

# Surrey Police and Sussex Police

## Health and Safety Policy and Arrangements



## Health & Safety Service

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## 1. Document Control

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## **2. Vision and Guiding Principles**

### **A statement from the Chief Constables and Police and Crime Commissioners of Surrey and Sussex Police.**

- 2.1. *'The effective and sensible management of health and safety risk is an essential part of delivering an efficient police service for the residents of Surrey and Sussex.*
- 2.2. *We believe health and safety should be seen as an enabler, a mechanism and way of behaving which enables officers and staff to take the risks the community expects to ensure their protection, while avoiding unnecessary and avoidable harm and cost.*
- 2.3. *In keeping with the College of Policing Code of Ethics, we expect all officers and staff to take personal responsibility for their actions and to consider how those actions could not only affect their personal safety, but the safety of colleagues and the wider community in which they serve. This will demonstrate that we operate with integrity, respect and are accountable for the decisions we take.*
- 2.4. *We are committed to achieving compliance with health and safety law. Risk is an inherent part of policing, and we believe that through effective training, planning, and integrating sensible safety risk management into the way we operate, these risks can be managed effectively.'*

Sussex Chief Constable	Signature: Approved electronically Date:
Sussex Police and Crime Commissioner	Signature: Approved electronically Date:
Surrey Chief Constable	Signature: Approved electronically Date:
Surrey Police and Crime Commissioner	Signature: Approved electronically. Date



### 3. Definitions

Definitions are shown throughout the policy in bold text.

- 3.1. **Collaboration / Collaborated Services** means a joint service subject to a Section 22A agreement.
- 3.2. **Department Specific Equipment and Plant** means equipment issued to **Police Officers, Police Staff (With Police Powers), Police Staff and Volunteers** to undertake their role. It also means equipment and plant which is department specific.
- 3.3. **Dynamic Risk Assessment** means an assessment of safety risk which is not initially documented, made in accordance with the National Decision Model (NDM).

**Dynamic Risk Assessment** can be used when, due to a rapidly changing hazardous situation, officers have no time to document their decision making. Officers must make use of their training, experience, and the National Decision Model to manage safety risks in such situations. As soon as reasonably possible afterwards, the significant findings of decision making must be documented and justified. **Dynamic Risk Assessment** must only be used where rapidly changing circumstances truly justifies it.

**Dynamic Risk Assessment** must not be used because of a lack of adequate planning for foreseeable safety **Threats**.

- 3.4. **“Health and Safety Management System”** means the arrangements outlined within this policy, for example:
  - a. Health and Safety Policy and Arrangements.
  - b. **Seven Safety Expectations of Risk Owners and Statement of Assurance.**
  - c. Health and Safety Toolkits.
  - d. People Safety Standards.
  - e. Property Safety Standards.
  - f. Risk Assessments.
- 3.5. **Home Force** means the police force an officer is ‘employed’ by.
- 3.6. **Host Force** means the police force with direction and control in cases of mutual aid.
- 3.7. **Mandatory Minimum Health and Safety Training** is the absolute minimum safety training that all officers and staff must complete and is specified in the template job role risk assessments published by the Health and Safety Service.
- 3.8. **Mutual Aid** is a request for support initiated under the Police Act 1996.



- 3.9. **National Decision Model (NDM)** is the decision-making model that Surrey Police and Sussex Police use to manage health and safety risk and is the model used in risk assessments. Some terms used in the NDM include:
- Threat (hazard).
  - Working strategy (control measure).
- 3.10. **“Near Miss/es”** mean a situation or incident which came close to causing harm (an injury for example) but didn’t. **Near Misses** are an opportunity to learn and prevent a reoccurrence in the future.
- 3.11. **“Office of the Police and Crime Commissioner”** means the Office of the Sussex Police and Crime Commissioner and, the Office of the Surrey Police and Crime Commissioner.
- 3.12. **“Operational Risk Assessment”** means a documented assessment of safety risks completed prior to a planned police operation. The person in charge of that operation is responsible for assessing safety **Threats** to officers, staff and any other person who could be affected by the operation, making use of the National Decision Model and any relevant guidance in Authorised Professional Practice.
- 3.13. **“Police Estate”** means fabric of buildings and structures, including building services, equipment and plant which are integral to them. It includes fixtures / fittings and non-departmental specific furnishings (for example cupboards, desks, and chairs). It also includes external structures, equipment, and plant, but excludes **Department Specific Equipment and Plant**, which is the responsibility of the Chief Constable (as outlined below).
- a. Examples of building fabric / structures include, (not exhaustive):
    - Asbestos management.
    - Structural integrity.
  - b. Building services include, (not exhaustive):
    - Cooling, heating, and ventilation systems.
    - Fixed electrical systems.
    - Gas pipe work.
    - Hot and cold-water systems.
  - c. Examples of equipment and plant include, (not exhaustive):
    - Boilers.
    - Generators.
  - d. Example of furnishings (not exhaustive):



- Tables.
  - Chairs.
  - Furnishings.
  - Cupboards.
  - Floor coverings.
- e. Examples of external structures / equipment and plant include (not exhaustive):
- Electric gates / barriers.
  - External lighting systems.
  - Pathways, pedestrian routes, and roads.
  - Walls.
  - Trees and plants.
- 3.14. **“Police Officer”** means a constable or special constable within the police rank structure, from constable to chief constable.
- 3.15. **“Police Staff (With Police Powers)”** means a member of **Police Staff** who has powers given under Section 38 of the Police Reform Act 2002.
- 3.16. **“Police Staff”** means an employee of the Office of Chief Constable, who does not have police powers.
- 3.17. **“Job Role Risk Assessment”** means a risk assessment which examines the safety **Threats** associated with a job role or cluster of similar job roles, identifying suitable **Working Strategies** to manage those, **Threats**.
- 3.18. **“Reasonably Practicable”** means balancing the level of risk with effort to control it, whether that be money, time or trouble.
- 3.19. **“Record of Risk Owners”** (The Record) The purpose of The Record is to identify departments who the Health and Safety Service are actively working with, so that the **Strategic Health and Safety Board** has oversight as to how well safety risk is being managed in these areas.
- 3.20. **“Risk Owner”** A person with management responsibility for **Police Officers, Police Staff, the Police Estate** or a police activity.
- 3.21. **“Safety Incident”** means an incident caused by or affected by Police activity, which results in an injury or could have done (physical or psychological).

