

# Glasgow City Council Internal Audit Section Committee Summary

## Financial Services – Cook Freeze – Business Continuity and Safety

Item 4(a)

19th June 2024

### 1 Introduction

- 1.1 As part of the agreed Internal Audit plan we have carried out a review of business continuity planning (BCP) and health and safety at the Council's Cook Freeze production kitchen. Cook Freeze is operated by Catering and Facilities Management (C&FM) which is part of Financial Services.
- 1.2 Cook Freeze is a purpose built facility located in Black Street near the city centre and is used to prepare meals where they may not be able to be produced on site, including many Council properties and services (e.g. schools, care homes, resilience team activities, and Encore). The site is around 40 years old and there is the potential for significant impact on the supply of meals to these locations if an issue was to develop.
- 1.3 Additionally, the Council has a legal duty to put in place arrangements to manage health and safety at work. Workers at Cook Freeze face health and safety risks from the use of machinery and hand tools, transportation of goods, manual handling, loud noises, and exposure to flour dust.
- 1.4 The scope of the audit was to ensure there are sufficient and appropriate controls in place covering business continuity and health and safety and that these are operating effectively. The scope of the audit included:
  - Health and safety arrangements in place at Cook Freeze.
  - Roles and responsibilities regarding health and safety.
  - Reporting accidents and near misses.
  - Ensuring Cook Freeze are aware of their critical functions and prepared to manage a business continuity event.
  - Processes in place for ongoing maintenance of the building and key equipment.
  - Reviewing the Cook Freeze business continuity plan to ensure the impact of an incident has been adequately addressed.
  - Business continuity testing and lessons learned documentation.
- 1.5 Food safety at Cook Freeze and the meal delivery model was previously reviewed during the Education food standards audit completed as part of the 2022/23 Internal Audit plan and so was not covered as part of this audit.
- 1.6 The audit included the overall health and safety arrangements at Cook Freeze; however the audit scope excluded compliance with health and safety legislation/regulations.

## 2 Audit Opinion

- 2.1 Based on the audit work carried out a reasonable level of assurance can be placed upon the control environment. The audit has identified some scope for improvement in the existing arrangements and 6 recommendations which management should address.

## 3 Main Findings

- 3.1 We are pleased to report that the key controls are in place and generally operating effectively. Financial Services have a health and safety management standard in place which outlines the roles and responsibilities of those involved. A health and safety risk assessment has been completed for Cook Freeze and incidents are recorded and investigated by an appropriate officer using the Council's HANDS (Health and Safety) system.
- 3.2 A Business Impact Assessment (BIA) and Business Continuity Plan (BCP) have been developed for Cook Freeze using the corporate template and at the time of the audit fieldwork this had been reviewed within the last 12 months. Additionally, senior officers routinely engage with their counterparts in other local authorities to discuss common issues. However, our audit testing has found that there are some areas that could be improved.
- 3.3 We were informed that the main building at the Cook Freeze site has started to experience defects including issues with the roof, flooring and windows. While maintenance has been undertaken to address some of these issues when they impact upon production, as the building ages there is an increased risk of an incident occurring. An alternative site has not been identified if the Cook Freeze building was not available for an extended period. We were informed that the current site is reaching capacity and could struggle to meet demand if a further expansion to free school meals is implemented.
- 3.4 The Council's Business Continuity Management Policy notes that, "as a minimum, BCPs for the most critical services/functions should be exercised annually. A planned exercise must be undertaken even where functions/Services have dealt with actual incidents". However regular testing and lessons learned exercises are not in place for the Cook Freeze business continuity arrangements. While we were advised of how management would initially respond to a major business continuity incident including loss of IT and utilities, this is not documented in the BCP.
- 3.5 Completion of the Council's BCP training courses was not recorded for some Cook Freeze staff. While these courses are not mandatory one of the courses is highly recommended for managers and the other for all staff.

