



# Health & Safety in Schools

## Follow up review

**May  
2019**



**Medium  
Assurance**

## Purpose & Background Information

Our original review of Health and Safety arrangement in schools was completed in June 2018. We gave a low assurance rating due to:

- lack of evidence to demonstrate that staff had received the relevant health and safety training;
- no formal mechanism to record when high priority actions identified during school visits carried out by the Corporate Health and Safety team were completed;
- not all schools were in receipt of a fire risk assessment dated within the last two years; and
- some schools did not have an infection control plan in place.

As part of the review we selected of seven schools at random, one of which formed part of the sample during the original audit review: –

Internal Audit carry out a follow up review of all audits that receive a low or no assurance rating as well as any high or major risk issues raised. This provides assurance to management and those charged with governance that the agreed actions identified at our initial audit visit have been implemented, or suitable progress is being made to address the areas of concern. This enables us to reconsider the overall assurance opinion and provide an updated opinion where appropriate.

It should be noted that the updated opinion is based on the assumption that systems and controls as previously identified during the original audit remain in operation and are being complied with in practice. The purpose of our follow up exercise is not to retest the operation of controls which have already been assessed, but to review how management has responded to the action plans following our initial work.

## Audit Opinion

Based on the work carried out by both services and schools we found that significant progress has been made in addressing the risks issues identified during the original review. A number of the agreed actions have been implemented, which have strengthened the controls in place.

Progress on the development and implementation of an action tracking system has been delayed due to capacity issues within ICT department; however, work is now underway. **(See Risk Issue 1 for more detail)**

We confirmed that all schools now have a fire risk assessment completed within the last two years. The responsibility for carrying out fire risk assessments has since transferred to the Property Health and Safety Team as it ties in with their work. **(See Risk Issue 2 for more detail)**

Since our original review, there has been an increase in the reporting of accidents and incidents to the Corporate Health and Safety Team. The reason for this is attributed to increased promotion and communication between the Corporate Health and Safety Team, the schools and the Business and Finance Managers. **(See Risk Issue 3 for more detail)**

Questions have been added to Education Support's self-evaluation tool to prompt schools to record that staff who have received health and safety training. Testing identified an increase in the schools receiving the mandatory health and safety training which is directed to all staff (from 27 in 2017-18 to 34 in 2018-19). We noted some improvement in schools using the corporate HR induction template, which encompasses health and safety. However, to ensure all staff are aware of the health and safety arrangements and there is a consistent approach at schools, further promotion of the HR induction template document is required. **(See Risk Issue 4 for more detail)**

Good progress has been made with schools engaging with the Healthy Schools Coordinator to put in place effective Infection Control plans. Training has been provided to schools, which will be repeated annually to maintain awareness regarding infection control arrangements. Our testing shows that 6 out of the 7 schools that we sample tested had an infection control plan or are working towards implementing one. **(See Risk Issue 5 for more detail)**

Overall, good progress has been made in addressing the risks issues identified during the original review: one major issue and two of the four moderate issues have been addressed. A further follow up will be carried out to review the progress made on the outstanding actions. Based on the progress made to date we are providing a 'Medium Assurance'.

Audit Opinion as at June 2018	Audit Opinion as at May 2019	Direction of Travel
Low Assurance	Medium Assurance	

## Action Plan

**Audit Follow-up Review of:**      **Health & Safety in schools**  
**Date:**                                      **May 2019**  
**Action Plan Contacts:**              **Corporate Health & Safety Manager**

Progress with Implementing Agreed Actions		
Previous	Current	Risk Rating
0	0	Critical
1	0	Major
4	2	Moderate

