

Operational / Compliance Report

Committee: Finance & General Purposes

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1. Purpose of Report

To update Members on the Council's operational, statutory, and compliance position as of October 2025, to identify areas for improvement, and to outline the strategic direction for strengthening cyclical review, risk management, and digital record keeping.

2. Executive Summary

The Council continues to maintain a strong overall compliance position, with most statutory duties actively managed and documented. One material noncompliance (fire door integrity) remains ongoing and is to be delivered via the Public Works Loan in early 2026.

Officers are enhancing the Councils operating systems by reviewing health and safety processes, documentation and developing its Risk Profile.

key focus will shift toward embedding cyclical compliance reviews, formalising digital record keeping, and adopting a modern safety culture based on the Safety-II model (see point 8)

3. Statutory & Operational Compliance

Legal & Governance Framework

The Council's operations are governed by the following key legislation and standards:

- Health & Safety at Work etc. Act 1974
- Management of Health & Safety at Work Regs 1999
- First Aid Regulations 1981 (already referenced implicitly)
- Display Screen Equipment Regulations 1992.
- Manual Handling Operations Regulations 1992
- Reporting of Injuries, Diseases and Dangerous Occurrences Regs 2013 (RIDDOR)
- Regulatory Reform (Fire Safety) Order 2005
- Control of Asbestos Regs 2012
- PUWER 1998 / LOLER 1998
- Environmental Protection Act 1990
- Data Protection Act 2018 / UK GDPR
- Freedom of Information Act 2000
- Public Sector Bodies Accessibility Regs 2018
- Equality Act 2010
- Accounts & Audit Regs 2015
- Civil Contingencies Act 2004
- Public Contracts Regulations 2015
- Terrorism (Protection of Premises) Bill – expected 2026

4. CSNPC Compliance Overview (as of 31 October 2025)

System / Area	Status	Notes / Actions
Fire Risk Assessments	●	Completed 2025; next review due 2027.
Fire Door Integrity	●	Non compliant; replacement works funded (PWL B 2026). Interim measures in place.
Electrical Safety (EICR, PAT)	●	All currently valid. 5 sites due EICR renewals during 2026.
Legionella / Water Hygiene	●	Active monthly programme (Graham Water Hygiene). Nominal trends.
Gas Safety	●	All certificates valid. Annual boiler servicing in place.
HVAC Systems	●	Service and filter change due (PTCC & MSH)
Lift Servicing (PTCC)	●	LOLER inspection and quarterly service due 2025.
Asbestos Management	●	Registers reviewed and updated in 2025.
Fleet & Vehicle Safety	●	All vehicles MOT'd, serviced, and insured.
Play Areas / ROSPA	●	Annual inspections due December 2025. Weekly Idverde checks ongoing.
Music & TV Licences	●	Valid; renewals due 2026.
Digital Record Keeping	●	Current process under review.
Business Continuity Plan	●	Adopted 2025. Reviewed annually.
Training & Competence	●	All current; DSE annual reviews and FAW renewals completed 2025.

Summary: 8 areas fully compliant, 5 in progress, 1 (fire doors) non compliant under active remediation.

- A new corporate risk profile is being drafted to reflect strategic, financial, operational, reputational, and compliance risks.
- Comprehensive review and update of site specific risk assessments (general, COSHH, manual handling, event, safeguarding).
- Embedding of Standard Operating Procedures (SOPs) and Safe Systems of Work (SSoWs) for all manual, cleaning, and maintenance operations.
- Implementation of Emergency Action Plans (EAPs) for key sites and community events.

5. Health & Safety Performance

- No RIDDOR or enforcement events recorded in 2025.
- Fire warden and first aid training up to date.
- Annual H&S audit planned for 2026.
- COSHH inventory audit planned for 2026.

6. Digital Record Keeping

The Council's operational responsibilities continue to grow, with multiple community buildings, sports facilities, play areas, libraries, fleet vehicles, and an increasing network of contractors and inspection procedures.

