

MANAGEMENT BOARD

Safety Management Update

Paper from the Head of Parliamentary Safety

Purpose of Paper

1. This paper provides the Management Board of both Houses with commentary and opinion on the extent to which the House Authorities are managing safety risks and implementing the Combined Safety Policy.

Action for the Board

2. The Boards are asked to endorse their commitment to safety by supporting arrangements to put the safety policy into effective practice.

Background

3. In July 2014, the Clerks of both Houses agreed a Combined Health and Safety Policy¹. The document sets out the responsibilities and arrangements for putting the policy into effect, the expected standard to effectively manage safety risks and highlights specific provision for building works and construction activities.
4. A series of incidents occurred in 2013/14, which had the potential to cause serious harm. Following the introduction of revised governance arrangements, this led to the joint Chairs of the Parliamentary Safety Assurance Committee (PSAC) commissioning a further review by Deloitte, which reported initially in summer 2014. The review confirmed the management view that safety risk management controls were insufficiently robust. The review acknowledged that clear governance and guidance on how safety should be managed across parliament had been put in place (an improvement since Deloitte's report in 2010) but identified the following deficiencies:
 - a) a lax culture to safety management in some key areas;

¹ <http://intranet.parliament.uk/Documents/employment/safety/combined-safety-policy.pdf>

- b) insufficient resources in the central safety team;
- c) a lack of a thorough and consistent authority from management; *and*,
- d) a need for a united, consistent and strict approach to safety.

Management of Safety Risks; Safety Assurance

5. The 2013–14 Safety Assurance report to the Parliamentary Safety Committee from the Head of the Parliamentary Safety team and the independent Deloitte review (July 2014) both gave *partial* assurance that the governance, risk management and control arrangements are effective. The Parliamentary Safety Team (PST) completed a further review of arrangements to control contractors during summer works (2014), and identified significant failings in the overall management of one or more high category risks. The summary report is annexed for information.

Management of Safety Risks: Opinion

Control of Low Risk Environment

6. The majority of staff work in a low risk office environment and this year's assurance exercise is likely to result in a moderate or substantial level of assurance in relation to office based risks. Our accident profile is commensurate with employers with similar undertakings:
 - Falls, slips and trips account for approximately a third of accidents reported to HSE² from all businesses and also one third of accidents reported to PST.
 - Handling incidents and slips/trips are the most frequent cause of over seven day injury reported to HSE. In 2014, five of the seven RIDDOR reports sent by PST to HSE resulted from a handling injury and the remaining two were as a result of a fall.

Control of High Risk Activities

7. Construction and building maintenance work generally are at the higher risk end of workplace activities in the UK; the characteristics of the industry and the challenges it creates for health and safety are well documented. It is therefore not surprising that the management and control of construction risks on the Parliamentary estate is complex and is a high priority for action. All

² <http://www.hse.gov.uk/Statistics/causinj/kinds-of-accident.htm>

incidents reported on the estate in the last two years with the potential to cause serious harm have arisen from work involving contractors or related to renovation/refurbishment projects. In this financial year, five incidents have been investigated by PST, the CDM-Co-ordinator³ or contractors' own safety advisers (see table one).

8. In September 2014 the HSE undertook a “safer sites” campaign across the UK. Construction Inspectors completed unannounced visits to building refurbishment projects or repair works. Unacceptable conditions and dangerous practices were found at nearly half of the premises visited; with 1 in 5 sites being so poor formal enforcement action was required. The HSE notes that many of the issues identified could have been easily prevented with simple, straightforward management and planning.
9. As with the HSE observations, investigations by PST indicate that repeated risk control failings on the parliamentary estate arise from inadequate arrangements for planning, managing and monitoring of contracted work.
10. The House of Lords have assigned a “red risk” to the Facilities risk, which reflects concerns arising from the findings of the safety inspections in the construction area completed during the summer by the Parliamentary Safety Team (see para 5). They particularly noted that two thirds of the projects inspected were non-compliant with the recently introduced Control of Contractor guidance and some aspects of the Permit to Work system for contractors were also found to be seriously flawed. John Borley, the Commons Director General of Facilities, and Brian Finimore, were working hard to rectify the situation, which had been elevated to a high priority action within PED.

Progress in Implementing the Deloitte Action Plan

11. Deloitte recommended a number of actions including increasing developing engagement and understanding in staff, improving to the procurement process, better risk management and more robust reporting on key performance indicators. An action plan has been submitted to the Audit Committee and an update will be provided for the January meeting of the Joint Committee.
12. Implementation of the recommendations is mainly on track, but staff turnover in the Parliamentary Safety Team is an issue which we are addressing urgently. It has been recognised that the volume of reactive and proactive work cannot be maintained in the final quarter of this financial year; resources will be deployed on a risk basis and additional support is being given by use of a safety consultant and re-employment of a part time member of staff for a fixed period.

