

Audit Objective

To provide an assessment of the suitability and effectiveness of the council's current Corporate Health & Safety arrangements.

Executive Summary

	Assurance Opinion	Management Actions		Organisational Risk Assessment	Medium
	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.	Priority 1	0	Our audit work includes areas that we consider have a medium organisational risk and potential impact.	The key audit conclusions and resulting outcomes warrant further discussion and attention at senior management level.
		Priority 2	7		
		Priority 3	6		
		Total	13		

Key Conclusions

	The main corporate Health & Safety (H&S) Policy and supporting suite have not been formally reviewed for at least six years. The policy does not articulate the council's risk appetite or reflect recent organisational changes. The H&S team has now started updating the H&S policy.	Audit Scope We reviewed the risk that the council's arrangements for managing health & safety are inadequate. To do this we assessed the following areas: <ul style="list-style-type: none"> The council's H&S policies and procedures are complete, kept up to date and clearly identify areas of responsibility. Senior management and the Corporate H&S team maintain appropriate oversight of H&S. The council provides officers with sufficient H&S training. The council has effective mechanisms for identifying and remedying H&S risks. The council conducts regular drills, prepares and tests Personal Evacuation Plans (PEPs), and remedies any issues identified. We did not have enough time to review arrangements for third parties or training for staff with additional responsibilities (e.g. fire wardens and first aiders).
	The council lacks a comprehensive H&S management system that enables effective and efficient corporate oversight. We found several issues that could be improved by introducing a system, including: <ul style="list-style-type: none"> Inconsistent follow up of remedial actions arising from accident reports and site inspections. Fragmented oversight of training completion rates due to data being held in different systems. 30% of corporate risk assessments being overdue, and there is limited assurance that assessments are being completed by trained staff and approved by senior managers as required. The H&S team has procured a new system that it expects to implement by the end of 2025/26.	
	The council's Central Joint Safety Panel has not met since January 2024. The Panel has many responsibilities in the H&S Policy, including monitoring the effectiveness of training and establishing the extent to which risk assessments cover the council's activities. It is not clear how these responsibilities are being fulfilled.	
	The H&S team operate a programme of regular site inspections. While it needs some updates, the council's policy suite is comprehensive. The H&S team reports quarterly on H&S matters to the Senior Leadership Team and recently presented their annual report to the Personnel Committee.	

Further Information

Officers have agreed to implement 13 actions by 30 June 2026. We added value in this review by finding and providing information about the organisational positioning of the health and safety function in SWAP partner councils. Most responding councils have a H&S team that sits within either a Resources or HR function, with the team providing guidance, advice and monitoring while services retain core responsibilities. During the audit, we noted that this is inconsistent at EDDC, where the H&S team takes on some first-line responsibilities, such as completing risk assessments in some, but not all, parts of the council.