This includes:

- a. A **Near Miss**.
- b. An accident.
- c. Custody adverse incident.
- d. An assault.
- e. Use of force.





- f. Any other circumstance that affects the safety of officers, staff, detainees, or the public.

Such incidents must be reported through 12/2 in Surrey or FIAMS in Sussex. This includes:

- a. Injuries to **Police Officers** or **Police Staff**.
  - b. Injuries and '**Near Misses**' to members of the public or detainees which have occurred as a result of or made worse by Police activity.
- 3.22. "**Seven Safety Expectations of Risk Owners and Statement of Assurance**" is a document summarising the safety responsibilities of a **Risk Owner**. It is expected that **Risk Owners** will sign an annual statement of assurance to the Chief Constables and Police and Crime Commissioners that they are meeting or actively working towards meeting the Seven Expectations or if not, provide an improvement action plan.
- 3.23. "**Strategic Health & Safety Threat Assessment**" is a document which outlines strategic health and safety issues of concern. It risks rates those issues in accordance with the Joint Risk Strategy, identifies applicable departments, root causes and tracks solutions.
- 3.24. "**Strategic Health and Safety Board**" is the collaborated health and safety meeting of Surrey Police and Sussex Police. The meeting is in part to fulfil the requirements of the Safety Representatives and Safety Committees Regulations 1977 (as amended) and Health and Safety (Consultation with Employees) Regulations 1996.
- 3.25. "**Task Specific Risk Assessment**" are risk assessments which examine **Threats** associated with particularly hazardous tasks / equipment and / or chemicals in more detail.

Particularly hazardous or complex activities will require risk assessment which is more in depth and specific to the activity / work equipment and / or chemical, for example:

- a. Confined space working.
  - b. First aid.
  - c. Hazardous chemicals.
  - d. Hazardous manual handling.
  - e. Hazardous work equipment.
- 3.26. "**The Force**" means Surrey Police and Sussex Police which are separate legal entities with a Section 22A Collaboration Agreement.
- 3.27. "**Volunteer**" means a person who carries out unpaid work, including work experience. Examples include Police Cadets and Special Constables.





## 4. Review

- 4.1. This policy and the associated health and safety management system outlined within it, will be formally reviewed every two calendar years. This will include a review of the equality impact assessment, formal consultation with stakeholders and re-signing by both chief constables and police and crime commissioners. There will also be a 12-month review to see if anything significant has changed which would mean the policy needs to be reviewed earlier.
- 4.2. This policy shall remain in effect until it is replaced or revoked.

## 5. Roles and Responsibilities

### Office of the Police and Crime Commissioner (PCC)

- 5.1. Has overall responsibility for the safety of the **Police Estate** and those who could be affected by it. The Surrey PCC is responsible for the **Police Estate** operated / owned by Surrey and the Sussex PCC is responsible for the **Police Estate** operated / owned by Sussex.
- 5.2. Sufficient resources are made available to meet health and safety legal requirements and compliance with the **Health and Safety Management System**.
- 5.3. Has overall responsibility for the health and safety of the employees and **Volunteers** of the PCC's office.
- 5.4. With regard to the **Police Estate**, specific responsibilities include ensuring:
  - a. The building fabric, structures, building services, equipment and plant of the **Police Estate** are:
    - Fit for purpose.
    - So far as is **Reasonably Practicable**, safe.
    - Maintained and repaired so they are, so far as is **Reasonably Practicable**, kept in a safe condition.
    - Where required (in addition to maintenance), subject to periodic thorough inspection, testing and examination by a competent person.
    - Where appropriate, subject to risk assessment, and the development of a safe working practices.
  - b. Contractors are effectively managed and operate safely.
  - c. An effective **Health and Safety Management System** is in place.
  - d. Health and safety **Threats** are identified and assessed, and required **Working Strategies** are implemented.



- e. Adequate resources are made available to meet health and safety legal requirements.
- 5.5. On a day-to-day basis, responsibilities related to the safety of the **Police Estate** are delivered by the relevant estates / facilities department and fall to Head of Estates and Facilities.
- 5.6. With regard to health and safety arrangements for **Police Officers, Police Staff, Police Staff (With Police Powers)** and **Volunteers**, as well as any person who could be affected by police activity, specific responsibilities include ensuring:
  - a. They are subject to sufficient scrutiny as to their effectiveness.

#### **Office of the Chief Constable**

- 5.7. Has overall responsibility for:
  - a. The health and safety of **Police Officers, Police Staff, Police Staff (With Police Powers), Volunteers** and any person who could be affected by police activity.
  - b. **Department Specific Equipment and Plant.**
  - c. **Police Officers and Police Staff (With Police Powers)** from other forces, who are under the direction and control of **The Force** in a **Collaborated Service** or situations where Mutual Aid arrangements are invoked.

Responsibilities include ensuring:

- a. Where there are line management responsibilities, meeting the responsibilities identified for superintendents / chief superintendents.
- b. Health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and associated **Health and Safety Management System**.
- c. There is an effective **Health and Safety Management System** in place.
- d. Compliance with the **Health and Safety Management System** is achieved.
- e. Health and safety risks to **Police Officers, Police Staff, Police Staff (With Police Powers), Volunteers** and any person who could be affected by police activity are identified, assessed and adequate **Working Strategies** put in place.
- f. In the allocation of resources, the health and safety implications of resource allocation decisions are considered, and where there are concerns these are raised with the Police and Crime Commissioner.
- g. **Department Specific Equipment and Plant** is:
  - Fit for purpose.
  - So far as is **Reasonably Practicable**, safe.
  - Maintained and repaired so it is, so far as is **Reasonably Practicable**, kept in a safe condition.



