

## Health and Safety – Annual Report 2017/18

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Wards affected: All

### PROPOSED DECISION

That the health and safety annual report for 2017/18 be noted.

### Corporate Implications

The Council has a duty to conform to the requirements of the Health and Safety at Work Act 1974, to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees at work and the health and safety of others affected by its undertakings, also the general requirements of the Management of Health and Safety at Work Regulations 1999.

### Executive Summary

1. Overall 2017/18 has been a relatively quiet year for health & safety, with a low number of accidents and incidents. Good progress has been made to tackle the relatively few risk areas that do exist, and all WDC service areas have been active to ensure that health & safety issues in their areas have been well managed.
2. The vast majority of the agreed actions on the Health & Safety work programme for 2017/18 have been completed (see Appendix 1 for more details). The exceptions have been the introduction of new software for accident reporting and undertaking DSE Assessments. Progress on implementing these 2 new systems has been suspended as a result of the decision by Bucks County Council not to renew the Service Level Agreement with WDC to provide a health and safety service beyond 31 March 2018.
3. As a result of the decision by Bucks CC we have explored a range of options to ensure that continuing H&S support is in place during 2018/19. After considering 3 separate proposals, we have decided to enter a partnership with Aylesbury Vale District Council from 1<sup>st</sup> April 2018, for a year initially with the opportunity to develop a closer working partnership thereafter.
4. During 2017/18 we have continued to ensure that all our policies are fully up to date. The Council's overarching Health and Safety Policy was reviewed and signed by Karen Satterford in September 2017. A range of other H&S policies have also been reviewed and issued over the last year.
5. A key risk area has been identified around ensuring that health & safety risks in external WDC premises are fully covered. We have therefore developed an initial health & safety checklist for Property Managers to use, and we have also run a

workshop with them to help clarify responsibilities for health and safety between Facilities Management and Property Managers.

6. In December 2016 it was agreed to review the health & safety management arrangements within the council. The new arrangements have worked well during 2017/18, but a recent Health and Safety Audit has identified the need for strengthened health and safety training for Heads of Services and Directors. This will be arranged during 2018.
7. All WDC service areas produced health & safety action plans during 2017/18, and progress on these has been reviewed at quarterly management meetings. Progress on all service plans is virtually complete, and work is now underway to complete new plans for 2018/19 by the end of May 2018
8. 2017/18 has been a quiet year for accidents and incidents with a reduction from 2016/17. Q4 was particularly quiet, with no reported accidents or near misses. There were also no additions to the Cautionary Contact Register this last quarter.
9. There have been no further complaints to Corporate Health and Safety from staff parking in Easton Street Car Park following the new interventions by Parking Services to deter rough sleepers. However the problems with drug users and dealers using the toilets remains.

### **Sustainable Community Strategy/Council Priorities - Implications**

10. People – The Health & Safety at Work Act recommends that an effective management structure and arrangements are in place delivering the policy, ensuring that all staff are motivated and empowered to work safely and to protect their long term-term health, not simply to avoid accidents.

### **Background and Issues**

#### **Health and Safety Work Programme 2017-18**

11. Following Bucks CC's decision not to renew the Service Level Agreement with WDC, costed proposals were sought for providing a similar service from other local authorities and independent Health and Safety Consultants. It has been agreed that Aylesbury Vale District Council (AVDC) offered the best replacement service at an economic rate. The new service level agreement with AVDC started on 1<sup>st</sup> April 2018, and will run for a year initially with the opportunity to develop a closer working partnership thereafter if it is successful. AVDC will provide a telephone and e-mail helpline, undertake two health & safety audits a year and be available to undertake consultancy work if the WDC corporate Health and Safety team need any additional expertise or support.
12. Detailed progress against the 2017/18 corporate work programme is summarised at Appendix 1. Other information is as follows:
  - The Council's Health and Safety Policy was reviewed and signed by Karen Satterford in September 2017 to acknowledge the Council's responsibility for managing health and safety.
  - The Health & Safety & Wellbeing responsibilities document (Section 1.5 of Health and Safety Policies and Procedures) details the responsibilities of each tier of the Council. This document will need to be re-signed by SMB and

Heads of Services during 2018/19, as several previous signatories have now left the Council.