Audit Findings & Management Action Plan – November 2025

Finding 1	Action		
<p><u>The Corporate H&S Policy is outdated and does not articulate risk appetite. The council has not reviewed the supporting Health & Safety policy suite for at least six years.</u></p> <p>The council maintains a corporate Health & Safety (H&S) Policy, as well as a supporting suite of policies covering specific areas. The policies are published on the internal intranet.</p> <p>We reviewed the published policies and found that:</p> <ul style="list-style-type: none"> • None of the policies have been formally reviewed for at least six years. One policy has not been reviewed for 15 years (Violence at Work). • Not all policies include review dates, so it is unclear how often they should be reviewed. • Of the 11 policies we reviewed, 3 were approved by Members and 3 were discussed by the Central Joint Safety Panel and service areas. There is no evidence that the remaining 5 policies have been reviewed or approved outside of the H&S team. • the respective policies do not include the H&S legislation that they relate to. <p>The corporate H&S Policy is detailed, but it has not been updated since 2017, despite being due for review in 2020. Since 2017, the council has moved headquarters and underwent a management restructure. The roles, responsibilities, and processes outlined in the policy may no longer reflect actual practice. The corporate H&S Policy also does not clearly articulate the level of health and safety risk the council is willing to tolerate.</p> <p>While the existing policy suite covers a range of topics, the 2025/26 H&S Action Plan includes commitments to introduce new policies covering first aid, corporate H&S training, and display screen equipment. We note that there are no specific policies for manual handling or home working.</p> <p>We also found that the H&S policies, procedures, and guidance are not published in the same place on the intranet. Some have been published in the Corporate H&S page; others are saved in the Blackdown House and Exmouth Town Hall pages and the remaining in the Covid page. Not having all the policies, procedures, and guidance in one place could increase the chance of staff overlooking the policies and becoming non-compliant.</p>	<p>The H&S team have already recognised that the Corporate H&S and associated policies are overdue for review and have included their review in the 2025/26 Action Plan.</p> <p>The review of the Corporate H&S policy is progressing well, and a draft copy will shortly be passed to the Assistant Director – Environmental Health for his review.</p> <p>As part of the update of the policy, the council will:</p> <ul style="list-style-type: none"> • Review all supporting policies and incorporate these into the corporate Health & Safety policy as appendices. • Consider whether any new supporting policies are required. • Determine its risk appetite for health & safety and include this in the policy. • Determine whether additional resources are needed to manage health & safety in line with risk appetite. • Present the updated policy to the Personnel Committee for approval • Communicate the updated policy with staff, publish it on the internal intranet and once implemented, on the new H&S management system. • Implement a process to ensure the policy is regularly reviewed going forward. 		
Priority	2	SWAP Reference	AP#7101
Responsible Officer	Assistant Director – Environmental Health		
Timescale	30 June 2026		

Finding 2	Action		
<p><u>We found issues in the incident & accident reporting and monitoring process.</u></p> <p>The corporate H&S Policy states that:</p> <ul style="list-style-type: none"> All accidents/incidents and significant near misses must be reported and investigated to reduce the risk of recurrence. The Principal Environmental Health Officer or Corporate Safety Officer will receive all reports, conduct a proportionate investigation, and complete a record of actions taken. <p>The Policy includes a link to an accident and reporting procedure, but we found the link was broken. We were unable to find any incident and accident reporting guidelines on the intranet. Such information helps staff to identify what needs to be reported, how to report it and within what time limit.</p> <p>We reviewed a sample of 12 incident and accident reports from the last year. We found that:</p> <ol style="list-style-type: none"> The current Firmstep form does not facilitate a complete audit trail because: <ul style="list-style-type: none"> The 'action taken', 'responsibility' and 'timescale' fields are not mandatory. The form does not allow for documents to be attached as evidence. There are no additional fields into which monitoring comments can be added. Where the 'action taken' is the responsibility of service areas, the H&S team does not appear to consistently check that the agreed action has been completed. This was evident in three cases where issues had been referred to the service area and H&S officers did not know if actions had been taken. In one instance, there was a delay of at least 11 weeks between an incident occurring and the H&S Officer instructing the service area to remedy the issue. 	<p>The H&S team will create incident & accident reporting guidance for staff and post this to the intranet.</p> <p>The new H&S system will allow action monitoring with visibility across the H&S team, but in the meantime, the H&S team will introduce a monitoring process to ensure that remedial actions arising from incident & accident reports are completed. This will also include an escalation process if actions remain unactioned.</p>		
<p>Officers told us the weaknesses relating to Firmstep are already known. The 2025/26 H&S Action Plan includes an aim to procure a new H&S system by December 2025.</p>	<p>Priority</p> <p style="text-align: center;">2</p>	<p>SWAP Reference</p>	<p>AP#7281</p>
	<p>Responsible Officer</p>	<p>Principal H&S Officer</p>	
	<p>Timescale</p>	<p>30 June 2026</p>	

Finding 3

We found issues with health & safety checks performed across council sites.