- Where required (in addition to maintenance), subject to periodic thorough inspection, testing and examination by a competent person.
- Where appropriate, subject to risk assessment, and the development of safe working practices.

5.8. In practice, the day-to-day management of these issues will be delegated to appropriate operational levels within the organisation.

### **Deputy chief constable (DCC)**

- 5.9. Has responsibility for ensuring health and safety management arrangements are implemented and scrutinised as to their effectiveness.
- 5.10. Responsibilities include ensuring:
- a. Where there are line management responsibilities, meeting the responsibilities identified for superintendents / chief superintendents.
  - b. Health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and associated **Health and Safety Management System**.
  - c. The effectiveness of **the Health and Safety Management System** is monitored and scrutinised.
  - d. Meaningful consultation with elected safety representatives and employees takes place, by chairing **The Strategic Health and Safety Board**. Responsibility for chairing the **Strategic Health and Safety Board** is shared between the Surrey DCC and Sussex DCC. The Head of Health and Safety Service will ensure there are regular briefings on strategic health and safety matters for the DCC who is not chairing the meeting.
  - e. Superintendents, chief superintendents (and equivalent **Police Staff** grade) are complying with health and safety management arrangements as outlined in this policy.

### **Assistant chief constable(s) and chief officers**

- 5.11. Will ensure that health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and associated **Health and Safety Management System**.
- 5.12. Responsibilities include ensuring:
- a. Where there are line management responsibilities, meeting the responsibilities identified for superintendents / chief superintendents.
  - b. Available resources are allocated to meet the requirements of the **Health and Safety Management System**.
  - c. Where there are concerns that available resources cannot meet legal standards of health and safety compliance, this is escalated.



**Risk Owners - Superintendent, chief superintendent and equivalent (heads of department)**

- 5.13. Have responsibility for ensuring that health and safety within their area of responsibility is managed effectively on a day-to-day basis and compliance with the **Health and Safety Management System** is achieved.
- 5.14. Responsibilities include ensuring (not exhaustive):
- a. Health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and associated **Health and Safety Management System**.
  - b. The development and implementation of policies and processes to manage safety risk within their area of control.
  - c. Informing the Health and Safety Service if the department is engaging in activities which mean it needs to be added to the **Record of Risk Owners**. Please see risk profiling section below.
  - d. Safety risk to **Police Officers, Police Staff, Police Staff (With Police Powers) and Volunteers**, as well as any person who could be affected by the department's activities are identified, assessed, and managed. Where possible this should be integrated into existing decision-making tools, for example the National Decision Model or other College of Policing / NPCC guidance.
  - e. All job roles are subject to **Job Role Risk Assessment**.
  - f. All police operations are subject to **Operational Risk Assessment**.
  - g. Those affected by significant **Threats** are involved in the risk assessment process and the development / implementation of **Working Strategies** (where it is reasonable to do so).
  - h. Prior to the introduction of any measure which could substantially affect health and safety, those affected (and their representatives) are consulted with. This could include new ways of working, equipment, uniform, or training.
  - i. The **Seven Safety Expectations of Risk Owners and Statement of Assurance** as well as People / Property Safety Standards are reviewed and where applicable complied with.
  - j. Health and safety **Threats** specific to the department which aren't covered in the People Safety / Property Safety Standards are identified and notified to the Health and Safety Service, subject to risk assessment and effective **Working Strategies** / safe systems of work put in place.
  - k. Assaults, accidents, custody adverse incidents, **Near Misses** and use of force are reported and investigated, and where required, reasonable measures put in place, to prevent a re-occurrence.
  - l. Local health and safety consultation with elected representatives and employees takes place.
  - m. Training required to enable **Police Officers, Police Staff, Police Staff (With Police Powers) and Volunteers** to undertake their role as safely as possible is identified, implemented, and refreshed.
  - n. Completion of the Annual Safety Assurance Statement to the Chief Constable and Police and Crime Commissioner confirming that for the



department concerned, it is *'meeting or actively working towards meeting the Seven Safety Expectations.'* Where a risk owner feels they aren't able to sign the statement, they must provide an action plan for meeting the Seven Safety Expectations.

- o. In cases of **Mutual Aid**, employer duties for the safety of officers / staff and those affected by their activities remains with their **Home Force**. For more information and clarification, please see Section 5.4 below. When a request for **Mutual Aid** is received, risk assessments must be requested and checked from the **Host Force**. The skills and competencies of officers and staff supplied for the **Mutual Aid** must match the requirements of the request.
  - p. Any **Safety Incidents** while on **Mutual Aid** must be reported to the Health and Safety Service.
  - q. **Department Specific Equipment and Plant is:**
    - Fit for purpose.
    - So far as is **Reasonably Practicable**, safe.
    - Maintained and repaired so it is, so far as is **Reasonably Practicable**, kept in a safe condition.
    - Where required (in addition to maintenance), subject to periodic thorough inspection, testing and examination by a competent person.
    - Where appropriate, subject to risk assessment, and the development of a safe working practices.
  - r. Issues of concern, for the safety of officer, staff or any other person affected by police activity are escalated.
- 5.15. Review of and compliance with the People Safety / Property Safety Standards along with the development of suitable risk assessments and safe systems of work should be delegated to a suitable operational level. Responsibility for their completion, adequacy and effective implementation remains at chief superintendent, superintendent, or equivalent **Police Staff** rank.

### **Sergeant, Inspector and equivalent (line managers)**

- 5.16. Have responsibility for ensuring that health and safety **Threats** within their area of responsibility are identified, and effectively managed.
- 5.17. Where applicable, information is fed into the People Safety / Property Safety risk management arrangements.
- 5.18. Responsibilities include ensuring:
  - a. Health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and **Health and Safety Management System**.
  - a. Safety risk to **Police Officers, Police Staff, Police Staff (With Police Powers)** and **Volunteers**, as well as any person who could be affected by



the department's activities are identified, assessed, and managed. Where possible this should be integrated into existing decision-making tools, for example the National Decision Model or other College of Policing / NPCC guidance.