<b>Risk Issue 1</b>	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.		
<b>Underlying Weakness</b>	<p>The Corporate Health and Safety team carry out the following inspections and assessments of school premises: –</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Fire Risk Assessments.</li> </ul> <p>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 &amp; Safety team follow up priority issues based on their significance and the resources available but are not currently recording any progress or updates.</p>		
<b>Action (Ref)</b>	<b>Agreed Management Action</b>	<b>Responsibility &amp; Deadline</b>	<b>Status</b>
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	Corporate Health & Safety Manager & ICT Business Partner for	In progress – revised date 31/09/2019

	within a given timescale. The system will include iterative reminders from the system and escalation triggers as part of the process.	Service by 30/03/2019	
<b>Follow Up Results</b>	Due to capacity issues within ICT this action had been delayed. The Corporate Health and Safety team met with the Senior Business Systems Officer, ICT in April 2018 to discuss system requirements. A possible solution was discussed but this needs further investigation. An amended timescale has been provided for 30 September 2019.		
<b>1.2</b>	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 by 30/09/2018	Complete
<b>Follow Up Results</b>	Internal Audit attended the Business and Finance Managers meeting on 10 September 2018 to raise awareness of the risks issues identified during the review and the schools' responsibility.		
<b>1.3</b>	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 by 30/03/2019	In progress
<b>Follow Up Results</b>	The Corporate Health and Safety team has noticed an improvement in the communication from schools, in particular with the Business and Finance managers for the clusters on the status of actions arising from the inspections carried out.  Once the new action tracking system is implemented, the Corporate Health and Safety team will be able to measure progress with addressing actions more accurately.		

<b>Risk Issue 2</b>	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.		
<b>Underlying Weakness</b>	<p>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 &amp; 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<sup>1</sup>:</p> <ul style="list-style-type: none"> <li>• 5 were assessed in 2018.</li> <li>• 25 were assessed in 2017.</li> <li>• 11 were assessed in 2016.</li> <li>• 11 were assessed in 2015.</li> <li>• 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.</li> <li>• 3 relate a new school sites or classroom that have not yet been assessed.</li> </ul> <p>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.</p>		
<b>Action (Ref)</b>	<b>Agreed Management Action</b>	<b>Responsibility &amp; Deadline</b>	<b>Status</b>
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 by 30/03/2019	Complete

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<sup>1</sup> Although there are 58 schools in Denbighshire, some have more than one site, giving a total of 65 school sites.

**Follow Up  
Results**

The Corporate Health and Safety Manager advised that all schools now have up-to-date fire risk assessments in place. Officers within the Corporate Health and Safety team carried out fire risk assessments for schools and other civic sites e.g. leisure centres and libraries.

Since the original review, fire risk assessments will now be carried out by the Property Health and Safety team as an officer with the team carries out fire risk assessments for Council properties. The completed fire risk assessments will be recorded on the Technology Forge system, which will prompt when actions and fire risk assessments are due.

<b>Root Cause 3</b>	Some schools are not using the corporate system for recording accidents or incidents which have occurred on school premises.		
<b>Underlying Weakness</b>	<p>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 &amp; 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 &amp; 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 &amp; 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.</p> <p>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.</p>		
<b>Action (Ref)</b>	<b>Agreed Management Action</b>	<b>Responsibility &amp; Deadline</b>	<b>Status</b>
<b>3.1</b>	School Support team to include “accident incident reporting” to the self-assessment reporting tool for schools used by Education.	Principal Manager– Modernising Education by 30/03/2019	Complete
<b>Follow Up Results</b>	A question on accident incident reporting is now included on Education Support’s self-assessment reporting tool for schools. Education Support monitor the responses and results of the self-evaluation tool are passed on to the relevant service e.g. Corporate Health & Safety.		
<b>3.2</b>	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 by 30/03/2019	Complete

<p><b>Follow Up Results</b></p>	<p>Report provided by Corporate Health and Safety Manager demonstrated that there has been an increase in the reporting of accident and incident reporting by 26%. Communicating the importance of reporting accidents and incidents has been carried out through: –</p> <ul style="list-style-type: none"> <li>• Follow up discussions with line managers (including head teachers and Business and Finance Managers) where incidents were highlighted and not reported. In our original testing, two schools within the sample had not reported incidents.</li> <li>• Discussed in health, safety and wellbeing courses</li> <li>• Newsflashes and quarterly newsletters</li> <li>• Regular monitoring visits and face to face discussions.</li> <li>• The number of accidents and incidents reported in 2018–19 was 338 in comparison with 230 in 2017–18.</li> <li>• Letter from Corporate Governance Committee to Chairs of Governors for all schools prompting for action to address issues highlighted within the original audit report.</li> </ul>
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<p><b>Risk Issue 4</b></p>	<p><b>Not all schools were able to demonstrate that staff have attended the required Health and Safety training courses.</b></p>
<p><b>Underlying Weakness</b></p>	<p>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.</p> <p>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.</p> <p>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.</p>

