



THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

Internal Audit

TMO Health and Safety

FINAL DRAFT AUDIT REPORT

June 2010

Draft Report circulated to:

Lornette Pemberton	TMO Director of People and Organisational Development
Janice Wray	TMO Health and Safety Advisor

Final Draft Report also circulated to:

Robert Black	TMO Chief Executive
Sacha Jevans	TMO Director of Customer Services
Simon Throp	TMO Assistant Director of Asset Investment and Engineering
Roberto Cusano	Group Accountant HRA (RBKC)
Pam Sedgwick	Housing Clientside Manager (RBKC)
Laura Johnson	Chief Housing Officer (RBKC)
Steve Mellor	Group Finance Manager (RBKC)

TABLE OF CONTENTS	Page
--------------------------	-------------

EXECUTIVE SUMMARY

INTRODUCTION:

- | | |
|-------------------------|---|
| 1. Objectives and Scope | 6 |
|-------------------------|---|

FINDINGS, RECOMMENDATIONS AND MANAGEMENT RESPONSE:

- | | |
|--------------------------------|----|
| 2. Corporate Health and Safety | 7 |
| 3. Electrical Safety | 11 |
| 4. Asbestos | 14 |
| 5. Legionella Management | 15 |
| 6. Action Plan | 16 |

EXECUTIVE SUMMARY

- 1 This audit was a high level review which was undertaken as part of the 2009/2010 audit plan.
- 2 The Kensington and Chelsea Tenant Management Organisation (TMO) is an arms length management organisation responsible for providing landlord services for the Borough's housing stock of approximately 10,000 properties. A Management Agreement between the Council and the TMO governs the overall relationship.
- 3 The arrangements for Health and Safety within the TMO are governed by a Policy statement which outlines the TMOs approach in a number of key areas:
 - Statement of Intent: The TMO recognises and accepts its responsibilities and affirms its intent to satisfy all the provisions and obligations of the Health and Safety Act 1974 and subsequent legislation;
 - Organisation: The Responsibilities of the TMO directors, managers and staff are set out; and
 - Arrangements: General statements about the TMOs specific policies and approach to the major areas of Health and Safety concerns.
- 4 Although Health and Safety is the responsibility of every member of staff, a co-ordinating role is performed by the Corporate Health and Safety Team (HST) which reports to the Director of People and Organisational Development. This team's core functions include setting and updating policies and procedures, administering corporate and employee Health and Safety, and monitoring and reporting throughout the TMO. In addition to these functions, the HST has responsibility for running the Health and Safety programmes for a number of operational areas, for example fire safety and asbestos management. It is recognised that, by performing this role, there is a reduction in the resources and ability of the HST to carry out the monitoring and inspection role that they are required to perform.
- 5 There are various reporting mechanisms in place to direct and monitor the Health and Safety activity within the TMO, and report on it to senior management. They include the following:
 - Employees and technical Health and Safety Committees;
 - Discussion of Health and Safety at Board level; and
 - Annual Health and Safety report and Service Plan.

The Council is responsible for providing insurance for the incidents that may occur to residents and tenants to TMO property. The TMO are responsible for insuring against incidents to their employees in the course of their normal duties. The Council Corporate Health and Safety Adviser receives copies of the TMO annual reports and the minutes of the TMO

H&S Committee and is advised promptly of all major accidents and incidents, and these provide assurance that the TMO has appropriate arrangements in place.

- 6 The TMO are currently working on the implementation of the Keystone Asset Management System. We understand that this is a modular package covering all aspects of asset management and maintenance. It features a Service Module which is designed to schedule, record, monitor and manages the servicing cycles for assets, building and plant. The introduction of this system is anticipated by all the managers who assisted with this audit, as it would mean that records could be centrally maintained in a uniform manner and be accessible to all staff. Currently manual systems are used to manage and monitor maintenance activity.
- 7 The key findings of the audit were as follows:
- Good systems are in place to ensure corporate Health and Safety;
 - Asbestos detection and action is performed on a risk and priority basis;
 - Electrical safety is managed by external contractors, and the TMO is devising monitoring systems; and
 - There are a small number of issues from the previous Legionella Management audit which are still outstanding.

