

Committee: Police	Date: 23 rd September 2013
Subject: City of London Police- Health and Safety Management Performance annual update	Public
Report of: Commissioner of Police POL 44 /13	For Information

Summary

This report advises your Committee of progress made in developing and applying Health and Safety policy throughout the Force since the previous report submitted to your Committee in September 2012 (Pol 67/12 refers). Progress is considered under the headings of, Policy and organisation; The three-year strategic plan; Risk management; Training; Managing performance and audit.

The Commissioner is responsible for Force Health and Safety. The delivery of H&S has been delegated to the Director of Corporate Services as Force Lead. All directorates have integrated Health and Safety (H&S) into their management structures and systems. The last year has however been a challenging one, with two changes to management of the Head of Occupational Health, Safety and Welfare (OHSW) as well as a number of changes within the senior management of Human Resources (HR) business area under which H&S is managed. One major achievement was the commencement of a joint Occupational Health Service with the City of London Corporation in Autumn 2012.

The Force continues to work towards delivering the three year strategic Health and Safety Plan with 42 actions progressing. The plan shows the 2012 position and the 2013 update. (Appendix 1) The emphasis of the current three year plan is on the monitoring and review of the Directorate and Force management in this area.

In terms of risk management, the Force manages this under a process called 'Top X'. Directorates identify risks and this is reviewed and managed at the Force's Force Health and Safety Committee. 14 risks were identified in 2011 with one remaining open for monitoring purposes. (Appendix 2).

There has been a significant drive on Health and Safety Training. Mandatory modules, such as Fire Awareness are now monitored at the Force's Performance Management Group (PMG). A table is included in the main body of the report for Members reference. The Force is planning to take a more risk based approach to identifying appropriate training for specific roles in the future.

The Force completes an Annual Certificate of Assurance which is a top level review of H&S management systems to identify strengths and weaknesses, the current certificate is dated February 2012 and is due for a further review. The City Of London Police has a Health and Safety management system in place, with all

the necessary components for Directorate Heads to manage their areas effectively.

Accident data shows that there has been a total of 44 accidents involving Staff in the calendar year Jan 2012-Dec 2012. Full details are shown in the report including a four year comparison, which shows a marked reduction in reporting. This is being explored by the new Head of OHSW.

Recommendation

It is recommended that Members note the contents of this report.

MAIN REPORT

BACKGROUND

1. The City of London Police (CoLP) submits a report annually to your Committee on the progress made in applying Health and Safety policy and practice, and advises Members of any developments during the year. This review period of this report covers the period 1 January 2012 – 31 March 2013. However, for information purposes some details of current performance are given so that progress against the current Force Action Plan can be monitored.
2. Due to resignations, absence due to illness and restructure, the Force Health & Safety and Welfare departments have experienced significant disruption to the level of resources available to deliver their services during the course of the past year. However, progress continues to be made against the Force action plan and effective development and engagement through Directorates has ensured continued risk review and localised response strategies.

CURRENT POSITION

Health and Safety Policy and Organisation

3. The CoLP Health and Safety Policy and associated Standard Operating Procedures provide a framework for promoting continuous improvement in the management of Health and Safety.
4. The Commissioner is ultimately responsible for Force Health and Safety performance. He has appointed Eric Nisbett, the Director of Corporate Services (DoCS) as the Chief Officer Health and Safety lead and it is DoCS who chairs the Force Health and Safety Committee. The Heads of Directorates are responsible for the effective management of Health and Safety in their own business areas, and are assisted in this key role by Safety Coordinators.
5. All Directorates have integrated Health and Safety as part of their management systems and the majority have developed a dedicated intranet site for Directorate Health and Safety information on their own pages. This demonstrates their commitment to Health and Safety and provides a dedicated

channel for communication of Directorate specific Health and Safety matters to staff.