³ CDM co-ordinator; appointed for projects which must be notified to HSE. He/she will advise and assist the client on how to comply with the Construction Design and Management Regulations during the project, and to ensure that suitable arrangements are made and implemented for the co-ordination of safety measures during planning and preparation for the construction phase.

13. Management of construction/building maintenance risks needs to be a priority area for improvement. This is a key concern for PSAC, particularly given the planned growth in the volume of construction work over the next few years.
14. PED have committed to improving the safety risk management of their work activities and have now started to implement a more robust system—for example, their senior management are inspecting sites on a regular basis and they have a regular safety meetings to discuss issues which have cropped up. PST have been sent copies of the contractor's management checklists and will use a sample of them as evidence in the annual assurance exercise, which will commence in the House of Commons in January 2015. The safety team will also be carrying out an audit of the permit to work arrangements and continuing a programme of site inspections.
15. PST feel that action is still needed before robust management of construction risks is fully achieved, but improvements are on the way. We are keen to see the Control of Contractors policy supplement being properly implemented on the estate and The Director General of Facilities has suggested a workshop in early 2015 to establish how this can be achieved.
16. It is estimated that it will take up to two years before high risks are robustly and consistently controlled. In the meantime, the monitoring work by PST will identify what risks need to be targeted, and management action from PED should ensure that appropriate and proportionate mitigations are in place. PST will continue to work in partnership with PED to help them understand and comply with their legal duties and deliver relevant initiatives.

Next Steps

17. The Deloitte report identified that a key issue is leadership⁴. Directors and senior management must visibly lead safety initiatives and show commitment from the top of the organisation to the workforce.
18. Integrating the recommendations of the Deloitte audit at the operational level and completing actions identified in accident investigation reports will enable the House Authorities to apply consistent and acceptable levels of control to workplace risk⁵.
19. If the general approach is supported, Board Members are asked, to consider:

⁴ <http://www.hse.gov.uk/leadership/>

⁵ Combined Safety Policy, Section 3b. July 2014

- a) Agreement of a safety vision and values statement to be cascaded and adhered to by both Management Boards. This safety vision will be circulated to Board Members for comment, within the next fortnight.
- b) Leading by example and building safety considerations into relevant business management and decision making processes.

Dr Marianne McDougall
Head of Parliamentary Safety
8 January 2015

Table 1: Incidents requiring further investigation April 2014 to date

1. **PoW:** Contractors dropped a propane gas cylinder from height; the cylinder ruptured and propane gas escaped into the basement and surround areas of HoL. The Principal Contractors own investigation identified the causes of the accident to include misuse of equipment, incorrect method of securing load, damaged lifting equipment being used, lack of operative competence, poor communication between principal contractors, sub-contractor and sub-sub-contractor. The distance the cylinder fell was never established, but given that it ruptured on impact, it is suspected that it fell from the roof of the PoW.
March/April 2014
2. **PoW:** A heavy auger fell to the ground when the chain used to lift the equipment broke. Contractors own investigation identified: no lift plan in place, no review taken by appointed person. Lift not being undertaken in accordance with contractors own procedures, issues with competence of individual staff.
September 2014
3. **7MB:** A live mains cable came into contact with metal trunking and short circuited; an electrician avoided serious injury as he wasn't touching the trunking at the time. PST investigated and found that the sub-standard installation of the cable had at some stage become damaged, exposing the wire. Other contributory factors included poor communication between PICT and PED, inadequate management arrangements for two sets of contractors working on different projects in the same area and uncertainty within PED's project leaders, project managers and maintenance managers regarding safety responsibilities, particularly in relation to CDM work and projects.
October 2014
4. **PoW:** A contractor working in BRG arranged a three day fork lift truck driver training for his staff. One of the safety advisers noticed a loaded FLT being

manoeuvred in BRG in close proximity to a number of pedestrians, cyclists and vehicles. It was apparent that the driver was not an experienced/competent person and was being supervised by an instructor. The risks were not being adequately controlled and the House Authorities were unaware that the course was being delivered. *November 2014.*

5. **PCH:** A contractor suffered an electric shock when he was working on a lighting circuit (Attlee suite); he was attempting to rectify a problem whilst working adjacent to a live circuit. This incident is currently under investigation by PST as work on live circuits should rarely be permitted. *December 2014*

Annex A

Interim Safety Assurance Exercise—Control of Contractors SUMMARY

1 Aim

During the summer works period 2014, the Parliamentary Safety Team (PST) sought to establish whether there were appropriate arrangements in place to manage the PED contracted work activities. The project specifically looked at the arrangements in place to:

- oversee the work;
- check that agreed risk controls are working; and
- deal with any unanticipated hazards/risks that arise

Seventeen projects, representative of the typical summer work activity were evaluated following the principles of the then current Health and Safety Executive (HSE) Campaign “Safer Sites”⁶. The assurance exercise also undertook a high level review of the Permit to Work (PTW) arrangements for the Parliamentary estate, using the HSE’s checklist⁷.

