

Committee: Police Committee – For Information	Date: 25 th September 2015
Subject Health and Safety Annual Performance Update	Public
Report of: Commissioner of Police POL 39/15	For Information

Summary

This report provides information on the current position regarding the management of health and safety within The City of London Police (CoLP) since the last report submitted in September 2014 (POL 61/14).

The current health and safety action plan was introduced into the Force following the conclusion of the previous plan at the end of October 2014. In addition, individual Directorate health and safety action plans were introduced to enable the Directorates to devise appropriate, proportionate, local level health and safety management plans.

Now that the risk management framework is in place, the Force needs to embed health and safety best practice into the day-to-day work it undertakes and assure itself that this is the case.

The roll out of Health and Safety mandatory training for all staff is underway and as of 1st July 2015 69% of Police Staff and 85% of police officers had completed their training.

In addition, managers and supervisors should promote a culture of positive challenge in relation to health and safety issues and concerns within their teams in accordance with the Force's Risk Management Standard Operating Procedure where risks are identified at a team level and escalated appropriately.

RECOMMENDATIONS

It is recommended that Members:

- A receive and note the contents of this report; and
- B receive and note the progress to date on the Force Health and Safety Action Plan 2014-17 (Appendix 1).

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. As reported at your meeting on 26th September 2014 the new Force Health and Safety Plan will run from November 2014 to March 2017 and covers a 2.5 year period; this shorter period is to enable the plan to be better aligned with the Force's standard planning cycle. The annual report to your Committee in September 2014 covered the period 1st April 2013 to 30th June 2014.
2. It was also reported that the Force's Annual Health and Safety report would now be presented to your Committee in July each year. Therefore, this report covers the period 1st July 2014 – 31 March 2015 and does not cover a full year. Subsequent year's reports will cover the period 1st April to 31st March annually. 7

CURRENT POSITION

3. The Force Health and Safety Committee monitor the progression and effectiveness of the management of health and safety across the Force.
4. The introduction of the new Force Health and Safety Action Plan (attached at Appendix 1) effective from 1st November 2014 was designed to support Directorates in their management of health and safety. It reinforces the mechanism to escalate issues which cannot be resolved locally, or which have Force-wide implications, to the Force Health and Safety Committee and onward to Force Risk Assurance Group if deemed necessary.
5. There are a number of actions within the plan, which are designed to:
 - improve health and safety management structures with an emphasis on performance measurement and review,
 - support all employees to achieve appropriate levels of health and safety competency.
6. Progress towards completion of these actions will continue to be monitored by the Force Health and Safety Committee.
7. Although health and safety has been more formally integrated within other areas of CoLP's strategic planning and monitoring, for example within the Force Risk Assurance Group, the Force must also evidence that health and safety is considered part of 'business as usual' and

therefore embedded in the work and activities that the Force undertakes.

Health and Safety Policy

8. An updated version of the Force's Health and Safety Policy was endorsed by the Commissioner and published in January 2015.
9. In his Policy statement, the Commissioner acknowledges that, by having an effective and proactive health and safety management system in place, risks to employees and members of the public are reduced. Furthermore, it contributes to operational objectives.
10. The Policy details the responsibilities of managers and employees and outlines arrangements for the management of health and safety, including the governance structure, within CoLP.
11. Since the last annual report presented in September 2014, in addition to the updated Health and Safety Policy, the following Standard Operating Procedures and Guidance have been published:
 - Risk Management
 - Risk Assessment Guidance for New and Expectant Mothers
 - General Risk Assessment

Risk Management

12. A defined framework is now in place for risk management and escalation with focus now being given to embedding health and safety into day to day business.
13. Last year, saw the introduction of changes to improve the safety management system for risk management. Changes made include the introduction of two e-learning courses for managers and supervisors which are deemed mandatory to provide a minimum level of competence. These courses are on NCALT (National Centre for Applied Learning Technologies) and are Health and Safety for Managers and Risk Assessment.
14. To support the completion of risk assessments, not only has the Force introduced mandatory risk assessment training, it has also provided new, concise risk assessment guidance and a simplified risk assessment template. These were introduced into CoLP in line with those used within the Corporation of London.
15. The health and safety risk management process was outlined in a Standard Operating Procedure in February 2015. The aim of which is to make it simpler to understand how risk should be identified and

addressed or escalated if it is not possible to manage identified risks at local level.

16. Health and safety Key Performance Indicators (KPIs). have been included in Directorate Performance Plans for 2015/16, which are reported to Performance Management Group (PMG), and are intended to assist Directorate Heads establish a degree of assurance that health and safety is being managed within their Directorate. The specific areas of health and safety management around which KPIs have been introduced are:

- Directorate Health and Safety Committee arrangements and effectiveness.
- Directorate Top X – focused on the Directorate return of its Top X in conjunction with Force submissions. Also, that each Directorate has an action plan to manage risks where further actions have been identified.
- Accident and near miss reporting – focused on the number of reports made and that appropriate follow up actions are taken by managers and supervisors.