6. Due to recent organisation structural changes occasioned through implementation of the City First model, Uniformed Policing and Corporate Services updated websites are under development. The Head of Occupational, Health, Safety and Welfare has recommended through Directorate Health and Safety committees, that Directorate specific Health and Safety information is made available on all Directorate intranet sites to ensure the consistency of information available which was highlighted in last year's report.
7. The proposed merger of CoL and CoLP Occupational Health (OH) services referred to in last year's report took place in Autumn 2012 and Occupational Health Management Performance is not covered in this report.

Three Year Strategic Health & Safety Plan 2011-14

8. The Force three-year Strategic Health and Safety Plan commenced in October 2011 and concentrates on monitoring and review for continuous improvement. There are 42 actions to be reviewed in order to achieve improvement.
9. A review of the Force Action Plan against this time last year shows improvement in its overall monitoring and review of progress. At the same stage last year the need for review of many of actions was highlighted. The majority of these reviews have taken place.
10. Appendix 1 –Health & Safety Action Plan Review – August 2013 provides a comparison of the current position for actions against the position as at last year and provides information on the progress of each specific action.
11. Although some gaps have been identified; data collation, health and safety training needs against job profiles and a consistent approach towards the publication of Directorate specific Health and Safety information on Directorate intranet pages, work has begun to address these. Where appropriate new systems – such as a focused, risk based approach to identifying training needs are being introduced.

Risk Management

12. 'Top X' is the process of identifying the significant health & safety risks within the Force and highlighting these risks to senior management so that action plans can be put in place to mitigate the risks. It is also a requirement of the Corporation's business planning process.
13. All Directorates complete a 'Top Risks' (Top X) review every October which forms the basis for a composite Force report submitted to the Town Clerk. It is the responsibility of each Directorate to ensure that these are reviewed and updated as required. The review of these top risks and plans developed to mitigate them should be monitored through Directorate and Force Health and Safety Committees.

14. Following on from the Directorate reviews a Force-wide review of the 'Top X' should have been completed in November 2012. This was partially completed but the central CoLP submission to the Town Clerk was not made. This omission was primarily caused by several staff changes in key posts involved in the process. The Force has put in place secondary monitoring systems such as inclusion of Health & Safety within the performance management meeting structure, to ensure more effective compliance with wider corporate obligations. Of the fourteen top risks that were identified in 2011, a recent review of those risks show that one remains open with one being left on the 'Top X' register for monitoring purposes. Appendix 2, 'Top X' Review August 2013, provides further detail.
15. In 2011 the top risk was identified as radio reception failure around Liverpool Street Station. During 2012 only one report of radio failure was received. Further work is continuing on a new Air Wave site at Liverpool Street Station and installation is due to begin in mid September 2013. Your Committee received several updates on this matter as part of the Commissioner's update throughout 2012, owing to a question raised by Deputy Keith Knowles. The Commissioner ensured that this remained on the Strategic Management Board Agenda, and the Force worked with the British Transport Police (BTP) to ensure that a way forward was agreed. In the meantime, appropriate patrol strategies have been put in place to mitigate the risk. This action remains on the 'Top X' register, as previously mentioned, for monitoring purposes whilst the improvement works are undertaken.
16. A new annual Health and Safety audit plan will be introduced in Force in 2014. 'Top X' will be a crucial element in planning the audit schedule. A formal review of Directorate 'Top X' and a Force-wide 'Top X' will be completed during autumn 2013.

Health and Safety Training

17. All Directorates undertake an annual review their Health and Safety training requirements.
18. An overview of training completed in the last four years is shown below.