The following areas of good practice were noted:

- There are a number of procedures, practices, meetings and reports which ensure that Health and Safety awareness and matters are embedded throughout all levels of the TMO;
- Contractors working on TMO properties are formally advised of specific asbestos hazards where this information is available on each job sheet. Where a specific hazard is not known, contractors are formally advised to be aware of general hazards and are advised of the appropriate action to take; and
- We noted that, in order to make best use of the manpower and financial resources available for Health and Safety matters, programmes of work were being planned and prioritised on a risk basis, to ensure that due attention was given to important issues.

There were three high priority recommendations:

- The roles of the Health and Safety Team and operational management should be clarified, to reflect the division of responsibilities envisaged by the policy;
- The Health and Safety Policy should be reviewed and amended to ensure that the arrangements in place are correctly stated; and
- The 2009/10 Annual Health and Safety report should include statement about the Legionella Management activities that have been achieved in the year, and how this fits in with the overall work programme.

- . The key medium priority recommendations were as follows:
- The register of Health and Safety policies should include information on their projected review dates;
 - The tasks in the Health and Safety service plan should be separated into specific initiatives and ongoing work. The basis of the prioritisation of the tasks should be given to aid understanding;
 - Consideration should be given to using information from existing asbestos surveys to provide information and advice on similar properties. The feasibility of procuring asbestos management services on a contractual basis should be investigated; and
 - The TMO should draft and maintain a comprehensive list of the Legionella Management structures in operation within all relevant premises when the Keystone system is introduced and define the responsibilities of the Legionella Appointed Persons for its facilities.

- 8 Internal audit as a result of our audit work, we are able to give a **Satisfactory Assurance**. In giving this assurance we are commenting on the systems for ensuring the Health and Safety in the areas covered by the audit. Most of these systems are based on an ongoing programme of works, and our audit assurance is based our evaluation of the works that have been performed and the future plans. We conclude that the current programme of work in the areas reviewed represents a proportionate approach to minimising the Health and Safety risks. We are of the opinion that the system presents a **Medium Risk** to the TMO achieving its overall service objectives.
- 9 Please note that this audit report, and associated opinion, is only a level of assurance, based upon an analysis of system controls as they existed at the time of the audit, and limited to the sample of evidence reviewed. It does not provide assurance that the control framework will not be subject to future change. It is management's responsibility to maintain an adequate and effective control environment and ensure for the detection and prevention of fraud.
- 10 A glossary of audit terms is provided in the Appendix to this report to clarify and explain the opinion and priority ratings used.

INTRODUCTION

1. Objectives and Scope

- 1.1 This high level review has been undertaken as part of the 2009/10 audit plan.
- 1.2 The objectives of this audit were to assess and evaluate the controls in the following areas:
 - Corporate Health and Safety;
 - Electrical Safety;
 - Asbestos; and
 - Legionella Management.
- 1.3 Key controls were ascertained by observation and interviews with members of the TMO Health and Safety and Technical teams. The controls identified were then documented and tested to ascertain the level of compliance. All findings were discussed with key officers on completion of the fieldwork for this audit.

FINDINGS, RECOMMENDATIONS AND MANAGEMENT RESPONSE

2. Corporate Health and Safety

2.1 As stated in the Executive Summary to this report, the TMO Health and Safety policy governs all the aspects of the organisation's commitment to comply with and implement all applicable Health and Safety legislation. This document is dated May 2009 and issued by the Chief Executive. It comprises three main sections and we reviewed these to ascertain whether they were fit for the stated purpose. We found that the first section entitled "Statement of Intent" was satisfactory.

2.2 We reviewed a section entitled "Organisation" which seeks to assign the responsibilities for Health and Safety within the TMO. We noted that

- The Directors and Heads of Division were responsible for Health and Safety within their Divisions; and
- The Health and Safety Advisor (HSA) is responsible for providing advice and guidance and monitoring, auditing and reporting on the implementation of the policy.

In reality, the HSA is involved in the detailed implementation of Health and Safety matters across the organisation, and the ability to perform the independent monitoring role is weakened. If this situation persists, there is a risk that the TMO may not receive accurate and timely information on the effectiveness of the Health and Safety systems in place, and take the required action.

Recommendation: We recommend that the roles of the Health and Safety Team and operational management be clarified, to reflect the division of responsibilities envisaged by the policy.