- 3.6 There is no CCTV at the site, and we have been advised there are six keys which may make it difficult to identify who had accessed the building if an incident was to occur outwith business hours.
- 3.7 A specific risk register is not currently maintained for Cook Freeze. However, we noted that the departmental risk register contains one overarching risk relating to the Cook Freeze premises.
- 3.8 Health and safety training records were observed on site, and it was noted that a number of staff members had not yet undertaken the required manual handling of loads training. We were advised that since Catering and Facilities Management joined the Council in 2018, training has been managed internally and recorded by internal admin on attendance lists and spreadsheets. We noted that this approach may be disjointed as information is held across various mediums.
- 3.9 The wording of the Council's health and safety policy suggests that the union appointed Health and Safety Representative should conduct inspections every three months. However, we noted that inspections are not occurring with this frequency.
- 3.10 An action plan is provided at section four outlining our observations, risks and recommendations. We have made 6 recommendations for improvement. The priority of each recommendation is:

Priority	Definition	Total
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	1
Medium	Less critically important controls absent, not being operated as designed or could be improved.	1
Low	Lower level controls absent, not being operated as designed or could be improved.	4
Service Improvement	Opportunities for business improvement and/or efficiencies have been identified.	0

- 3.11 The audit has been undertaken in accordance with the Public Sector Internal Audit Standards.
- 3.12 We would like to thank officers involved in this audit for their cooperation and assistance.
- 3.13 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan.

## 4 Action Plan

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> All reasonably possible scenarios are adequately considered in the business continuity plan.				
1	<p>We were informed that the main building at the Cook Freeze site has started to experience defects including issues with the roof, flooring and windows. While maintenance has been undertaken to address some of these issues when they impact upon the production and delivery of food from the site, as the building ages there is an increased risk of an incident occurring.</p> <p>Currently an alternative site has not been identified if the Cook Freeze building was not available for an extended period. Work is ongoing to identify an alternative site where some production could take place during a “black start” event where there is a widescale loss of utilities.</p> <p>Additionally, we noted an ICT related risk.</p> <p>We were advised how management would initially respond to a major business continuity incident including loss of IT and utilities, however this is not documented in the BCP.</p> <p>Without identifying alternative locations and documenting interim arrangements</p>	<p>Management should document plans to continue operations following an incident preventing use of the Cook Freeze site. This should consider alternative premises which could accommodate Cook Freeze staff and allow production to continue, even if in a reduced capacity. This should also consider sources of equipment and the distribution of meals.</p> <p>Management should document their interim arrangements in the BCP for responding to a major business continuity incident including loss of IT and utilities.</p> <p>Management should continue to liaise with their IT business partner regarding the ICT issue identified.</p>	High	<p><b>Response:</b></p> <p>A procedure document will be created to supplement BCP and this will outline alternative locations and processes should Cook Freeze site be unavailable for any reason.</p> <p>Meetings with our IT partner are underway to discuss and contingency arrangements will be put in place during the interim period.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Senior Operations Manager</p> <p><b>Timescales for Implementation:</b></p> <p>30<sup>th</sup> October 2024</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
	there is an increased risk that the initial response to a business continuity incident will be delayed.			

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Adequate training is in place and testing of the business continuity plan has been completed.				
2	<p>The Council's Business Continuity Management Policy notes that <i>"as a minimum, BCPs for the most critical services/functions should be exercised annually. A planned exercise must be undertaken even where functions/Services have dealt with actual incidents"</i>. As the Cook Freeze supplies meals to care homes it is likely to be considered a critical function, however regular testing and lessons learned exercises are not in place for the Cook Freeze business continuity arrangements.</p> <p>Completion of the Council's BCP training courses were not recorded for some Cook Freeze staff. While these are not mandatory, one of the courses is highly recommended for managers and the other for all staff. Arrangements can also be made for staff who do not have access to the GOLD online training and development system.</p> <p>If staff are not adequately trained and the business continuity arrangements have not been tested there is an increased risk that during a live incident staff may not respond as expected or it may not have been identified that the plans in place are not effective.</p>	<p>Management should introduce testing/exercising for Cook Freeze business continuity planning processes, review the outputs, and update the plans as appropriate. This process of testing and review should be completed at least annually.</p> <p>Management should review the staff who are required to complete BCP training and there after ensure this is complied with.</p>	Medium	<p><b>Response:</b></p> <p>Managers will take the BCP course on Gold and a briefing to all other staff through our toolbox talk process will ensure all staff are briefed and aware of BCP.</p> <p>Before the end of this calendar year a testing exercise will take place to test BCP arrangements.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Senior Operations Manager</p> <p><b>Timescales for Implementation:</b></p> <p>BCP training – 30<sup>th</sup> October 2024</p> <p>Testing exercise – 18<sup>th</sup> December 2024</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Appropriate physical security arrangements are in place for the Cook Freeze site				
3	<p>The Cook Freeze site does not have CCTV and we have been advised that six keys have been distributed to staff to access the premises.</p> <p>Without CCTV and a significant number of keyholders there is an increased risk that accountability cannot be assigned if a security incident was to occur at the site outwith business hours.</p>	Management should review the appropriateness of current arrangements for key holders, with a view to reducing these to improve accountability while maintaining operational resilience.	Low	<p><b>Response:</b></p> <p>A review of key holding arrangements will take place immediately however this needs to include resilience as operation is required out of hours for any incidents in the city.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Head of Catering and Facilities Management</p> <p><b>Timescales for Implementation:</b></p> <p>30<sup>th</sup> September 2024</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> All relevant risks from the risk register are included in the business continuity plan.				
4	<p>A specific risk register is not currently maintained for Cook Freeze and we noted that the departmental risk register contains one overarching risk relating to the Cook Freeze premises.</p> <p>Without considering and monitoring risks that could affect the Cook Freeze there is an increased likelihood that these crystallise and become operational issues.</p>	Management should formulate a process for documenting and monitoring developing risks at the Cook Freeze on the departmental or service level risk registers.	Low	<p><b>Response:</b></p> <p>Specific risks to Cook freeze will be highlighted on Pentana as part of our service-related risks. In addition, specific risk meetings will take place focussing on Cook Freeze.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Senior Operations Manager</p> <p><b>Timescales for Implementation:</b></p> <p>30<sup>th</sup> September 2024</p>



