Health & Safety in Schools

June 2018

HEALTH & SAFETY

Low Assurance

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Purpose & Scope of Review

We carried out this review to inform the annual internal audit report and annual governance statement.

During this review we covered the following health and safety arrangements in schools:

- Policy and procedures;
- Risk assessments in schools (safety and fire)
  - Health & safety gap analysis in schools;
- Training and awareness;
- Accident and incident reporting;
- Reactive reports.

Our review included sample testing of five schools, namely:

- Ysgol Caer Drewyn,
- Ysgol Henllan,
- Christchurch C.P. School,
- Prestatyn High School,
- Ysgol Bryn Clwyd.

Records held by Corporate Health & Safety and the Councils HR system (iTrent) allowed us to test training provision and accident and incident reporting across all schools.

Context

It is the responsibility of the schools and their governing bodies to have effective governance and controls in place to ensure that any health and safety issues are addressed, school staff are suitably trained and the arrangements for health and safety are robust.

The Corporate Health and Safety team provides support to schools as set out in the Service Level Agreement (SLA) for Health & Safety that all schools have opted into. This includes: –

- Annual inspections of schools, e.g. themed review for 2017–18 covering health and safety arrangements in schools. Reports are issued to schools including an action plan detailing issues, actions and timescales.

- Fire risk assessments for all schools. Reports are sent to the schools including an action plan detailing issues, actions and timescales.
- Provide and facilitate health and safety training for school-based staff.
- Support and guidance for reactive works and reports as required.
- The team work closely with Occupational Health (who do the medical assessment of staff) before minibus driver assessments are carried out to ensure designated staff are safe to drive minibuses.

Audit Opinion

Our review of Health and Safety in Schools has identified a number weaknesses that need strengthening to minimise the risk of harm, injury or fatality to staff, children and other users of school buildings.

Testing a sample of five schools confirms that the following health and safety related documents are in place: –

- Up to date health & safety policies which cover key areas such as risk assessments, first aid and fire evacuation arrangements as well as monitoring.
- Four of the five schools tested had an asbestos management plan and/or risk assessment in place identifying areas where asbestos was present at the schools.
- Relevant emergency response plans appropriate for each individual school's needs.
- Only two out of the five schools had an infection control plan in place.

The Corporate Health and Safety team raise schools' awareness of issues within their reports, and they follow up priority issues according to their significance and the resources available. While the school is responsible for implementing the agreed actions, there is no central system in place to record when the required actions have been implemented. A measured approach is required to ensure that any inaction does not put users of school buildings at risk of harm, injury or fatality. See Risk/Issue 1 for more information.

Although fire risk assessments are in place, our testing highlighted 10 school sites where a fire risk assessment had not been updated within the last three years. The Corporate Health & Safety team is undergoing a programme of visits to schools to update their fire risk assessments to comply with Article 9 (2) of the Regulatory Reform (Fire Safety) Order 2005 which states that a risk assessment must be reviewed and updated by a responsible person on a regular basis or where there has been a significant change affecting the premises. It is a concern that out of date school fire risk assessments could mean that fire safety measures are not adequate which may put the safety of staff and children at risk. Also, in the event of a fire, the school and Council may be investigated by the Fire & Rescue Authority or the Health and Safety Executive (HSE) and enforcement action taken if the school or Council is deemed negligent. See Risk/Issue 2 for details.

While many schools are using the corporate system to record accidents and incidents, and the Health & Safety team promote its use, our testing confirms that some schools have never recorded an accident or incident on the corporate system. Our sample testing confirms that schools do maintain their own manual records on site which the legislation allows. However, lack of data centrally makes it difficult for the Corporate Health & Safety team and/or Corporate Health & Safety Committee to monitor and take action if there are emerging trends across schools and to ensure that all serious accidents and incidents are reported to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 (see Risk/Issue 3 for more details).

The Corporate Health and Safety team promotes and facilitates health and safety training courses for staff, some mandatory and others advisory. Analysis of the training records kept on the Council's HR system (iTrent) highlighted a few schools where none of their staff were showing as having attended a health and safety training course. While most schools have a trained representative, some staff have not attended the relevant health and safety course for their role. Head teachers from the sample of five schools tested, confirmed that school-based staff had received some training (e.g. induction where health and safety is covered); however, only one school had evidence to demonstrate this (see Risk/Issue 4).

The Healthy Schools Co-ordinator is currently working with schools and raising the importance of having an infection control plan in place. This is a key document for identifying various infections that could impact the school and ensure that controls are put in place to users of school buildings where possible. Although a plan is not mandatory, it is advisable, particularly given the recent outbreaks in a few of Denbighshire's schools. See Risk/Issue 5 for more information.

