



Cairngorm National Park Authority
Health & Safety
Internal Audit 2006/07
August 2007
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Contents		Page
Section 1	Executive summary	1
Section 2	Detailed findings and recommendations	5
Section 3	Statement of responsibility	12

Appendices

Appendix A	Main issues noted in the external risk assessment conducted by First Safety	13
Appendix B	Main issues noted in the external fire assessment conducted by First Safety	14
Appendix C	Personnel interviewed	15

Section 1 - Executive Summary

1.1 Introduction

This internal audit of Health & Safety is part of our programme of operational reviews approved by the Audit Committee. We have reported by exception only, where no comment is made the results of our work indicate that the control objective was being met.

1.2 Background

The Health & Safety at Work Act (1974) is the primary legislation governing the health and safety of employees, contractors and the visitors within the workplace. It places a duty on employers to ensure that the workplace is a safe environment for all. The principal requirements are that each organisation has a formal health and safety policy that is communicated to all members of the workforce and that the workforce is consulted in the development of such policy.

The senior management of an organisation have a legal responsibility to comply with all health and safety legislation or risk prosecution. To assist in this matter Cairngorm National Park Authority's (CNPA) own health and safety policy states 'it is the responsibility of the management team with regard to health and safety to appoint a safety representative from within the staff to assist the Heads of Group in the planning and organisation of the health and safety management system and to ensure that adequate training is provided.'

CNPA is part of the On the Ground Initiative, a Scottish Executive initiative for public sector bodies encouraging collaboration and shared services between organisations. The Health and Safety grouping within this initiative keeps them up to date with any changes in Health & Safety policy and also informs them of any changes that they are required to make to working practices.

CNPA has an annual fire maintenance contract in place with Chubb, which covers a review and service of the fire alarms and fire extinguishers on site.

In the last twelve months independent Health & Safety risk assessments and Fire Safety assessments have been carried out on the properties of CNPA.

1.3 Approach

This internal audit incorporated an assessment of the organisation's structure governing health and safety and an assessment of the controls in place to ensure the identification of health and safety risks, the timely reporting of risks and performance, and the actions taken to address these risks. Our approach was to consider how the organisation manages its Health & Safety responsibilities. We tested the procedures and activities in place by reviewing appropriate documentation and through discussion with relevant members of staff and the testing of key controls.

Section 1 - Executive Summary (continued)

1.4 Overall Assessment

The following table summarises the areas of our review and our overall assessment of the control environment against each objective:

Area of Control	Overall Assessment	Report Ref.
CNPA has appropriate senior management overview of health and safety matters across the organisation.	***	2.7
Key personnel have been delegated responsibility to identify health and safety risks and report these to an appropriate body.	***	2.7
CNPA is made aware of changes in Health & Safety legislation and reacts to it.	****	
A risk assessment process is undertaken for all activities conducted to identify Health & Safety risks.	**	2.1, 2.2, 2.4, 2.5 & 2.6
Action is taken to mitigate health and safety risks.	*	2.1, 2.2, 2.3, 2.4, 2.5 & 2.6
A Health & Safety incident log is maintained and reported to the Board.	****	

Key:

- **** Arrangements accord with good practice and are operating satisfactorily (recommendations are in respect of minor matters).
- *** Adequate arrangements are in place, but certain matters noted as requiring improvement.
- ** Arrangements in place offer scope for improvement.
- * Inadequate level of control and unacceptable level of risk.

In total, we identified **seven** recommendations as follows:

Description	Priority	Number
Major issues that we consider need to be brought to the attention of Management and the Audit Committee	1	1
Important issues which should be addressed by management in their areas of responsibility	2	5
Minor issues where management may wish to consider our recommendations	3	1
	Total	7

Section 1 - Executive Summary (continued)

1.5 Overall Conclusion

We can conclude that a number of significant weaknesses exist with regard to the adequacy and effectiveness of the current Health & Safety environment within CNPA. We have summarised the weaknesses and issues below and further details of our findings and recommendations can be found within **Section 2** of this report.