- The Council's set of Health and Safety Policies and Procedures has continued to be updated. All policies and procedures are readily accessible on the Council's intranet (Wycopedia).
- Following consultation with WDC services a new Driving for Work Policy will be published in the near future. Other policies reviewed and published during 2017/18 are listed below:
  - 1.1 WDC's Health & Safety Policy
  - 1.2 Health and Safety consultation arrangements
  - 2.6a Checklist for Managers Working in Low Risk Environments
  - 2.6b Checklist for Heads of Service and Property Managers
  - 3.3 Fire safety in all Council premises
  - 4.3 Use of LPG cylinders & appliances
  - 6.1 Display Screen assessment (DSE)
  - 7.4 Management Guidance for the use of the Ken Morgan Room
  - 8.2 Blood borne diseases
  - 8.3 Work related infectious diseases
  - 8.6 Illness and infections
  - 8.7 Working outside in the summer
  - 9.4 Control of contractors
  - 9.11 Christmas safety tips
  - 9.12 Driving at work
  - 10.6 Hand arm vibration

**13** A checklist for managers has been produced (section 2.6b Health and Safety Policies and Procedures) clarifying the responsibilities between Services/Heads of Service/Property Managers and Facilities Management to manage health and safety issues in properties where the Service is the duty holder. A workshop for Property Managers was held on 10 April 2018 to discuss these issues to ensure health and safety is managed effectively.

**14** The Corporate Health and Safety Team are continuing to undertake individual DSE Assessments as required. 29 assessments have been completed during 2017-18. A range of different workstation accessories have been supplied including 8 vari-desks which allow individuals to stand/sit for part of the day as recommended by Public Health as an aid to well-being. Fifteen new fully adjustable chairs have been supplied, where necessary.

**15** Work to upgrade the lighting levels in main reception is now complete; all workstations are now compliant with the HSE's Lighting at Work guidance.

**16** Strong progress has been made on improving security arrangements on the QVR site during 2017/18. Following a visit and report by the South Eastern Counter Terrorism Unit (SECTU) a number of physical improvements have been made to the QVR site (eg additional perimeter lighting), and a new Bomb Threat & Terrorist Incident policy has been prepared. A wide range of security awareness training has been provided to both WDC employees, and other tenants based on the QVR site. Further work will be needed during 2018/19, but the Council's security arrangements are now significantly improved.

**17** We keep particular attention on a range of key WDC premises, as they tend to have a higher health & safety risk profile. During 2017/18 the following progress has been made:

- Saunderton Lodge was inspected on 9 January 2018. The issues found were mostly housekeeping related. The cross corridor fire doors had the hinge protection removed so that they would latch properly; however, this has introduced a new finger trap risk to young children. The contactor is sourcing different hinge protection so the doors will latch and the hinge protected. A weekly record listing checks of the fire doors, as required by the fire risk assessment remains an outstanding item. Other work to replace the corridor flooring with a surface that can be kept hygienically clean, kitchen units, some double glazed panels and showers has been commissioned by FM.
- Booker Depot: Serco, the waste contractor which occupies most of the site, was audited at the end of November 2017. Following receipt of the action points relevant to Wycombe District Council, Major Projects and Estates (MP&E), Health and Safety (H&S) and DBK (Management Agent) met on 16 January 2018 to discuss the action required and agree a formal response to the Waste Contract Group. A Site Risk Assessment has been drafted, as required by the Auditor and progress made on implementing the other action points.

Booker Depot was re-inspected on 13 February 2018 by the health & safety team, the Estates team and by DBK the site managers, and an action report drafted. There were no major issues but housekeeping remains an issue with some of the tenants. The perimeter fence had been breached leading to the possibility of trespassers accessing the site and a blocked drain had caused standing water to impede the pedestrian walkway and some of the traffic circulation route.

**18** Easton Street Car Park. During 2017/18 the Corporate Health and Safety team and Parking received a number of e-mails from employees concerned for their safety when parking in the Easton Street car park. However, following the introduction of evening foot patrols no further complaints have been received. Rough sleepers are now a very rare occurrence and if found are moved on immediately. The only problem remains with drug users/dealers and the occasional urination on stairs. Parking Services advise that there have been many occasions where males and females have been found in the female toilet cubicles taking drugs and evidence of needles; this also occurs in the male toilets. The security foot patrols remove any unattended drug paraphernalia and any persons not using the facilities appropriately during the evening patrols.