The corporate Health & Safety Policy states that there should be annual inspections of all Council workplaces. The Policy states the Service Lead – Environmental Health is responsible for “routine inspections of all Council workplaces” but actual inspections should be conducted by members of the Central Joint Safety Panel.

Corporate sites:

Officers could not provide any evidence that general H&S site inspections take place at Blackdown House or Exmouth Town Hall, the council’s main offices.

General health and safety inspections are conducted at East Devon Business Centre, Thelma Hulbert Gallery, and Manor Pavilion. While inspection records indicate that some issues have been identified, there is currently no documented evidence to confirm that these issues are being actively monitored or followed up to ensure they have been resolved.

The latest fire check reports for Blackdown House (dated 26 June 2025) and Exmouth Town Hall (dated 25 June 2025) report issues that were identified in previous fire check reports (dated 2 May 2024 and 28 February 2025 respectively).

Operational sites:

Operational sites are subject to quarterly health and safety inspections. The latest reports for the Camperdown and Manstone depots show 48 and 49 defects, respectively. For Camperdown, this includes several issues identified in previous inspections, which indicates issues are not being addressed promptly. The latest reports for Camperdown and Manstone do not include resolution timescales for all identified defects.

Inspection forms:

We observed several different inspection checklists in use, and inconsistencies in checklists used for corporate and operational buildings. These include:

- Operational checklists including prompts to assess the exterior of the buildings, which are not included in the corporate checklists.
- Operational checklists not including fields to identify the officer responsible for addressing a defect.
- Corporate checklists not including a timescale field.

The checklists we saw do not have a system that indicates the level of risk posed by an individual defect. Introducing this would help services to prioritise resolving specific defects.

Action

In conjunction with the Central Joint Safety Panel (see AP#7404) the H&S team will ensure that regular site inspections are conducted at Blackdown House and Exmouth Town Hall.

To deal with issues identified from the site inspections, the H&S Team will:

- identify how issues should be reported and subsequently monitored for actioning
- introduce an escalation process, involving the Director – Housing & Health or the Assistant Director – Environmental Health if issues remain outstanding

The Assistant Director – Environmental Health has already recognised that issues identified during the inspections are not being monitored for rectifying and is putting in a process to check that issues are resolved.

The number of recurring reported defects at CD and Manstone have been partially due to resource issues within Street Scene. Staffing levels are now back to normal. The Operational H&S Officer has arranged for biweekly audits at both depots and has agreed to organise a clear up day.

The H&S team will also review the existing site inspection checklists and agree upon a consistent format that allows the recording of:

- the defects identified
- the level of risk posed by the defect
- the officer responsible for resolving the defect
- the agreed timescale for resolution
- when the defect has been addressed

Priority	2	SWAP Reference	AP#7306
Responsible Officer	Principal H&S Officer		
Timescale	31 December 2025		

Finding 4	Action												
<p><u>The Central Joint Safety Panel has not met since January 2024.</u></p> <p>The Safety Representatives and Safety Committee Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996, require the council to consult with employees’ representatives on health and safety. The 2024/25 Annual Health and Safety Report states this is achieved through the Central Joint Safety Panel (CJSP).</p> <p>Under the Corporate Health and Safety Policy the CJSP is responsible for:</p> <ul style="list-style-type: none"> • Receiving reports from the Health and Safety team and service representatives on health and safety compliance. • Examining accident statistics and trends to identify unsafe conditions and recommending remedial actions. • Monitoring the effectiveness of health and safety training. • Determining the extent to which health and safety risk assessments cover council activities. • Examining annual health and safety inspection reports. <p>We found that the CJSP has not met since January 2024. It is unclear whether the Panel’s responsibilities are being fulfilled through other avenues.</p>	<p>The Central Joint Safety Panel will be reintroduced. The Principal H&S Officer has plans to present this at the next Joint Staff Forum and is awaiting the date of the next meeting from HR. He has already raised the re-introduction of the Panel with unions.</p> <p>The current H&S policy requires a representative from each service area; however, this requirement will be reviewed and if necessary, the H&S policy updated, as it is felt that a representative from each office-based service area may be excessive.</p> <p>Communication of their responsibilities and appropriate training will be provided to Panel members at their first meeting.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #e6f2ff;">Priority</td> <td style="background-color: #ffc107;">2</td> <td style="background-color: #e6f2ff;">SWAP Reference</td> <td>AP#7404</td> </tr> <tr> <td style="background-color: #e6f2ff;">Responsible Officer</td> <td colspan="3">Assistant Director – Environmental Health</td> </tr> <tr> <td style="background-color: #e6f2ff;">Timescale</td> <td colspan="3">31 December 2025</td> </tr> </table>	Priority	2	SWAP Reference	AP#7404	Responsible Officer	Assistant Director – Environmental Health			Timescale	31 December 2025		
Priority	2	SWAP Reference	AP#7404										
Responsible Officer	Assistant Director – Environmental Health												
Timescale	31 December 2025												