Our key findings are as follows:

- The independent fire risk assessment of the CNPA premises was reported on 07/03/06 and found that CNPA was only 58% compliant with best practice. While action has been taken to resolve many of the 143 issues highlighted in these reports, and evaluation of other issues indicates monitoring rather than action is required, no formal record of this has been made by officers. These reports had a target completion date of 01/10/06. We have raised a priority one recommendation. (*Recommendation 2.1*);
- In the last twelve months health & safety risk assessments have been undertaken at all CNPA properties by an external consultant from First Safety. These reports highlighted a number of issues that required management attention. Implementation dates for the addressing these points were agreed, but have passed without any record being made of appropriate action having taken place. These reports identified 78 recommendations over the three CNPA premises requiring immediate action, although some risks have been identified more than once within each report. (*Recommendation 2.2*);
- Observational testing of the CNPA offices in Grantown-on-Spey revealed that several fire doors were wedged open. This issue was also noted as part of the fire risk assessment that was undertaken by an external consultant. (*Recommendation 2.3*);
- CNPA currently has eight fire marshals, three of whom have not received training appropriate to the post. (*Recommendation 2.4*);
- Portable Appliance Testing (PAT) has been carried out, but not on a regular basis. Best practice suggests that this should be undertaken annually. Hardwire testing has not been carried out at any of CNPA's premises in line with the Institute of Electrical Engineers (IEE) Regulations, although it was noted that numbers 15 & 16 The Square, Grantown on Spey were rewired within the last 2 years. (*Recommendation 2.5*);
- Not all members of staff have completed the personal and generic risk assessments or Ergonomic and Workstation Assessments and manual handling. Twenty-seven of sixty-five members of staff have completed the personal/generic risk assessments and thirty-six of sixty-five have completed the Ergonomics and Workstation assessment. (*Recommendation 2.6*);
- Although it is recognised within CNPA who is the responsible individual for Health and Safety, no one has been officially appointed to the role. The CNPA Health and Safety Policy states that 'it is the responsibility of the management team with regard to health and safety to appoint a Safety Representative from within the staff to assist the Heads of Group in the planning and organisation of the Health and Safety Management System and to ensure adequate training is provided.' (*Recommendation 2.7*).

Section 1 - Executive Summary (continued)

1.6 Acknowledgements

We would like to take the opportunity to thank all of the CNPA staff involved in assisting us in this audit. The findings and recommendations in this report were discussed with the Health & Safety representative and Head of Corporate Services at the conclusion of our fieldwork.

To assist management in using our reports, we categorise our recommendations according to their level of priority as follows:

- **Priority One** - Major issues that we consider need to be brought to the attention of management and the Audit Committee,
- **Priority Two** - Important issues which should be addressed by the management in their areas of responsibility,
- **Priority Three** - Minor issues where management may wish to consider our recommendations.

Section 2 - Detailed Findings and Recommendations (continued)

2.1 Fire Safety Assessments

Finding	Recommendation	Rationale	
<p>An external consultant was commissioned to undertake a fire risk assessment of all the premises of CNPA. The report was published on 07/03/06 and found that CNPA was 58% conformant with best practice.</p> <p>While action has been taken to resolve the majority of the issues highlighted in these reports, no formal record of action or further risk evaluation has been made. These reports had a target completion date of 01/10/06.</p>	<p>Action plans should be developed, monitored and reported to the Management Team on a quarterly basis and thereon to a suitable governance committee.</p>	<p>Acting on the issues will ensure that fire safety procedures and activities safeguard the workforce.</p> <p>Examples of the most significant issues in the report are as follows:</p> <ul style="list-style-type: none"> • Means of escape are not clearly signed and kept free from obstruction; • Not all fire doors can be immediately opened from the inside without a key; • Users of fire extinguishers have not been adequately trained. 	
Management Response		Responsibility/ Deadline	Priority
<p>In discussion with the Health and Safety representative, and following a walk-through of premises with him, the Head of Corporate Services has ascertained that action has been taken on issues highlighted in the reports. However, it is also clear that no written record has been made of action taken in addressing issues raised, or of further evaluation of risks entailed; the potential to take action to mitigate risk or the decision to accept minor risks and monitor the situation. These records will be established, a health and safety monitoring log established, and these will be reviewed by the Head of Corporate Services and Health and Safety representative on a quarterly basis.</p> <p>The Business Services Manager has also initiated a monthly walk-through of the premises to ensure appropriate policies are being adhered to and make an inspection to identify any hazards and / or maintenance issues.</p> <p>Given this is a priority one recommendation, and there are a number of other recommendations made, I recommend an early follow up report on this is made to Committee by the internal auditors.</p>		<p>Health and Safety Representative (Business Services Manager) /</p> <p>End August 2007 and ongoing</p>	<p>One</p>