**19** Service Health and Safety Action Plans for 2017/18 have been largely completed. New updated plans for 2018/19 are already underway, and will be completed by end of May 2018

**20** Review of Health & Safety management arrangements – up until December 2016 the Council's health & safety management arrangements included both an Executive Group (consisting of all WDC Heads of Service) and an Operational Group (consisting of service lead representatives from a senior management level). This model had created some duplication between the groups, and so it

was agreed that from January 2017 onwards we would pilot a new arrangement by disbanding the Executive Group, and ensuring that (i) all Operational Group discussions were relayed to the Senior Management Board (SMB) on a quarterly basis, and (ii) that health & safety would be formally considered at all service Department Management Team (DMT) meetings to ensure the full engagement of Heads of Service and other managers.

- 21** This new arrangement is summarised in the diagram at Appendix 2. It has now been in place for a year, and seems to have worked well:
- 21.1 Two independent H&S audits are carried out on different WDC services each year, so that we get an independent assurance of how well all WDC services are addressing H&S. One of the most recent audits (carried out by Bucks CC) has concluded that our H&S management arrangements work well
  - 21.2 The Operational H&S Group is now chaired by the Head of HR, ICT & SSS, and reports quarterly to SMB. A new innovation is the production of an annual H&S report which will be considered by SMB and the Audit Committee each May
  - 21.3 A strong internal framework of corporate work programme and service work programmes is in place. Progress against these targets is monitored regularly, and this report has shown the progress is very good
  - 21.4 Monthly H&S KPI statistics are reported to the Head of HR, ICT & SSS. The frequency and type of accidents, near misses and any violent incidents are regularly collected and analysed
  - 21.5 We have a full set of H&S policies and procedures in place, and these are readily available to all staff on the Council's intranet. A rolling programme of updates is constantly underway
  - 21.6 A full H&S training programme is available for all staff to access.
- 22** The recent independent H&S audit did note that as a result of the changes to the H&S management structure there is a risk that WDC Heads of Service may now be slightly more remote from regular recognition of health & safety risks. They did not consider this to be a major issue, but did recommend that the Council consider some H&S refresher training during 2018/19. This will be arranged during 2018.
- 23** Otherwise it is concluded that the revised H&S management arrangements have worked well, and therefore the revised arrangements (see Appendix 2) have now been confirmed from April 2018 onwards

### **Proposed Health and Safety Work Programme 2018-19**

- 24** Every year we develop a corporate health & safety work programme for the year – the plan for 2018/19 is attached as Appendix 3.
- 25** Individual service areas are also already preparing their plans for 2018/19, and these will be completed by the end of May 2018. Key issues to be addressed this year include
- identifying health and safety training needs;
  - undertaking risk assessments to include job based risk assessments, new and expectant mothers, young people and DSE;
  - stress risk assessments as this is the major cause for workplace absence;

- return to work risk assessments, to reduce the likelihood of further lost working time;
- personal safety/lone working and training in the use of technological solutions in the interview rooms or when out on site
- encouraging the reporting of accidents/incidents
- commissioning contractors using PAS91 or SSIP to be consistent across WDC
- contract monitoring and
- security at work.