Finding 5	Action												
<p><u>Not all service areas have a nominated Service Safety Officer for day-to-day H&S matters.</u></p> <p>In accordance with the council’s H&S policy, it is the responsibility of the Assistant Directors/Corporate Leads to nominate a Service Safety Officer (SSO) to act as liaison officer for health and safety matters on his/her behalf for day-to-day matters. The Policy states that SSOs attend the quarterly Central Joint Safety Panel meeting.</p> <p>The survey we issued to a sample of 10 Assistant Directors/Corporate Leads asked the question ‘do you have a SSO within your service area?’ 4 of the 5 responders answered either “No”, “N/A” or confirmed they did not know who the SSO for their service was.</p> <p>We asked the H&S team if they had a list of current SSOs. Officers told us there is no list in place and that SSOs are only identified if they attend the Central Joint Safety Panel meeting. As reported under AB#7404 the Panel has not met since January 2024.</p>	<p>As stated in AP#7404 above, the Central Joint Safety Panel will be re-introduced. Assistant Directors/Corporate Leads will be required to nominate Service Safety Officers for their respective areas to act as Panel members.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #e6f2ff;">Priority</td> <td style="background-color: #ffc107;">2</td> <td style="background-color: #e6f2ff;">SWAP Reference</td> <td>AP#7430</td> </tr> <tr> <td style="background-color: #e6f2ff;">Responsible Officer</td> <td colspan="3">Assistant Director – Environmental Health</td> </tr> <tr> <td style="background-color: #e6f2ff;">Timescale</td> <td colspan="3">31 December 2025</td> </tr> </table>	Priority	2	SWAP Reference	AP#7430	Responsible Officer	Assistant Director – Environmental Health			Timescale	31 December 2025		
Priority	2	SWAP Reference	AP#7430										
Responsible Officer	Assistant Director – Environmental Health												
Timescale	31 December 2025												

Finding 6

We identified several weaknesses in the risk assessment process.

Under the corporate H&S Policy, “Service Leads” are responsible for ensuring appropriate managers complete the necessary risk assessments (RAs) for their area, and the Service Lead is required to approve each risk assessment. The Service Lead role no longer exists within the council structure, so we have assumed this responsibility now sits with Assistant Directors or Corporate Leads. The H&S Policy requires RAs to be reviewed annually.

The H&S team maintain a spreadsheet that includes the details of corporate and operational RAs. This list is not shared outside of the H&S team. This means officers responsible for updating RAs may lack oversight of the RAs in place in their service.

Some risk assessments are completed by staff outside of the Corporate H&S team. There are no processes in place to confirm the assessments have been completed by a competent or trained assessor. We were advised the H&S team spot check risk assessments, but they do not retain any evidence of these checks.

We reviewed the central list of RAs and found that 51 of 167 (30%) of corporate RAs are overdue for review, with the oldest being overdue since June 2019. Officers told us that, other than emailing the service, there is no agreed escalation process to deal with overdue RAs. We also identified through discussion with officers that there are Beach Safety team risk assessments not included in the risk assessment spreadsheet.