Section 2 - Detailed Findings and Recommendations

2.2 Health & Safety Risk Assessments

Finding	Recommendation	Rationale	
<p>In the last twelve months health & safety risk assessments have been undertaken at all CNPA properties by an external consultant from First Safety. These reports highlighted a number of issues that were found to be “fairly low risk” although they do require management attention, the most significant of these can be found at Appendix A. Implementation dates for addressing these points were agreed, but have passed without any action being recorded.</p> <p>These reports identified a range of additional controls over the three premises requiring immediate action, although some risks have been identified more than once within each report.</p>	<p>The deficiencies in relation to Health & Safety risks should be actioned by CNPA at the earliest opportunity. Where it is not deemed practical to do so or if there are resource constraints then this should be reflected in the organisation’s risk register.</p>	<p>Staff and visitors within the workplace may be at undue risk if the actions are not addressed.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>In discussion with the Health and Safety representative, and following a walk-through of premises with him, the Head of Corporate Services has ascertained that action has been taken on issues highlighted in the reports. However, it is also clear that no written record has been made of action taken in addressing issues raised, or of further evaluation of risks entailed; the potential to take action to mitigate risk or the decision to accept minor risks and monitor the situation. These records will be established, a health and safety monitoring log established, and these will be reviewed by the Head of Corporate Services and Health and Safety representative on a quarterly basis. The Business Services Manager has also initiated a monthly walk-through of the premises to ensure appropriate policies are being adhered to and make an inspection to identify any hazards and / or maintenance issues.</p>		<p>Health and Safety Representative (Business Services Manager) / End August 2007 and ongoing</p>	<p>Two</p>

Section 2 - Detailed Findings and Recommendations (continued)

2.3 Fire Doors

Finding	Recommendation	Rationale	
<p>Observational testing of the offices in Grantown-on-Spey revealed that several fire doors were wedged open. This issue was also noted as part of the fire risk assessment that was undertaken the external consultant on 13/04/06.</p>	<p>Staff should be reminded that designated fire doors must remain closed at all times when not in use.</p> <p>If there is a requirement for doors to remain open then a solution should be sought that ensures the doors close automatically when the fire alarm sounds.</p>	<p>This is in direct contravention of the prevailing Health & Safety Legislation and negates any benefits that are to be derived from the installation of fire doors.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>All office doors are designated as “fire doors”. However, in order to overcome some of the hurdles posed to integrated working between officers and Groups by the office geography and improve communications between staff, which comprises a number of offices accommodating between 1 and 3 staff, it has become accepted practice to wedge office doors open.</p> <p>It is agreed that all fire doors for circulation areas must be kept closed at all times, in order to control the spread of fire should any such event occur.</p> <p>The cost of automatic door closures is likely to be prohibitive. However, closure of all fire doors in circulation areas will significantly mitigate the risk of fire spreading rapidly from high risk areas.</p>		<p>Business Services Manager (to enforce closure of fire doors in circulation areas by all staff) /</p> <p>End September 2007 and ongoing</p>	<p>Two</p>

Section 2 - Detailed Findings and Recommendations (continued)

