London Olympic
and Paralympic Games 2012

Health, Safety and Welfare
Intervention Strategy for regulating
LOCOG managed activities.

Web version
07/2011
PREFACE

The LOCOG health, safety and welfare intervention strategy covers the health and safety regulation of the London Organising Committee of the London and Paralympic Games Ltd (LOCOG), and its activities. The strategy describes how health and safety co-regulators should intervene with LOCOG managed activities and premises.

The aim of this strategy is to promote consistent and proportionate regulation, whilst ensuring regulators are satisfied that LOCOG is achieving high standards of health and safety compliance throughout the preparations and during the London 2012 Games.

PURPOSE

1 This intervention strategy covers the health and safety regulation of the London Organising Committee of the London Olympic and Paralympic Games Ltd (LOCOG), and its activities.

2 The HSE Board has agreed an overall strategy. HSE’s aim is to facilitate a safe and successful London 2012 Games and create a lasting legacy of health and safety benefits.

3 HSE will use the opportunity presented by the London 2012 Games to promote the HSE Strategy, to work with others and to demonstrate that health and safety is an enabler, not a barrier to delivery.

4 To achieve this broad aim, a number of objectives have been agreed by the HSE Board for HSE’s Olympic work:
   
   - to work with and through others on this project to drive up standards of occupational health, safety and welfare;
   - to be a best practice regulator, thereby enhancing the reputation of HSE and the health and safety brand; and
   - to ensure good practice and lessons learned are shared to create a lasting health, safety and welfare legacy.

5 This intervention strategy sets out the approach and priorities for HSE and LA co-regulators to deliver the HSE Board aims and objectives.

INTRODUCTION

Background

6 LOCOG is responsible for preparing and staging the London 2012 Games. It is a company limited by guarantee, funded mainly by the private sector, through sponsorship, media contracts and ticket sales.

7 LOCOG was set up in accordance with the Host City Contract between the International Olympic Committee (IOC), the host city, the National Olympic Committee (NOC) and National Paralympic Committee (NPC).
8  LOCOG is led by Sebastian Coe (Chair) and Paul Deighton (Chief Executive). It is based in Canary Wharf along with the Olympic Delivery Authority. By the time of the 2012 Opening Ceremony around 200,000 people will be working on the Games - including 10,000 staff, up to 70,000 volunteers and a 100,000 contractors e.g. caterers, waste contractors etc.

9  LOCOG will let most of the contracts for services to deliver and run the Games. Major procurement for contracts started in 2009.

10 Paul Deighton has described LOCOG as an events management company, currently moving from an office based planning focus to an operational delivery organisation.

Scope
11 This strategy is specific to the period from September 2010 until September 2012, and covers the planning and preparations for the sporting events including the construction of new temporary venues, existing venue overlay, transport, logistics, and test events. It will be reviewed in March 2012. This version has been reviewed in June 2011.

12 This strategy will be followed by HSE, and has been shared with LA co-regulators on the Olympic Games Co-ordinating Group. LAs are encouraged to adopt and follow this strategy.

13 The outcomes from interventions will be shared with Local Authority (LA) colleagues, and within HSE.

14 This strategy is specific to health and safety, as defined by the Health and Safety at Work etc. Act 1974 and does not cover matters such as road safety, fire safety and public health and trading standards.

LOCOG ROLES AND RESPONSIBILITIES
15 LOCOG is responsible for staging a memorable London 2012 Olympic Games and Paralympic Games (London 2012 Games). This includes:

- adding the ‘Olympic overlay’ to the purpose-built venues and existing venues, including building the stands and fields of play for temporary sites;
- staging a series of test events in the year before the Games;
- sports competition management, venue management, venue branding, as well as in-venue security, waste and cleaning;
- accommodation, catering, medical and anti-doping services and transport for athletes, officials, IOC, IPC and International Federations.
- ceremonies, Torch Relays, national and international cultural activities and official London 2012 Live Sites;
- recruiting and managing volunteers, workforce and contractor workforce for the Games; and
• event services, including in venue catering, information, merchandise and ticketing.

16 The main sporting venues for the London Olympic and Paralympic Games will be in the Olympic Park in Stratford, East London, although there other venues including:

• existing sports venues hosting the sport that they were designed for, that will be converted by Olympic overlay (eg Wimbledon, football stadia);
• existing venues converted for a different sport(s) (eg Lord’s cricket ground hosting archery);
• existing venues that will be converted to sports venues (ExCel, North Greenwich Arena, Earls Court); and
• new temporary venues, built for the London Games (eg Greenwich Park, Horse Guards Parade).

