

# **EAST DUNBARTONSHIRE COUNCIL**

## **HEALTH & SAFETY PROCEDURE**

### **WORKPLACE INSPECTIONS**

#### **SP49**

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## DOCUMENT CONTROL AMENDMENT RECORD

Date	Issue No	Amendment	Person Responsible for Amendment
Feb' 24	01	Initial issue	L Gold

## 1. INTRODUCTION

The monitoring and review of preventative and protective measures is a requirement of the Management of Health and Safety at Work Regulations 1999 for which routine workplace health and safety inspections are to be conducted to check that such measures are in place and effective. Workplace health and safety inspections cover specific selected work areas within an organisation or workplace.

The aim of workplace health and safety inspections is to prevent work related accidents and ill health by identifying new hazards; and checking that preventative and protective control measures are implemented and effective. Workplace inspections need to take account of premises, plant, procedures, activities and substances, and therefore needs to be undertaken with all relevant stakeholders involved (e.g. trades union safety representatives, duty holder and service managers, employees, building managers or facilities officers in charge of the building etc.)

The intention would be that inspections are undertaken and managed at a local/service level and inspections are carried out “jointly” as agreed with our Trade Union colleagues within the Council. If working well, inspections should be a useful tool to manage health and safety within the premises offering employees and managers an opportunity to share their knowledge and experience, helping the inspection process, increasing worker involvement and boost morale amongst employees.

All workplace inspections should be recorded as evidence of legal compliance with the above requirement thus demonstrating that appropriate arrangements are in place for active monitoring of the safety management system.

## 2. SCOPE

This paragraph sets out the procedure and guidance for conducting health and safety inspections of Council workplaces as part of a proactive monitoring regime identifying and correcting potential hazards before injuries/ill health occur to ensure compliance with the general duties under the Health and Safety at Work Act 1974 (HSWA).

This does not cover audits or work equipment specific legal inspection requirements (e.g. ladders, hand tools, electrical equipment, scaffolds, local exhaust ventilation (LEV), groundwork's etc.) although these can be recorded.

## 3. ROLES AND RESPONSIBILITIES

Roles and responsibilities are intrinsically linked to SP29 Duty Holder Procedure and people leader roles such as Managers and Team Leaders with accountability for employees.

### 3.1 Service Manager/Duty Holder/Head Teacher

The above persons or, if having delegated the responsibility to another member of staff, should ensure that regular workplace health and safety inspections are carried out within their identified area(s) of responsibility by competent persons.

Service Manager/Duty Holder/Head Teacher are encouraged to coordinate all interested parties to conduct joint inspections of their area to minimise "over regulation" and help to resolve any grey areas where responsibility is either shared or not clearly defined.

3<sup>rd</sup> Tier H&S meetings should be the most appropriate place and time to discuss and set dates for workplace inspections.

Safety representatives (staff elected) who cover the area/employees involved should be informed of the planned workplace inspections and invited to participate.

The Service Manager/Duty Holder/Head Teacher can decide to undertake workplace inspections at any given time due to their area of responsibility and role managing people, if there is substantial change in conditions of work, an incident occurs or the HSE publishes new information on hazards. Where possible, they should follow the frequency established by this procedure.

All deficiencies identified must be acted upon in a timely manner. If during an inspection an unsafe/high risk activity or issue is discovered, contact the H&S Team immediately for advice and to confirm stoppage of dangerous/unsafe task/activity.

The Service Manager/Duty Holder/Head Teacher and Trade Union safety representative should ensure that the report of the inspection is carried out as per provided by the H&S Team checklist.

Once completed, an electronic format copy should be submitted to the H&S Team for recording. The H&S Team will then forward a copy of each report to the Estates Team.

Where applicable, the H&S advisor, if carrying out the inspection, will be responsible for collating, recording and submitting the inspection checklist.

Where Service Manager/Duty Holder/Head Teacher are unsure of the requirements of any regulations relating to health and safety in their workplace they should contact the Health & Safety team for advice.

### **3.2 Trade Union Representatives**

Trade Union safety representatives must work together with the Service Manager/Duty Holder/Head Teacher to undertake workplace inspections.

Trade Union safety representatives must have been elected/appointed by their Trade Union. It is recommended they are trained in health and safety however, it is not necessary to hold a competence certificate as they will be an employee who normally carries out work in the workplace to be inspected and should be aware of the current health and safety and operational arrangements.

Where applicable, union-appointed health and safety representatives can also request workplace inspections to take place or conduct one independently having given reasonable notice in writing when they intend to carry out a formal inspection of the workplace and have not inspected it in the previous three months. If there is substantial change in conditions of work, an incident occurs or HSE publishes new information on hazards, the representatives are entitled to carry out inspections before three months have elapsed, or if it is by agreement.

Where there are more than one trade union represented within a workplace, one (1) Trade

Union safety representative of each Trade Union can participate in the inspections. It is recommended that at least one (1) representative accompanies the Service Manager/Duty Holder/Head Teacher when undertaking joint inspections and, where applicable on certain premises, along with the H&S advisor.