We reviewed the last three quarterly H&S reports issued to ELT and found that, while they include a section for risk assessments, the columns 'number of risk assessments' and 'overdue' are not fully populated.

Using the central list of risk assessments, we sample checked a selection of 18 risk assessments. We found that:

- 8 RAs had not been approved by an assistant director as required
- 7 RAs indicate further action is required but there is no evidence this action has been taken
- 7 RAs have been completed by officers whose competency is unknown
- 3 RAs either use a different or no risk matrix
- 3 of the risk assessments are overdue for review (July 23, Jan 24 and Aug 24)
- 2 RAs did not use the standard risk assessment template
- 1 RA was incomplete

Action

Assistant Directors and Corporate Leads are responsible for ensuring that risk assessments for their respective areas are completed and kept up to date. Their responsibilities will be reaffirmed as part of the request to be issued by the Assistant Director – Environmental Health that they nominate an officer(s) within their area to become their appointed risk assessor(s).

Two risk assessor training sessions have been booked to take place in November. A central list of training risk assessors will then be created. Once set up, the role of the service area risk assessors will be to:

- undertake new and review existing risk assessments
- ensure any issues arising from the risk assessments are actioned

The role of the H&S Team will then be to spot check and audit risk assessments and document such checks accordingly.

The new H&S system includes a risk assessment module. Once assessments are housed in the system, assurance can be given that they have been:

- undertaken by a training risk assessor
- completed using a standard template
- approved by an Assistant Director
- kept up to date because automatic reminders will be issued when an assessment is due for review and an escalation process will be in place where risk assessments remain overdue

The new system has a comprehensive reporting module and will be able to provide meaningful risk assessment reports for sharing with ELT as part of the quarterly H&S reports.

Prior to the implementation of the new system, Assistant Directors and Corporate Leads will be asked to ensure that all their risk assessments have been reviewed and updated so that only current risk assessments are uploaded into the new system. This will be communicated to SLT by the Assistant Director – Environmental Health. The Principal H&S Officer will also communicate updates through the ‘news and views’ staff communication platform.

Priority	2	SWAP Reference	AP#7419
Responsible Officer	Assistant Director – Environmental Health		
Timescale	28 February 2026		

Finding 7

We found weaknesses relating to H&S training for staff.

The corporate H&S Policy states that the Service Lead – Environmental Health and Car Parks is responsible for developing and maintaining a training matrix that specifies minimum corporate H&S training needs for all employees. The corporate H&S Policy does not include a defined list of required training for all employees.

The matrix sets out the requirements for every individual team, so there is variation in training requirements across the council. This makes monitoring and reporting compliance difficult. We were also advised that the H&S team last updated the completed training in the matrix 18 months ago, so there is no clear level of compliance for 2024/25.

The corporate H&S Policy states that line managers are responsible for ensuring that the employees they manage complete appropriate H&S training, and for reviewing H&S training needs with their employees during their annual Performance Excellence Review (PER).

There are six mandatory H&S training courses that all staff must complete on the Totara eLearning system. Two of these courses (manual handling and DSE) have a refresher training requirement. We analysed Totara data and found that:

- 28% of current employees either had not completed manual handling training or were overdue for refresher training.
- 64% of current employees either had not completed manual handling training or were overdue for DSE training.

The above figures suggests that the mandatory H&S training/refresher training is either not being discussed at PERs or, if it is, then staff are not completing it.

We have been advised that the Totara system does not have automated reminders for overdue training. Four corporate managers/supervisors who responded to our survey advised they believed there were automated reminders in place. This may explain why there are high levels of non-compliance with refresher training.

We also found that H&S training records are not properly centralised, being recorded in iTrent, Totara and on spreadsheets held by services. We have been advised there is no overall training record. H&S officers reported they have no access to iTrent or Totara records.

The corporate H&S Policy states the H&S team will produce regular reports for SLT and line managers showing where their staff training records do not meet mandatory standards. We reviewed SLT reports found this information is not included.