17. Top X is the process for considering the top health and safety risks across the Force. All Departments of the City of London Corporation are asked to report annually to the Town Clerk on their top health and safety risks. The Force Top X risks have been identified as:

- **Fire Safety** This relates to the Force's fire safety arrangements across the Force estate taking into account the challenges it faces as a 24/7 service. New measures have been introduced to manage these risks and the effectiveness of such measures are being monitored.
- **Ongoing hazards associated with working/occupying an ageing estate** – relating to failures of plant equipment which results in loss of essential services such as hot water supply. Due to the current poor and deteriorating position around building facilities, failure rates are likely to increase. Although there are plans to provide an improved Force estate going forward going forward in the long term, if this position is not addressed occupation of existing buildings is likely to become more inherently unsafe. This should also be considered in conjunction with plans to potentially increase the use of these building as operations/staff are moved around during refurbishment. There are plans being developed to undertake a programme of minor works and details will be included in future Accommodation Programme reports to Committee(s) and will incorporate costs to sustain existing buildings in the interim to mitigate this position.

- **Interface risks** – leading to a level of confusion over responsibilities between building ‘owners’ and building ‘occupiers’. Improved consultation between CoL (City Surveyors) and CoLP is resulting in a more effective use of resources with improved lines and responsibility for scheduled works. Plans are now also being developed which will focus on those works which will best mitigate the most serious identified building risks in conjunction with the Accommodation programme.
- **Display Screen Equipment** – a paper was presented to the Force Health and Safety Committee proposing that CoLP use the same system for management of DSE assessments as used by the Corporation. A number of queries were raised regarding cases where follow up would be required by a trained assessor. Further to this meeting a decision was taken to run a trial of the Assessrite system at GYE, the Corporation H&S Team have agreed to help support the trial and assist with any follow-up assessments which may be necessary.
- **Personal Safety risks** - this centres around personal safety risks and potential security risks at entrances to Police stations based upon national, security threat levels and risks to those working in the front offices of Police buildings due to the potential for violent attack by members of the public

General Services and representatives from Intelligence and Information and Crime Directorates have been involved in drawing up plans to mitigate such risks. These have included further advice and briefings provided to all staff and also a full review of physical security in place at entrances and exits at Wood Street, Bishopsgate and Snow Hill. City Surveyors department have been liaising with contractors and suppliers to finalise the plans, which should be agreed across the summer. Implementation will then follow.

Accident and Incident Reporting

18. Over the past three years the numbers of accidents and near miss reports received have remained at a consistent level. Table 1, - Accident and Incident Data refers.

Table 1 – Accident and Incident Data

Totals	CY 2012	CY 2013	FY 2014- 2015
Police Officer	39	34	38
Police Staff	5	14	8
Others (including Agency workers and contractors)	0	2	3
Accident totals	44	50	49
Near Miss Totals	2	8	9
RIDDOR	4	3	2

19. During the reporting period the RIDDOR¹ reports to the Health and Safety Executive (HSE) comprised one that involved an officer who sustained a back injury in a police vehicle and was absent from work for 12 days as a result. The second was an incident involving unintentional discharge during a non-live-fire training exercise.²
20. The Force is planning to move to the accident and near miss reporting system that is currently being trialled in some departments of the Corporation of London.
21. A trial of the reporting system will be undertaken within CoLP. Following assessments and review of feedback it is hoped that a full roll out across the Force will then occur.

Training

22. Health and Safety courses are available, on both NCALT (National Centre for Applied Learning Technologies) and through the City of London Corporation, to inform and support managers and supervisors as to what is required of them in the management of health and safety.

¹ RIDDOR: the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. Reportable incidents include fatalities to workers and non-workers, major injuries from a prescribed list including amputations, fractures (other than to fingers, thumbs and toes) and asphyxia. All workplace injuries that result in a worker being either absent from work, or, unable to undertake their normal duties for seven consecutive days or more. Non fatal accidents to non-workers where the non-worker is taken directly to hospital. Certain, specified occupational diseases. Dangerous occurrences from a list of 27 such as: the collapse, overturning or failure of load-bearing parts of lifts and lifting equipment.

² Subject of Appendix 2- in Non-Public Section

23. The Force's Strategic Management Board (SMB), at their June 2014 meeting, gave their endorsement to a proposal to make the following two NCALT training courses, Health and Safety for Managers and Risk Assessment, mandatory for all managers and supervisors.
24. Roll out is taking place and as at 1st July 2015, 69% of Police Staff and 85% of Police Officers had completed the Health and Safety for Managers course. Additionally, 62% of Police Staff and 75% of Police Officers had completed the Risk Assessment course.
25. Table 2 below provides details of compliance for completion of mandatory health & safety training as at 1st July 2015.