Management comment:
Agreed.

2.3 We confirmed that there was appropriate Senior Management involvement in the monitoring and review of Corporate Health and Safety:

- The Annual Health and Safety Report is presented to the Executive Team, the TMO Board and RBKC;
- The ongoing work with fire inspections is reported each month to the Executive Team the TMO Board and the Housing Operations Committee; and
- Health and Safety policies are reviewed by the Operations Committee.

- 2.4 The Policy document also contains a section entitled "Arrangements" which is a summary of the main principles applying to specific areas of Health and Safety. On examining this section we noted that there were two types of statement:
- Statements of existing practice: e.g. "Contractors are vetted for competence and adequate resources in the area of Health and Safety"; and
 - Statements of intended practice: for example "All jobs will be assessed for see if staff should be identified as users of display screen equipment".

We consider that these statements are capable of being mis-construed by persons reading the policy and there is a risk that the TMO may be successfully challenged if the practices described in the policies are not in place. For example the policy states that "Extensive records are kept on the location of asbestos in our properties", but the information in existence does not achieve the levels of comprehensiveness implied by this statement.

Recommendation: We recommend that the Health and Safety Policy should be reviewed and amended to ensure that the arrangements in place are correctly stated.

Management comment:

Agreed

- 2.5 The Health and Safety Policy is supplemented by a number of detailed policies and procedures and these were detailed in an appendix to the 2008/09 Annual Health and Safety Report. The detailed policies are available to all employees via the TMO intranet site. Additional procedures on Health and Safety are contained within the TMO Construction Work Information Guide and the Estate Staff Handbook.
- 2.6 The scope of this audit did not allow a comprehensive review of the policies but we did perform the following checks:
- A sense check to confirm that all the major Health and Safety policy areas are covered; and
 - Ensured that the six Regulations on Health and Safety at Work introduced in 1992 were covered by the policies and guidance:
 - The Management of Health and Safety at Work;
 - Manual Handling Operations;
 - Display Screen Equipment;
 - Workplace (Health, Safety and Welfare);
 - Provision and Use of Work Equipment; and
 - Personal Protective Equipment.

We confirmed that guidance was in place for all these subject areas.

- 2.7 We understand that the majority of policies were last updated in 2007, and were informed that many of them were currently being reviewed. We are supportive of the current efforts to update the policies but noted the absence of a systematised basis for reviewing and updating policies. We consider that without such a system there is a risk that the policies due for review will not be identified and updated on a timely basis.

Recommendation: We recommend that the register of policies should include information on their projected review dates.

Management comment:

Agreed

- 2.9 In order to fulfil their statutory obligations and safeguard the welfare of staff residents and visitors, all TMO staff are given adequate and appropriate training in the Health and Safety matters applicable to their roles. The following procedures are in place:
- There is a 45 minute presentation on Health and Safety included within the Induction Day for new staff; and
 - Shortly after commencing their employment, all new staff receive a personalised training session from a member of the Health and Safety Team. A checklist is completed to indicate the areas covered and this is signed by the member of staff and placed on the employees file.
- 2.10 Where applicable and appropriate, the TMO strives to obtain relevant external validation and accreditation for the corporate Health and Safety activities. The staff of the Health and Safety Team all hold professional memberships of the relevant organisations. In addition, the ongoing work programme on Fire Safety is designed to comply with the relevant legislation and is being performed in conjunction with the Fire Service.
- 2.11 We examined the TMO's approach to planned and preventative actions to maintain and improve the level of corporate Health and Safety. The service plan contains a list of tasks to be performed over the coming year, ranked by priority. Some of these tasks are ongoing and others are of a short term nature. We reviewed the service plans for 2009/10 and noted the following:
- The inclusion of continuous and one-off tasks makes it difficult, for users of the document to identify where the efforts will be focused during the year;

- The assigning of priorities to the tasks within the plan is a creditable effort to rank them in the order of importance. However there were no definition of how the priorities had been determined, and whether the same basis had been used for all the work tasks.

With the current presentation of the information that there is a risk that management will not be able to assess how the proposed activities fit into the corporate risk landscape, and monitor and direct those activities in the most appropriate manner.

Recommendation: We recommend that the tasks in the service plan should be separated into specific initiatives and ongoing work. The basis of the prioritisation of the tasks should be given to aid understanding.