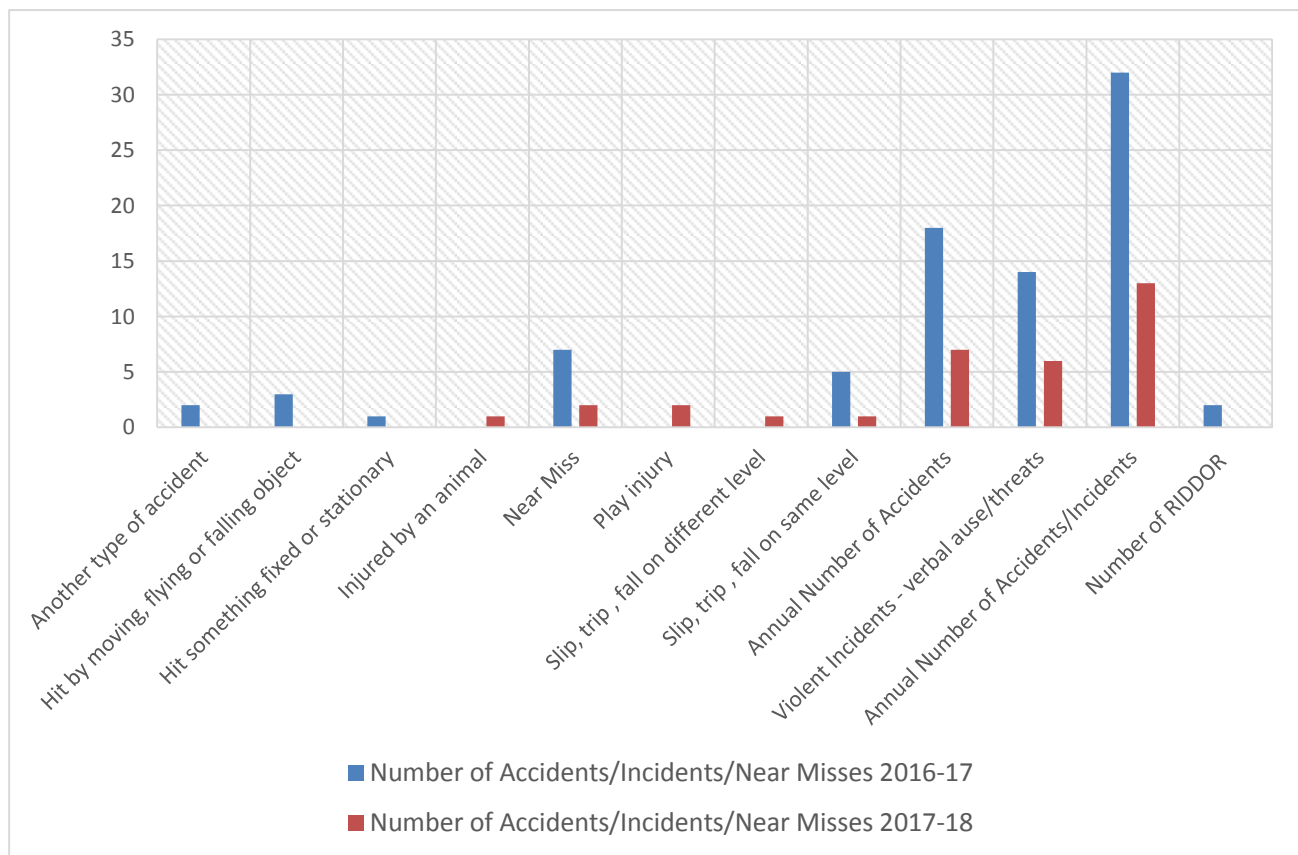
## Health and Safety Performance 2017/18

### Accidents Incidents and Near Misses

**26** 2017/18 has been a very quiet year for accidents and incidents, with a reduction in incidents from the last 2 years. During Q4 period, no accidents/near misses nor verbal abuse/threats/physical assaults have been reported.

	2015/16		2016/17		2017/18	
	Number Reported	RIDDOR Reportable	Number Reported	RIDDOR Reportable	Number Reported	RIDDOR Reportable
Accidents – Employees	7	0	8	2	5	0
Accidents – Non-employees	5	0	2	0	0	0
Near Misses	5	N/A	6	N/A	2	N/A
<b>Total Number of Accidents and Near Misses</b>	<b>17</b>	<b>0</b>	<b>16</b>	<b>2</b>	<b>7</b>	<b>0</b>
Incidents of Illness where paramedics attended	1	N/A	2	N/A	0	N/A
Violence at Work Incidents (resulting in additions to Cautionary Contacts Register)	9	N/A	14	N/A	6	N/A