Action

It is recognised that H&S training records are held in various systems and currently a comprehensive oversight of staff H&S training is not easy to create.

The plan is that the new H&S system will be the central H&S training record. It will house details of all mandatory/work-based H&S training courses.

The training matrices, one per service, are currently being updated to:

- Capture the mandatory and work-related H&S training for each officer within the respective service area
- Whether the training is in date or overdue

This information will then be uploaded into the new H&S system when it goes live

Induction training will continue to be recorded within iTrent with the data downloaded to the new H&S system on a regular basis. Corporate mandatory training will be housed in Totara with a regular interface of the training data into the new H&S system.

Reports will be created from the new system and provided to ELT to keep them informed if staff are not attaining the mandatory H&S training

Training records have recently been a topic of conversation between HR and the H&S Team and:

- It has been decided that all online mandatory H&S training held in Totara will be required to be refreshed every three years
- The automated reminder and subsequent escalation process within Totara is now working. Following a recent purge, staff are actively undertaking the various mandatory training sessions.
- A list from Totara of staff who have not undertaken the mandatory H&S training will be obtained by the H&S Team who will then send out reminders and escalate accordingly. It is yet to be decided whether this will be a quarterly or half yearly exercise.

A review of all mandatory staff training is currently being conducted by HR and will incorporate H&S requirements.

Priority	2	SWAP Reference	AP#7305
Responsible Officer	Principal H&S Officer		
Timescale	31 March 2026		

Finding 8	Action												
<p><u>One site has not had an evacuation drill in the last six months. Issues identified during a drill at Blackdown House are still outstanding.</u></p> <p>While evacuation drills are conducted in accordance with HSE requirements (every 12 months) at Blackdown House, Exmouth Town Hall and the operational sites at Camperdown and Manstone, the council’s corporate H&S Policy requires evacuation drills to be conducted at least every 6 months. We found that Camperdown has not had a drill in the last six months.</p> <p>We requested evidence of evacuation drills at the East Devon Business Centre but did not receive this.</p> <p>An evacuation drill took place at Blackdown House on 1 April 2025. Some issues and recommended actions were identified, these were subsequently reported to SLT.</p> <p>We selected some of the recommended actions and requested evidence that they had been completed. We found that:</p> <ol style="list-style-type: none"> 1) The report included a recommendation for a sweeper to be designated to stay at the entrance door to prevent the public accessing the building during evacuation. We were advised there has been no feedback about this, so no instruction has been issued to the sweepers. 2) There was one meeting room where the alarm was not heard. The alarm was to be re-tested the following day and if the problem persisted, then the alarm company would send an engineer to investigate. We asked for evidence that this had been addressed. Due to miscommunication between the relevant teams, no specific action was taken. 	<p>Fire warden training has been organised for October 2025 after which time evacuation drills will be conducted at all relevant sites in line with the policy.</p> <p>In respect of the issues arising from the Blackdown House fire drill on 1 April, they are being addressed as follows:</p> <ol style="list-style-type: none"> 1. The sweeper system is being reviewed. One of the updates to Duty Managers will be for them to designate a sweeper to remain at the entrance door unless the situation does not allow this. 2. The Principal H&S Officer advised that the recent fire drill at Blackdown House on 2 October found that the alarm sounded normally and was heard in all areas. He will, however, clarify the correct process to follow when reporting fire drill issues with the Property Assets team. He added that any remedial actions from the fire drills will lie with the H&S Team until such times as they receive evidence of the issues having been rectified. <p>The Principal H&S Officer has advised that any key findings resulting from the fire drills are reported to ELT by the Assistant Director – Environmental Health.</p> <table border="1" data-bbox="1137 882 2119 1027"> <tr> <td data-bbox="1137 882 1384 932">Priority</td> <td data-bbox="1384 882 1630 932">3</td> <td data-bbox="1630 882 1865 932">SWAP Reference</td> <td data-bbox="1865 882 2119 932">AP#7465</td> </tr> <tr> <td data-bbox="1137 932 1630 981">Responsible Officer</td> <td colspan="3" data-bbox="1630 932 2119 981">Principal H&S Officer</td> </tr> <tr> <td data-bbox="1137 981 1630 1027">Timescale</td> <td colspan="3" data-bbox="1630 981 2119 1027">31 December 2025</td> </tr> </table>	Priority	3	SWAP Reference	AP#7465	Responsible Officer	Principal H&S Officer			Timescale	31 December 2025		
Priority	3	SWAP Reference	AP#7465										
Responsible Officer	Principal H&S Officer												
Timescale	31 December 2025												