17 In addition to the sporting venues, LOCOG will be managing non-competition venues. These include logistics centres, transport depots, training facilities and facilities within hotels and airports.

Organisation
18 LOCOG is headed by a Board; membership details can be found on http://www.london2012.com/about-us/the-people-delivering-the-games/the-london-organising-committee/locog-board.php.

REGULATORY FRAMEWORK

19 The Health and Safety (Enforcing Authority) Regulations 1998 allocate the enforcement of health and safety legislation at different premises, and activities between LAs and HSE.

20 There are 19 LAs with fixed sporting venues, and other LAs will have road events and non-competition venues, within their Boroughs or Council areas. At the Olympic Park, the Joint Local Authority Regulatory Services (JLARS) aims to co-ordinate and standardise LA regulatory services in the Olympic Park.

21 The regulatory framework surrounding the London 2012 Games is complex. The enforcement responsibility varies with both activity and through time, as construction work finishes and venues are handed over for the event.

22 In terms of LOCOG as a dutyholder, the main activities and premises that HSE has regulatory responsibility for are:

• all construction activity (this includes most of the overlay work, as well as the construction of the temporary venues);
• broadcasting and the interface with the Olympic Broadcasting Service;
• some transport and logistic centres (depending on main activity);
• crown and LA premises where they interface with LOCOG managed venues or activities;
• some training camps, (depending on ownership and main activity) where LOCOG are part funding and facilitating. A list of training camps can be found on http://www.london2012.com/documents/training-camps/pre-games-training-camp-agreements-summary-jun-2010.pdf
• some suppliers contracted by LOCOG e.g waste removal; and
• emergency services.

23 LAs are the enforcing authority for:

• most of the activities at sporting venues during Games time;
• some transport and logistics centres (depending on main activity);
• event preparation that is not construction;
• some training camps;
• road venues where the road is closed;
• residential accommodation, hotels etc;
• catering; and
• offices.

24 In addition to their responsibilities under the Health and Safety (Enforcing Authority) Regulations 1998, LAs also have a regulatory responsibility for safety certification, under the Safety at Sports Grounds Act 1975 and regulated stands under the Fire Safety and Safety of Places of Sport Act 1987 and for licensing under the Licensing Act 2003. The Olympic Stadium is the only new or temporary Olympic venue currently planned to be certificated under the Safety at Sports Grounds Act. Other venues may be licensed under the Licensing Act 2003.

25 The London Building Act applies to and is enforced by the Inner London Boroughs. This requires consent for temporary structures including temporary sports stands, marquees and inflatable structures.

26 Public safety is one of the four licensing objectives in the 2003 Licensing Act.

27 The licensing arrangements will vary between LAs. 12 premises licences have been granted on the Olympic Park with conditions attached. LOCOG will be submitting their Operational Management Plans to the licensing authorities in advance of any licensable activities taking place.

INTERVENTION STRATEGY

28 The aim of the health and safety interventions with LOCOG is for regulators to be satisfied that LOCOG is achieving high standards of health and safety compliance throughout the preparations for London 2012 Games. Regulators will also look at ensuring that proper consideration is given to the risks arising from use during Games time. The focus of the strategy is on ensuring that health and safety risks are considered during planning and preparation for the London 2012 Games. At present HSE’s aim is to not carry out interventions (other than reacting to incidents and complaints) during Games time.
This strategy is based on the principles of effective inspection and enforcement set out in the Hampton Report of 2005 (http://www.berr.gov.uk/files/file22988.pdf). In implementing the strategy regulators will ensure that we:

- make best use of available resource;
- carry out timely and proportionate interventions to promote compliance, targeting higher risk activities and challenging inadequate arrangements; and
- promote a consistency of approach with colleagues and other Regulators to avoid duplication.

Interventions will be front-end loaded to ensure that risks are identified and during the design and planning stages, and appropriate control measures are put in place.

In particular regulators will be seeking:

- strong leadership from LOCOG and others in the supply chain in championing the importance of, and a common sense approach to, health and safety;
- high standards of health and safety delivered through LOCOG’s procurement and planning arrangements;
- robust arrangements for the control and management of contractors, including monitoring of health and safety performance;
- a clear commitment to ensuring and developing the competence of all those involved in the preparations for London 2012 Games; and
- assurance that the arrangements for managing health and safety at each venue are robust and the activities properly co-ordinated.

HSE as the national regulator for occupational health and safety will provide leadership, support and advice to LA co-regulators.