Management comment:

This will be reflected in individual forward job plans as appropriate.

- 2.12 There are systems in place to respond to Health and Safety incidents as they occur. The Customer Service Centre receives calls from residents and staff relating to any potential hazards and after ascertaining the nature incident they assign the appropriate contractor to investigate or rectify the issue as appropriate. Out of office hours, the calls are routed to Pinnacle, who offer a similar service. There is always an out of hours duty officer and duty caretaker available. This is further supplemented by a technical advice service whereby a number of TMO managers are available for consultations on any incidents arising out of hours.
- 2.13 The TMO have also developed a minor emergency plan to deal with incidents that affect a large number of people/properties, but are confined to the TMO estate. For larger scale emergency planning, the TMO would take their lead from the Council and comply with their arrangements.
- 2.14 The TMO maintains all the records required for statutory purposes on spreadsheet systems. The notifiable events are also maintained on this spreadsheet and are highlighted for management information and statutory notifications purposes. All recorded incidents are tabled for discussion at the quarterly Health and Safety Committee meetings.
- 2.15 Ad-hoc management information reports are prepared for the Executive Team meetings as required. The Annual Health and Safety report is the main management information tool, but we understand

that management are requesting the development of Performance Indicators for this service, to enable the activities to be monitored on a quarterly basis. We support this initiative.

Recommendation: We recommend a timetable should be developed for introducing the performance indicators on corporate Health and Safety.

Management comment:

Agreed

3. Electrical Safety

The Health and Safety arrangements for the electrical installations cover the following areas:

- Capital Projects;
- Estate Lighting;
- Electrical Testing; and
- Fire Alarms.

The arrangements differ according to the area and we have reviewed them separately in this section of the report.

Capital Projects

- 3.1 Capital projects are typically the refurbishment of a number of dwellings or properties. Consultants to be appointed to write the specifications of works, and this then follows the usual practice, of inviting and analysing tenders, consultation with leaseholders and formal appointment of successful contractors. The projects are normally procured under the CYTRA framework. Effectively this ensures that the contractors have been vetted to ensure that they are reputable and have the infrastructures to comply with all the relevant professional requirements.
- 3.2 The standard and requirements of the electrical installations for these capital projects are detailed in the tender specifications and the analysis of tenders is designed to ensure the Health and Safety of the electrical installations by confirming compliance with these requirements. The contracts also feature a general clause to the effect that all works must comply with current guidelines.
- 3.3 The following checks are also in place to confirm that the electrical and other installations are completed to the required standard.

- Contractors produce method statements which are reviewed by electrical specialists within the TMO;
- The contracts state that the Contractor is responsible for the Health and Safety of the public. A pre-construction Health and Safety meeting is normally held, and a suitable risk assessment made;
- The consultants visit and inspect the works on a weekly basis to ensure that it is proceeding as required;
- There is an independent Clerk of Works who produces a weekly report on the project;
- Monthly site meetings are held with representatives of the TMO, consultants and contractors; and
- On practical completion of the project, all the relevant certificates are obtained from the contractor and sent to the TMO engineers for review and entering on the database of installations in all properties.

We consider the above processes to be satisfactory.

No recommendations have been made in this area.

Estate Lighting

3.4 Estate lighting comprises the external and emergency lighting on TMO estates. The contract for planned and reactive maintenance of these is was awarded to RGE in 2009 and the following arrangements are in place:

- All faults are to be rectified within five days, and emergency lighting needs to be rectified within 24 hours;
- All emergency lighting is inspected twice a year in accordance with statutory obligations. Certificates from these tests are forwarded to the TMO electrical engineers who review and retain them; and
- RGE are authorised to carry out repairs to lights that they note to be defective when they are on site. Otherwise faults are advised to them by the Customer Service Centre in the normal manner.

3.5 We understand that as part of the development of performance indicators throughout the TMO, the management team have been tasked with developing suitable measures. Monthly reviews are held with the contractors but the performance measurement information has not been fully developed. Until these measures are in place there is a risk that opportunities to improve and rectify contractual performance will not be identified.

Recommendation: We recommend that appropriate systems are put in place to monitor the performance of the RGE

contract.

Management comment:

Agreed

Recommendation: We recommend that a formal post implementation review of this contract is performed.