- b. All roles are subject to **Job Role Risk Assessment**.
- c. All police operations are subject to **Operational Risk Assessment**.
- d. Those affected by significant **Threats** are involved in the risk assessment process and the development / implementation of **Working Strategies** (where it is reasonable to do so).
- e. Prior to the introduction of any measure which could substantially affect health and safety, those affected (and their representatives) are consulted with. This could include new ways of working, equipment, uniform or 3.
- f. Safety Incidents are reported and investigated, and where required, reasonable measures put in place, to prevent a re-occurrence.
- g. Where a team member is unable to report a **Safety Incident** themselves, this is done on their behalf. This includes keeping the Health and Safety service updated to any change in circumstances related to a Safety Incident. Changes could include:
  - i. Changes in circumstances surrounding the original report.
  - ii. Person going off sick.
  - iii. Person going on restricted duties.
  - iv. A medical diagnosis.
  - v. A detainee being taken to hospital and the treatment they received.
- h. Training required to enable **Police Officers, Police Staff, Police Staff (With Police Powers)** and **Volunteers** to undertake their role as safely as possible is identified, implemented, and refreshed.
- i. Issues of concern related to safety are escalated.

## **Head of Health and Safety Service**

5.19. Responsibilities include ensuring:

- a. Compliance with the responsibilities identified for superintendents / chief superintendents in relation to the management of the Health and Safety Service.
- b. Health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and associated **Health and Safety Management System**.
- c. The design, rollout and auditing of an effective **Health and Safety Management System**.
- d. Being a competent person who can assist the PCC (in relation to the Police Estate only) and the Chief Constable to undertake the measures the PCC and the Chief Constable needs to take to comply with the requirements and prohibitions imposed on them by the relevant statutory provisions, as required by Regulation 7 of the Management of Health and Safety at Work Regulations 1999.





- e. Appropriate and meaningful proactive and reactive management information is developed and reported to the **Strategic Health and Safety Board**.
- f. The provision of professional advice and support on complying with health and safety law.
- g. The effective management of the Health and Safety Service.

## **Director of Estates and Facilities**

### 5.20. Responsibilities include ensuring:

- a. Compliance with the responsibilities identified for superintendents / chief superintendents.
- b. Health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and compliance with the **Health and Safety Management System**.
- c. Compliance with the Property Safety Standards for the **Police Estate** and ensuring that the **Police Estate** meets the standards identified within it.
- d. Health and safety **Threats** within the **Police Estate** which are not covered in the Property Safety Standards are identified and notified to the Health and Safety Service, subject to risk assessment and effective **Working Strategies** / safe systems of work put in place.
- e. Where **Police Officers, Police Staff, Police Staff (With Police Powers)** and **Volunteers** occupy premises under the control of another organisation, ensuring those premises are, so far as **Reasonably Practicable**, safe, and meet equivalent standards to those identified within the Property Safety Standards.
- f. The **Police Estate** is maintained and repaired so it is kept, so far as is **Reasonably Practicable**, in a safe condition. This responsibility is limited to the fabric, structures, equipment, building services and plant directly associated with the **Police Estate**, it does not include **Department Specific Equipment and Plant** which are the responsibility of the service concerned.
- g. Equipment, plant and building services which are integral to the **Police Estate**, and which aren't service specific are:
  - Fit for purpose.
  - So far as is **Reasonably Practicable**, safe.
  - Maintained and repaired so they are, so far as is **Reasonably Practicable**, kept in a safe condition.
  - Where required (in addition to maintenance), subject to periodic thorough inspection, testing and examination by a competent person.
  - Where appropriate, subject to risk assessment, and the development of a safe working practices.

### 5.21. Agreement is reached with departments occupying police premises (including external organisations) on which assets facilities management





will take responsibility for, and those which are the responsibility of individual departments.

- 5.22. Relevant management information, which outlines how compliant the **Police Estate** is with statutory safety responsibilities and the requirements of this policy, are shared with the PCC at regular intervals.

### **Head of Joint Transport Service**

- 5.23. Responsibilities include ensuring:
- a. Compliance with the responsibilities identified for superintendents / chief superintendents.
  - b. Health and safety within their area of responsibility is managed effectively, including the effective implementation of this policy and compliance with the **Health and Safety Management System**.
  - c. Police vehicles are fit for purpose, maintained in a safe and road worthy condition, and are, so far as is **Reasonably Practicable**, safe.
  - d. Assets directly associated with the provision of the Joint Transport Service are:
    - Fit for purpose.
    - So far as is **Reasonably Practicable**, safe.
    - Maintained and repaired so they are, so far as is **Reasonably Practicable**, kept in a safe condition.
    - Where required, subject to periodic thorough inspection, testing and examination by a competent person.
    - Where appropriate, subject to risk assessment, and the development of safe working practices.

### **Occupational Health**

- 5.24. The provision of advice to managers on employee / officer related health matters.
- 5.25. Responsibilities include ensuring the provision of advice to managers on:
- a. Health surveillance.
  - b. Ill health retirement.
  - c. Pre-employment health checks.
  - d. Reasonable adjustments.

### **Police Federation, Superintendents Association and Unison Health and Safety Representatives**

- 5.26. Have responsibility for representing the health and safety interests of their members and, where agreed **Police Officers, Police Staff and Police Staff (With Police Powers)** who are not members. This can include bringing to the attention of managers, health, and safety concerns, as well



as being part of the consultation process for health and safety issues which have a substantial impact upon **Police Officers, Police Staff and Police Staff (With Police Powers)**.