Finding 9

H&S reporting and oversight could be improved.

There are three reports prepared for the Executive Leadership Team (ELT):

- Quarterly H&S Report
- Annual H&S Report; and
- Annual H&S Action Plan

We reviewed reporting arrangements and found the following weaknesses:

- The Quarterly H&S report includes incident & accident figures for each month in the reporting period, but the format used makes it difficult to see month-to-month or longer-term trends.
- The Annual H&S Report includes some figures from the previous year as a comparator but including figures over the longer time limit would show a clearer trend.
- The Annual H&S Action Plan sets out in-year objectives, but the quarterly report does not clearly monitor progress against the Action Plan in-year.
- The Annual H&S Report for 2024/25 includes a lot of information about the H&S team’s activity across 2024/25 but does not clearly tie this back to the supporting Action Plan, so it is unclear whether all objectives were achieved.
- Training information included in the quarterly and annual H&S reports only covers training delivered directly by the H&S team. It does not capture compliance rates for H&S eLearning modules, so senior management may not have total oversight over training compliance (see Finding 7).
- The Quarterly and Annual H&S reports include monitoring of lone worker application usage, but the figures presented are not supported by commentary.

We were advised that the council has not established any formal corporate performance indicators for health and safety matters.

We also note that ELT meetings are not formally minuted. This means there is limited evidence of senior management’s discussions or actions taken in response to H&S reporting.

Action

While the H&S team acknowledge these findings, they are pleased with the vast improvements made over the last two years from a starting point where no H&S reports were issued. The latest improvement has seen the introduction of progress against the 2025/26 H&S Action Plan being presented to the Personnel Committee (September 2025).

In terms of further improvements, the H&S team will consider:

- Using comparative data covering at least three years in the Annual H&S Report.
- Ensuring that the next Annual Report clearly reports performance against the Annual H&S Action Plan.
- Changing the format of the quarterly H&S report to facilitate trend analysis for incident and accident statistics.
- Incorporating compliance rates for eLearning courses into the quarterly and annual report.

It should be noted that the current Lone Worker system does not allow the reporting of accurate statistics. A new Lone Worker system has been procured and the expectation is that the reporting element of the system will be significantly improved so that meaningful statistics can be issued.

Once the new H&S system has been implemented, consideration will also be given to introducing formal H&S performance indicators that will be monitored as part of the council’s overall performance framework. Examples of which may include:

- Compliance with mandatory staff training
- Completion of planned fire and evacuation drills
- Completion of the inspection programme
- Reductions in incidents and accidents

It is recognised that minutes are not taken at meetings of the Executive Leadership Team, or the Senior Leadership Team and items are only noted where there are actions.

Priority	3	SWAP Reference	AP#7298
Responsible Officer	Assistant Director – Environmental Health		
Timescale	30 June 2026		