2.4 Training of Fire Marshals

Finding	Recommendation	Rationale	
<p>CNPA currently has three fire marshals from a total of eight who have not received training appropriate to the post.</p>	<p>All fire marshals should be given appropriate training in respect of fire prevention and control and evacuation procedures as soon as is practicable.</p> <p>CNPA should consider if the training of all staff in fire awareness and prevention would be of benefit to the organisation.</p>	<p>If these individuals have not received appropriate training then they will be unaware of what is expected of them should a fire take hold in the premises of CNPA.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>The finding arises from recent turnover in staffing, which will always be a feature of an organisation – hence the decision to have 8 marshals for an organisation of only 60 staff to ensure there will always be sufficient trained staff in place.</p> <p>Fire Marshal training has now been held (July 2007) and all staff therefore now up to date. Annual programme of training to be put in place to ensure skills are up to date and cover any future personnel changes.</p> <p>All line managers have received health and safety training, with the intention that this filters down through the organisation and helps support implementation of policy and procedures.</p>		<p>Business Services Manager /</p> <p>Finding already actioned, with ongoing responsibility for annual fire marshal update training.</p>	<p>Two</p>

Section 2 - Detailed Findings and Recommendations (continued)

2.5 Electrical Testing

Finding	Recommendation	Rationale	
<p>Portable Appliance Testing (PAT) has been carried out, but not on a regular or formal basis that is scheduled and recorded.</p> <p>Hardwire testing has not been carried out at any of CNPA's premises, although it was noted that numbers 15 & 16 The Square, Grantown on Spey were rewired within the last 2 years. (Hardwire testing involves assessment of the electrics of a building.)</p>	<p>A formal schedule of Portable Appliance Testing should be developed and the results recorded to ensure that all electrical devices are subject to regular testing.</p> <p>Hardwire testing should be scheduled and conducted at the earliest convenience for the properties that have not had their wiring replaced in the last two years.</p>	<p>The organisation must ensure that all electrical devices in use within CNPA premises meet the required standards of safety and performance.</p> <p>If any incidents occur with the wiring in any of the buildings that have not had wiring replaced and CNPA have not considered this as part of their Health & Safety procedures, they may have no recourse. (It is generally accepted practice to have all hardwiring reviewed at least every five years).</p>	
Management Response		Responsibility/ Deadline	Priority
Recommendations accepted.		Business Services Manager / December 2007	Two

Section 2 - Detailed Findings and Recommendations (continued)

2.6 Personal Risk Assessments

Finding	Recommendation	Rationale	
<p>Not all members of staff have completed personal and generic risk assessments or Ergonomic and Workstation Assessments, or for manual handling.</p> <p>27 of 65 members of staff have completed the personal/generic risk assessments and 36 of 65 have completed the Ergonomics and Workstation assessment.</p> <p>The results of training received by staff are recorded in the Snowdrop HR system, this can be easily monitored by running off a training received report for staff.</p> <p>Section 4 of the organisation's Health and Safety policy states that 'Risk Assessment is central to the arrangements for the management of the Board's Health and Safety Policy'.</p>	<p>CNPA must ensure that all staff complete their personal and generic risk assessments as soon as possible in order to comply with Health & Safety policy.</p>	<p>At present CNPA is failing to comply with its own Health & Safety policy.</p> <p>The organisation is at risk of non-compliance with accepted policy, therefore placing staff welfare at risk.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Recommendation accepted. Reminder to complete or update personal / generic risk assessments will be issued as part of upcoming mid-year assessment process; implementation monitored and reinforced through Management Team.</p>		<p>Business Services Manager with HR Manager / October 2007</p>	<p>Two</p>

Section 2 - Detailed Findings and Recommendations (continued)

2.7 Safety Representative

Finding	Recommendation	Rationale	
<p>Although it is recognised within CNPA who the responsible individual for Health and Safety is, no one has been officially appointed to the role.</p> <p>The CNPA Health and Safety Policy states that ‘it is the responsibility of the management team with regard to health and safety to appoint a Safety Representative from within the staff to assist the Heads of group in the planning and organisation of the Health and Safety Management System and to ensure adequate training is provided.’ This has not happened.</p>	<p>The appointment of a Safety Representative should be formalised and the appointment conveyed to all staff of CNPA.</p>	<p>CNPA is not currently complying with its own Health & Safety policy. Page 6 of CNPA’s health and safety policy states that with regards to health and safety one of the main responsibilities of the Chief Executive and the Management team is to ‘appoint a Safety Officer from within the staff to assist Heads of Department in the planning and organisation of the health and Safety Management System and ensure adequate training is provided.’</p>	
Management Response		Responsibility/ Deadline	Priority
<p>This has been done, through incorporating agreed targets for health and safety into the Business Services Manager’s annual appraisals, and also communicated to staff (initially by Staff Consultative Forum paper 8, May 2005). The Business Services Manager has also undertaken agreed Health and Safety Training – the Institute of Safety and Health “Managing Safely” one-week course.</p> <p>Acknowledged that the job description for the role requires to be updated.</p>		<p>Head of Corporate Services (for update of job description) / March 2008</p>	<p>Three</p>