5.27. Responsibilities include ensuring:

- a. Regular attendance at relevant health and safety meetings, or if not possible appointing a representative.
- b. The concerns and views of members are represented.
- c. Appropriate workplace health and safety inspections are carried out with reasonable notice of such inspections being provided to relevant managers and the Health and Safety Service

## **Health and Safety Service**

5.28. The Health and Safety Service is responsible for:

- a. The design, roll out, review and risk-based auditing of the safety management arrangements outlined within this policy.
- b. Where significant coordination between departments on a safety compliance area is required, the Health and Safety Service will develop policy in these areas to ensure adequate cooperation and set strategic level standards. Compliance areas where this applies include:
  - i. Asbestos Management.
  - ii. Construction Design and Management Regulations 2015.
  - iii. Working Time Regulations and Fatigue Prevention.
- c. The provision of competent health and safety advice and support.
- d. Investigation of particularly serious **Safety Incidents**.

5.29. The Health and Safety Service is an advisory service and provides a source of competent health and safety advice. Specialised risk areas may require additional competent advice to be sourced. The Health and Safety Service will advise whether it has internal competence for specialised areas upon request, as this will depend on the individual qualifications and / or experience of individual team members.

5.30. Ownership of safety risks rests with departments who have day to day control over the safety risk.

5.31. Responsibilities include ensuring:

- a. Guidance is developed on complying with health and safety law.
- b. Development, roll out and review of the safety management system.
- c. The effective management of the accident / **Safety Incident** reporting system and record-keeping, and where applicable, reporting incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) to the Health and Safety Executive.



- d. Liaison with enforcement authorities (Health and Safety Executive, Public Health England, and Fire Service).
- e. Auditing of the effectiveness of safety management arrangements in a way which is commensurate to the level of risk posed by departments, reporting back findings to **The Strategic Health and Safety Board**.
- f. Appropriate and meaningful proactive and reactive management information is developed and reported to **The Strategic Health and Safety Board**.

### **Ensuring Professional Impartiality**

- 5.32. During and following a health and safety review, every effort will be made to explain compliance levels and reach consensus with departments.
- 5.33. Where there is disagreement which cannot be resolved, the professional impartiality of the Health and Safety Service to provide competent advice (as required by the Management of Health and Safety at Work Regulations) will be maintained by clearly separating the advice of the Health and Safety Service from the view of the department. This will be achieved by offering departments a section within compliance reports to provide comment and feedback.

### **Health and Safety Advisors / Senior Specialists**

- 5.34. Health and safety advisors / senior specialists are responsible for providing departments with health and safety advice and supporting them to comply with the health and safety arrangements outlined within this policy.
- 5.35. Responsibilities include ensuring:
  - a. Compliance with SOP 2 for the departments where they are the nominated safety advisor listed in the **Record of Risk Owners**.
  - b. When required, reviewing safety incidents reported through FIAMS and 12/2 in accordance with SOP 1.
  - c. The head and deputy head of the health and safety service are supported to discharge the responsibilities of the Health and Safety Service and the requirements outlined within this policy effectively.
  - d. Carrying out safety reviews as outlined in the Annual Safety Review Plan.
  - e. **Complying** with Health and Safety Service Standard Operating Procedures.
  - f. Investigation of particularly serious **Safety Incidents** in accordance with SOP 3.
  - g. Prior to undertaking site visits, taking on work or investigating **Safety Incidents**, identifying whether the work falls outside the scope of the job profile risk assessment for a health and safety advisor. Where this is the case, the safety advisor is responsible for notifying the head of the Health and Safety Service and completing a suitable assessment of the risk.



## **Health and Safety Assistants**

- 5.36. Health and Safety assistants are responsible for providing support to the health and safety advisors and deputy / head of health and safety service to discharge their responsibilities effectively.
- 5.37. Specific responsibilities include:
- a. The effective day to day management of the **Safety Incident** reporting and record-keeping systems, including RIDDOR reporting in accordance with SOP 1.
  - b. The effective day to day management of the health and safety generic email inbox.
  - c. Complying with Health and Safety Service Standard Operating Procedures.

## **Police Officers (including Specials), Police Staff, Police Staff (With Police Powers) and Volunteers, including Police Cadets.**

- 5.38. Responsibilities include ensuring:
- a. Compliance with the **Health and Safety Management System**.
  - b. They take personal responsibility for their actions, taking reasonable steps to protect their health and safety and others affected by their activities.
  - c. Compliance with the **Health and Safety Management System** and associated arrangements.
  - d. Compliance with the findings and **Working Strategies** identified in risk assessments / safe systems of work.
  - e. All **Safety Incidents** are reported by the end of a shift. This includes any **Safety Incidents** while on **Mutual Aid** or **Collaboration**.
  - f. Any change in circumstances related to a **Safety Incident** are reported to the Health and Safety Service. Changes could include:
    - i. Changes in circumstances surrounding the original report.
    - ii. Going off sick.
    - iii. Restricted duties.
    - iv. Medical diagnosis.
    - v. A detainee being taken to hospital and the treatment they received.

## **Responsibilities within Collaborated Services and Mutual Aid**

- 5.39. In cases of formal collaboration, responsibilities for health and safety are identified within the Section 22A Collaboration Agreement. Responsibility generally sits with the force who has the direction and control, however Section 22A Agreements must be checked for specific details.
- 5.40. In cases of Mutual Aid, the **Home Force** and **Host Force** have health and safety responsibilities. The **Home Force** retains primary responsibility for



the health and safety of officers and staff who are sent on mutual aid and those affected by their activities, while the **Host Force** is responsible for health and safety pertaining to the direction and control given.

## **6. Safety Management Arrangements**

### **Constituent parts of the safety management system**

- 6.1. The **Health and Safety Management System** consists of the following component parts, which are also summarised in Figure 2 below.

#### **Health and Safety Policy and Arrangements**

- 6.2. The purpose of the Health and Safety Policy and Arrangements is to establish how safety will be managed and assign responsibilities to ensure it is managed effectively.