## Comparison Graph on Number of Accidents 2016-17 and 2017-18



- The table and graph above indicate that the number of accidents this year has fallen significantly; therefore it is difficult to detect any trends because of the small amount of data. As last year, 28% of all accidents and near misses are slips trips and falls; a further 28% were play accidents involving children at Saunderton Lodge. There was no lost time and therefore no accidents required reporting to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- There has been a substantial decrease in the number of verbal abuse and threatening behaviour incidents that have been reported this year following last year's large increase.
- Corporate Health and Safety will add an article to Talking Point reminding staff to ensure that they report all accidents and significant near misses (where there could have been a potential for harm or property damage) and incidents of verbal abuse threats or physical assault. This will help clarify whether the data for 2017-18 is a true reflection of the accident/incident rate for WDC or an under-reporting issue.
- Health issues may be more of a concern during 2017-18 rather than safety, as stress is the highest reason for sickness absence.

### **Health and Safety Training during 2017/18**

**27** Health & safety training and support continues to be a high priority for WDC, and therefore we have ensured that a wide range of training opportunities have been provided during 2017/18.

<b>Course Name</b>	<b>No of Courses</b>	<b>Total No of Participants</b>
Asbestos: The Management of Asbestos in Buildings P405 (4days accredited course)	1	1
Defibrillator Training	1	4
Evac Chair Training	4	29 (includes 11 tenants)
Fire Risk Assessor Training	2	2
Fire Warden Training	5	7
Emergency Assembly Point Coordinator Training	1	8
Emergency Controller	1	2
First Aid at Work	2	2
First Aid at Work Requalification	3	5
Health and Safety Induction	4	24
Manual Handling	1	1
NEBOSH General Certificate in Construction (4 days)	1	1
Personal and Safety at Work	3	3
Personal Safety - Pin Point Training 7.1 and 7.2	11	16
Personal Safety - Pin Point Training 7.4 Ken Morgan Room	1	1
Project Griffin (Security Awareness)	4	103
QVR site security – Bomb Threats & Terrorist Incidents	1	19
Visual Tree Course	3	4
Working at Height	1	1
<b>Total Number of Attendees</b>		<b>227</b>



## **Conclusion**

- 28** 2017/18 has been a relatively quiet year in terms of accidents and incidents, and all WDC services continue to manage health & safety well, and to review it regularly at their team meetings. The 2 independent health & safety audits during 2017/18 (on Community Services and on HR, ICT & Shared Support Services), have both produced positive results.
- 29** However, there continue to be some ongoing risks that need to be managed – in particular, at particular WDC premises (notably Saunderton Lodge and Booker depot), and with particular work related issues (eg property management, and stress at work). These will continue to be monitored as part of the 2018/19 work programme, and by the relevant service areas.
- 30** The health and safety function has continued to build on the previous year's considerable work to introduce arrangements for complying with health and safety legislation and good practice. Although the Council's risk profile remains low, extensive work has been undertaken to improve the basic framework for managing health and safety.
- 31** The decision by Bucks CC to cease our partnership, after 4 years of successful joint working, did come as a surprise. However, the experience has demonstrated the benefits of a joint working approach, and therefore we have been able to quickly specify and confirm a new partnership with another neighbouring authority (Aylesbury Vale DC). As this is a new relationship we propose to pilot it for 1 year in the first instance, but we will review this in autumn 2018 with a view to extending it further if it is working well.
- 32** We have an extensive set of health & safety policies and procedures in place, a strong commitment to training and good progress has been made to deliver the 2017/18 work programmes. This means that we have a strong and resilient base in place, and are well placed to move forward into 2018/19.

## **Background Papers**

- 33** None.

## HEALTH &amp; SAFETY

## CORPORATE WORK PROGRAMME 2017-18 – end of year progress (as of 31 March 2018)

Costs – there are no additional costs attached to actions other than staff costs unless stated - funding will be from existing budgets.

