



NORTH YORKSHIRE POLICE, FIRE AND CRIME COMMISSIONER, FIRE AND RESCUE AUTHORITY

Health and Safety

Internal audit report 3.22/23

FINAL

22 November 2022

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1. EXECUTIVE SUMMARY

Why we completed this audit

A review of health and safety arrangements in place at North Yorkshire Police, Fire and Crime Commissioner, Fire and Rescue Authority ('the Service') has been completed with the objective of ensuring the Service has adequate controls and processes in place to respond to any health and safety incidents and ensure timely actions and reporting is carried out. We have considered health and safety processes, policies, training, injury / incident reporting, record keeping and governance arrangements in place at the Service.

All new starters joining the Service are required to undertake a mandatory Health and Safety, Manual Handling and Fire Safety training as part of the induction process, which includes information on welfare arrangements, a tour of the premises, housekeeping, safe working procedures, and first aid and fire safety precautions. All Crew and Watch Managers undertake IOSH (Institution of Occupational Safety and Health) Managing Safely training, which is refreshed every three years. Station Managers undertake both IOSH and additional NEBOSH (National Examination Board in Occupational Safety and Health) training, which does not require refreshing. Both the IOSH and NEBOSH courses are third-party training providers and give Station and Crew Managers accredited qualifications within health and safety.

All health and safety events, such as injuries sustained during service or slips, trips, and falls, are recorded on a SharePoint system as soon as practically possible after the occurrence and direct notifications are sent to the Health and Safety Unit and line managers to inform them of any incidents. These events are reviewed and signed off within seven days by a manager or department head. Between August 2021 and August 2022, a total of 53 safety events were reported.

The Health and Safety Unit is responsible for establishing whether the incident is reportable to the Health and Safety Executive (HSE) in accordance with RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) 2013.

A three-yearly premises audit is carried out across the Service's 38 sites and predominantly covers day-to-day hazards and defects. A site-specific workplace risk assessment is also carried out periodically, of which the review frequency is determined by the assessor following each risk assessment and must be undertaken at least annually. This focuses on health and safety risks inherent to each site. The Service has the following forums in place which review health and safety matters, with escalation of matters taking place in the following order:

- Health and Safety Unit (HSU).
- Health and Safety Sub-Committee (HSSC); and
- Health and Safety Committee (HSC).

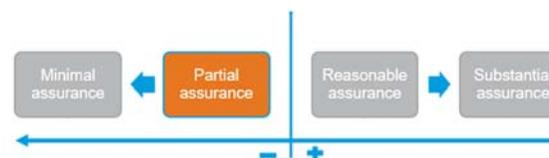
Conclusion

As a result of our review, we have agreed **two high** and **one medium** priority management actions. Whilst we have not identified issues in the investigation and reporting of accidents and near misses, our review has identified issues in the timeliness of completion of health and safety training modules, and we have noted that processes in place to chase outstanding training modules on a quarterly basis are ineffective. Issues were also identified in relation to Crew and Station Managers not completing Health and Safety e-learning training and the three-yearly cycle of IOSH training refreshers to ensure compliance within the accredited qualification.

Internal audit opinion:

Taking account of the issues identified, the Police, Fire and Crime Commissioner Fire and Rescue Authority can take **partial assurance** that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Action is needed to strengthen the control framework to manage the identified risk.



Key findings

Our audit identified the following exceptions with the Service's established control framework resulting two high and one medium priority actions being raised:



Review of the quarterly reports outlining non-completion of the refresher e-learning training in relation to Health and Safety, Fire Safety and Manual Handling identified that there is currently no escalation process in place to ensure staff are actively undertaking the e-learning training. We reviewed the quarterly reports from January, April and July 2022 and it was noted that some staff members were repeated on quarterly reports. In July 2022, 86 firefighters (both full-time and on-call) had not completed refreshers of the Health and Safety training, 90 of the Fire Safety training and 71 of the Manual Handling training. For admin or support staff, the numbers of overdue training were nine, seven and six respectively. There is a risk whereby members of staff are not being actively reminded to complete mandatory training requirements and therefore key health and safety processes may not be understood and complied with. **(High)**



From a sample of 10 new starters to the Service between 31 August 2021 and 31 August 2022, we conducted testing to ensure all new starters had completed mandatory Health and Safety, Manual Handling and Fire Safety training as part of the induction process. We noted that two new starters had not completed induction training in a timely manner (over six months after the employment start date). These two cases pertained to one on-call firefighter and one non-operational support officer. In another case, there was no LearnPro account setup for the employee, therefore no training had been conducted. This employee joined the Service on 13 September 2021 and had a non-operational support contract.

