as part of their role, also attend sites and will discuss specific issues with staff or a manager at a site level. Staff health and safety events are also used to raise awareness and promote health, safety and wellbeing for all council employees. Training courses can also be used to raise awareness of general health and safety good practice, as well as providing more detailed information, instruction and guidance on specific policies and procedures.



Borough Council

- Borough Council establishes the Health and Safety Committee as a formal standing committee of the council.
- Borough Council formally adopts the health, safety and wellbeing strategy.

Corporate Leadership Team

- The Corporate Leadership Team (CLT) approves corporate health and safety policies and procedures.
- CLT ensures effective implementation across the council, both corporately and at directorate level.

Health and Safety Committee

- The Health and Safety Committee is the formal consultative body with trade unions and provides overview of health and safety performance across the organisation.
- The committee approves recommendations to CLT for new or changed corporate health and safety policies, and make recommendations to Borough Council to adopt the health, safety and wellbeing strategy.

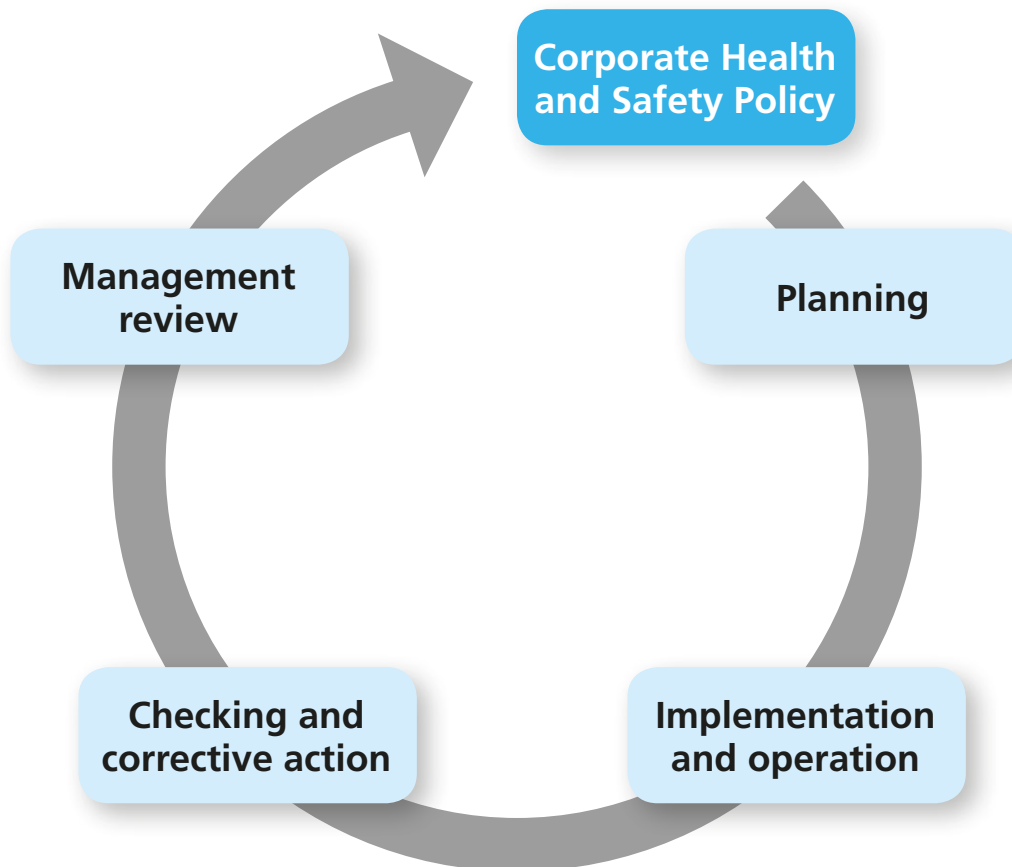
Health and Safety Operational Management Group

- The Health and safety Operational Management Group is a joint officer / trade union group that meets to discuss the detail of health and safety management in the council. In particular, it focuses on monitoring performance and discussing health and safety issues affecting the whole council.
- The group also reviews draft policies and procedures before making recommendations to both the Health and Safety Committee and Corporate Leadership Team to adopt them as policy.