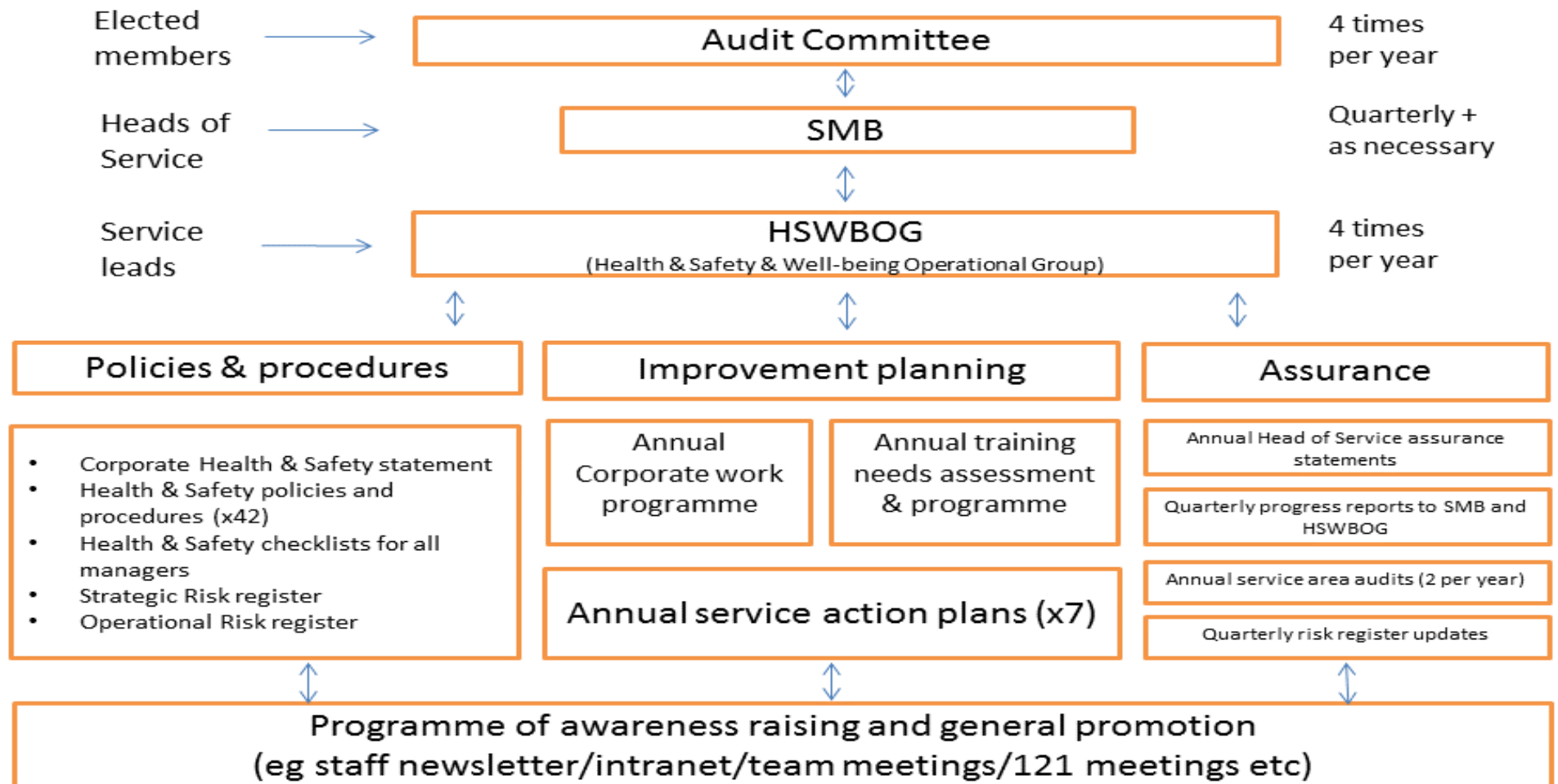
Activity area	Improvement action	Timescale	Owner	Current Status	RAG	Progress update
<b>A - Training Programme</b>	A1 - Develop 2018 corporate programme training	By end Dec 2017	H&S team	COMPLETE		New training programme for 2018 circulated at HSWBOG meeting in November 2017
	A2 - Induction training (as required)	As required	H&S team	COMPLETE		Health and Safety Induction Course provided 13 June, 27 September, 28 November 2017 and 27 February 2018
	A3 – Explore potential for e-learning induction module for employees	By end January 2018	H&S team	COMPLETE		E-learning courses have been made available by HR for Health and Safety to assess. E-learning health and safety course is suitable for prior learning before attending face to face Health and Safety Induction course.
<b>B - WDC Health and Safety Policies and Procedures</b>	B1 – Ongoing review and updating of WDC H&S policies	Ongoing	H&S team	COMPLETE		<p>A number of policies have been updated this year.</p> <ul style="list-style-type: none"> <li>• WDC's Health &amp; Safety Policy</li> <li>• Health and Safety consultation arrangements</li> <li>• Checklist for Managers Working in Low Risk Environments</li> <li>• NEW Checklist for Heads of Service and Property Managers</li> <li>• Fire safety in all Council premises</li> <li>• Use of LPG cylinders &amp; appliances</li> <li>• Display Screen assessment (DSE)</li> <li>• Management Guidance for the use of the Ken Morgan Room</li> <li>• Smoking at work</li> </ul>

