

COMMITTEE	<b>AUDIT AND GOVERNANCE COMMITTEE</b>
DATE	<b>8 FEBRUARY 2018</b>
TITLE	<b>REPORT OF THE CONTROLS IMPROVEMENT WORKING GROUP</b>
PURPOSE OF THE REPORT	<b>TO REPORT ON THE MEETING HELD ON 22 JANUARY 2018</b>
AUTHOR	<b>COUNCILLOR RICHARD MEDWYN HUGHES</b>
ACTION	<b>TO ACCEPT THE REPORT AND CONSIDER THE RECOMMENDATIONS</b>

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## **1. INTRODUCTION**

1.1 A meeting of the Working Group was held on 22 January 2018 with the Chair of the Audit and Governance Committee, Councillor Richard Medwyn Hughes, Vice-chair, Councillor John Brynmor Hughes (Vice-chair) and Councillors Angela Russell and Berwyn Parry Jones, Sharon Warnes (Lay Member), Luned Fôn Jones (Audit Manager) and Bleddyn Rhys (Audit Leader) present.

1.2 The reports that the Working Group addressed were:

<b>TITLE</b>	<b>DEPARTMENT</b>	<b>AUDIT OPINION</b>
Disposal of Confidential Waste – The Use of Red Sacks and Shredders	Corporate	B
Health and Safety – Ysgol Dyffryn Ardudwy	Education	B
Health and Safety – Primary Schools	Education	n/a

1.3 Officers attended to discuss the individual reports.

## 2.1 Disposal of Confidential Waste – The Use of Red Sacks and Shredders

### 2.1.1 The main findings of the audit were as follows:

*The relevant expenditure code on the financial ledger was checked for payments made to Antur Waunfawr. However, there was no way to distinguish between red sack services and Antur Waunfawr's other services, but overall expenditure seems to have increased steadily. This supports findings by the Information Unit, which believes that the use of red sacks has gradually increased due to recent office relocations. Although there is an increase in the use of red sacks, their use for office relocations is in line with the Council's policy.*

*A visual inspection of offices in Pencadlys and Plas Llanwnda was carried out to identify open red sacks that are not locked away. This inspection was carried out in the evening to identify where the sacks are kept overnight. In the vast majority of offices visited, arrangements were appropriate, but examples were found where red sacks were kept open and not locked away. It seems that some offices do not adhere to the Confidential Waste Disposal Policy. By disposing of confidential day-to-day waste in open red sacks rather than shredding it, the Council unnecessarily retains information, in an obvious red bag which clearly states that it contains confidential waste. It should be noted that the public does not have access to any of these premises.*

2.1.2 Helen Parry, Information Manager was welcomed to the meeting to discuss the audit.

2.1.3 The Audit Manager provided a summary of the audit findings. The Audit Manager stated the importance of disposing confidential waste in a proper manner, especially taking into account that the General Data Protection Regulation will come into force on 25 May 2018.

2.1.4 The Audit Manager explained that the Information Management Service had made several efforts to raise the awareness of Council staff on the importance of proper confidential waste disposal with several e-mails circulated along with bulletins on the Council's intranet pages. The Audit Manager displayed the latest bulletin to the members of the Working Group. The Audit Manager stated that the audit opinion category was not a reflection on the efforts of the Information Management Service but rather the lack of proper action by the Council's staff.

2.1.5 A discussion took place on the steps taken by the Information Service since the publication of the report. The Information Manager explained that the Head of Corporate Support had referred pictures of the open red sacks and their locations to all Council Heads of Department for implementation. It was explained that it was possible to encourage departments to invest in more shredders, and to keep them in prominent locations such as near the photocopiers. It was noted that saving money was not the intention of a reduction in the use of red sacks, as the cost of using red sacks is generally relatively low.