Where new starters are not completing mandatory health and safety training in a timely manner, there is a risk that incorrect procedures could be followed, which could lead to potential injuries or health and safety incidents. **(Medium)**



From a sample of 10 Station and Crew Managers across the Service, we identified that in two instances mandatory Health and Safety, Manual Handling and Fire Safety e-learning training had not been completed in line with the policy requirement.

Additionally, from a sample of 10 Station and Crew Managers, we tested to confirm each manager had completed the IOSH Managing Safely training or NEBOSH National Certificate in Occupational Safety and Health training in line with their respective role. We concluded that in one instance the completion date of the last IOSH training was 8 July 2019 and is overdue the three-year refresher requirement. In another case, we were unable to confirm if both IOSH and NEBOSH training had been completed due to no dates being recorded on the LearnPro system and no supporting evidence being received.

There is a risk that Station Managers within the Service are not completing mandatory e-learning modules within the LearnPro system in line with the procedure which could result in the inaccurate following of health and safety procedures within the Service.

There is a further risk where Station Managers and Crew Managers are not undertaking their mandatory NEBOSH training or their IOSH refresher training, which could result in health and safety incidents should incorrect procedures be followed in line with role requirements. **(High)**

Our audit review identified that the following controls are suitably designed, consistently applied, and are operating effectively:



We obtained and reviewed the Accident Management and Investigation Procedures in place for the Service and confirmed these procedures were in date and available to all staff within the Service. We also concluded that the procedures contain clear and concise information for all staff within the Service to ensure appropriate management and investigations are undertaken in the event of an accident or incident being recorded.



The Health and Safety Unit provide key bulletins to all staff on a monthly basis along with `Toolbox Talks` and direct communication with Station Managers following fire risk assessments (FRA), assurance checks and performance monitoring audits which are completed on a quarterly basis to ensure standards are consistently maintained and updated across the Service.



For a sample of 10 accidents, 10 near misses and five logged RIDDOR reportable cases, we concluded that in all instances the incident was logged within 24 hours of the incident occurring. In all instances the incident was collated and logged by the Health and Safety Unit within 24 hours, including initial communication with the incident owner. In all cases, a full risk assessment was recorded by the line manager with supporting evidence within one week of the incident date. For the five RIDDOR reportable instances, we concluded in all instances the RIDDOR was reported to the HSE within 10 days of the incident occurring.



From the database of accidents and near misses (which include causes for concern), we reviewed a sample of 10 accidents, 10 near misses / causes for concerns and five RIDDOR reportable cases (including two breathing apparatus occurrences). It is noted that there have been no noted reports of needle stick incidents logged in the last 12 months. We noted:

- A review of 10 reported accidents reviewed concluded there is a clear effective reporting and follow up system in place resulting in appropriate recording and logging of all accidents, which are duly followed up by the Health and Safety Unit through to the closure of the incident.
- All accidents were reported into the HSSC for formal review, where the decision to close or escalate the incident to the HSC for further investigation was made.

- A review of 10 near misses / causes for concerns confirmed all cases have been reviewed, with supporting evidence of investigations and sub-committee reviews available. We can conclude that in all incidents raised there is a continual monitoring and reporting framework in place to ensure lines of communication throughout are being addressed.
- A review of the five RIDDOR cases concluded that effective reporting had been conducted throughout, all five RIDDOR cases had been reported and logged within a 10-day period.
- In all five RIDDOR reportable samples a thorough investigation had taken place to mitigate the risk where required.
- In relation to the two BA occurrences logged as RIDDOR reportable cases, these have both been logged and reported as dangerous incidents, and in turn formal investigations have been launched directly with the manufacturer.



Through review of lessons learnt documentation and HSSC meeting minutes, we were able to evidence that the Service records and acts upon instances raised across all of the Service Departments to ensure that all employees within the Service are kept updated with identified issues and a consistent approach across the Service is implemented to mitigate any further risk.



The Service has a dedicated Health and Safety Unit who pro-actively act upon all accidents and near misses reported, which are then reported and discussed within the HSSC on a monthly basis, and where escalation is recommended, the reported incidents are then reviewed by the HSC.



The HSSC has been established as an intermediary reporting element between the Health and Safety Unit and the HSC to review all accidents, near misses and RIDDOR cases and provide assurance on incidents reported to review supporting evidence and close incidents or escalate.