Section 3 - Statement of Responsibility

Statement of Responsibility

We take responsibility for this report which is prepared on the basis of the limitations set out below.

The matters raised in this report are only those which came to our attention during the course of our internal audit work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of internal audit work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices. We emphasise that the responsibility for a sound system of internal controls and the prevention and detection of fraud and other irregularities rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify all circumstances of fraud or irregularity. Auditors, in conducting their work, are required to have regards to the possibility of fraud or irregularities. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud. Internal audit procedures are designed to focus on areas as identified by management as being of greatest risk and significance and as such we rely on management to provide us full access to their accounting records and transactions for the purposes of our audit work and to ensure the authenticity of these documents. Effective and timely implementation of our recommendations by management is important for the maintenance of a reliable internal control system.

Deloitte & Touche LLP

August 2007

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Appendix A - Main issues noted in the external risk assessment conducted by First Safety

Main issues noted in the external risk assessments conducted by First Safety: -

1. Safe access and progress must be available and consideration must be made for people with disability
2. All portable electric equipment must have portable appliance testing carried out annually
3. High level storage must not be used
4. All boilers and other plant must have a suitable maintenance policy in place. All work must be carried out by a competent person and all checks recorded
5. All heat sources must be appropriately guarded
6. All windows must have restrictors fitted to prevent them opening more than 100mm
7. All work carried out by contractors must be risk assessed. This includes work carried out by window cleaners. All contractors must supply their own risk assessment, method statement and insurance policy
8. All shelving units must be secured to the wall
9. The area of low head room outside the boardroom must be clearly signed on approach and marked with hazard warning tape.
10. All mains electrics must have cyclical mains testing carried out in accordance with IEE regulations. All work must be carried out by competent person and records kept. All electric cupboards and plant rooms must be kept secure at all times
11. No one will work at height without a suitable and sufficient assessment carried out in accordance with The Work at Height Regulations 2005. All access equipment must be assessed under this regulation as well.
12. All substances must be assessed under The Control of Substances Hazardous to Health Regulations 2002.
13. A risk assessment and control procedure must be put in place to control the risk of Legionella in the water supply
14. All floor area used to walk on must be kept clear of items. Storage must only take place in designated areas. All cables must be secured away from walkways. All floor coverings must be secured and regularly inspected. All spillages must be cleared up immediately and wet floor signs used as required
15. Senior management must ensure that suitable security measures are in place for the building and that staff are not in danger.
16. A suitable number of HSE Approved First Aiders must be in place within the building. A suitable number of first aid kits must be located in conspicuous places throughout the site.

Appendix B - Main issues noted in the external fire assessment conducted by First Safety

Main issues noted in the external fire assessments conducted by First Safety: -

1. Some areas only have one route of escape from the building
2. Means of escape are not clearly signed and kept free from obstruction
3. Not all fire doors can be immediately opened from inside without a key
4. When unoccupied, all office and compartment doors are not kept shut
5. Emergency lighting has not been installed so exits can be accessed safely
6. The existing means of fire detection cannot discover a fire quickly enough to raise an alarm in time for all occupants to escape to a safe place
7. Unoccupied parts of the premises are not covered by fire detection
8. Users of fire extinguishers have not been adequately trained

The fire report runs to around 30 pages and states that CNPA is only 42% compliant with fire safety regulations.

Appendix C - Personnel Interviewed

- **Andrew Rinning –Health & Safety Representative**
- **Francesca Scott - Human Resource Manager**
- **Morag James - Corporate Services Administration Officer**