This growth has significantly increased the volume of statutory and operational documentation (fire safety certificates, water testing logs, FRA actions, inspection reports, insurance records, contractor certifications, etc.).

Historically, many records have been held in paper files and spreadsheets, often stored across different sites / platforms. While functional, this approach now presents several limitations:

- Time lost retrieving information or verifying compliance evidence.
- Risk of out of date documentation or missed renewals.
- Lack of audit ready transparency for councillors, auditors, and insurers.
- Duplication or risk of loss.

A transition to a digital compliance and asset management platform is therefore both necessary and proportionate to the Council's current scale. Digital record keeping refers to the systematic storage, management, and tracking of all compliance related data, inspection evidence, and risk assessments through a secure, cloud based platform or structured internal file system.

For CSNPC, this would include:

- Electronic versions of all compliance certificates (Fire, Water, Gas, EICR, PAT, etc.).
- Digital site inspection forms and photographs.
- Asset registers linked to specific locations and equipment.
- Automated reminders for renewal dates and contractor inspections.
- Central access for authorised staff, Clerk, and auditors.

The Council's HR provider, Avensure, offers an integrated platform, 'PeopleCloud', that can host HR, training, and compliance documentation.

[Cloud HR Software | Online HR Management Software](#)

Benefits of Adoption

- No additional cost (already within HR service contract).
- Secure storage of HR, training, and safety documentation.
- Automated reminders for statutory reviews and renewals (EICR, FRA, training, etc.).
- Centralised access for officers and managers.
- Supports transparency and efficiency for both internal audit and AGAR compliance.

7. Critical Review & Continuous Improvement

The Council continues to make significant progress in establishing a mature, transparent, and well documented compliance framework. However, this review has identified several areas where further development is required to strengthen governance, reduce administrative risk, and enhance the resilience of operational systems.

While all statutory compliance requirements are currently met, the Council's processes remain partly manual and reactive in nature. The following improvement areas will ensure the Council transitions towards a fully cyclical, digital, and learning based compliance model embedding best practice and ensuring that compliance assurance is proactive and measurable.

• Contractor Compliance

The Council relies on a range of third party contractors and service providers, including Idverde, Graham, and Walker Fire, to deliver essential maintenance, compliance, and grounds services. To ensure accountability and safety, all contractors engaged by the Council are required to provide evidence of technical competence, appropriate insurance cover, and compliance with the Council's Health & Safety standards as outlined in the Procurement Policy. Contractor qualifications, insurance certificates, and RAMS are verified annually by the Operations team, with results logged within the central compliance register. This process ensures that all external partners operate to the same high standards expected of internal staff and reduces organisational exposure to third party risk.

• Cyclical Review Integration into Governance

Although the Council's compliance position is strong, cyclical review processes are not yet fully embedded into the governance structure. The Head of Operations will establish formal timetables for all key compliance domains, including fire safety, electrical testing, water hygiene, and training renewals, ensuring that each area is reviewed within a set interval. These timetables will be integrated into the quarterly Finance & General Purposes (FGP) Committee cycle and cross reference with the Annual Governance and Accountability Return (AGAR) process. This will create a structured link between operational compliance activity and the Council's formal assurance framework, improving traceability and audit readiness.

• Training Matrix Ownership

The Council is committed to maintaining a trained and competent workforce. To strengthen oversight and accountability, a central training matrix will be established within PeopleCloud, managed by the Operations Manager and reviewed quarterly with HR. The matrix will record all statutory and role specific training such as Health & Safety inductions, First Aid at Work, Manual Handling, and Display Screen Equipment (DSE) assessments. This system will provide clear visibility of staff competence levels, automate renewal reminders, and form part of the Council's annual audit evidence for workforce compliance.