- 2.1.6 However, following the findings of this audit and similar audits carried out in the past, concern was expressed that there was insufficient awareness amongst officers of the risks and the responsibility of individuals to protect information, despite the efforts of the Information management Service. Working Group members enquired what would be the implications if the use of red sacks would be terminated, and force the services to dispose of confidential waste by the sole use of a shredder. It was explained that this would not be practical as the use of red sacks for the proper purpose was an efficient way of disposing waste, that is, for bulk disposal where the sacks are sealed immediately before disposal. However, **the Information Manager agreed to select a department to pilot arrangements whereby requests for red sacks will be challenged to ensure that they have a specific purpose and confirmation that the sacks will be disposed of as soon as possible.** The audit findings did not highlight that some departments/services appear better or worse than others, therefore it was agreed to select a department where reducing the use of red sacks will be more practical, and discussions will be held in due course.
- 2.1.7 Both the Working Group and Internal Audit acknowledged the effort of the Information Management Service, and also stating that work is underway to ensure compliance with the General Data Protection Regulation.
- 2.1.8 The Information Manager was thanked for attending the meeting and for explaining the current situation and the work programme planned in respect of the General Data Protection Regulation which will come to force in 2018.

## **2.2 Health and Safety – Ysgol Dyffryn Ardudwy**

### **2.2.1 The main findings of the audit were as follows:**

*It was generally seen that Ysgol Dyffryn Ardudwy complied with Health and Safety requirements but the following aspects needed to be tightened to mitigate the risks highlighted.*

*The School has a Health and Safety Policy which is reviewed annually. However, the policy is kept electronically as they are a Green School, which means that staff do not have access to it.*

*The School did not have a copy of the Corporate Health, Safety and Welfare Policy (2015), a copy of the current policy was sent to the Head Teacher's attention.*

*The Head Teacher has not attended the IOSH Managing Safely training, this is a general weakness for all Gwynedd schools, and is not a reflection of the management of Ysgol Dyffryn Ardudwy. Arrangements are now in progress by the Education Department to ensure that all primary Head Teachers receive this training.*

*A sample of the school's risk assessments were checked to ensure that the school have essential/generic assessments that have been identified by the Council and that they are current. Assessments were found to be in place for each of the risks examined but were not reviewed annually.*

*The Head Teacher expressed concern that the Caretaker had not received any training as to how to carry out the fire safety tests before commencing in her role. It is noted that the Caretaker is now aware of how to carry out these tests.*

*There was no Fire Risk Assessment at the school, a copy was received from an officer from the Property Unit following the visit and was forwarded to the Head Teacher. The School did not have a Fire Management Plan, the Head Teacher was informed of the need to complete the plan with the school's details and was sent a current template following the visit.*

*All fire safety equipment were not recorded in the Fire Log Book. The Head Teacher was informed of the need to do this in the current Fire Log Book.*

*Fire safety tests were checked on the day of the visit and it was found that records of escape route tests had not been maintained. The Head Teacher reported that the routes were kept clear but no weekly test was carried out. In addition, fire extinguishers were tested monthly rather than weekly. The school did not use the current Fire Log Book to record the tests, the Head Teacher was notified of this and a copy was sent following the visit.*

*When checking the 'Register of Flushing for Little Used Water Outlets' it was found that the last test had been held two and a half weeks ago rather than weekly.*

*The school has arrangements in place for recording accidents / injuries. Three members of staff have a first aid qualification and inform parents/ guardians of any incidents. For more serious accidents, the school uses 'Reporting an accident or incident that is the case for minor serious injuries for a Pupil' forms for pupils and uses the HS11 (2004) book for staff to report to the Health and Safety Unit. It was explained that these forms are now out of date and that there is a need to use the 'Accident Recording Book, Disease, Dangerous Occurrence or Violent Incident' HS11 (2014) to record any accidents/incidents from now on. The HS11 (2014) book and the guidelines were already in the school.*

*The current version of the Asbestos Management Plan was not in the school, a copy was sent following the visit. In addition, an essential/generic risk assessment list was sent to the Head Teacher in order to identify other risk assessments that are needed in the school.*

2.2.2 Ann Jones, the Head teacher of Ysgol Dyffryn Ardudwy and Owen Owens, Schools Senior Manager were welcomed to the meeting.