HSE and LAs are committed to ensuring that lessons learned and good health and safety practice will be shared as a lasting legacy from the Olympic project in line with the stated objective of the Coalition Government’s Programme (ch.7 of http://www.cabinetoffice.gov.uk/media/409088/pfg_coalition.pdf).

Initial work has focused on understanding the LOCOG health and safety leadership programme, training programme and management arrangements.

The approach that will be adopted is:

- a central intervention to assess and influence LOCOG’s policies, procedures and arrangements;
- a sampling approach to gain assurance that the arrangements are delivering in practice as LOCOG’s planning develops;
- a “vertical slice” considering how key functional areas are planning to manage risk; and
• a “horizontal slice” on a sample of venues looking at how the functional areas come together and deliver coherent health and safety management and risk control.

36 This does not exclude consideration of venue specific matters, but the main approach to venue interventions will be to sample how LOCOG’s arrangements are working in practice.

37 The level of follow up intervention will be sufficient to provide reassurance to the regulator that the policies, arrangements and standards are being implemented. If early inspections provide confidence about the adequacy of management arrangements then the intervention plan may be adjusted to give a lighter inspection loading. Where construction work is being carried out, either in the construction of temporary venues, or through overlay, HSE’s Construction Division will lead the early interventions, in accordance with its agreed intervention strategy http://www.hse.gov.uk/aboutus/london-2012-games/resources/construction-intervention-strategy.pdf

38 All interventions will be targeted at identified high risk work activities. In particular:

• work at height;
• vehicle pedestrian separation;
• lifting operations;
• occupational health risks – manual handling, COSHH, etc;
• public event and crowd safety including temporary demountable structures; and
• electrical safety.

39 Given the complexity of the regulatory framework it is likely that interventions may involve both HSE and LA inspectors.

40 Interventions will include identification and recording of good practice that could form part of a learning legacy from London 2012 Games.

41 In addition, lead inspectors (HSE, LA or both) will be appointed for key LOCOG functional areas. These lead inspectors will act as a point of contact for LOCOG, they will also assess the health and safety standards and arrangements (vertical slice), and intervention arrangements relevant to their functional area. Interventions will be commensurate with the risks, and will be based on a sampling approach as outlined in paragraph 35.

42 Lead inspectors will be supported by a virtual team of inspectors from Field Operation Division (FOD) Regions, Construction Division and relevant LAs.

Currently lead inspectors are in place for the following functional areas:

• construction;
• transport; and
Other functional areas where lead inspectors could be appointed include
- ceremonies;
- logistics; and
- torch relay.

**PROACTIVE INTERVENTIONS**

**Core Agenda for interventions with LOCOG**

43 The following topics will form the basis of interventions with LOCOG:

**Leadership**
- clear evidence of strong leadership from directors/senior managers and supervisors; and
- evidence that appropriate performance standards set for supply chain have been set.

**Competence of workers and volunteers**
- effective arrangements for assessing competence of contractors;
- clear evidence of health and safety competence in LOCOG employees and secondees;
- effective arrangements for induction and training; and
- effective arrangements for training volunteers.

**Design and planning for safety and health**
- identify substantial issues which should be addressed through design;
- ensure health and safety is properly considered during procurement; and
- ensure health and safety hazards have been addressed through design and planning.

**Management and control of contractors and suppliers, including monitoring arrangements**
- evidence that health and safety performance, arrangements and commitment are considered when selecting contractors and suppliers;
- evidence that designers, contractors and other team members that are selected are competent, and adequately resourced;
- effective arrangements for ensuring that contractors are adhering to method statements and meeting relevant performance standards; and
- ensure arrangements for monitoring contractor performance are in place.

**Co-ordination, responsibilities, interfaces and boundaries at venues and other sites**
- ensure that the overall responsibility for health and safety is clearly set out for each of the venues, premises and activities, within LOCOG’s remit;
- ensure that there is clarity over roles and responsibilities, and that these arrangements are effectively communicated to contractors, venue or
• ensure that arrangements for ensuring health and safety include boundaries and interfaces with other premises and activities; and
• ensure that there are management arrangements in place to cover co-operation and communication between contractors.

**Worker Involvement**

• evidence that LOCOG has effective arrangements for consultation with consultation with workers, including compliance with legal requirements;
• evidence that effective arrangements exist for involving workers management of health and safety e.g. in risk assessment, incident investigation, near miss reporting etc; and
• explore LOCOG’s plans for involving workers as the organisation expands.

**Construction**

44 HSE’s Construction Division has an agreed intervention strategy for all London 2012 related construction work, and will act as a lead for all construction matters.