Table 2 – Mandatory health and safety training courses for managers and supervisors

NCALT Course	Total number of Police Staff to be trained	Number of Police Staff completed as at 01.07.15	% complete	Total number of Police Officers to be trained	Number of Police Officers completed as at 01.07.15	% complete
Health and Safety for Managers	94	65	69%	238	203	85%
Risk Assessment	94	58	62%	238	179	75%

FORCE HEALTH AND SAFETY ACTION PLAN 2014 – 2017

26. The current Force Health and Safety action plan commenced in November 2014, it is designed to support Directorates to manage risks locally and provide a defined escalation process for those risks which cannot be managed locally or have Force-wide implications.
27. Further work is needed to ensure health and safety is integrated as part of day-to-day activities. Furthermore, there is a requirement that all departments of the Corporation of London integrate health and safety into their business planning. The Force has supported this by introducing KPIs to Directorate and Force Performance Plans for 2015/16.
28. There are 12 actions in the current Force Action Plan and each Directorate has an individual action plan which is aligned to individual, Directorate risks.

29. The current plan is attached at Appendix 1 with a RAG assessment of the current status as at June 2015 included. An overview of the RAG status of actions is detailed below:

Red	0
Amber	5
Green	7

30. Three of the amber actions where further work is required relate to Planning and Arrangements whilst the remaining 2 relate to Implementation. In particular actions re emergency planning arrangements require updating including the provision of adequate numbers of Fire (Evacuation) Marshals and First Aiders who are appropriately trained to deal with emergency situations within CoLP buildings. Work to address is currently underway and is being monitored by the Force's Health and Safety Committee.

Annual Certificate of Assurance

31. Each Department of the City of London Corporation is required to complete an Annual Certificate of Assurance covering the period 1st January – 31st December annually. The purpose of the report from Department Directors/Chief Officers to the Town Clerk is to provide assurance that the department has a health and safety management system and an assurance process.
32. For the Certificate of Assurance covering 2014, due to the changes that have been made to the arrangements for health and safety risk management within CoLP, it was decided to focus on risk management. The aim of this was to measure the suitability of the Force's risk management arrangements and identify areas of good practice along with areas where additional improvements may be necessary.
33. There were several areas of good practice, in line with legal requirements, identified including the regular review of risk assessments, consultation with employee representatives and the introduction of new systems that align the risk management process in CoLP to those used in the Corporation of London.
34. Three areas requiring improvement were identified. These are:
- i. All managers and supervisors were required to complete mandatory health and safety training, Health and Safety for Managers and Risk Assessment, on NCALT. The deadline was agreed by SMB as the beginning of September 2014.

However, as at 1st July 2015 all Directorates still have some line managers and supervisors who have yet to complete this training. The Force continues to enforce this requirement and, will consider at the next meeting of PMG, how best to ensure that current supervisors and officers complete the course in a timely manner and, new recruits complete as part of their induction.

- ii. Provide independent assurance that health and safety risks are considered and managed appropriately during operations. The Force's Health and Safety Manager will undertake this assurance role by attending future operational planning and de-briefing meetings.
 - iii. All Directorates have a system in place to regularly review their existing risk assessments which is a legal requirement. However, there are certain circumstances where an immediate review of risk assessments is necessary, including after an accident or near miss. Appropriate and timely management follow up is currently difficult to monitor. It is anticipated that once the Force moves onto a new accident and near miss reporting system during the current Corporation-wide roll out, line management follow up will be easier to monitor and identify, including review of risk assessments.
35. In addition to the Annual Certificate of Assurance, during March 2015, the Corporation of London internal audit team carried out an audit to give an assurance opinion to the Town Clerk and Chief Officers on the quality of: Health and Safety Policies, the annual certificate of assurance and accident reporting system. City of London Police was one of the three departments audited which was carried out by sampling documents and procedures. At the time of writing this report a draft copy of the audit report has been issued to the Town Clerk and Chief Officers of the departments audited for comment. Once the final Report has been issued outcomes will be followed up and monitored if there are any areas for improvement identified.

RECOMMENDATIONS

36. It is recommended that Members:
- A. receive and note the contents of this report; and
 - B. receive and note the progress to date on the Force Health and Safety Action Plan 2014-17 (Appendix 1).

CONCLUSION

37. There has been continued progress in areas of health and safety management over the past year. In particular, the governance structure and risk management system.
38. However, changes to management systems need to be fully integrated into local management processes to make these systems effective.
39. An assurance strategy will be developed and introduced over the forthcoming year. The strategy should incorporate local and senior management team self-assurance that health and safety is incorporated and evident in planning and undertaken in day-to-day activities. This should be supported by central independent assurance by the Force Head of Health and Safety.

Contact:

Nicola Scoon

Head of Health and Safety

Tel: 020 7601 2288

E-mail: nicola.scoon@city-of-london.pnn.police.uk