#### **Record of Risk Owners**

- 6.3. The purpose of **The Record of Risk Owners** is to identify departments that the Health and Safety Service is actively working with, it also outlined planned safety reviews for the financial year ahead and the results of those reviews. The Record ensures that the **Strategic Health and Safety Board** has oversight as to how well safety risk is being managed in these areas.

#### **Seven Safety Expectations of Risk Owners and Statement of Assurance**

- 6.4. To simplify expectations of **Risk Owners**, the Health and Safety Service produce a document called '**Seven Safety Expectations of Risk Owners and Statement of Assurance**.' This document explains clearly and succinctly what **Risk Owners** need to consider in managing safety risk.

#### **The People Safety Standards (Appendix 1)**

- 6.5. The People Safety Standards are a set of standards written in uncomplicated English, identifying expectations around the management of safety risk, associated with people. These are the standards that departments will be reviewed against during a safety review.
- 6.6. The purpose of the People Safety Standards is to set out in clear and uncomplicated English the Health and Safety Service's expectations of how the safety of people will be managed. This is to make it simple for **Risk Owners** to identify what safety arrangements they need to put in place, within their area of responsibility.



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## **The Property Safety Standards (Appendix 2)**

- 6.7. The Property Safety Standards are a set of standards written in uncomplicated English, identifying corporate expectations around the management of safety risk associated with the **Police Estate**. These are the standards that departments will be reviewed against during a safety review.
- 6.8. The purpose of the Property Safety Standards is to set out in clear and uncomplicated English the Health and Safety Service's expectations of how the safety of how the safety of the **Police Estate** will be managed. This is to make it simple for risk to identify what safety arrangements they need to put in place, within their area of responsibility.

### **Safety Toolkits**

- 6.9. The purpose of the safety toolkits is to identify in a clear and simple way, how to manage specific health and safety **Threats**.

### **Dynamic Risk Assessment**

- 6.10. **Dynamic Risk Assessment** means an assessment of safety risk which is not initially documented.
- 6.11. **Dynamic Risk Assessment** can be used when, due to a rapidly changing hazardous situation, officers have no time to document their decision making. Officers must make use of their training, experience and the National Decision Model to manage safety risks in such situations. As soon as reasonably possible afterwards the significant findings of decision making must be documented and justified. **Dynamic Risk Assessment** must only be used where rapidly changing circumstances truly justifies it.
- 6.12. **Dynamic Risk Assessment** must not be used because of a lack of adequate planning for foreseeable safety **Threats**.

### **Operational Risk Assessments**

- 6.13. Prior to a planned operation, the person in charge of that operation is responsible for assessing safety **Threats** to officers, staff and any other person who could be affected by the operation, making use of the National Decision Model. This must include:
- a. Documenting the significant findings in a risk assessment.
  - b. Identifying safety **Threats** to officers, staff and any other person who could be affected.
  - c. Ideally eliminating those safety **Threats**, or if not possible reducing and controlling the risk they pose to the lowest **Reasonably Practicable** level.
  - d. Briefing everyone who could be affected by the risk assessment (where reasonable to do so) as part of a pre operation briefings, explaining





**Working Strategies** and how to use identified personal protective equipment correctly.

- 6.14. Where an activity is spontaneous, officers should make use of **Dynamic Risk Assessment** and their training, experience and the National Decision Model to manage safety risks and as soon as possible, document their decision making.

#### **Job Role Risk Assessment**

- 6.15. All job roles must have an associated **Job Role Risk Assessment**. This is a risk assessment which examines the safety **Threats** associated with a job role or cluster of similar job roles and identifies suitable **Working Strategies** to manage those, **Threats**.

#### **Task Specific Risk Assessments**

- 6.16. Particularly hazardous activities will require risk assessment which is more in depth and specific to the activity / work equipment and / or chemical, for example.
- a. Confined space working.
  - b. First aid.
  - c. Hazardous chemicals.
  - d. Hazardous manual handling.
  - e. Hazardous work equipment.

#### **Strategic Health & Safety Threat Assessment**

- 6.17. Strategic health and safety issues of concern will be recorded and reported to the **Strategic Health and Safety Board** and Audit Committees' using the **Strategic Health & Safety Threat Assessment**.

