



National Offender Management Service

HEALTH AND SAFETY ARRANGEMENTS FOR WORKPLACE INSPECTION

This instruction applies to:-		Reference:-
NOMS Headquarters Prisons		AI 25/2015 PSI 36/2015
Issue Date	Effective Date	Expiry Date
21 December 2015	21 March 2016	N/A
Issued on the authority of	NOMS Agency Board	
For action by (who is this instruction for)	All staff responsible for the development and publication of policy and instructions (Check in box as appropriate) ☒ NOMS HQ ☒ Public Sector prisons ☒ NOMS Immigration Removal Centres (IRCs) ☐ Contracted Prisons* ☒ Governors ☒ Heads of Groups <i>* If this box is marked, then in this document the term Governor also applies to Directors of Contracted Prisons</i>	
Instruction type	Health and Safety Management System and Legal Compliance	
For information	All staff in NOMS HQ Prison establishments	
Provide a summary of the policy aim and the reason for its development/ revision	This PSI sets out minimum requirements for workplace and work area health and safety inspection. The aim of the policy is to introduce a consistent system of inspection which will allow all establishments to ensure the provision of a healthy and safe working environment.	
Contact	For further information about this PSI contact Policy lead: Jim Noonan – National Lead Health & Safety, NOMS HQ Email - Jim.noonan@noms.gsi.gov.uk Tel: 07807 509865	
Associated documents	PSI 06/2015 AI 04/2015 Policy, Organisation and Summary Arrangements for the Management of Health and Safety	
Replaces the following documents which are hereby cancelled: None		
Introduces amendments to the following documents: None		
Audit/monitoring: Compliance with this instruction will be monitored at three levels: Locally via quarterly report to establishment health and safety committees and SMTs and via the		

NOMS Occupational Health, Safety and Fire Risk Control Evaluation Tool (NORCET)
Regionally via establishment assurance visits from regional HSF teams and NORCET
Nationally via aggregated NORCET monitoring reports and Independent Audit and Assurance
(IAA) Governance and Order (G+O) Audit.

Notes: *All Mandatory Actions throughout this instruction are in italics and must be strictly adhered to.*

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1. Executive Summary

Background

- 1.1 This instruction is one of a number of Prison Service Instructions (PSIs) which forms part of NOMS' Health and Safety Management Arrangements as required by the Health and Safety at Work Act and subsidiary legislation. All these arrangements can be accessed via the "Policies and Resources" section of the NOMS Intranet. Related guidance and safe operating procedures are available via MyServices and the "My People Online" section of the "Communities" tab on the NOMS Intranet. It is a legal requirement for these arrangements to be brought to the attention of all employees.
- 1.2 Health and Safety law and good practice require that employers implement appropriate measures for managing OHSF including the monitoring and review of preventative and protective measures. It is an integral part of a manager's role to manage OHSF systems, which includes the regular inspection of the work area for which they are responsible to ensure that controls over hazards are maintained.
- 1.3 This Instruction sets out national policy for the routine inspection of workplaces with a view to providing a safe working environment.
- 1.4 A system of workplace inspections is a proactive measure, designed to identify hazards within the workplace before such hazards cause harm to staff, prisoners or visitors. It also suggests remedial actions which can be introduced to improve the safety of our working situations and should be an integral part of any OHSF risk management system.
- 1.5 As well as reducing OHSF risk, a systematic approach to health and safety inspection ensures that NOMS is meeting its duty of care owed to staff and third parties.

Desired Outcomes

- 1.6 Work-related injury and ill health amongst staff, prisoners, contractors and visitors is reduced and controlled.
- 1.7 OHSF Risks are meaningfully assessed and proportionately controlled and monitored.
- 1.8 Staff and their representatives are consulted on OHSF matters
- 1.9 Incidents and hazards are accurately and promptly reported and recorded
 - All establishments operate a robust, demonstrable workplace inspection system.
 - The approach to inspecting workplaces is consistent across the estate, but flexible enough that where current systems are in place, they can be incorporated.
 - Governors, managers and staff are aware of the benefits to be gained from implementing an efficient system of workplace inspection and the place of such a system within good overall management of the OHSF risk.