The review has identified a number of weaknesses that need strengthening within the school environment to ensure compliance with health & safety legislation and to minimise the risk of harm to users of school buildings. For this to be effective, it will require a co-ordinated approach from schools, Education Support Services and the Corporate Health and Safety team. Given the nature of the issues identified, and the potential impact of any adverse consequences, we are providing a 'Low' assurance overall.

Low Assurance	Significant weaknesses in management of risks and/or controls that put achievement of objectives at risk.

Action Plan

Audit Review of: Health & Safety in Schools

Date: June 2018

	Corporate Risk/Issue Severity Key	
0	**Critical** – Significant issues to be brought to the attention of SLT, CET, Cabinet Lead Members and Corporate Governance Committee	
1	**Major** – Corporate, strategic and/or cross-service issues potentially requiring wider discussion at SLT and/or CET	
4	**Moderate** – Operational issues that are containable at service level	

Risk Issue 1	There is no formal mechanism in place corporately for recording the status of actions raised as part of the inspections and assessments carried out by the Corporate Health and Safety team.
Background Detail	The Corporate Health and Safety team carry out the following inspections and assessments of school premises: – - General health and safety inspections with involvement from the schools. These cover different themes i.e. in 2017/18 focused on policies and procedures and in 2018/19 the focus will be on cleaning standards. - Fire Risk Assessments. Although improvement actions which are identified to address any issues are formally reported to the school, there is no process/system in place centrally to record that the necessary actions have been implemented. Although the school has a role to address the actions, the Council, as landlord, also has a role to maintain school buildings. The Health & Safety team follow up priority issues based on their significance and the resources available but are not currently recording any progress or updates.

Action (Ref)	Agreed Management Action	Responsibility	Deadline
1.1	Meet with ICT to discuss and implement an action tracking system for the recording of "recommended actions" with the agreed timescales. The recipients of the "recommended actions" to respond to the Corporate Health and Safety Team within a given timescale. The system will include iterative reminders from the system and escalation triggers as part of the process.	Corporate Health & Safety Manager & ICT Business Partner for Service	30/03/2019
1.2	Internal Audit to attend a future Business and Finance Managers meeting to highlight the responsibility of the schools for updating the status of actions arising from inspections.	Internal Audit Services	30/09/2018

| 1.3 | Schools to advise Corporate Health and Safety on the progress/status of actions resulting from the Corporate Health and Safety inspections. | All School Head teachers | 30/03/2019 |

Risk Issue 2	Some schools' fire risk assessment may no longer be relevant as they have not been reviewed within the last three years. As a result, there is potential that fire safety measures are inadequate.
Background Detail	The Regulatory Reform (Fire Safety) Order 2005 states that fire risk assessment must be reviewed and updated by a responsible person on a regular basis or where there has been significant changes to the premises. Although the legislation does not specify the frequency of fire risk assessments, the Corporate Health & Safety team aim to carry out a fire risk assessment every three years. The team is undergoing a programme of updating schools' fire risk assessment; however, testing shows that there are a number of schools who have not had their fire risk assessment updated within the set target period. At the time of our review, of the 65 school sites[1]: 5 were assessed in 2018. 25 were assessed in 2017. 11 were assessed in 2016. 11 were assessed in 2015. 10 were last assessed in 2014. Although four of these school sites are due to be updated this year, at the time of our review there were no planned dates for the remaining seven schools.

[1] Although there are 58 schools in Denbighshire, some have more than one site, giving a total of 65 school sites.

	• 3 relate a new school sites or classroom that have not yet been assessed.
	Where fire risk assessments are not up-to-date and adequate and appropriate fire safety measures are not put in place (see Risk Issue 1 above), there could be greater risk of injury or loss of life in the event of a fire.

Action (Ref)	Agreed Management Action	Responsibility	Deadline
2.1	We will add extra resource into the process to bring all school FRA's within a three year period. This resource will be taken from other activities in a balanced manner. We will maintain our target of three yearly FRA reviews where resources permit.	Corporate Health & Safety Manager	30/03/2019

Risk Issue 3	Some schools are not using the corporate system for recording accidents or incidents which have occurred on school premises.		
Background Detail	Analysis of the corporate system for recording accidents and incidents shows that 20 out of 58 schools (34%) have not recorded any accidents or incidents. Our sample testing confirms that schools are recording accident & incidents locally which complies with legislation as it does not specify how accidents and incidents should be recorded. However, this means that the Corporate Health & Safety team has difficulty monitoring all accidents and incidents that have occurred on school premises to gauge any emerging trends, enable monitoring by the Corporate Health & Safety Committee and ensure that serious accidents and incidents are reported to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013. The Corporate Health and Safety team as part of their role has advised the schools but cannot force the schools to record accidents and incidents on the corporate system.		
Action (Ref)	**Agreed Management Action**	**Responsibility**	**Deadline**
3.1	School Support team to include "accident incident reporting" to the self-assessment reporting tool for schools used by Education.	Principal Manager- Modernising Education	30/03/2019
3.2	We will continue to regularly communicate the requirements for accident incident reporting to school responsible persons through training, Health and Safety attended, Education Health and Safety committee and Business & Finance Managers meetings.	Corporate Health & Safety Manager	30/03/2019