Alternatively, the persons to undertake the inspections can be discussed with the Service Manager/Duty Holder/Head Teacher.

Where trade union safety representatives are unsure of the requirements of any regulations relating to health and safety in their workplace they should contact the Health & Safety team for advice.

### **3.3 Employees**

Employees are required to participate fully in the inspections that take place regularly or after an incident; should they be required to have an input.

### **3.3 Health & Safety Team**

The H&S team will undertake inspections with Service Managers/Duty Holders/Head Teachers for depots, offices and secondary schools and where assistance has been sought from other premises. For primary schools and early years centres/nurseries, the Duty Holder/Head Teacher/Head of Centre and the trade union safety representative will undertake the inspection and forward this to the H&S team once completed.

The H&S Team must be informed with reasonable notice when the inspection date has been agreed by Service Manager/Duty Holder/Head Teacher, emailing the H&S inbox.

Notwithstanding, as per the powers granted in the Health and Safety Policy of the Council, section 5.13, the H&S Team can undertake an inspection at any Council premises or work area at any time, without notice, to effectively implement the provisions of the health and safety policy.

The H&S team will be responsible for collating, recording and submitting the inspection checklist and will make sure all parties have received a copy, including the Estates Team.

Where appropriate, the Health and Safety Manager will report an overview of all inspections at the 2<sup>nd</sup> Tier H&S Committees.

## **4. PLANNING WORKPLACE INSPECTIONS**

Workplace health and safety inspections need to be more than just a simple hazard spotting tour of the premises and should adopt a more holistic and planned approach. The persons undertaking a workplace health and safety inspection should already be familiar with the workplace activity, premises, equipment, personnel and procedures pertaining to their area of responsibility and should draw on this knowledge when planning the inspection taking into consideration:

- known issues (individual and collectively) and other factors (who does what, where, when and how) to identify significant hazards;
- the various categories of people who may be affected by, or impact on, the workplace activity (employees, contractors, trainees, visitors, members of the public, etc.);

- suitability, use, control and storage of PPE;
- the workplace hazards and the existence and effectiveness of related control measures;
- training and competence of employees;
- reviewing previous inspection reports, accident/incident reports and other records;
- the timing of the inspection to take place during a time considered to be representative of normal working conditions.

The workplace inspection should identify remedial actions necessary, by determining the extent to which procedures and controls are being complied with, as well as the condition of plant, equipment, premises, etc.

To facilitate this, the H&S Team has put together an inspection checklist, with a RAG (Red, Amber, Green - traffic light) system outcome guide which identifies all relevant areas of an inspection to convey the workplace's H&S status. It uses a simple key assessment of satisfactory, not satisfactory or not applicable and has built in tolerances.

The inspection findings are classified as Satisfactory, Fair, and Unsatisfactory. The details of the findings and observations made during the inspection process are present.

Outcome Guide	Assessment Guide	
<b>Green (90% &amp; Above) Satisfactory</b>	This means the requirements of the standard have been met. The process is implemented and documented. Possibly minor non-conformances were found.	<b>Continual improvement to be explored.</b>
<b>Amber (75%-89%) Fair</b>	Indicates a good degree of compliance, however, some aspects may not be fully implemented.	<b>The actions required to bring the aspect up to full compliance should be completed so far as is reasonably achievable.</b>
<b>Red (Below 75%) Unsatisfactory</b>	This is the absence, omission or total breakdown of the management system and may involve a breach of statutory duty /legislation.	<b>The actions required to bring the aspect up to full compliance should be completed so far as is reasonably achievable without delay.</b>

#### 4.1 Frequency of inspections

The frequency of inspection will normally be determined by the level of risk involved in the activities and the type of environment in which they are performed but should be conducted at least once in every 6 months.

At EDC, it has been determined they will occur every 4 months, before Easter break, before summer break and before the Christmas break. For other sites, twice a year should suffice to check items have been closed out, for example, before summer break and before Christmas.

#### 4.2 Number of people undertaking an inspection

One person representing management, one person representing each Trade Union present in the workplace and a health and safety adviser.

The H&S team will undertake inspections with Service Managers/Duty Holders/Head Teachers for depots, offices and secondary schools as default. For primary schools and early years centres/nurseries, the Head Teacher/Head of Centre and the trade union safety representative will undertake the inspection and forward this to the H&S team once completed.

The persons inspecting must liaise with the Building Manager and/or Facilities Officer on site before conducting the site inspection. This is important as it is an opportunity for the group and

in particular individuals who may be less familiar with the specific location to stop and take 5, review the onsite six pack and discuss any building safety issues and emergency arrangements before commencing with the inspection.

This can be arranged locally but as a recommendation, four (4) should be the maximum number but generally two (2) would suffice, consisting of Trade Union safety representative and Manager/Duty Holder/Head Teacher or delegated responsible person.