2 Assurance Opinion

Partial assurance: evidence indicates significant failings in the overall management of one or more high category risks.

Each project was evaluated independently against an assurance rating scale⁸. Of the 17 projects;-

• Assurance level NONE	6 projects where the evidence indicated little or no management of health and safety risks
• Assurance level PARTIAL	5 projects where the evidence indicated significant failings in the management of safety risks.
• Assurance level	2 project where the evidence indicates weaknesses in

⁶ From 22 September until 17 October, HSE Construction Inspectors made unannounced visits to sites where refurbishment projects or repair works are underway.

⁷ Guidance on Permit to Work Systems (HSG250). Health and Safety Executive, 2005

⁸ Insert LINK

MODERATE	the management of safety risks
• Assurance level SUBSTANTIAL	4 projects where the evidence indicates only minor weaknesses in the management of one or more medium or low category risks
• Assurance level FULL	0 projects where the evidence indicates that all health and safety risks have been managed sensibly, proportionally and effectively

Based on the information given to PST, it was also concluded that the current Permit to Work arrangements do not secure control of the relevant safety risks and may be providing a false sense of safety. Consequently the assurance level for this aspect is NONE.

3 Discussion

In general, the following issues were noted, suggesting that effective risk controls were not in place and risks arising from the work of contractors were not being managed:

- Risk assessments and method statements (RAMS) had not been prepared for all projects or were not readily accessible or available for inspection and record keeping was generally inadequate.
- RAMS reviewed by the safety team were frequently generic, foreseeable hazards/risks/control measures to be implemented for those projects were not specified. Risks were poorly managed in some projects and working practices were unsafe for both the contractor and others on the parliamentary estate. There were very few checks that risk controls are actually working.
- Working areas were not well organized or maintained in a safe condition.
- Poor communication and co-ordination existed within and between projects.
- There was little evidence that House staff in control of the projects were actively overseeing the work activities or identifying poor working practices.

Of particular concern was the existing PTW arrangement. Evidence indicated that the arrangements were no more than permission to carry out a dangerous job. Fundamental shortcomings include

- A lack of formal, documented arrangements for the management and operation of the PTW system.
- No clear identification of who could authorise particular jobs and limits to that authority, no monitoring of the system to check that it is working as intended.

- PTW were issued on the assumption that the project leaders are content that risks are being managed, the necessary documentation is in place and that the contractors are sufficiently competent to do the work safely. There is no evaluation by the authoriser that this is in fact the case.

4 Conclusion

The House Authorities are not actively managing safety risks across the Parliamentary estate to achieve consistent and acceptable levels of control⁹, as two thirds of the evaluated projects had either weak or virtually non-existent risk management arrangements. Risk assessment and control documentation was missing or inadequate and there was *“a lax culture to safety management, with staff and contractors not fully adhering to safety requirements”*¹⁰.

The findings of this assurance exercise were consistent with the conclusion of the investigation into the HoL plant room incident¹¹ i.e. *“there are insufficient processes in place for the management of contractors and, where arrangements do exist, they have not been put into practice. This has resulted in a failure to fully meet health and safety obligations”*.

The lack of assurance in relation to the permit to work (PTW) system was of specific concern. PTW are an essential part of the risk management process and should determine how a given job can be carried out safely. A more detailed review was recommended.

5 Next Steps

In addition to the recommended actions⁷ in the Deloitte report, as a matter of urgency the next steps are

- PED: commence implementation of the Control of Contractors Policy with immediate effect
- PST: audit the permit to work arrangements using the HSE audit questionnaire in their guidance document HSG250, before end December 2014

⁹ Combined Safety Policy, Section 3b. July 2014

¹⁰ Safety Risk Management – process design and implementation review. Report by Deloitte for the Audit Committee, July 2014

¹¹ House of Lords (HoL) Plant Room Incident on 28th May 2013: SHWS Investigation Report - Issue 2. October 2013

- PST: audit the application of the Control of Contractors policy for higher risk activities on the Parliamentary estate, before the end of this financial year

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