

<b>Committee:</b> Police Committee – For Information	<b>Date:</b> 22 <sup>nd</sup> September 2016
<b>Subject</b>  Health and Safety Annual Performance Update	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 39-16	<b>For Information</b>

### **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 2015, POL 39-15.

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.

The Force continues to embed health and safety best practice into the day-to-day work it undertakes. The Force Leadership Programme promotes the behaviours and organisational values necessary to achieve a positive health and safety culture and achieve a high level of health and safety performance. 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.

The assurance process involving internal and external assessments have highlighted areas for improvement around the management of fire safety linked to responsibilities and documentation. The Corporation of London is in the process of introducing corporate policy and guidance that supports the actions that are being undertaken to mitigate risks at City of London Police occupied buildings.

Common areas of good practice that were noted include the arrangements for the management of health and safety including risk assessment processes.

### **Recommendation(s)**

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.
2. The period covered by this report is from 1 April 2015 to 31 March 2016, although up to date information in some areas is provided for Member's information.

### **Current Position**

3. During the course of the past year changes have been made to the structure of the Force Health and Safety Committee which is now chaired by the Assistant Commissioner.
4. The Committee monitors the progression and effectiveness of the management of health and safety across the Force.
5. The Force Health and Safety Action Plan (attached at Appendix 1) are 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 or the Corporation of London Corporate Health and Safety Committee if deemed necessary.
6. There are a number of actions within the plan, which are designed to:
  - improve health and safety management structures
  - support all employees to achieve appropriate levels of health and safety competency.
7. Progress towards completion of these actions will continue to be monitored by the Force Health and Safety Committee.
8. Work continues to ensure health and safety is integrated as part of day-to-day activities. The Force's Leadership Programme promotes the three big cultural shifts (empowerment, people growing and innovation) and organisational values which are essential in any organisation with a positive health and safety culture and a high level of health and safety performance.
9. Over the past year the Force, through a network of volunteers, has set up a Health and Wellbeing network.
10. The network has the full support of the Commissioner and Force's Senior Management Team. The Force's Health and Safety Manager is part of this network

and acts as a conduit between the Health and Safety Committee and the Health and Wellbeing Network.

## **Risk Management**

11. 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. When reported in November 2015 to the Town Clerk's Department the Forces Top X risks were:
  - **Personal Safety** risks at the entrance and exit of CoLP occupied buildings (Bishopsgate and Snow Hill) and risk of attack at the Front Office in Wood Street. Remedial works have been completed.
  - **Accommodation related issues in the High Tec Crime Unit** where a lot of action has been taken to mitigate identified risks. Some of which are temporary measures until, as part of the Accommodation Programme, permanent measures will be put in place to mitigate identified risks.
  - **Fire Safety** – a number of areas have been identified for improvement. Plans have been agreed with the Support Services and Estates Director, who has management responsibility for the Facilities Team, and these will be implemented taking into account the requirements of the new Fire Safety Policy that is in the process of been introduced by the City Surveyor's Department.
12. Since the report was submitted in November 2015 progress has been made against a number of the risks. The risks have been reassessed, and, as part of the Force's monitoring processes have been removed from the Force Top X register. These risks continue to be monitored at directorate level.
13. As part of the continual review process the following risks were added to the Force Top X in May 2016. Although outside the reporting period of this report, this information is included for Members information.
  - **Body Armour** – It has been recognised that not all Police Officers have the correct body armour and that, there are supply chain issues at a national level. The Force is currently working with existing and national suppliers to find solutions to the national issues.
  - **Personal Safety risks, Reception area, Guildhall Yard East (GYE)** - due to the changes in security threat levels the reception area at GYE presents some personal safety and security risks. At the time of writing this report proposals for the redesign of the reception area are being submitted for approval. Measures are in place to mitigate risks presented by callers who are verbally or physically aggressive.

## Accident and Incident Reporting

14. Over the past three years the numbers of accidents and near miss reports have increased during the reporting year 2015/16. The increase in reporting is from Police Officers. There are no specific trends related to this and is most likely due to on-going promotion, at Force and directorate level, of the importance of reporting accidents and near misses. Table 1, - Accident and Incident Data refers.

**Table 1 – Accident and Incident Data**

<b>Totals</b>	<b>CY*</b> <b>2013</b>	<b>FY**</b> <b>2014-2015</b>	<b>FY</b> <b>2015-2016</b>
<b>Police Officer</b>	34	38	51
<b>Police Staff</b>	14	8	5
<b>Others (including Agency workers, contractors and detainees)</b>	2	3	4
<b>Accident totals</b>	50	49	60
<b>Near Miss Totals</b>	8	9	16
<b>RIDDOR</b>	3	2	4

\*Calendar Year

\*\*Financial Year

15. During the reporting period the RIDDOR<sup>1</sup> reports to the Health and Safety Executive (HSE) comprised of one Police Officer who sustained a fracture to their arm whilst executing an arrest warrant at a private address. The remaining incidents were 'over 7 day reports' involving Police Officers who were either absent from work or on light duties for 7 consecutive days or more following an accident at work. They all related to different accidents including an injury sustained whilst on cycle duty, policing at Notting Hill carnival, a slip whilst rushing down stairs at Wood Street Police Station.
16. The HSE continue to carry out an investigation which is currently still live. Members should refer to the restricted Appendix 2 for further detail on this.