Risk Issue 4	Not all schools were able to demonstrate that staff have attended the required Health and Safety training courses.
Background Detail	Analysis of iTrent (HR system) and discussion with a sample of Head teachers identified that not all schools are using iTrent as the recording mechanism for recording training courses, in particular health and safety courses. There was evidence on iTrent that school representatives have attended a range of health and safety courses (53 out of 58 schools); however, records show that some school employees had not attended the relevant courses for their role, for example a Head teacher is required to attend the 'Managing Safely' course. The only other mandatory course that all staff should attend is the induction course, which covers Health and Safety. The sample of five schools tested confirmed that they all provide the mandatory induction training course which includes Health and Safety; however, only one school was able to evidence this. The Corporate Health and Safety team advises the schools of the available courses but it is each school's responsibility to ensure that the relevant staff attend the recommended courses.

Action (Ref)	Agreed Management Action	Responsibility	Deadline
4.1	School Support team to include "Health & Safety course" to the self-assessment tool 'School Management Review'. This is monitored by the Education Support team and highlight any schools that have not attended the appropriate training.	Planning & Resources Manager (Education)	30/3/2019
4.2	Schools to use the corporate induction template provided by HR and incorporate the Health and Safety checklist template provided by Corporate Health and Safety to devise their own in-house induction for all new staff within their schools. This document will also assist with ensuring that all corporate mandatory training is covered during the induction period.	All School Head teachers	30/03/2019
4.3	Internal Audit presented the results of this review at the Heads of Clusters meeting in May 2018 and each Head teacher that was in attendance at the meeting was required to feedback to their school clusters that all staff must attend the relevant Health & Safety training and maintain formal training records.	All School Head teachers	30/03/2019

Risk Issue 5	Some schools have not implemented an infection control plan which sets out controls to address associated risks.
Background Detail	Our sample testing highlighted some schools without an infection control plan in place. The purpose of an infection control plan is to identify various infections and illnesses and the controls required to address the associated risks. This is particularly advisable given the recent outbreaks at a few schools within Denbighshire.
	The Healthy Schools Co-ordinator is in the process of working with schools to raise awareness of the importance of having infection control plans in place.
	Note: The Corporate Health & Safety team in co-ordination with the Council's Cleaning Services team and the Healthy Schools Co-ordinator will review the risk of infection at schools in 2018/19.

Action (Ref)	Agreed Management Action	Responsibility	Deadline
5.1	Create relevant questions relating to infection control plans and cleanliness. The questions will be available for all schools to answer on the self-assessment tool 'School Management Review' in terms of what arrangement are in place. The information will then be analysed and a minimum level of quality assurance will be agreed for relevant officers to carry out spot checks of a sample of schools.	Principal Manager – Modernising Education and Healthy Schools Co-Ordinator.	30/12/2018

| Report Recipients	
• Chef Executive Officer	
• Corporate Director: Economy and Public Realm	
• Corporate Director Communities	
• Head of Facilities, Assets & Housing	
• Head of Education & Children Services	
• Head of Finance / Section 151 Officer	
• Corporate Health & Safety Manager	
• Programme Manager – Business Change	
• Principal Manager – Modernising Education	
• Planning & Resources Manager (Education)	
• Healthy Schools Co-ordinator	
• Scrutiny Co-Ordinator	
• Chair – Performance Scrutiny Committee	
• Lead Member for Finance, Corporate Plan & Performance	
• Corporate Governance Committee	
• Lead Officer – Operations & Business Support	
• Strategic Planning & Performance Officer	

Internal Audit Team		
Samantha Davies	Auditor	01824 708086 Samantha.davies@denbighshire.gov.uk

Key Dates	
Review commenced	January 2018
Review completed	March 2018
Reported to Corporate Governance Committee	11 July 2018
Proposed date for 1st follow up review	April 2019

Appendix 1 – Assurance Definition

		Assurance Rating (based on areas reviewed)
🟩	High Assurance	Risks and controls well managed and objectives being achieved.
🟨	Medium Assurance	Minor weaknesses in management of risks and/or controls but no risk to achievement of objectives.
🟧 ▶	Low Assurance	Significant weaknesses in management of risks and/or controls that put achievement of objectives at risk.
🟥	No Assurance	Fundamental weaknesses in management of risks and/or controls that will lead to failure to achieve objectives.