Management comment:

Agreed

Electrical Testing

- 3.6 Electrical testing is the review of the electrical installation within a location to ensure that the Health and Safety of the occupants and users of that area is assured. The schedule of electrical testing within the TMO is accordance with the "17th Edition of the Institute of Electrical Engineers Wiring Regulations": Commercial premises are inspected every ten years and domestic premises are inspected every five years. All void premises are automatically inspected.

There are three types of report received as a result of these inspections:

- Completions certificates related to re-wired building;
- Minor works certificates for partial rewires; and
- Periodic inspection reports.

- 3.7 We are informed that the programme of inspecting the properties commenced in 2007 and properties are being inspected on a priority basis. Communal areas and those premises with the oldest installations are being inspected first. It is management's intention to complete the programme of inspections within the next two years. These issues have been highlighted to senior management through the annual reporting processes and we therefore make no further recommendations.

Fire Alarms

- 3.8 The fire alarms are subject to quarterly tests with the annual and half yearly test being more detailed. All tests involve a check to ensure the normal working operations of the alarms.

No recommendations have been made in this area.

4. Asbestos

- 4.1 The TMO recognises its responsibility to safeguard contractors, residents and visitors from the risk to health posed by asbestos which is or could be present in their properties. We obtained and reviewed a copy of the draft Asbestos Policy and Procedure document dated December 2009 and noted that this was a comprehensive document covering practical working and potential risks.
- 4.2
- On a practical basis the asbestos management processes comprise the surveys to determine the presence of asbestos, and appropriate action which could be either to contain or remove the hazardous material. Due to the size of the TMO estate, the work is proceeding as follows: Visual and sampling surveys are carried out in void dwelling and there is an ongoing programme of communal surveys and re-inspections;
 - Specific actioned within blocks and estates;
 - Reactive work arising from concerns raised by residents and contractors; and
 - Work in areas deemed to be high priority.
- 4.3 The results from these investigations and actions are maintained in a database, which will be replaced by the Keystone system described in Section six of the Executive Summary to this report. This database is linked to the Academy system and when jobs are requested for properties with an asbestos history this is also printed on the job ticket. Where no specific asbestos information is available there is a general advice to contractors to advise of the possibility of encountering asbestos.
- 4.4 Given that most TMO estates contain a certain number of similar properties, it is reasonable to assume that the same materials have been used in their construction. Thus it is highly probable that if asbestos is discovered in one property, the neighbouring properties would contain the same materials in the same locations. However the TMO does not use any method of "cloning" the information to advise residents and contractors of potential hazards, though the TMO does use the information they do hold to provide residents with all relevant information.. We consider that, in the event of an incident in a property neighbouring one which had been surveyed, there is therefore a risk that the TMO would not be able to demonstrate that they had used their best endeavours to identify and communicate the potential risks.

Recommendation: We recommend that consideration should be given to using information from existing asbestos surveys to provide information and advice on similar properties.

Management comment:

Agreed

Keystone Asset management system will Extrapolate data from known asbestos information to matching dwellings. It is hoped to go live at the end of August.

- 4.5 The asbestos testing is done on a piecemeal basis as there is no contract in place for this work. The testing firm supplies an estimate for the work to be done, and provides certification if relevant at the end of the work. We consider that there is a risk that the TMO is missing an opportunity to improve the financial and operational efficiency of the asbestos operations because there is no contract in place.

Recommendation: We recommend that the feasibility of procuring asbestos management services on a contractual basis should be investigated.

Management comment:

Agreed

- 4.6 The responsibility for organisation and administering the asbestos management work is performed by the Corporate Health and Safety Team. We have already stated in Section 2.2 that the responsibilities of the operational and corporate staff require review and therefore we make no further comment.

No further recommendations have been made in this area.