## 5. CONDUCTING WORKPLACE INSPECTIONS

When conducting a workplace inspection, particular attention should be given to the existence and maintenance of suitable engineering controls (rather than the reliance on use of personal protective equipment (PPE)); the arrangements to deal with emergencies; the availability of adequate current information; and if necessary, warnings regarding the nature of the plant/substance hazards concerned (e.g. where and how work activities are being carried out and the potentially exposed population).

The following list provides some practical guidance to help complete workplace inspections in the most effective manner:

- throughout the inspection refer back to the interaction between: people, processes, premises, plant and substances.
- use the inspection checklist as an aide, but do not let it limit the scope of the inspection.
- review competencies and training requirements/records for staff.
- check risk assessments, equipment documentation and maintenance records.
- talk to as many employees as possible, listen to their observations/problems and suggestions.
- expect people to be on their best behaviour; beware of false impressions.
- do not get distracted by trivial risks or issues.
- look for potential shortcuts in work procedures or deviations from good practice.
- take account of both normal and potential abnormal work conditions and activities.
- where possible, put remedial measures in place immediately.

The workplace inspection checklist can be found at the end of this procedure and includes:

- detail of the area of responsibility;
- date and the name of the persons conducting the inspection
- the items to consider during the inspection per specific area: people, procedures, premises, plant and substances
- findings for each/corrective action taken/required (where appropriate, required actions to be added to the premises' health and safety action plan)
- a RAG system for status reporting, to raise management's attention to the H&S issues.

## 6. OUTCOME, ACTION PLAN and FOLLOW-UP

Results of the inspections can be discussed and managed locally at 3<sup>rd</sup> Tier H&S meetings with Trade Union safety representatives and where relevant, can be reported by the H&S



Manager through the 2<sup>nd</sup> Tier H&S Committee.

Non-Compliance issues can be addressed at time of inspection where practicable, e.g High risk issues need timely corrective action.

If during an inspection an unsafe/high risk activity or issue is discovered, contact the H&S Team immediately for advice and to confirm stoppage of dangerous/unsafe task/activity.

A H&S Action Plan can be developed with target date being the next inspection unless an urgent matter. The Manager/Duty Holder/Head Teacher will seek to respond to any matters arising and where not possible to close out actions.

Any remedial works or requests should be managed through the already established channels such as through Building Manager/Facilities Officer logging repairs on the Hub where Estates Team will review with their surveyors, as appropriate. For H&S training, the People Development and the Health & Safety teams can be contacted.

Where an educational establishment requires works beyond regular maintenance and repair, the School Improvement Team should be contacted by the Head Teacher/Head of Centre.

Where applicable, actions failing to meet the target dates or failing to adequately manage the risks must be reported through the chain of command or escalate to the 2<sup>nd</sup> Tier H&S Committee.

Any queries can be directed to the H&S Team, who will sign post as to next steps or who to contact.

## **7. RETENTION OF RECORDS**

Records should be maintained of any workplace health and safety inspections undertaken (copied to the appropriate Trade Union safety representatives) including any inspection notes and checklists raised, as well as any formal post inspection reports and action plans produced; these should be retained for a period of at least three years.

It is recommended that copies of any work services request; equipment or material demands and training support requests are kept as evidence of action taken. These records should include, as appropriate, the dates of submission, review, any hastening action, and the completion of tasks. The ones pertaining to the building premises should be located and saved in the Six Pack.

## **8. MONITOR AND REVIEW**

As part of the EDC Health and Safety Management System, the EDC Health and Safety Team will conduct regular audits and inspections to monitor the implementation of this management procedure.

The EDC Health and Safety Team will review this management procedure every two years from the date of signing or sooner as a result of any changes to legislation or some other event i.e. a major incident or accident.

The EDC Health and Safety Team will provide feedback in the form of a report following any audits and inspections. When necessary, the procedure will be amended and reissued with an

updated version number.

All Service Managers/Duty Holders/Head Teachers must ensure that local procedures are updated to reflect any changes to the management procedure.

## 9. REFERENCES

### HSE Guidance and Regulation

- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health, Safety and Welfare) Regulations (WHSWR).
- Fire (Scotland) Act 2005
- HSE – INDG 232 – Consulting Employees on Health and Safety
- HSE - HSG 263 – Involving Your Workforce In Health and Safety: Good Practice For All Workplace

### East Dunbartonshire Council: Health and Safety Policy / Procedures

- HSP01 Health and Safety Policy
- HSP02 Gas Safety
- HSP03 Fire Safety
- HSP04 Management of Asbestos
- HSP05 Management of Contractors
- HSP07 Controlling Workplace Hazards
- SP01 Accident and Incident Reporting
- SP35 Accident and Incident Investigation
- SP13 Manual Handling
- SP16 Gas and Carbon Monoxide Emergency
- SP18 Provision of First Aid
- SP21 General Office Health, Safety and Welfare Arrangements
- SP23 Working at Height
- SP27 PPE and RPE
- SP28 Portable Appliance testing
- SP29 Duty Holder

### East Dunbartonshire Council: Health and Safety Forms

- P04 (A) Educational Establishment Health and Safety Inspection Checklist
- P04 (B) Depot/Office/site Health and Safety Inspection Checklist