The combined effect of these health and safety governance arrangements will lead to an overall improvement in the management of health and safety in the council through consistent development and application of standards.

Part Three: Arrangements for managing health and safety

3.1 Health and safety management system



The council's health and safety management system is based on a Plan, Do, Check, Act cycle. This continuous improvement cycle means that council procedures and arrangements are reviewed and improvements identified and implemented.

- **Policy** – The Health, Safety and Wellbeing Strategy and this health and safety policy form the key parts of the council's policy towards health and safety management, including allocating roles and responsibilities. The strategy sets the long-term aims and the policy provides more of the operational detail of how the

strategy will be achieved and measured through development of key performance indicators. Seven performance indicators are identified within the Health, Safety and Wellbeing Strategy.

- **Planning** – The corporate health and safety action plan details measurable actions and milestones for achieving the aims of the strategy. The action plan also enables key resources to be allocated. At a departmental level, policy statements allocate responsibility and actions plans highlight key aims for that department each year.

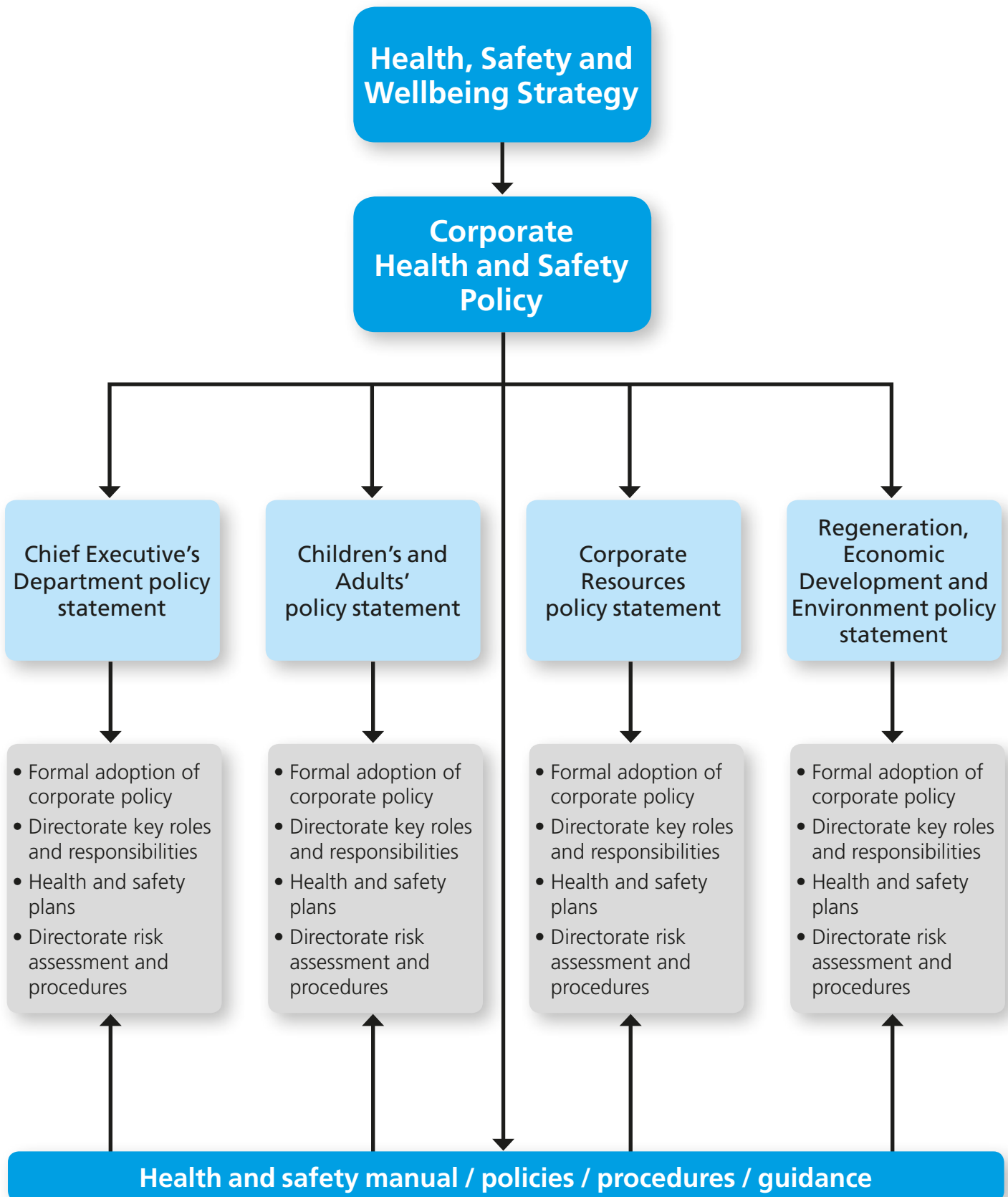
- **Implementation** – The risk management and assessment enables effective identification of hazards and ensures appropriate controls are implemented in line with legislative requirements and industry best practice. The health and safety manual provides detailed procedures and processes for effective risk control. Provision of appropriate health and safety training is another key element of the implementation phase. Consultation and communication arrangements as detailed in this policy are also important for effective implementation of health and safety management arrangements.
- **Checking and corrective action** – The health and safety team operate a three year audit cycle where a comprehensive audit of each service is carried out and remedial actions are identified. Audits are followed up to ensure actions have been implemented and trend analysis carried out at an organisational level to identify further priority areas for action. In addition, managers are required to complete six monthly performance reviews which are monitored and analysed by the health and safety team. The online incident reporting system is used to record and monitor incidents.
- **Management review** – Oversight is provided in a number of areas including regular performance reports using defined performance indicators to the Corporate Leadership Team, the Health and Safety Committee, internal auditors and British Standards Institution for certification to BS OSHAS 18001. The findings of these audits and reviews help feed changes to policy and strategy. The health and safety team will also prepare annual reports based on performance data, risk assessment and audit findings. These annual reports will be considered by the relevant management group at an annual meeting in order to identify areas for improvement for the coming year. In addition member oversight will be provided by an annual review at Borough Council as well as at the Health and Safety Committee.