5. Legionella Management

- 5.1** We performed a specific review of Legionella Management throughout the Council in 2008/09, and therefore we followed up our recommendations to ascertain the progress so far. All recommendations were previously accepted by management and therefore we have summarised the outstanding recommendations here below:

Ref	Original Recommendation	Action Taken	Outstanding Recommendation
2.3	We recommend that systems be implemented within each Business Group to enable them to supply a formal annual confirmation that they have complied with their Legionella Management obligations.	The 2008/09 Annual Health and Safety report included a position statement and approach.	We recommend that the 2009/10 Annual Health and Safety report should include statement about the Legionella management activities that have been achieved in the year, and how this fits in with the overall work programme.
3.2	We recommend that each Business Group should draft and maintain a comprehensive list of the Legionella Management structures in operation within all relevant premises.	This is outstanding and planned for June 2010.	We recommend that the TMO should draft and maintain a comprehensive list of the Legionella Management structures in operation within all relevant premises when the Keystone system is introduced.
3.3	We recommend that each Business Group should define the responsibilities of the Appointed Persons for its facilities, and provide the training required to perform this role competently.	Outstanding.	We recommend that the TMO should define the responsibilities of the Appointed Persons for its facilities, and provide the training required to perform this role competently.
4.2	We recommend that guidelines for the risk assessment of Legionella should be formulated at Council level and passed to the Business Groups for implementation.	There is a two yearly cycle of risk assessments in place.	None

Ref	Original Recommendation	Action Taken	Outstanding Recommendation
	also be formulated.		
5.4	We recommend that efforts should be made to ensure that the arrangements with Reef Water Services are made compliant with the Council Financial Regulations.	Reef Services have now been appointed as the contractor, and work to Council standards and guidelines.	None
5.6	We recommend that guidelines should be formulated to enable Council contract managers to review activities performed by third party contractors on the Council's behalf	Reef Services have now been appointed as the contractor, and work to Council standards and guidelines.	None
6.1	We recommend that guidelines for the maintenance of log books at each operational location should be formulated and distributed to relevant staff involved in the Legionella Management process.	Documentary results of the surveys are obtained from the contractor and retained.	None
6.2	We recommend that all Appointed Persons should be reminded to check that appropriate action is taken in respect of defects identified during routine inspections and that this action is adequately documented in the log books.	Following the implementation of Recommendation 3.3 above, this will be put in place.	We recommend that all Appointed Persons should be reminded to check that appropriate action is taken in respect of defects identified during routine inspections and that this action is adequately documented in the log books.
7.1	We recommend that a	Feedback from monthly	As per 2.3

Ref	Original Recommendation	Action Taken	Outstanding Recommendation
	management information system should be considered to provide positive confirmation that Legionella Management activities have taken place.	progress meetings is given to the 2-monthly Technical H&S Group which reports to Executive Team. Would also refer to point 2.3 above which confirmed that performance on water quality is included in the Annual H&S Report.	
8.1	We recommend that consideration should be given to recording separately the costs of Legionella Management, to assist contract negotiations and identifying the cost of different management regimes.	This is already TMO practice.	None

SUMMARY OF AGREED ACTIONS

6. Action Plan

- 6.1 Recommendations have been made and actions agreed as shown above. The attached action plan contains details of these, along with the risk evaluation, responsible officer and a date for implementation.

Appendix**Audit Glossary**

1. In order to help put the audit opinion and recommendation priority ratings in context the following tables detail the current ratings used by Internal Audit.

ASSURANCE	Opinion
Substantial Assurance	There is a sound system of control designed to achieve the objectives. Compliance with the control process is considered to be substantial and few material errors or weaknesses were found.
Satisfactory Assurance	While there is a basically sound system, there are weaknesses and/or omissions which put some of the system objectives at risk, and/or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.
Limited Assurance	Weaknesses and / or omissions in the system of controls are such as to put the system objectives at risk, and/or the level of non-compliance puts the system objectives at risk.
No Assurance	Control is generally weak, leaving the system open to significant error or abuse, and/or significant non-compliance with basic controls leaves the system open to error or abuse.

Then also one of the risks below is stated:

Taking into account the assurance level given above and the significance of the system we are of the opinion that the system presents a:

Low risk to the organisation achieving its overall service objectives.
Medium risk to the organisation achieving its overall service objectives.
High risk to the organisation achieving its overall service objectives.

2. All recommendations in the action plans will carry a priority weighting using the following classification:

HIGH	Recommendation addresses fundamental weaknesses, which seriously compromise the effective accomplishment of the system's objectives. Risks presented by the control weaknesses could be damaging in the short term. The management action required should be implemented as soon as possible, certainly within 0-3 months.
MEDIUM	Recommendation addresses serious weakness, which affect the reliance to be placed on the system. Risks presented by control weaknesses could be damaging in the medium term. Management action is required within 0-6 months.
LOW	Recommendation addresses minor weaknesses, or suggests a desirable improvement. Risks presented by control weaknesses are unlikely and inconsequential. Management action is recommended to address concerns within 0-9 months.