Application

- 1.10 Workplace inspection can include informal 'walkabout' inspections in which managers ensure the work carried out in their areas is being done safely and in which any problems are identified and addressed. Managers **and** staff, particularly those who are line managers, should be alert to hazards at all times, and respond appropriately to the level of risk by instructing staff and prisoners or reporting equipment and premises faults for example.

- 1.11 The purpose of formal workplace programmed inspections is to ensure that NOMS has a systematic means of checking its workplaces and acting on hazards as they arise. Furthermore it ensures that these are also recorded systematically, to provide evidence of appropriate management of OHSF.
- 1.12 Section 2 of this Instruction is concerned with formal workplace inspection and describes a system for carrying out such inspections on a routine basis.
- 1.13 *This PSI is issued with a 3 month lead-in period. Where programmes of workplace inspection are already in place, it is not necessary to repeat inspections undertaken previously in the lead-in period to comply with the new instructions. It is sufficient that any revised programme of inspection developed under this instruction is put in place within 3 months of its issue.*

Mandatory actions

- 1.14 *Governors must ensure that all staff are made aware of this Instruction. They must put in place measures to deliver and maintain a programme of inspections.*
- 1.15 *Heads of Group must either satisfy themselves that an adequate inspection programme is in place in premises where they have staff located e.g. HQ or, where no such programme is in place, put in place measures to deliver and maintain a programme of inspections.*
- 1.16 *Relevant line and function managers must undertake inspections in line with the agreed programme.*
- 1.17 *All staff must be familiar with Section 2 of this Instruction and understand the mandatory nature of Workplace Inspections.*
- 1.18 *Policy leads must follow the processes set out in Section 2 in ensuring an appropriate system of proactive Workplace Inspections is in place and that managers in particular, are aware of their obligation for the implementation of such a system.*

Resource impact

- 1.19 Most establishments already undertake some form of inspection regime in various parts of the organisation. The introduction of a more consistent and systemic approach to workplace inspections should therefore not have any significant resource implications.

(Approved for Publication)

Carol Carpenter
Director of Human Resources, NOMS

2. Operational Instructions

All Staff and Managers

- 2.1 *All staff must be made aware of the contents of this section and the system of workplace inspections within their establishments. This must form part of local staff information services and particularly local induction and familiarisation training.*
- *All staff have a statutory duty to co-operate with their employers' systems for managing health and safety and this extends to reporting, and / or acting on, hazards as they arise in the workplace.*
 - *Managers, in particular, must ensure the work areas for which they are responsible, are inspected regularly in line with this PSI or local inspection programmes devised under it.*

Routine Workplace Inspection System

- 2.2 *Managers are responsible for ensuring there is a system for routine inspections within their work areas. A schedule of workplace inspections must be compiled locally, in consultation with the HSF Advisor and other relevant staff.*
- 2.3 *The frequency of workplace inspections will vary in different locations, depending on the level of assessed risk within the work area; the higher the risk in a particular work area, the more frequent the workplace inspections should be. [Annex B](#) sets out **optimal** frequencies for various work locations.*
- 2.4 *Workplace inspections will normally be conducted during normal working hours, but it may be worth varying this in work areas that work different shifts or where operational circumstances vary considerably out of hours.*
- 2.5 *Managers must ensure that workplace inspections are recorded in a format suitable to their work situations. The example checklist at [Annex A](#) must be used as it is or have additional relevant local material appended to it.*
- 2.6 *In residential areas many establishments will already have a system of Accommodation Fabric Checks (AFC) in place. Where this is the case, it may well be feasible to adapt their AFC format to include HSF items, although the frequency and scope of AFC's might need to be reviewed.*
- 2.7 *Records of the inspections must be sufficient to show that all areas of the workplace are covered in line with the relevant frequencies and that any hazards in the work area would be identified.*
- 2.8 *Managers are responsible for ensuring their areas are inspected as per the inspection schedule. It is good practice to involve other managers where applicable, staff or staff safety representatives in the process and to seek specialist OHSF advice where required.*
- 2.9 *It is the manager's responsibility to record any significant findings and to ensure that both immediate and or underlying problems are addressed appropriately. This may involve one or more levels of action. The example below is a simple example of this:-*

Simple example: Wet spillage on floor

- *Remove hazards immediately (e.g. ask someone to mop the floor).*

- Ascertain why the floor is wet. Does it happen regularly, or is it an isolated incident? (E.g. the suitable cleaning regime may not be being used).
- Address any management issues (e.g. appropriate supervision, training issues).
- Consult other departments e.g. refer to facilities management helpdesk via NOMS Homepage intranet link if it is a building repair / facilities management issue
- Formally report to functional heads where problems cannot be easily unresolved.
- At any stage it may be worthwhile to record the required action to the NORCET Action Plan and/or the Consolidated Action Plan.