The Service's Health and Safety Policy outlines the responsibilities for health and safety within the Service. The policy is dated July 2022 and has been approved by the Chief Fire Officer. There is a detailed terms of reference in place for the HSC and HSSC, which provides a comprehensive breakdown of the responsibilities within the Service and their duties towards health and safety and ensuring the safety of employees and members of the public throughout.



We undertook analysis of the Health and Safety Unit's log of accidents and incidents against the reported accidents and incidents presented to the HSSC for review and concluded that the reported incidents logged with the Health and Safety Unit aligned to those reported to the Committee.



We have reviewed the Veritau Internal Audit Report dated 29 March 2022 that detailed two highlighted areas of concern whereby the Health and Safety Team did not have comprehensive access to SharePoint central (raised as a priority 2 – medium) and station specific sites, and that risk assessment documentation did not include evidence of the central review and feedback processes carried out by the Health and Safety Team (raised as a priority 3 action – low priority). Through discussion with the Health and Safety Manager and system reviews, we were able to confirm that both actions had been addressed.

Discussions with the Health and Safety Manager confirmed that the Service has not recently been audited by the HSE.

2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Risk: H&S protocols to protect our workforce, public and partner agencies. Preventing death or serious injury, working within prescribed or current HSE guidelines and legislation.

Control	<p>Health and safety training including Fire Safety and Manual Handling is to be undertaken as part of the induction process and should be completed as soon as practicably possible after commencement of employment.</p> <p>Refreshers are undertaken annually for control staff and every three years for station staff.</p>	Assessment:	
		Design	✓
		Compliance	×
Findings / Implications	<p>The Health and Safety Manager outlined that control staff undergo yearly refresher training for DSE risk assessments and all other refresher training for health and safety is completed every three years. Station staff are required to complete three-yearly refresher training of the Health and Safety training including Fire Safety and Manual Handling through the LearnPro e-learning system. Automatic notifications are sent to staff when the refresher course is due for completion and monthly chasers are sent to staff where training has not yet been completed.</p> <p>We have received and reviewed the Induction of New Employees and Transferee’s Procedure which was last reviewed on the on 1 July 2022 with a next review date of the 30 June 2025. The procedure clearly documents the responsibility for all new employees to ensure that the following training programs have been conducted as soon as practicable after they commence employment:</p> <ul style="list-style-type: none"> • LearnPro General Health, Safety and Environment Awareness training module; • LearnPro Manual Handling training module; and • LearnPro Fire Safety training module. <p>Additionally, there are clear responsibilities outlined for the Health and Safety Unit, which include:</p> <ul style="list-style-type: none"> • providing access to the LearnPro suite of health and safety training programmes and give guidance on its use to staff when requested to do so; and • to maintain records on the completion of all LearnPro health and safety training and assessments. <p>We selected a sample of 10 new staff members to the Service from 31 August 2021 to 31 August 2022.</p>		

Risk: H&S protocols to protect our workforce, public and partner agencies. Preventing death or serious injury, working within prescribed or current HSE guidelines and legislation.

Through system review of the Learnpro system and discussion with the Health and Safety Manager we concluded that:

- in nine of 10 samples reviewed, of which eight were station staff and one were control staff, we concluded that all induction training had been completed in line with the procedural documentation;
- in two of the above nine samples, it has been noted that induction training across the three sections has not been completed in excess of six months of start of employment; and
- in the final one sample reviewed, it has been confirmed that there is no dedicated LearnPro account setup for the individual (control staff) and therefore as this is the only platform to confirm training has been conducted, we can conclude that no training has been completed, the start date of employment for this employee is the 13 September 2021.

There is a risk whereby procedural documentation is not reviewed and updated to reflect current practises could result in an inaccurate following of the induction process for new staff.

There is a further risk that key staff within the Service are not conducting their mandatory Health and Safety training in line with the procedures which could result improper and ineffective use of key equipment within the service.

<p>Management Action 1</p>	<p>Management will ensure all new starters within the Service conduct mandatory Health and Safety e-learning training on the LearnPro system as soon as practicably possible post commencement of employment as outlined within the Induction of New Employees and Transferee’s Procedure.</p> <p>Management will follow up and investigate any staff members within the Service who do not actively have a LearnPro account to undertake training elements.</p>	<p>Responsible Owner: DCFO</p>	<p>Date: 31 March 2023</p>	<p>Priority: Medium</p>
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Risk: H&S protocols to protect our workforce, public and partner agencies. Preventing death or serious injury, working within prescribed or current HSE guidelines and legislation.