Activity area	Improvement action	Timescale	Owner	Current Status	RAG	Progress update
						<ul style="list-style-type: none"> <li>• Blood borne diseases</li> <li>• Work related infectious diseases</li> <li>• Illness and infections</li> <li>• Working outside in the summer</li> <li>• Control of contractors</li> <li>• Christmas safety tips</li> <li>• Driving at work</li> <li>• Hand arm vibration</li> </ul>
	B2 – Develop new WDC policy for bomb threats and terrorist incidents	By end July 2017	H&S team	NEARLY COMPLETE BUT WILL BE RE-INCLUDED IN THE 2018/19 WORK PROGRAMME		<p>Bomb threat and terrorist incident policy has been published on Wycopedia. New emergency rucksacks have been located at suitable points including the tenants premises</p> <p>Fire Wardens have been trained in their use to instruct staff what to do in the case of a terrorist incident or another emergency</p>
	B3 – Develop new WDC guidance for use of drones (to be linked to emerging national guidance)	By end March 2018	H&S team	SUSPENDED AWAITING GOVERNMENT ADVICE		Development of guidance on the use of drones has been rolled over to 2018-19, as still waiting for national guidance following Government announcement in July 2017 that drones will have to be registered and users will have to sit safety awareness tests. Guidance for private and commercial use is available on CAA website
	B4 – Ensure stress risk assessments are being carried out by all WDC service areas	Ongoing	H&S & HR teams	COMPLETE BUT WILL BE RE-INCLUDED IN THE 2018/19 WORK PROGRAMME		Some managers attending training in Supporting Mental Wellbeing were unaware of the Stress Management Policy and the Stress risk assessments. Need to advertise policy more widely and check on progress with team stress risk assessments. Will include again on 2018-19 Health and Safety Action Plan to ensure risk assessments are being undertaken and discussed at team meetings.

Activity area	Improvement action	Timescale	Owner	Current RAG Status	Progress update
	B5 – Promote use of job based risk assessments across all WDC service areas	Ongoing	H&S team	COMPLETE	Roll out information on job based risk assessments
<b>C - Auditing, monitoring and inspection of services</b>	C1 – Complete 2 service audits (Community Services, and HR/ICT/SSS)	By January 2018	BCC audit team	COMPLETE	Community and HR/ICT/SSS were audited in February 2018. Community was graded as Excellent and HR/ICT/SSS graded as Good
	C2 – Refresh 7 service action plans, and ensure they are being delivered	By end May 2017 (plus quarterly monitoring)	H&S team	COMPLETE	All services have plans in place – progress has been monitored at HSWBOG meeting 18 July, 21 November 2017 and 16 January 2018. Greater scrutiny is required for 2018-19, as staff and some managers are unaware of requirement for job based risk assessments and stress risk assessment.
<b>D – Communications activity</b>	D1 – Monthly H&S communication	Ongoing	H&S team	COMPLETE	Articles have appeared in Talking Point as required e.g. DSE Assessments, the use of Vari-desks fire security and emergency information.
	D2 – Review & improve H&S presence on new Council Intranet (Wycopedia)	By end December 2017	H&S team	COMPLETE	All policies and procedures now listed on Wycopedia
<b>E – H&amp;S governance</b>	E1 – Complete full review of Bucks/WDC SLA	By end October 2017	PS/PB/BCC	COMPLETE	BCC have informed WDC that they will not renew Service Level Agreement for health and safety services. Other options for providing health and safety service from April 2018 are being considered.  After considering proposals from other district councils and a Health and Safety Consultant, a decision has been made to take up a Service Level Agreement with Aylesbury Vale District Council. An emergency e-mail