2.10 It is a management responsibility to ensure that any necessary remedial actions identified as a result of workplace inspections in their area are implemented and then to monitor the efficacy of any such measures that are introduced. [Annex C](#) shows the process of inspection and action within an establishment.

Senior Management Team Safety Tours in Custodial Establishments

- 2.11 As well as the regular inspection of work areas, establishments currently operate periodic safety tours, conducted by the Governing Governor, the H&S Sponsor, or by another SMT member, usually in conjunction with the HSF Advisor.
- 2.12 The implementation of SMT safety tours provides oversight of HSF in a 'snapshot' format and is good evidence of senior ownership of the risk.
- 2.13 The frequency and scope of SMT safety tours will vary between establishments, but should sample the whole establishment within a period proportionate to size and risk. For example, if an establishment is divided into four parts, quarterly safety tours would ensure the establishment is subject to formal annual safety tour and would ensure that the task is not too great an imposition for any individual SMT member.
- 2.14 Governors may of course opt for more frequent safety tours, commensurate with the assessed risk and their assessment of the need for OHSF Leadership in the establishment.

OHSF Audit and Performance Monitoring

- 2.15 *Annual inspection programmes must be documented and published. Progress against the plan is to be reported to the Health and Safety Sponsor in prisons and, in all cases, the relevant OHSF committee.*
- 2.16 *Where Heads of Groups and other Senior Managers have teams occupying premises such as HQ or other administrative or ancillary sites they must ensure they are aware of the program of inspections and the reports arising from it. .*
- 2.17 It is NOT the role of the OHSF committee to "fix" individual items arising from inspections. Items raised by inspection should be dealt with by normal business processes such as Planet FM requests or internal instructions e.g. to clear rubbish etc. However, where inspections raise regular themes or persistent problems, the committee will be informed and be the forum to address these.
- 2.18 Where establishments already operate their own internal self-auditing system above and beyond G+O Audits and NORCET returns, this should include the auditing of the system of workplace inspection.
- 2.19 The efficacy of workplace inspection and safety tour programs are reported on via the NORCET OHSF monitoring tool and, on a sample basis, by G+O audits. *Reports and*

action plans from these processes must be reviewed and approved by the establishment SMT as part of the risk and control process.