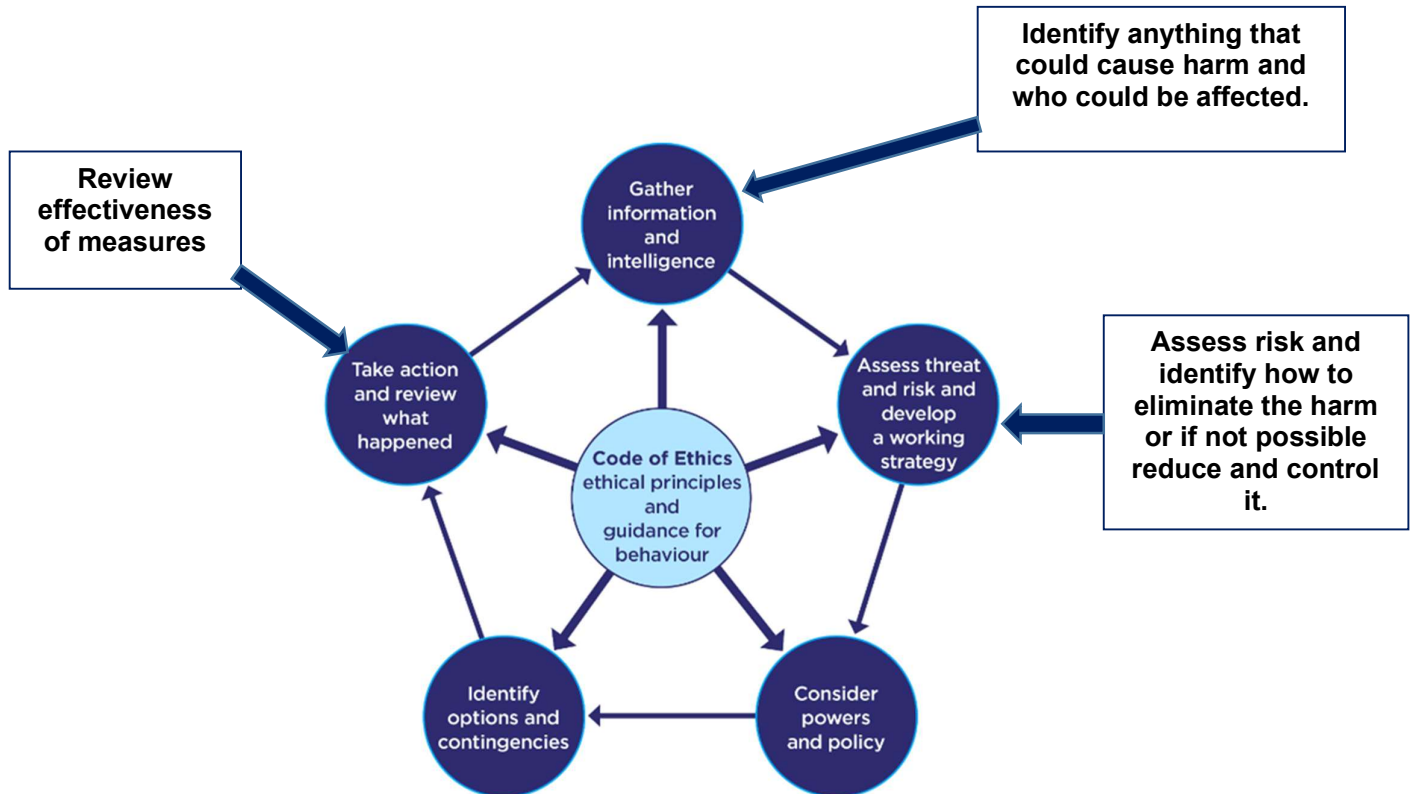
#### **Operational Policing**

- 6.18. Operational policing teams are expected to consider foreseeable safety **Threats** as part of general risk assessment. Consideration of safety **Threats** must also be incorporated into the use of the National Decision Model. For example:
- a. As part of the '*gather information and intelligence*' stage, health and safety **Threats** to officers, staff and any other person who could be affected by the activity must be identified.
  - b. At the '*assess threat and risk and develop a working strategy*,' stage, health and safety **Threats** must be assessed, and suitable **Working Strategies** identified and implemented. **Working Strategies** must ideally eliminate the threat or if not possible manage and control the risk.
  - c. At the '*take action and review what happened*' stage, the effectiveness of **Working Strategies** must be reviewed, and lessons learnt.





Figure 1: Using the National Decision Model to manage safety



National Decision Model. College of Policing.

<https://www.app.college.police.uk/app-content/national-decision-model/the-national-decision-model/>

## Consultation and Communication

- 6.19. Surrey Police and Sussex Police recognise and value the importance of effective employee / officer consultation and working with representatives of the Police Federation, Superintendents' Association, and recognised trade unions.
- 6.20. Health and safety consultation will take place through a combination of strategic and divisional / local health and safety meetings, which employee representatives will play an integral part.
- 6.21. It is a requirement of managers (identified above) to involve **Police Officers, Police Staff, Police Staff (With Police Powers)** and **Volunteers** in the assessment of significant safety risks and in the development and implementation of effective **Working Strategies**. We



believe this is an essential part of developing safety arrangements which are effective and have employee backing.

- 6.22. It is a requirement of managers (identified above) to actively consult with **Police Officers, Police Staff, Police Staff (With Police Powers), Volunteers** and their representatives prior to the introduction of any measure which could substantially affect health and safety.
- 6.23. Any new or changes to existing safety policies, guidance, toolkits, and risk assessments will be communicating to officers and staff using the following methods.
- Consulted on and published at the Strategic Health and Safety Board.
  - Published on the Health and Safety Service's intranet pages.
  - Listed and mentioned in routine orders.
  - Highlighted in weekly communications emails which highlight force news.

#### **Strategic Health and Safety Board**

- 6.24. The purpose of **The Strategic Health and Safety Board** is to discuss safety issues of strategic importance and to comply with the Safety Representatives and Safety Committees Regulations as well as the Health and Safety (Consultation with Employees) Regulations. The terms of reference of the meetings provide further detail.
- 6.25. Examples of issues of strategic importance include:
- The design, roll out and review of the safety management system. For example, all new safety policies, guidance, toolkits, and risk assessments.
  - Accident / **Near Miss** statistics.
  - Issues of concern raised by safety representatives.
  - Monitoring completion rates of **Mandatory Minimum Safety Training**.