- **Environmental & Sustainability Policy**

There is an identified the need to consolidate the Councils environmental management arrangements into a single Environmental & Sustainability Strategy, aligning operational activity with specific duties under the Environment Act 2021 and best practice under the Climate Change Act 2008. This strategy will bring together policies covering waste management, biodiversity, energy efficiency, and carbon reduction, ensuring that sustainability is embedded into both operational delivery and community engagement. The work will contribute towards Swindon's wider climate resilience objectives.

- **Business Continuity Testing**

The Council's Business Continuity Plan (BCP) was adopted in 2025 and sets out how critical services will be maintained in the event of disruption. To ensure the plan is effective and practical, a live BCP test exercise will be undertaken around March 2026, involving staff and key partners. This test will simulate a realistic scenario such as power outage, IT system failure, or loss of site access, and will assess communication, decision making, and service continuity. The findings will be used to refine the BCP, ensuring it remains aligned with best practice guidance under the Civil Contingencies Act 2004 and internal audit expectations.

- **Procurement & Contractor Oversight**

Procurement and contractor management form an integral part of the Council's compliance and governance system. Under the Financial Regulations (May 2025) and Procurement & Contractor Management Policy, all contracts are subject to pre engagement verification to confirm competence, insurance, and compliance with statutory duties under the Health & Safety at Work etc. Act 1974 and Public Contracts Regulations 2015. Annual reviews of contractor performance and compliance documentation will be added to the Council's cyclical review calendar, ensuring consistent oversight and reinforcing transparency, accountability, and best value.

Implementing these measures will create a transparent, cyclical, and data driven approach to compliance management, reducing reliance on manual processes, improving resilience, and aligning with best practice principles set out in ISO 45001 and HSG65 (Managing for Health & Safety).

8. Embedding a Safety-II Approach

Beyond regulatory compliance, the Council should embed a modern learning culture to enhance safety resilience and workforce engagement. Traditional safety management (often called Safety-I) focuses on analysing incidents, failures, and noncompliance to prevent recurrence. While this remains essential, modern best practice increasingly recognises the complementary concept of Safety-II, which emphasises understanding how and why everyday work succeeds despite changing conditions.

Why Safety-II Matters for the Council

Central Swindon North Parish Council operates a diverse range of community facilities and open spaces, managed by staff and agency teams who work autonomously and in dynamic environments. Adopting a Safety-II mindset allows the Council to:

1. Learn from normal work (not just from incidents).
 - Understand how staff adapt procedures to deliver safe, effective outcomes.

2. Encourage open reporting and dialogue, treating near misses and improvisations as learning opportunities, not blame triggers.
3. Design systems that are resilient, recognising that human flexibility often prevents accidents.
4. Empower employees to contribute ideas that improve safety and service quality simultaneously.
5. Integrate safety and performance, so health, safety, quality, and efficiency reinforce each other rather than compete.

Implementation (2026 Plan)

- Integrate Safety-II principles into team meetings and post incident reviews.
- Use PeopleCloud to record “positive safety observations” alongside incidents and near misses, creating a balanced dataset.
- Expand H&S meetings to include reflection sessions on “what went right” during projects or events.
- Train staff in human factors awareness and ‘just culture’ leadership.
- Publish learning bulletins twice yearly summarising improvements identified through Safety-II analysis.

Benefits

- More engaged workforce and improved morale.
- Early identification of system weaknesses before failures occur.
- Continuous improvement culture aligned with ISO 45001 and HSG65.
- Stronger assurance to councillors and insurers that the Council is managing risk intelligently and sustainably.

9. Martyn’s Law (Protection of Premises) Bill

Background

“Martyn’s Law,” formally the Terrorism (Protection of Premises) Bill, is a forthcoming piece of UK legislation designed to strengthen public space security following the 2017 Manchester Arena attack in which Martyn Hett was killed. The Bill aims to ensure that all organisations responsible for publicly accessible locations take proportionate steps to protect staff and the public from the risk of terrorism.