Activity area	Improvement action	Timescale	Owner	Current Status	RAG	Progress update
						will be available and access to a telephone helpdesk will be made available to staff in April 2018.
	E2 – Review new internal governance structures (following changes made in January 2017)	By end January 2018	PS/PB	COMPLETE		New arrangements are working well. These have been reviewed and are proposed to be extended.
<b>F – Property management</b>	F1 – Review role of property managers with regard to their H&S responsibilities	By end March 2018	H&S & FM teams	WILL BE COMPLETED IN APRIL 2018		<p>New manager's guidance has been prepared. Presentation produced for workshop for Property Managers. Workshop has been delayed as the 2<sup>nd</sup> quarter's HSWBOG meeting was postponed to November where that checklist was discussed.</p> <p>Workshop arranged for 10 April 2018. Facilities Management's 31 database will be available to Property Managers</p>
<b>G – Online reporting</b>	G1 – Implement online accident reporting tool (AssessNet)	By end October 2017	H&S team & Service leads	WILL BE REVIEWED AS PART OF NEW SLA WITH AVDC		Following BCC's decision (November 2017) not to renew SLA the online accident reporting system will not be implemented. E-forms cannot be supported by IT. AVDC have offered a new accident/incident platform when their new HR system is implemented in August 2018.
	G2 - Develop online DSE self-assessment process (Healthy Working provided by Cardinus)	By end March 2018	H&S team	WILL BE REVIEWED AS PART OF NEW SLA WITH AVDC		See comments above (G1)

### Wycombe District Council – Health & Safety Management System



## HEALTH &amp; SAFETY

## DRAFT - CORPORATE WORK PROGRAMME 2018-19

Costs – there are no additional costs attached to actions other than staff costs unless stated - funding will be from existing budgets.

Activity area	Improvement action	Progress	Timescale	Owner	Current RAG Status
<b>A - Training Programme</b>	A1 - Develop 2018 corporate training programme		By end of April 2018	Corporate H&S team	
	A2 - Induction training (as required)	Will be arranged as required – probably 3 or 4 sessions per year	As required	Corporate H&S team	
<b>B - WDC Health and Safety Policies and Procedures</b>	B1 – Ongoing review and updating of WDC H&S policies	Programme is ongoing	Ongoing	Corporate H&S team	
	B2 – Complete new policy for bomb threats and terrorist incidents, and ensure full training and testing		By end October 2018	Corporate H&S team	
	B3 – Ensure stress risk assessments are being carried out by all WDC service areas		Ongoing	Corporate H&S team & HR team	
<b>C - Auditing, monitoring and inspection of services</b>	C1 – Complete 2 service audits (to be agreed)	AVDC now contracted to carry out these audits – probably in Autumn 2018	By end March 2019	Corporate H&S team	
	C2 – Refresh 7 service action plans, and ensure they are being delivered	5 plans already completed – 2 others in hand	By end May 2018 (plus quarterly)	H&S service leads & team	

Activity area	Improvement action	Progress	Timescale	Owner	Current RAG Status
			monitoring)		
<b>D – Communications and reporting activity</b>	D1 – Monthly H&S communication		Ongoing	Corporate H&S team	
	D2 – Review & improve H&S presence on new Council Intranet (Wycopedia)	Some minor initial work completed	By end December 2018	Corporate H&S team Comms team	
	D3 – Develop eforms for various H&S processes (eg accidents/DSE/violent incidents)	Will be reviewed as part of new SLA with AVDC	By end March 2019	Corporate H&S team Comms team	
<b>E – H&amp;S governance</b>	E1 – Ensure arrangements in place to replace Bucks/WDC SLA	Broad SLA agreement completed with AVDC – final details to be sorted	By end April 2018	PS/PB	
	E2 – Review internal H&S arrangements at WDC	Initial review already underway – further review planned for early Autumn 2018	By October 2018	PS/PB	