3.2 Health and safety management system structure

The diagram on page 18 highlights how the key documents in the council's health and safety management system fit together.

- The Health, Safety and Wellbeing Strategy sets the long term aims of the council for health and safety management. There are seven key aims in the strategy with summary details of how these will be achieved. The strategy identifies seven key performance indicators which is how health and safety performance will be monitored.
 - The health and safety policy provides more detail of how the strategy will be implemented and monitored, and particularly how roles and responsibilities are allocated.
 - Directorate health and safety policy Statements sit underneath the corporate health and safety policy and allocate responsibility at a departmental level. This includes how health and safety compliance and performance will be monitored at directorate level.
 - Directorate health and safety plans include specific targets and objectives set by the Senior Leadership Team for that department. Objectives are based on the overall aims of the strategy but reflect specific projects and actions required at a more local level.
 - The council's health and safety manual contains the detail on how specific subjects and issues are to be managed. The manual is divided into individual sections grouped as policies, procedures and guidance. The manual is available on the intranet to all staff.
- In addition, a corporate health and safety action plan will be produced each year identifying specific areas for improvement. These targets will be set using previous health and safety performance information and in consultation with senior managers, the staff side and members.



3.3 Risk management

The health and safety team will develop a risk assessment register that identifies which managers are required to complete a general risk assessment for their site or service. There is a detailed general risk assessment procedure and recording scheme available as part of the health and safety manual.

Managers who are identified on the register as being required to complete general risk assessments must review the assessments at least annually and send any updates to the health and safety team.

3.3.1 Corporate risk register and monitoring

The health and safety team will develop a corporate risk register that identifies all responsible managers and will report to Directorate Leadership Teams quarterly on compliance. A performance indicator of 100% compliance across the council by April 2015 was set in the Health, Safety and Wellbeing Strategy.

The register is used to monitor when assessments are due for review and ensure that managers are issued a reminder up to four weeks before the annual review and then when the risk assessment is overdue.