2.2.3 The Audit Manager outlined the main findings of the audits which included:

- Lack of IOSH Managing Safely training
- Failure to record accident on the current HS11 forms
- Failure to review risk assessments annually
- Lack of fire assessment and fire plan at the school
- Failure to test fire extinguishers on a weekly basis
- Failure to record fire safety equipment
- Failure to run taps that are used rarely for legionella management purposes

- 2.2.4 The content of the report was discussed with the Head teacher, with the Schools Senior Manager reinforcing the comments in the context of the Education Department's arrangements, which were also subject to specific discussion on the agenda of the Controls Improvement Working Group's agenda.
- 2.2.5 The Head teacher explained that a number of the agreed actions had now been implemented and that she is now attending IOSH training, following an event invitation from the Education Department. The Schools Senior Manager explained that the receipt of the Small and Rural Schools Grant enabled the Department to fund the courses, and it is expected that every Head teacher will attend the course as a requirement of their role as Site Managers.
- 2.2.6 The Head teacher showed a copy of the HS11 book in its current format as proof that she was using the current forms, but she did acknowledge that the older book was in use at the school on the day of the audit visit.
- 2.2.7 The Head teacher explained that she had started to review and update the risk assessments and that the task will be completed in the near future. However, although the Head teacher acknowledged the comments of the report, she stated that a Head teacher's workload is a barrier to maintain everything up to date.
- 2.2.8 There was considerable discussion about the role and accountability of the Caretakers, such as the arrangements for equipment testing. The Schools Senior Manager explained that schools caretakers, as the schools' catering staff, are employed by the Provider Unit and that Health and Safety responsibilities were incorporated within their job description. However, accountability for their work is unclear as the Provider Unit is responsible for the quality of their work, but the Head teacher is the Site Manager. **The Audit Manager stated that although caretakers undertake specific tests in relation to Health and Safety, the Head teacher has responsibility as site manager to occasionally verify the records maintained by the caretaker.**
- 2.2.9 The Head teacher of Ysgol Dyffryn Ardudwy was thanked for providing the Working Group on the developments since the release of the final report and the arrangements currently underway.

## **2.3 Health and Safety – Primary Schools**

- 2.3.1 The decision of the Audit and Governance Committee in its meeting held on 30 November was to invite relevant officers from the Education Department and the Health and Safety Service to the meeting. However, a representative from the Health and Safety Service was not present but the Schools Senior Manager was in attendance on behalf of the Education Department.

- 2.3.2 The Audit Manager presented a document highlighting the risks identified in the six schools visited during 2017-18, and expanding on the Department's general arrangements highlighted during the discussion on the Health and Safety – Ysgol Dyffryn Ardudwy report.
- 2.3.3 In response to a question from the Working Group, the Schools Senior Manager explained what training is available to Head teachers, especially new Head teachers in relation to Site Management. He explained that site management is not part of the National Professional Qualification for Headship (NPQH) but that there is already a mandatory Site Management course for Head teachers, but that the Education Department has already identified the need for an IOSH course and that the Small and Rural Schools Grant offers a great opportunity to act.
- 2.3.4 The impression amongst members of the Working Group is that site management was not prioritized by Head teachers, despite the importance of the Health and Safety of pupils and staff. Members of the Working Group expressed that it was essential that the arrangements needed to be as easy and simple as possible, with strong communication between the Council and the Schools in order to support Head teachers whom of course come from an Educational background and not from site management.
- 2.3.5 The Audit Manager enquired if plans were in hand to share the Audit findings with all the primary schools in Gwynedd. The Schools Senior Manager stated that the IOSH courses would be expected to cover aspects of the report and that newsletters were distributed and business meetings held, but due to the importance of this area, it was expressed that a stronger message would be beneficial. **The Schools Senior Manager asked the Audit Manager to draft a letter for the schools on the finding of the Health and Safety – Primary Schools audit. The Audit Manager agreed to this request and that the letter will be sent to the Schools in the name of the Schools Senior Manager and the Controls Improvement Working Group.**
- 2.3.6 The Schools Senior Manager was the open discussion and the plans to improve controls.