No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Health and Safety Policies are in place and employees are aware of their roles and responsibilities.				
5	<p>From the training records reviewed we noted that a number of staff had not recently undertaken manual handling of loads training and we were advised by the Production Manager that the course had only recently been relaunched. The Senior Health and Safety Advisor for Financial Services advised that within Catering and Facilities Management training is recorded on attendance lists / spreadsheets but that this is disjointed due to the breakdown of resources and various mediums holding information.</p> <p>The wording of the Council's health and safety policy suggests that the union appointed Health and Safety Representative should conduct inspections every three months. However, we noted that inspections are not occurring with this frequency.</p> <p>If training is not undertaken there is an increased risk of preventable health and safety incidents occurring.</p>	<p>Corporate Health and Safety should review the wording of section 5.2 of the Health and Safety Policy to ensure that the frequency of inspections is appropriate and reflects the requirements of the relevant legislation.</p> <p>C&amp;FM management should ensure health and safety training is undertaken and recorded as appropriate.</p>	Low	<p><b>Response:</b></p> <p>Catering and Facilities Management - Training will take place on manual handling for all staff and will design a process to ensure this is updated on SAP for reporting purposes.</p> <p>Corporate Health and Safety – The wording of section 5.2 of the Health and Safety Policy has been reviewed and updated.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Catering and Facilities Management – Senior Operations Manager</p> <p>Corporate Health and Safety – Health and Safety Manager (Governance)</p> <p><b>Timescales for Implementation:</b> 30<sup>th</sup> October 2024</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> There is an investment programme for equipment at Cook Freeze, and where appropriate, insurance arrangements are in place.				
6	<p>We were informed that equipment at Cook Freeze is replaced on an ad hoc basis when required due to current budget arrangements. While indemnity insurance is in place, insurance is not currently in place for equipment.</p> <p>We were informed that the current site is reaching capacity and could struggle to meet demand if a further expansion to free school meals is implemented.</p> <p>If insurance is not in place there is an increased risk that the recovery from an incident is delayed while budget is sought to replace key equipment. Additionally, as the current site is approaching capacity there is a risk that the Council could struggle to accommodate a change to Government policy regarding the expansion of free school meals.</p>	<p>Management should investigate the potential of insurance for equipment at Cook Freeze and assess the need for this.</p> <p>Management should undertake a formal assessment of the capacity requirements for the Cook Freeze service if the planned expansion to free school meals is implemented. If this shows that there is insufficient capacity to meet the expanded needs management should develop an action plan to address this.</p>	Low	<p><b>Response:</b></p> <p>An assessment for insurance will take place and discussion on high value equipment particular for future purchasing will allow us to understand insurance needs moving forward.</p> <p>Capacity requirements for roll out of universal free school meals will take place and appropriate action plan will be designed to meet any additionality.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Head of Catering and Facilities Management</p> <p><b>Timescales for Implementation:</b></p> <p>30<sup>th</sup> November 2024</p>