Overdue assessments will then be reported to the appropriate Directorate Leadership Team.

3.3.2 Review

Each general risk assessment is reviewed by a health and safety adviser and feedback provided to the manager as required. The level of detail in the general risk assessment is proportionate to the activities carried out by the service. The content of the assessments are analysed and significant issues are collated for comparison across the directorate and the council by the health and safety team. The health and safety team will analyse the risk profile of each general risk assessment from across the council to identify any trends. These findings will be used to guide development of corporate health and safety action plan as well as specific projects with the aim of reducing the overall risk profile of the council.

Each risk assessment is to be reviewed annually and resubmitted to the health and safety team. Comparison will be made with previous assessments to ensure that the continuous improvement cycle is being followed. Feedback will be provided to senior managers and leaders on the findings of the analysis as part of an annual health and safety report so that informed decisions on priorities and resources can be made.

The standard risk matrix and risk control scoring are on page 20.

3.3.3 Risk Matrix

		SEVERITY				
		INSIGNIFICANT (1) (e.g. a physical injury sustained but no treatment of injuries is required)	MINOR (2) (e.g. injuries requiring first aid treatment)	SERIOUS (3) (e.g. injuries resulting in lost time and/ or referral to other health professionals for further treatment or observation)	MAJOR (4) (Serious injuries such as fractures, dislocations, unconsciousness, internal injuries, eye injuries, severe burns, injuries requiring admission to hospital)	FATALITY / DISABILITY (5)
LIKELIHOOD	REMOTE (1) (improbable but might happen only rarely)	TRIVIAL (1)	TRIVIAL (2)	TOLERABLE (3)	TOLERABLE (4)	MODERATE (5)
	UNLIKELY (2) (but could happen at some time)	TRIVIAL (2)	TOLERABLE (4)	MODERATE (6)	MODERATE (8)	MODERATE (10)
	LIKELY (3) (and will probably happen at some time)	TOLERABLE (3)	MODERATE (6)	MODERATE (9)	SUBSTANTIAL (12)	SUBSTANTIAL (15)
	VERY LIKELY (4) (and will definitely happen at some time)	TOLERABLE (4)	MODERATE (8)	SUBSTANTIAL (12)	SUBSTANTIAL (16)	INTOLERABLE (20)
	CERTAIN (5) (will happen imminently)	MODERATE (5)	MODERATE (10)	SUBSTANTIAL (15)	INTOLERABLE (20)	INTOLERABLE (25)

3.3.4 Risk Controls

RISK LEVEL	ACTION AND TIMESCALE
LOW (1-5)	No additional controls are required. Consideration may be given to a more cost-effective solution or improvement that imposes no additional cost burden. Monitoring is required to ensure that the controls are maintained.
MODERATE (6-12)	<p>Every effort should be made to reduce the risk to a tolerable level if reasonably practicable. If not practicable, it may be possible to reduce the risk associated with such activities to the lower scale of 'Moderate'</p> <p>If a control measure cannot be financed immediately, it may be possible to plan for its implementation over a longer period of time e.g. one, or two years, while a number of other limited risk reduction measures are put in its place as an interim course of action.</p> <p>If the risk is judged to be moderate, there is a greater likelihood that detailed local safe working procedures will need to be written to make existing control measures more robust. Other ways of enhancing existing control measures are likely to include advanced training of staff and increased frequency of refresher training as well as increased supervision.</p>
HIGH (15-25)	Work should not be started or continued until the risk has been reduced. If it is not possible to reduce the risk, even with unlimited resources, work has to remain prohibited.