Type	Title	09-10	10-11	11-12	12-13
E-learning	Chief officer H&S	0	0	2	3
E-learning	CLDP*– H&S	2	1	1	1
E-learning	DSE**	0	8	67	155
E-learning	Fire Safety	0	29	50	429
E-learning	H&S for Managers	0	0	0	2
E-learning	Induction Safety	0	0	1	7
E-learning	Lone Working	0	0	0	5
E-learning	Manual	0	0	16	9

	Handling				
E-learning	Office Safety	0	0	0	4
E-learning	Risk Assessment	0	0	1	50
E-learning	Stress Management for employees	0	0	0	7
E-learning	Stress Management for Managers	0	0	0	2
E-learning	Workplace Safety	0	0	0	5
Training Video	DSE	0	0	2	7
Training Video	Fire Safety	0	0	2	48
Training Video	Induction Safety	0	0	1	14
Training Video	Manual Handling	0	0	3	1
Training Video	Risk Assessment	0	1	0	8
Totals		2	39	146	757

*CLDP- Core leadership development programme

** DSE- Display Screen Equipment

19. The table shows a significant increase in the number of staff participating in Health and Safety training during 2012/13.
20. During the reporting period mandatory Health and Safety training, in particular Fire Safety Training has been given a high priority. This training is refreshed every 3 years and many employees training had expired. This has been brought up to date and there is now an escalation process in place with notification to Directorate Heads when their staff do not complete mandatory Health and Safety training on time.
21. First aid training for officers is ongoing in partnership with the Metropolitan Police Service and includes defibrillator training.
22. Health and Safety training statistics are reviewed at Directorate Committees and staff are encouraged to complete training courses as appropriate. Compliance for completion of mandatory training, including health and safety, is monitored at the Force Performance Management Group (PMG) meeting, chaired by the Assistant Commissioner.
23. Currently mandatory training needs are determined utilising a training matrix and within each Directorate, Health and Safety training needs are predominantly determined by rank or grade. Processes have been put in place which ensures that managers identify the risks officers and staff may encounter within their role and appropriate training is then undertaken to help manage and mitigate these risks. This is similar to the way training needs are identified in the City of London Corporation and many businesses.

Managing Performance and Audit

24. Completion of the Annual Certificate of Assurance demonstrates the Force's commitment to Health and Safety. It is a top level review of our Health and Safety management systems and its completion helps identify Force-wide strengths and weaknesses, which, in turn, contribute to Health and Safety business planning for the forthcoming year.
25. The current Annual Certificate of Safety Assurance is dated February 2012 and work is underway to ensure completion of the annual assurance checks to complete the Force Annual Certificate of Assurance by January 2014.
26. The Force is able to demonstrate that it monitors its Health and Safety performance and satisfies legal requirements. Regular meetings are held at Directorate level with Health and Safety as a standing agenda item and at Force level at which Health and Safety Performance is monitored.
27. Monitoring of performance at these Health and Safety Committee meetings includes formal review of either the Force or Directorate Health and Safety Action Plans, accident and incident statistics and risks to both current and future work and operations and legislative changes. These reviews help identify where the need for changes in areas where there may be weaknesses along with highlighting areas of good practice that can be shared with other areas within the Force. This is a key element in any successful Health and Safety management system.
28. Furthermore, a new sampling and audit programme is to be introduced that will monitor performance and provide assurance throughout the year. The results of which will feed into The Force's Annual Certificate of Assurance in January 2014 and beyond.
29. The 2012 breakdown of accident/incident statistics are detailed below (it should be noted that whilst Directorate structures were changing during the year; statistics have been provided as per the breakdowns prevailing at the *start* of the year) and so, Members will note that the data is listed under the old Directorate structure.

Jan – Dec 2012	CSD	TP	ECD	CT &SCO	SSD	Totals
Police Officer Accidents	0	16	2	4	17	39
Support Staff Accidents	1	3	0	1	0	5
Accident totals	1	19	2	5	17	44

Detainee (Custody)	0	6	0	0	0	6
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Assault Physical	0	31	0	1	1	34
Assault Emotional	0	0	0	0	0	0

Near Miss	0	2	0	0	0	2
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Total Incidents	1	58	2	6	18	86
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RIDDOR Reportable	0	0	0	0	4	4
Dangerous Occurrence	0	0	0	0	0	0

CSD- Corporate Services Directorate
ECD- Economic Crime Directorate
SSD-Specialist Support Directorate