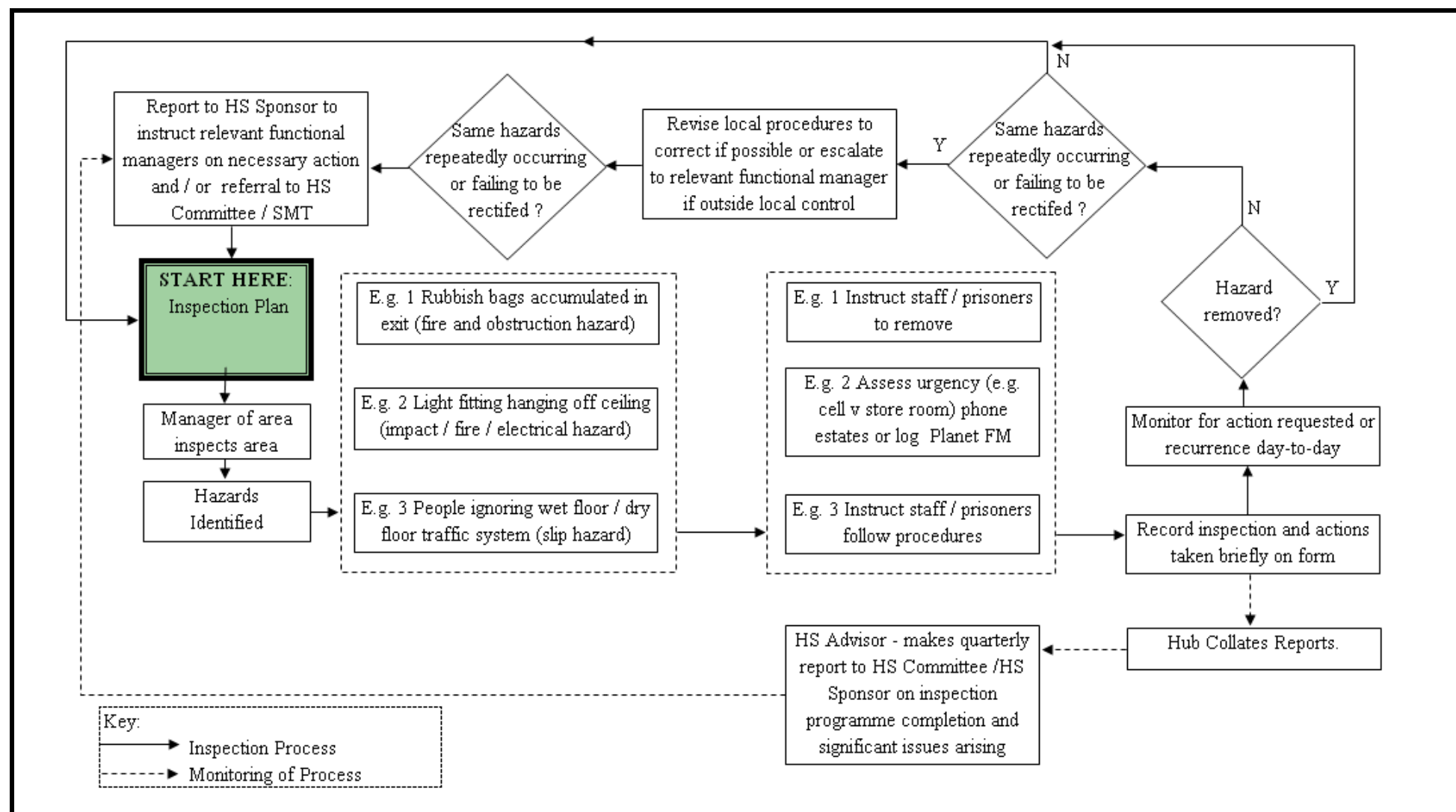
- 2.20 Regional HSF Teams will conduct a routine system of quality control of NORCET reports within their region on quarterly returns and during establishment visits.
- 2.21 The data from NORCET reports of all establishments are also collated regionally and this data inputs to the national NORCET picture.
- 2.22 Evidence of a robust, effective workplace inspection regime will also be required for Governance and Order audits.

ANNEX A

Workplace Inspection Checklist									
Establishment:									
Location/department:									
Work area:						Date:			
Inspection by:									
The following are suggested items to be included in a routine HSF inspection of the workplace. It is not meant to be an exhaustive list to cover all work situations.									
Housekeeping					Fire Safety				
Item	Y	N	N/A	Item	Y	N	N/A		
Is the Cleaning Schedule maintained? Is the area clean and tidy?				Are fire exits and fire routes kept clear of obstruction and fire doors used appropriately?					
Is rubbish stored appropriately and removed regularly?				Are Fire Exit signs and Fire Instruction signs in place and clearly visible?					
Are items stored appropriately and extraneous material removed?				Is fire equipment (e.g. extinguishers, misting units etc.) in place where it should be? Has it been tampered with or used?					
Are floors and walkways kept clear and free of slip/trip hazards?				Is the area free of spillages of flammable material, accumulation of combustible material, electrical or other fire hazards?					
Are walkways and stairs kept free of obstruction?				Is RPE easily accessible and ready for use?					
Comments:				Comments:					
Equipment				Work					
Item	Y	N	N/A	Item	Y	N	N/A		
Has all electrical equipment been maintained and is it in good working condition?				Are all staff and prisoners working in a suitably safe manner?					
Is all mechanical equipment in safe working condition?				Is appropriate PPE being worn where required?					
Is all furniture (including chairs) in sound condition and working order?				Is appropriate footwear being worn?					
Are vehicles segregated from pedestrians and operating safely?				Is correct equipment (e.g. access equipment) being used?					
Comments:				Comments:					
First Aid provision				Welfare					
Is the first aid box in place and sealed?				Is the temperature of the work area comfortable?					
Are plasters available?				Is the lighting level about right?					
Are self-harm kits in place and complete?				Is there adequate ventilation?					
Are Automated External Defibrillators in place and in working order?				Is sanitary provision clean and adequate?					
Comments:				Comments:					
The area is deemed as safe, with all necessary controls in place.				Some shortfalls identified and further action is required.					
Manager of work area:				Signed:				Date:	