Control	<p>Quarterly reports are generated from the LearnPro system providing a list of all staff who have lapsed in undertaking Health and Safety e-learning modules.</p> <p>The list is emailed directly to all Station Managers and Group Managers as a chaser for staff.</p>	Assessment:	
		Design	✓
		Compliance	×

Findings / Implications Through discussion with the Health and Safety Manager it has been confirmed that quarterly reports are generated from the LearnPro system which provides a list of all staff who have not completed mandatory training in relation to:

- Health and Safety
- Fire Safety; and
- Manual Handling.

The report is cascaded to all Station Managers and Group Managers to ensure their staff complete the outstanding modules.

We have received and reviewed the Enable LearnPro Health and Safety Reports for July 2022 for both admin colleagues and firefighters. There are three main tabs detailing Health and Safety, Fire Safety and Manual Handling which lists all staff members who have not completed their e-learning course. The report outlining the completions of admin and support colleagues stated that there are currently nine members of staff who have not completed Health and Safety training, seven that have not completed Fire Safety training and six that have not completed Manual Handling training. Whereas the report detailing completions for firefighters outlined that 86 firefighters were overdue Health and Safety training, 90 were overdue Fire Safety training and 71 were overdue Manual Handling training. These figures pertain to both full time and on-call firefighters.

We have received the formal email sent on the 15 July 2022 and we can confirm that the list is directed to all Station Managers, Group Managers and Head of Peoples Services.

Where members of staff are not being actively pursued to complete mandatory training requirements, there is a risk that key health and safety procedures will not be followed where staff are not adequately training in health and safety.

Management Action 2	Management will ensure that staff are actively chased to complete all Health and Safety e-learning training elements.	Responsible Owner: DCFO	Date: 31 March 2023	Priority: High
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Risk: H&S protocols to protect our workforce, public and partner agencies. Preventing death or serious injury, working within prescribed or current HSE guidelines and legislation.

Control	Station and Crew Managers receive the general health and safety training and are allocated additional modules, including IOSH training and NEBOSH training.	Assessment:	
		Design	✓
		Compliance	×

Findings / Implications The Health and Safety Unit conducted a presentation and exercise to all newly appointed and transferred Station Managers on the 16 November 2021. This presentation was given due to the amount of newly appointed Station Managers and formed part of a full day’s session to provide detailed training on Health and Safety prior to the completion of the Station Mangers compulsory NEBOSH training.

We have received and review the training materials named `Leading the Way` with the key objectives being to:

- Understand all your health and safety responsibilities;
- Understand additional management health and safety responsibilities;
- Understanding of moral, legal and financial reasons for effective health and safety; and
- Carry out a suitable and sufficient accident investigation.

There are key responsibilities outlined in the training plan to ensure all managers have knowledge of their detailed responsibilities to ensure the safety of themselves and colleagues at work is constantly monitored.

In addition, the Service delivered an exercise whereby managers were split into groups and provided with a health and safety-related scenario, from which managers would assess the details of the scenario and highlight any key action points.

Through discussion with the Health and Safety Manager we were advised that mandatory training modules for Health and Safety, Fire Safety Training and Manual Handling must be completed by all line managers every three years.

We selected a sample of 10 Station Managers across the Service to ensure that specific Health and Safety training has been completed and extended Health and Safety training platforms, including IOSH and NEBOSH had been conducted. We noted that:

- in eight samples review we have concluded that mandatory training of Health and Safety, Fire Safety and Manual Handling is up to date and has been completed;
- in one sample the expiry date for Fire Safety and Manual Handling expired in January 2022; and
- in one sample the expiry date for all elements expired on the 9 September 2022.

Through discussion with the Health and Safety Manager, it has been confirmed that Station Managers training in IOSH and NEBOSH is mandatory. Once a Station Manager is qualified in NEBOSH, they do not require IOSH refreshers.

Risk: H&S protocols to protect our workforce, public and partner agencies. Preventing death or serious injury, working within prescribed or current HSE guidelines and legislation.

The training sometimes takes a while to complete as the Service only provide one course a year but once this has been passed it is not a requirement to need a refresher as it does not expire.

IOSH is mandatory for Crew Managers. There is an initial three-day course then a one-day refresher every three years to stop the qualification expiring (this refresher is currently changing to an online version to make it easier to complete). Refresher training would not be required where individuals are NEBOSH qualified.