NOTE: Tolerable here means that risk has been reduced to the lowest level that is reasonably practicable

3.4 Monitoring and audit

3.4.1 Performance Indicators

There are seven health and safety performance indicators that have been set as part of the Health, Safety and Wellbeing Strategy. The seven indicators are:

Indicator	Measure
Indicator 1:	Maintain the certification of the council's health and safety management system in higher risk areas to the BS OHSAS 18001: 2007 standard, and align the whole council to the 18001 standard.
Indicator 2:	Achieve a 100% compliance rate for all general risk assessments completed by departments, services and teams.
Indicator 3:	Ensure all six monthly operational health and safety reviews and school governors' annual health and safety performance reviews are completed by service managers and Hounslow-maintained schools respectively.
Using the average performance statistics for 2010 to 2013 as a baseline indicator, to achieve a 20% reduction averaged over five years (2014 to 2019) against the following incident rates:	
Indicator 4:	The total number of staff injury accidents
Indicator 5:	The number of 'Major' and '7 day' accidents
Indicator 6:	The number of assaults leading to physical injury
Indicator 7:	The number of manual handling incidents leading to musculo-skeletal disorders

3.4.2 Performance monitoring

These indicators are used to report health and safety performance across the council. Quarterly reports are prepared for Directorate Senior Leadership Teams and the Corporate Leadership Team. In addition performance is reported to the Health and Safety Committee every six months and to Borough Council annually.

Each manager identified on the risk register has to submit a six-monthly Health and Safety Performance review. One of these six-monthly performance reviews will coincide with the review of their general risk assessment. In the case of schools, an annual performance review is necessary. The report ensures that the manager has considered all the health and safety hazards, and controls have been implemented. The six-

monthly performance review is a tool to assist managers to help them ensure they are managing health and safety appropriately and to help them prioritise any further actions required. In addition, managers are required to complete a six-monthly workplace inspection, and then submit the findings to the health and safety team.

Local arrangements may be implemented, in consultation with the health and safety team, where it makes sense for a wider workplace inspection to take place e.g. such as in the Civic Centre to avoid duplication of effort.

The general risk assessment, six-monthly performance review, annual school health and safety performance review and workplace inspections are monitored by the health and safety team, including trend analysis.

An annual report will be prepared including analysis of performance reviews, assessments and audits from each directorate as well as performance indicators. This feedback can be used by the Directorate Leadership Team to develop the Directorate Health and Safety Action Plan for the coming year. At a divisional and service level, health and safety objectives should be embedded within service plans.

3.4.3 Audit

The health and safety team carry out a programme of internal health and safety audits for all sites and services operating on a three year cycle. The audit template aligns with the requirements of BS OHSAS 18001. As part of the audit process, trend analysis is carried out to identify further priority areas for improvement locally and across the council. The audit process is monitored internally within the health and safety team to ensure consistent standards are applied.

3.4.4 Review

The health and safety management system and performance is reviewed at several levels across the authority.

- The health and safety team reviews the application of the management system across the council as part of the health and safety audit programme and collectively identifies areas for improvement to the system.
- The health and safety management system is also subject to internal audit review by the council's auditors. Significant findings and areas for improvement are reported to the Corporate Leadership Team and the Audit Committee
- The REDe health and safety management system is externally certified and certificated to BS OHSAS 18001.
- Senior management and leadership review and oversight of health and safety performance is accomplished through a number of measures. Quarterly performance reports and annual performance reviews are presented to Directorate and Corporate Leadership Teams. The Health and Safety Committee provides the oversight and challenge to the officer led management of health and safety, and Borough Council reviews health and safety performance annually.

3.5 Health and safety manual summary

The health and safety manual has three main sections, policies, procedures and guidance notes. The health and safety manual is available on the intranet and the contents are summarised below.

Policies	Guidance Notes
Asbestos	Airborne hazards
Construction	Casual or temporary and young workers
Fire safety	Display screen equipment (DSE)
Legionella and water management	Emergency planning
Stress	Event safety
Violence	Falls from heights
Procedures	First aid
Accident / incident reporting (RIDDOR)	Glazing
Auditing	Hazardous wastes
Construction work (CDM)	Health surveillance
Construction contractors	Lone working
Consultation and communication	Manual handling
Control of hazardous substances (COSHH)	Mobile phones
Document and data control	Noise
Hazard and defect reporting	Personal emergency evacuation plans (PEEP)
Infection control	Personal protective equipment (PPE)
Inspections	Pregnant / new mothers
Legal and other requirements	Private vehicles
Performance review	Slips and trips
Planning / objectives	Sun safety
Record keeping	Use of electricity
Risk assessment	Violence avoidance
Training and competence	Welfare facilities
	Work equipment



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