Workplace Inspection (WPI) Schedule				
Establishment:				
Responsible Person:				
Work Area	Frequency of WPI			Rationale
	Recommended minimum	Locally assessed frequency	Person(s) or Role(s) responsible	
Residential areas, including segregation units, Reception etc.	Weekly			Daily checks such as AFC and cleaning schedules are in place. WPI provides a more detailed record.
Admin and other office areas	Weekly			Low risk environment, but weekly WPI are straightforward and reasonably practicable.
Workshops and other manual work areas, including farms & gardens, laundry etc.	Weekly			High risk areas with various other checks already in place. WPI to supplement.
Kitchens	Monthly			Daily checks are already in place. WPI supplements these.
Facilities Management Areas	Monthly			Other checks in place. WPI supplements these.
Gymnasiums	Monthly			Daily checks are already in place. WPI can supplement these where required.
Education classrooms	Monthly			Low risk generally, but areas with higher risk activities, should be treated as per workshops.
Assessment by:			Date:	
- The list of work areas is not exhaustive and may vary from establishment to establishment. - The frequency of Work Place Inspections is the minimum recommended frequency. There should be a risk assessment process and more frequent workplace inspections may well be appropriate where this is dictated by the OHSF risk in a particular workplace. - Some work areas have other control measures such as statutory inspections, machinery inspections, cleaning schedules, AFC and daily checks etc. However, WPI's serve a different function to any of these, being a record of a physical inspection of the work area.				

NOMS Workplace Inspection Flowchart



Glossary and Definitions

Accidents – Any adverse and unintended event which has caused injury or ill-health, this includes assaults.

Contractors – Organisations commissioned to undertake work on behalf of NOMS.

G and O Audits – Governance and Order Audits undertaken by MoJ's Independent Audit and Assurance Team in NOMS' custodial sites. These cover Fire and OHS respectively on a 3 year cycle.

Cardinus – Cardinus Workstation Safety Plus ® - NOMS' Software Application for use by staff for the delivery of both risk assessment and training about safe use of computer workstations.

DSE – Display Screen Equipment – Computer and CCTV display equipment and workstations.

IP – Injured Party following an accident.

Near Miss - Any adverse and unintended event which would have caused injury or ill-health but, for some reason, did not, this includes assaults.

NORCET – NOMS OHSF Risk Control and Evaluation Tool – A reporting device to measure OHSF Performance at regular intervals across NOMS services.

OHSF – Occupational Health, Safety and Fire. This abbreviation is used to cover the whole range of OHSF risks. Where the term is used without the O and / or the F it is intended to indicate that the reference excludes that aspect of the risk, hence HS is used where references to occupational health and fire safety are **intended to be excluded**.

OHSF Sponsor – A senior manager in a particular NOMS location or service whose role it is to provide leadership on OHSF matters and ensure that OHSF work is expedited and that senior colleagues keep OHSF issues in mind when making management decisions. The OHSF Sponsor is not an advisor or expert.

OSSP – On-Site Service Providers - Contractors engaged to deliver ongoing services on NOMS' premises such as education, healthcare, facilities management etc. As distinct from contractors attending to undertake discrete, time-limited pieces of work.

Rivo – Rivo Safeguard ® - NOMS Accident Recording and OHSF Management Software

Safety Tour – A walk-through of a premises (or part of a premises) by a senior manager with a view to considering the health and safety of those using the premises and any issues or concerns they have.

SMT – Senior Management Team(s).

TFM Providers – Contractors, their employees and subcontractors who are engaged by NOMS to provide facilities management services to NOMS premises.

WPI – Workplace Inspection – Formal visual check of the state of a workplace (or part of it) to identify immediately visible hazards, put in place steps to remove them and make a brief record of the WPI.