TP- Territorial Policing Directorate
CT&SCO- Counter Terrorism and Specialist Crime Directorate

30. A four year comparison of accident/incident figures is given below for Members information:

Totals	2009	2010	2011	2012
Police Officer	50	65	65	39
Support Staff	11	11	11	5
Accident totals	61	76	76	44
Detainee (Custody)	1	34	16	6
Visitor	0	0	0	0
Assault Physical	17	13	38	34
Assault Emotional	0	0	0	0
Near Miss	18	26	43	2
RIDDOR*	2	5	1	4
Reportable Disease	0	0	0	0
Dangerous Occurrence	0	3	0	0
Time Lost (in days)	33	7	4	213

31. The reason for the decrease in accident reporting totals during the reporting period is due to a significant drop in near miss reports, along with a drop in the overall number of accidents reported.
32. Near miss reporting is important as it give the opportunity to address hazards before they cause actual harm. It is unclear why this reduction has occurred and further investigation is being undertaken. This involves year on year analysis of near miss reporting by Directorates and the types of near misses reported. The results will be followed up at Directorate level and monitored and reviewed at the Force Health and Safety Committee.
33. Current process issues relating to the reporting system for Accident/Incident and Near Miss reporting are being reviewed in order to realise efficiencies and improve consistency of reporting in both areas. This includes a review of the relevant policy and guidance.
34. There was an increase to the number of RIDDOR (Reporting of Incidents, Disease and Dangerous Occurrence Regulations) reportable incidents. All involved police officers. Four reports were made in total. Of these 3 were classified as 'over 7 day' reportable injuries. When someone sustains an injury whilst at work which results in the individual being unable to work, or unable to undertake their normal duties, for 7 days or more the incident is reportable to the HSE (Health and Safety Executive). These incidents were:
 - an officer breaking their thumb trying to control an unsettled horse;
 - an officer falling from a motor cycle;
 - an officer sustaining a back injury when loading a response vehicle.
35. The fourth RIDDOR reportable incident was a 'major injury' where an officer sustained fracture and other injuries due to a road traffic collision (RTC).
36. It is noted that injuries from animals and RTCs were included as part of the 2011 'Top X' register. These risks were both removed as part of an internal Force Occupational Health Safety and Welfare service (OHSW) review in 2012. These incidents will be taken into account by the Head of OHSW when compiling the Force's 2013 'Top X'.
37. The increase in time lost due to work related accident and injury was due to one incident where the individual was absent from work for almost 6 months.
38. Whilst owing to the resourcing issues in the past year there hasn't been the opportunity to bench mark the Force's performance against that of other Forces, this is currently being explored and it is hoped that this is something that can be included in the next report to your Committee.

CONCLUSION

39. The past year has seen several changes to the post-holder of Head of Occupational Health Safety and Welfare. This has unfortunately resulted in a

lack of continuity, consistency and the non-completion of Corporation Risk Management documentation. The workforce issues highlighted in the report have now been resolved.

40. Steady progress against the Force's Occupational Safety and Health Action Plan targets continue. Areas for improvement have been identified and actions are being taken to address these areas.
41. Despite the failure to comply with specified procedures, the Force is able to demonstrate that it is monitoring and meeting its legal requirements. Compliance with procedures is an area for improvement in the coming year. Work has begun to introduce internal monitoring systems that are intrinsically linked to these processes meaning that procedural compliance will be maintained in the future.
42. During 2014 a new three year plan will be developed at the conclusion of the current plan. It is envisaged that this will consolidate on the improvements already made and continue to focus on those areas where further requirements for improvements have already been identified.
43. The CoLP remains committed to health & safety and will continue to aim to comply with the law and provide and maintain a work environment that is safe and without risk to health for all officers, staff, contractors and others who may be affected by our activities.

Appendices

Appendix 1 – OH&S Action Plan Review August 2013

Appendix 2 – 'Top X' review August 2013

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