Finding 10	Action		
<p><u>Members do not receive H&S reports.</u></p> <p>Elected Members have a key role to play in ensuring the health, safety, and wellbeing of entire communities. Their decisions can have a major influence on the health and safety of both local authority employees and the public. We have been advised that the only Elected Member receiving H&S reports is the Portfolio Holder Council, Corporate and External Engagement.</p>	<p>This has now been implemented. The 2024/25 annual report was presented to the Personnel Committee on 10 September 2025.</p>		
	Priority	3	SWAP Reference AP#7297
	Responsible Officer	Complete	
	Timescale	Complete	
Finding 11	Action		
<p><u>Officers are not aware of the retention/disposal periods for H&S documents.</u></p> <p>The officers we interviewed were unaware of the retention/disposal periods for H&S incident/accident forms or risk assessments.</p>	<p>The Assistant Director – Environmental Health has shared data retention guidance with officers. Regardless, the Corporate H&S Team will investigate the respective retention periods for the various H&S documents and ensure that:</p> <ol style="list-style-type: none"> 1. The respective systems replicate these periods. 2. Service areas are aware of these periods so that they can destroy any paper copies at the appropriate time. 		
	Priority	3	SWAP Reference AP#7299
	Responsible Officer	Principal H&S Officer	
	Timescale	31 March 2026	

<p>Finding 12</p> <p><u>Some managers and supervisors reported they lack awareness of health and safety processes.</u></p> <p>We issued a series of H&S questions to a sample of 16 managers and supervisors. We received 11 responses, giving a response rate of 69%. We reviewed the responses and noted that:</p> <ul style="list-style-type: none"> • 2 officers reported they did not feel fully conversant with the council’s H&S Policy. • 1 officer reported they were unaware of the evacuation procedure at their place of work. • 3 officers advised that where they arrange or chair meetings, they do not share the evacuation process or alarm test details either at all (1) or if attendees are EDDC employees (2) <p>We note that, while staff are notified about new procedures or changes to existing ones, H&S policies and procedures are not regularly circulated to staff to remind them of their responsibilities.</p>	<p>Action</p> <p>The H&S team intend to produce a communications plan which will cover the collating and subsequent publication of relevant H&S policies and procedures via the Stay Connected staff communication channel.</p> <p>In addition, a Director H&S responsibility training course has been planned for the autumn.</p> <table border="1" data-bbox="1133 619 2103 767"> <tr> <td>Priority</td> <td>3</td> <td>SWAP Reference</td> <td>AP#7456</td> </tr> <tr> <td>Responsible Officer</td> <td colspan="3">Principal H&S Officer</td> </tr> <tr> <td>Timescale</td> <td colspan="3">31 March 2026</td> </tr> </table>	Priority	3	SWAP Reference	AP#7456	Responsible Officer	Principal H&S Officer			Timescale	31 March 2026		
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<p>Finding 13</p> <p><u>The council has not developed a formal procedure for Personal Emergency Evacuation Plans (PEEPs).</u></p> <p>PEEPs are mentioned in two Fire Arrangements policies. The policy for Blackdown House states that Strategic Leads are responsible for ensuring PEEPs are in place, though we were advised that line managers are responsible for ensuring their individual staff have plans.</p> <p>We could not find any document outlining the process through which the council identifies officers or members that may require a PEEP, though a PEEP questionnaire has been published on the intranet.</p> <p>At the time of our testing, there was only one PEEP in place, and this had only been in place for a few months. Two more PEEPs were being developed. This seems low considering the council reportedly has a headcount of 557 employees.</p>	<p>Action</p> <p>The H&S team reported they are generally comfortable with the number of PEEPs and countermeasures are, where possible, put into place to enable members of staff to evacuate promptly and safely with the need of a PEEP.</p> <p>However, it is important to regularly remind staff to consider whether they require a PEEP, so reminders will be incorporated into the communication plan mentioned in AP#7456.</p> <table border="1" data-bbox="1133 1209 2103 1358"> <tr> <td>Priority</td> <td>3</td> <td>SWAP Reference</td> <td>AP#7590</td> </tr> <tr> <td>Responsible Officer</td> <td colspan="3">Principal H&S Officer</td> </tr> <tr> <td>Timescale</td> <td colspan="3">31 March 2026</td> </tr> </table>	Priority	3	SWAP Reference	AP#7590	Responsible Officer	Principal H&S Officer			Timescale	31 March 2026		
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