Current Status (October 2025)

- The Bill has not yet become law.
- It was reintroduced by the Home Office in July 2025 for the 2025-26 Parliamentary session after consultation revisions in 2024.
- Royal Assent is expected during 2026, with an implementation (grace) period of roughly 12 – 18 months before full enforcement.
- The Home Office has confirmed that all local authorities and public venue operators will fall within its scope once enacted.

Until Royal Assent, duties under existing legislation, such as the Health & Safety at Work etc. Act 1974, Civil Contingencies Act 2004 and Counterterrorism and Security Act 2015 continue to provide the legal basis for emergency and security planning.

Anticipated Legal Duties

Martyn's Law will apply to publicly accessible premises capable of holding 100 people or more ("Standard Tier") and will impose enhanced obligations on those with 800 + capacity ("Enhanced Tier").

Owners or operators must:

1. Undertake terrorism specific risk assessments for each qualifying site.
2. Develop and maintain a security plan setting out protective measures and evacuation or lockdown procedures.
3. Provide staff awareness training on identifying and responding to suspicious behaviour or packages.
4. Co-operate with emergency services and local resilience partners in the event of an incident.
5. Evidence compliance on request to the Home Office or the proposed inspection authority.

Relevance to Central Swindon North Parish Council

The Council manages and hires out several publicly accessible buildings and event spaces, including:

- Pinetrees Community Centre & Library
- John Moulton Hall
- Moredon Community Centre
- Moredon Sporting Hub
- Community and outdoor events such as festivals and fireworks displays

These venues will likely fall within the Standard Tier of Martyn's Law. When enacted, the Council will become the "responsible person" for compliance.

Preparatory Steps Already in Place

- Draft Major Accident Prevention Policy (MAPP) and site specific Emergency Action Plans (EAPs) provide an initial response framework.
- Event risk assessments already consider crowd management, evacuation, and security control points.
- Ongoing liaison with Swindon Borough Council's Emergency Planning Unit supports interagency coordination.
- Staff and volunteer briefings include evacuation and lockdown instructions.

Recommended Next Steps (2026)

Action	Purpose	Target Date
Review all buildings and events to confirm capacity tier under the Bill	Establish compliance category	Q1 2026
Develop a Martyn's Law Security Management Plan aligned with MAPP and BCP	Formalise duties and documentation	Q2 2026
Nominate "Responsible Persons" for each qualifying site	Clarify accountability	Q2 2026
Deliver awareness training for staff and regular event volunteers	Build competency	Q3 2026
Integrate terrorism risk controls into the Council's Risk Profile and Register	Embed in governance cycle	Q3 2026

Implications for Councillors

Once enacted, Martyn's Law will create a new statutory compliance duty on the Council comparable in weight to fire safety or H&S legislation.

10. Forward Plan (Q4 2025 – Q2 2026)

Action	Deadline	Lead
Fire Door Replacement Programme	April 2026	Ops
Finalise Corporate Risk Profile	Feb 2026	Clerk / Ops
Adopt Major Accident Prevention Policy (MAPP)	April 2026	Ops
Business Continuity Plan review	April 2026	Clerk / Ops
Accessibility Audits	April 2026	Ops
Digital Compliance Software Migration	Q2 2026	Ops / IT
Tree & Drainage Inspection Programme	Q1 2026	Ops
Environmental & Sustainability Policy Review	Q3 2026	Ops / E&P

11. Recommendations

1. Note the operational and compliance position as of 31 October 2025.
2. Note the Fire Door Replacement status.
3. Note in progress Corporate Risk Profile and MAPP.
4. Approve in principle the implementation of PeopleCloud for HR, H&S, and compliance management; request a Q2 2026 update.
5. Note the ongoing integration of accessibility, sustainability, and equality objectives into operational planning.
6. Request the development of a cyclical compliance review timetable for FGP approval by April 2026.
7. Note preparations for Martyn's Law and associated obligations.