ACTION PLAN

Report Ref.	Recommendation	Priority	Agreed Action	Implem. Date	Responsible Officer
2.2	We recommend that the roles of the Health and Safety Team and operational management be clarified, to reflect the division of responsibilities envisaged by the policy.	High	Roles will be reviewed and responsibilities clarified, and reflected in job descriptions and forward job plans	End July 2010	Director of People and Organisational Development/Director of Customer Services.
2.4	We recommend that the Health and Safety Policy should be reviewed and amended to ensure that the arrangements in place are correctly stated.	High	Policy will be reviewed following consultation with staff and the trade union and reissued to staff	End July 2010	Health and Safety Advisor
2.7	We recommend that the register of policies should include information on their projected review dates.	Medium	Projected review dates will be included on the existing register	End July 2010	Health and Safety Advisor
2.11	We recommend that the tasks in the service plan should be separated into specific initiatives and ongoing work. The basis of the prioritisation of the tasks should be given to aid	Medium	Once roles and responsibilities have been clarified, this will be reflected in individual forward job plans	End July 2010	Director of People and Organisational Development/Director of Customer Services.

ACTION PLAN

Report Ref.	Recommendation	Priority	Agreed Action	Implem. Date	Responsible Officer
	understanding.				
2.15	We recommend a timetable should be developed for introducing the performance indicators on corporate Health and Safety.	Medium	The development and implementation of performance indicators on corporate health and safety will be undertaken	End September 2010	Health and Safety Advisor/Head of Strategy and Engagement
3.5	We recommend that appropriate systems are put in place to monitor the performance of the RGE contract.	Medium	The contractor presently records the information and it is also stored on Hummingbird when the invoices come in. The TMO are able to extract this information. A review of the process is being undertaken with the contractor on 6 July with a view to finalising these KPI's	End August 2010	Assistant Director of Asset Investment and Engineering.
3.5	We recommend that a formal post implementation review of this contract is performed.	Medium	An annual review will be undertaken at the end of the first year August 2010.	Beginning of August 2010	Assistant Director of Asset Investment and Engineering.
4.4	We recommend that consideration should be given	Medium	Keystone Asset management system will	End of August 2010	Assistant Director of Asset

ACTION PLAN

Report Ref.	Recommendation	Priority	Agreed Action	Implem. Date	Responsible Officer
	to using information from existing asbestos surveys to provide information and advice on similar properties.		Extrapolate data from known asbestos information to matching dwellings. It is hoped to go live at the end of August.		Investment and Engineering.
4.5	We recommend that the feasibility of procuring asbestos management services on a contractual basis should be investigated.	Medium	The TMO are looking to recruit a new Asset and Investment manager who will also act as Asbestos consultant and will look to procure this service.	August 2010	Assistant Director of Asset Investment and Engineering.
Recommendations brought forward from the 2008/09 Legionella Management report					
2.3	We recommend that the 2009/10 Annual Health and Safety report should include statement the Legionella management activities that have been achieved in the year, and how this fits in with the overall work programme.	High	We had already notified that this was intended to take place.	End July 2010	Health and Safety Advisor
3.2	We recommend that the TMO should draft and maintain a	Medium	Develop Legionella Module with Keystone	April 2011	Asset investment Manager

ACTION PLAN

Report Ref.	Recommendation	Priority	Agreed Action	Implem. Date	Responsible Officer
	comprehensive list of the Legionella Management structures in operation within all relevant premises when the Keystone system is introduced.				
3.3	We recommend that the TMO should define the responsibilities of the Appointed Persons for its facilities, and provide the training required to perform this role competently.	Medium	Develop Legionella management plan indicating key roles and responsibilities within the TMO	End September 2010	Engineering Services Manager
6.2	We recommend that all Appointed Persons should be reminded to check that appropriate action is taken in respect of defects identified during routine inspections and that this action is adequately documented in the log books.	Medium	See above	End September 2010	Engineering Services Manager