<sup>1</sup> 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.

17. As reported last year the Force is planning to move to the accident and near miss reporting system that was rolled out in other departments of the Corporation of London during the past year. Information security related issues mean that certain checks and assurances must be in place before the Force can commit to using an external organisation to process data relating to its staff and activities.
18. As a contingency measure, because this system is not used by any other Police Forces, other options to move CoLP from a paper-based accident and near miss reporting system are being considered. Preliminary enquiries into systems used by other Police Forces are being undertaken.

### **Force Health and Safety Action Plan 2014 – 2017**

19. 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.
20. 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.
21. The current plan is attached at Appendix 1 with a RAG assessment of the current status as at August 2016 included. For Members information, table 2 below provides an overview of the RAG status of actions over the past two quarters.

**Table 2 – Overview of Force Action Plan**

	Status as of August 16	Status as of May 16
Red	0	0
Amber	6	8
Green	6	4

22. Five of the amber actions where further work is required relate to planning and arrangements whilst the remaining actions relate to implementation. Progress on some of these actions has been slower than anticipated owing to the Force restructure over the end of the previous year and beginning of 2016. However, over the past quarter progress has resumed.
23. These actions are being progressed and their status will be reviewed at the next Force Health and Safety Committee in October 2016.

### **Assurance**

24. Each Department of the City of London Corporation is required to complete an Annual Certificate of Assurance covering the period 1<sup>st</sup> January – 31<sup>st</sup> 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.

25. There were several areas of good practice identified; in line with legal requirements, including the Force's governance structure for monitoring and managing risk and H&S and regular review of risk assessments, consultation with employee representatives.
26. The areas requiring improvement were identified as:
- The arrangements for the management of fire safety in CoLP occupied buildings. The arrangements for fire safety have also been identified as an area for action as part of the Top X process. The recent introduction of the Corporation of London's Fire Safety Policy clearly outlines requirements and responsibilities and processes necessary in line with these requirements. This will be monitored by the Force Health and Safety Committee.
  - First aid arrangements. Proposals for the future arrangements around first aid provision were discussed at the Force Health and Safety Committee and following these discussions it was agreed that a report would be submitted to the October Force Health and Safety Committee meeting for a formal decision.
27. In addition, as reported to your meeting in September 2015, at the time the report was written, the Force was awaiting the recommendations of a management system audit undertaken by the City of London Internal Audit department. When the final report was received there were no specific areas for improvement or actions identified for CoLP.
28. The report noted areas of good practice; "City of London Police (CoLP), we verified that the H&S Policy and Standard Operating Procedure (SOP) provided an overview as well as detailed guidance on the process by which risk assessments are carried out and recorded. The CoLP also provided a detailed H&S Action Plan showing the various identified risks and progress that has been made to introduce mitigating controls".
29. In January 2016 an external health and safety systems review was undertaken by the British Safety Council in 3 of the Corporation of London's departments. The City of London Police was one of the departments selected for review.
30. The findings of the British Safety Council review identified areas of strength around dedicated professional safety advice and areas where improvements could be made as around record keeping and access to information, mainly related to facilities management issues and the interface of responsibilities with the Corporation of London City Surveyors Department. The Corporation of London City Surveyor's Department are working to introduce a Fire Safety Policy and Building Compliance Standards which address the issues highlighted. Work has already begun on some of the issues, in particular fire safety, and progress of implementation will be monitored by the Force Health and Safety Committee.
31. The auditor also identified that the accident and near miss reporting system could be improved which would help with monitoring accident information. This is an area that has already been identified, internally within CoLP, as in need of

improvement; the Force currently uses a paper based reporting system and work has been on-going to move onto an electronic system.

32. The security requirements related to the handling of Police information are more stringent than those of many organisations which resulted in some delays introducing an appropriate electronic system.
33. Preliminary investigations into the viability of systems which are used in other Police Forces for accident and near miss reporting by other Police Forces are being undertaken. This is a contingency measure, should the external supplier not meet the requirements and vetting levels needed to handle Police data.

## **Recommendations**

34. 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**

35. Progress against some actions has been slower than anticipated than in previous years. Changes to the Force structure and in particular the Corporate Services Directorate impacted staff with specific health and safety responsibilities, and this contributed to the slower rate of progress.
36. However, changes to the governance structure mean that the Force Health and Safety Committee are now chaired by the Assistant Commissioner and steady progress is being made against outstanding actions.
37. Both internal and external assurance processes have identified common areas for improvement around safety issues related to facilities management and the recording and retention of information including fire safety. Work has begun on these issues and the recent publication of guidance from the City Surveyor's Department support the actions required.
38. Similar areas of good practice were highlighted including the arrangements around governance and management of health and safety.
39. As reported last year, in order to make the Forces health and safety systems effective they must be fully integrated into local management processes. The leadership programme and the behaviours it promotes around initiative and taking personal responsibility are important in helping the Force achieve a positive health and safety culture and a high level of safety performance.

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