Further review of the 10 Station Managers and Crew Managers' training records confirmed that:

- of the four Station Managers, three have completed NEBOSH training, in one instance we have been unable to confirm if this had been completed;
- in eight samples, IOSH training had been completed and there was suitable evidence to confirm this;
- in one of the remaining two cases, we were unable to confirm if IOSH training had been completed as no forthcoming supporting evidence has been received; and
- in the final instance, the completion date of the IOSH training was 8 July 2019 and is overdue its three-year refresher.

There is a risk that Station Managers within the Service are not completing mandatory e-learning modules within the LearnPro system in line with the procedure which could result in the inaccurate following of health and safety procedures within the Service.

There is a further risk that Station Managers and Crew Managers are not undertaking their mandatory NEBOSH training and/ or their IOSH refresher training, where applicable, which could potentially lead in inaccurate health and safety processes being followed by management, which could risk potential injury or health and safety incidents. To note, Station Managers do not require IOSH refresher training once they are NEBOSH qualified.

Management Action 3	Management will:	Responsible Owner:	Date:	Priority:
	a) Ensure all Station Managers throughout the Service complete all mandatory Health and Safety e-learning in line with the procedural requirements. b) Ensure all Station Managers and Crew Managers complete there mandatory IOSH refreshers in line with procedural requirements.	DCFO Head of Training	31 March 2023	High

APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Priority	Definition
Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Risk	Control design not effective*	Non Compliance with controls*	Agreed management actions		
			Low	Medium	High
H&S protocols to protect our workforce, public and partner agencies. Preventing death or serious injury, working within prescribed or current HSE guidelines and legislation.	0* (14)	3* (14)	0	1	2
Total			0	1	2

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The internal audit assignment has been scoped to provide assurance on how North Yorkshire Police, Fire and Crime Commissioner, Fire and Rescue Service manages the following risk:

Objective of the risk under review	Risk relevant to the scope of the review	Risk source
To ensure the Service has adequate controls and processes in place to respond to any health and safety incidents and ensure timely actions and reporting is carried out.	H&S protocols to protect our workforce, public and partner agencies. Preventing death or serious injury, working within prescribed or current HSE guidelines and legislation.	Risk register

Our review will focus on the following areas:

- Whether the Service has in place a health and safety policy and supporting procedures which have been subject to review and clearly communicated to all staff.
- Whether the Service provides health and safety training for staff at the stations and headquarters at induction and whether such training is refreshed as necessary.
- How the Service monitors and escalates any non-completions of health and safety training through the LearnPro e-learning system.
- Whether the Service provides health and safety training and guidance to line managers to ensure they are adequately informed of their responsibilities in respect of health and safety.
- How information is provided to staff with regards to health and safety, and whether appropriate communications are put in place to ensure standards are maintained.
- How the Service ensures the timely reporting of incidents and manages the investigation and RIDDOR reporting process.
- We will select a sample of accidents, incidents, near misses, breathing apparatus (BA) occurrences, needle stick events and causes for concern to review the processes in place and systems used for capturing supporting information, including issue reporting and actions taken.
- We will consider how learning from accidents, incidents, near misses, BA occurrences, needle stick events and causes for concern is analysed, addressed and disseminated across the Service.

- How information on health and safety incidents are reported across the Service, including through working groups and committee meetings.
- Health and safety reporting arrangements within the Service, including:
 - whether an appropriate committee has been charged with health and safety matters;
 - whether there is a clear terms of reference in place, including responsibility for health and safety oversight;
 - whether regular and relevant updates are provided to that committee, including incident / accident reporting; and
 - an assessment of the information reported to the committee, and whether management information is accurate.
- In addition, we will follow up the recommendations raised by Veritau and HSE.

The following limitations apply to the scope of our work:

- The scope of the work will be limited to those areas examined and reported upon in the areas for consideration in the context of the objectives set out for this review.
- Testing will be completed on a sample basis only.
- Our findings and opinions from this review will not replace any advice from external health and safety providers to the Service.
- We will not comment on the Service's compliance with health and safety legislation.
- We will not comment on the effectiveness or appropriateness of actions taken to address health and safety incidents.
- We will not comment on the content of health and safety training delivered to staff.
- We will not provide an opinion on the safety of sites or that staff are appropriately trained in reporting and managing health and safety incidents.
- Our work does not provide any guarantee against material errors, loss or fraud, or provide an absolute assurance that material error, loss or fraud does not exist.

Debrief held 28 September 2022
Draft report issued 13 October 2022
Responses received 22 November 2022

Final report issued 22 November 2022

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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of **North Yorkshire Police, Fire and Crime Commissioner, Fire and Rescue Service**, and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM UK Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

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