Action (Ref)	Agreed Management Action	Responsibility & Deadline	Status
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) by 30/3/2019	Complete
<b>Follow Up Results</b>	Attendance at a Health & Safety course question has been included on the self-assessment reporting tool for schools. Monitoring of the responses will be carried out by the Education Support team.		
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 by 30/3/2019	In progress – revised follow up date 31/10/19.
<b>Follow Up Results</b>	<p>Sample testing shows that: –</p> <ul style="list-style-type: none"> <li>• 2/7 schools have used the induction template for new staff at the schools and maintain records of the training received which includes H&amp;S training.</li> <li>• 2/7 confirmed that staff have received training as part of the induction process or through the health and safety awareness training, but do not retain a formal record to demonstrate this.</li> <li>• 3/7 did not respond.</li> </ul> <p>HR are currently in the process of launching the Corporate HR Induction checklist through the new starters' website, which has not been presented to schools as yet (planned for September 2019).</p> <p>Some schools are not maintaining records of staff training, including mandatory health and safety awareness training to confirm their attendance.</p>		

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 by 30/3/2019	Complete – ongoing
Follow Up Results	<p>478 members of school staff (34 schools) have received health and safety awareness training during 2018–19 compared to 190 staff within 27 schools in 2017–18. There are 10 schools who have not received health and safety awareness from the Corporate Health and Safety team in the last 2 years.</p> <p>Testing of the 7 sample schools shows that: –</p> <ul style="list-style-type: none"> <li>• 6/7 have attended health and safety awareness training provided by the Corporate Health and Safety Team between 2017–18 and 2018–19.</li> <li>• 1/7 schools has not received health and safety awareness training by the Corporate Health and Safety Team between 2017–18 and 2018–19.</li> </ul> <p>The increase in the training at schools has been as a result of the promotion of health and safety awareness courses through monitoring visits carried out by the Corporate Health and Safety team.</p>		

Risk Issue 5	Some schools have not implemented an infection control plan which sets out controls to address associated risks.
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<p><b>Underlying Weakness</b></p>	<p>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.</p> <p>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.</p> <p>Note: The Corporate Health &amp; 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.</p>		
<p><b>Action (Ref)</b></p>	<p><b>Agreed Management Action</b></p>	<p><b>Responsibility &amp; Deadline</b></p>	<p><b>Status</b></p>
<p><b>5.1</b></p>	<p>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 arrangements 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.</p>	<p>Principal Manager - Modernising Education and Healthy Schools Co-Ordinator by 31/12/2018</p>	<p>Complete - Ongoing</p>
<p><b>Follow Up Results</b></p>	<p>Questions have been added to the self-evaluation tool for schools to complete. The Healthy Schools Co-Ordinator has analysed the information completed to date and will be contacting the individual schools where responses are below 'acceptable' or showing as 'priority for improvement'.</p> <p>The Healthy Schools Co-Ordinator has provided support to schools regarding infection control arrangements, and ensuring that they have a good understanding of the purpose and requirements of the infection control plans. Training has been provided for schools and will be repeated annual to maintain a good understanding of the infection control processes.</p> <p>Our testing shows that 6 of the 7 schools had infection controls plans in place. This demonstrates an improvement on the previous testing where only 2 out of the 5 schools had an infection control plan in place.</p>		

## Report Recipients

- Chief 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
- Lead Member for Finance, Performance & Strategic Assets
- Corporate Governance Committee
- Strategic Planning & Performance Officer

## Internal Audit Team

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## Key Dates

Follow up review commenced	April 2019
Follow up review completed	May 2019
Reported to Corporate Governance Committee	5 <sup>th</sup> June 2019