**FOD Single Points of Contact (SPOC)**

45 Each FOD region has appointed a SPOC to lead on London 2012 Games issues. Where necessary, SPOCs will be engaged in discussions specific to venues or activities in their region.

46 SPOCS will also act as liaison officers with LAs in their region, both to identify emerging issues, and to communicate with LA co-regulators and LAs providing services and facilities.

**Flexible Warranting**

47 Under S19 of the Health and Safety at Work etc Act 1974 (HSWA) powers exist to allow one Enforcing Authority (EA) to appoint another EA’s suitably qualified inspectors to act within its field of responsibility. Flexible warranting essentially allows HSE and LA inspectors to be appointed to exercise their powers in each other’s premises or spheres of activity. It does not transfer the responsibility for enforcement which remains with the enforcing authority as designated in the EA Regulations.

48 HSE will work with LAs to develop a co-ordinated approach, (including consideration of flexible warranting where appropriate) with the aim of facilitating effective and efficient health and safety inspection, during the preparations and delivery of the London 2012 Games. Many LAs outside London with LOCOG venues have flexible warranting schemes in place.

**REACTIVE INTERVENTIONS**

**Complaints**

49 All complaints will be dealt with through the existing complaints handling procedures. HSE Complaints teams and LAs will be asked to advise the London 2012 Games Team about complaints requiring follow up.
Accidents
50 HSE will select incidents for investigation by HSE in accordance with HSE’s incident selection criteria. LAs are advised to follow the guidance in LAC 22/13.

CO-ORDINATION

51 Proactive interventions will need to be co-ordinated. This is a complex process, as both LAs and HSE have enforcement responsibilities, and the full range of LOCOG’s activities and sites is not yet clear. The focus is on early intervention, providing advice and achieving assurance that LOCOG’s policies and procedures are achieving high standards of health and safety, not detailed site based inspection.

52 The following principles will be applied to by those engaged on this work:

- HSE London 2012 team will be responsible for liaison with LOCOG at senior level;
- a co-ordination team of Senior HSE Managers will lead and co-ordinate the implementation of this intervention strategy in HSE. Band 2 leads and LA representatives will be invited to join the group as required;
- interventions will be planned jointly with LA colleagues;
- communication plans for relevant LAs will be developed by the London 2012 team in consultation with FOD Divisions and LAU;
- regular workshops for regulators involved in LOCOG interventions will be held, both to identify issues and identify and capture good practice; and
- information will be shared with LA co-regulators, using existing communication channels.

ENFORCEMENT

53 Any enforcement action taken by HSE will be in line with HSE’s published enforcement policies and procedures (LAC 22/17 refers). Enforcement action is likely to attract media attention and it is important that information about such action should be passed promptly to London 2012 Games Team.

COMMUNICATION

Communication – internal to HSE
54 Good communication between HSE staff responsible for delivery of interventions on LOCOG projects is essential. The Head of HSE London 2012 Games Team needs to be kept informed and made aware of immediate concerns or issues. Divisional FOD Heads of Operations will monitor progress with the plan. The Head of HSE London 2012 Games will brief HSE Director for London 2012 and others as required.

55 HSE London 2012 Games Team will be responsible for resolving issues of regulatory overlap in conjunction with LAU and LA representative bodies.
Communication – external

56  HSE’s London 2012 team holds regular meetings with LA co-regulators and other relevant regulators. JLARS, Westminster and Greenwich are represented on Olympic Games Coordinating Group. JLARS officers and LA inspectors are likely to have frequent contact with LOCOG and others as they deliver their regulatory responsibilities on food safety, licensing etc.

57  Appropriate LAs will be involved in intervention planning through meetings, workshops and reviews.

58  As the main activities change on venues in London and elsewhere, LAs and HSE inspectors will need to share information on health and safety concerns. For matters which are within HSE’s responsibility in the first instance, HSE London 2012 Team will receive notification of such matters even if LOCOG is notified in parallel. HSE’s London 2012 Team will then quickly alert the allocated team which will be best placed to decide whether urgent action is required, and who they need to contact.

59  Arrangements to communicate findings from interventions both within HSE and with LAs are being developed.

Legacy

60  Inspectors will contribute to capturing and sharing good practice and lessons learned from work of LOCOG. This will entail identifying and collating suitable material for promotion on HSE’s London 2012 webpages and elsewhere: ‘The health and safety learning legacy’ [see http://www.hse.gov.uk/aboutus/london-2012-games/index.htm] The HSE London 2012 team will be responsible for managing the webpages.