#### **Divisional / local health and safety meetings**

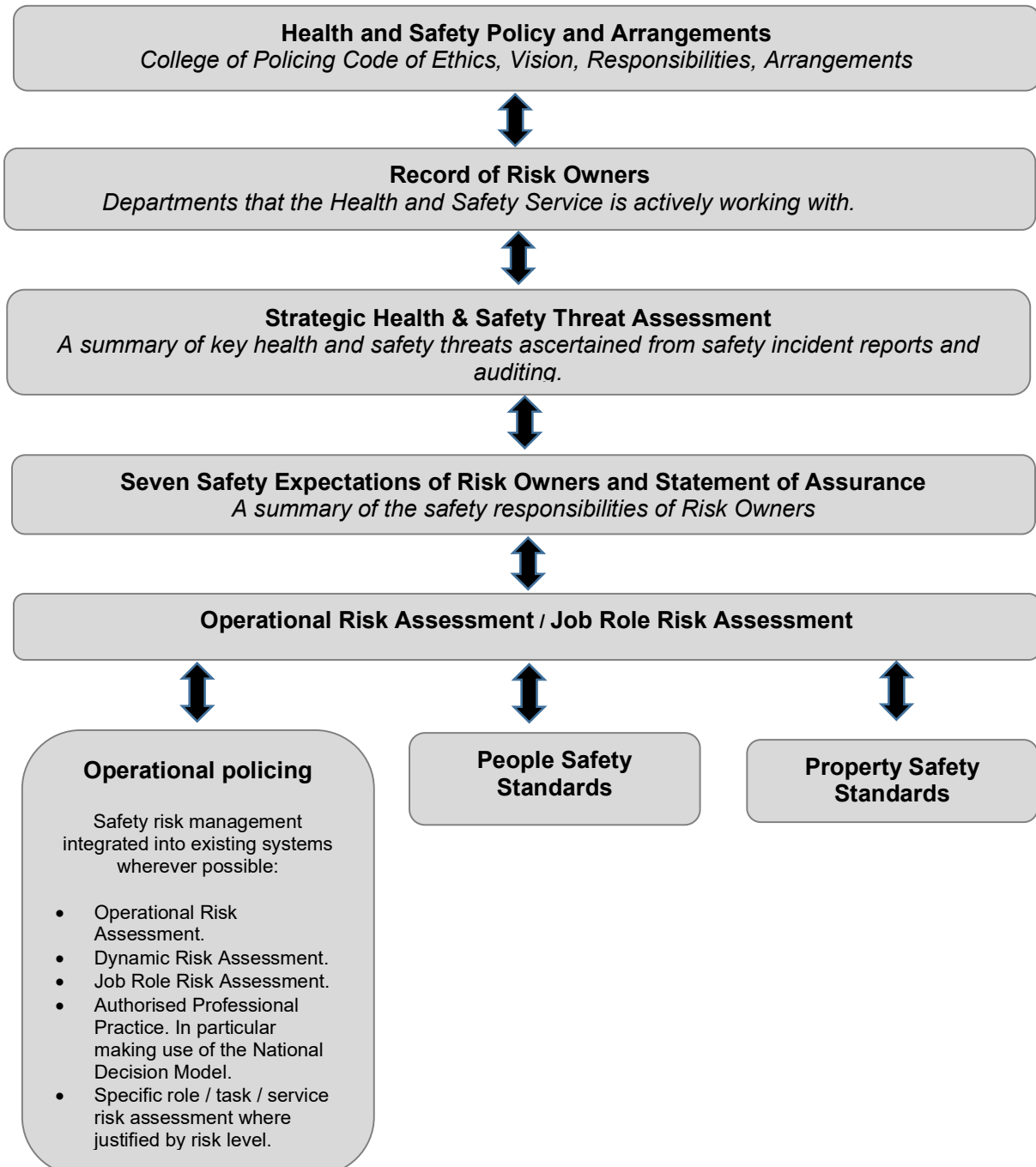
- 6.26. The purpose of divisional / local health and safety meetings is to discuss safety issues of local importance and to comply with the Safety Representatives and Safety Committees Regulations as well as the Health and Safety (Consultation with Employees) Regulations.
- 6.27. Examples of issues of local importance include:
- Risk assessments and **Working Strategies**.
  - Review of injuries resulting from assaults, accidents and **Near Misses**. (Data must be anonymised).
  - Compliance with the safety management system.
  - Issues of concern raised by **Police Officers, Police Staff, Police Staff (With Police Powers), Volunteers** and safety representatives.
  - Training, equipment, and plant.



- f. Monitoring completion rates of **Mandatory Minimum Safety Training**.

**Figure 2: Summary of the Health and Safety Management System**

6.28. Figure 2 on the summaries how the **Health and Safety Management System** fits together.





## Supporting Departments to Manage Safety Risk

- 6.29. The Health and Safety Service will allocate the amount of support it gives and priority to reviewing the effectiveness of safety management arrangements using department risk profiling.
- 6.30. It will:
- Focus resources based on risk.
  - Free up resources to support the highest risk parts of the organisation.
  - Free up resources to support those who need the most support.
  - Leave lower risk services to self-manage using toolkits and guidance with periodic dip checking.
- 6.31. The Health and Safety Service will publish a list of departments it is actively working with in the **Record of Risk Owners**. This will be published through the **Strategic Health and Safety Board**.
- 6.32. The Identification of departments that the Health and Safety Service is actively working with will be a desktop exercise based upon:
- Descriptors identified below in Figure 3 below.
  - The nature of activities undertaken.
  - History of safety incidents.
  - Complaints or concerns received.
  - Enforcement action.

**Figure 3: Criteria to be included on the Record of Risk Owners**

Risk rating	Descriptor	Oversite
Low (1)	<ul style="list-style-type: none"> <li>No or limited public contact.</li> <li>No hazardous machinery or chemicals used.</li> <li>No or limited lone working.</li> <li>No hazardous tasks undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>Periodic dip checking</li> </ul>
Medium (2)	<ul style="list-style-type: none"> <li>Public contact where violence and aggression is an intermittent threat.</li> <li>Intermittent lone working.</li> <li>Occasional use of hazardous equipment / chemicals.</li> <li>Occasional high-risk tasks undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>Periodic dip checking.</li> </ul>
High (3)	<ul style="list-style-type: none"> <li>High risk roles which could result in psychological harm.</li> <li>Regular public contact where violence and aggression is likely.</li> <li>Regular use of hazardous equipment / chemicals.</li> <li>Regular hazardous tasks undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>Support as outlined in SOP 2.</li> </ul>
Very high (4)	<ul style="list-style-type: none"> <li>Services undertaking particularly hazardous operations where a failure in safety systems would likely result in serious life changing injury or loss of life.</li> </ul>	<ul style="list-style-type: none"> <li>Support as outlined in SOP 2.</li> </ul>



- 6.33. By default, departments not identified in the **Record of Risk Owners** will be covered through general communications which will remind **Risk Owners** of their responsibilities through the use of the **Seven Safety Expectations of Risk Owners**.

### **Assessing Compliance with the Safety Management System**

- 6.34. Compliance with the safety management system will be assessed using People Safety and Property Safety. People Safety and Property Safety contain various standards which a department must comply with. During a health and safety review, the Health and Safety Service will provide an assurance rating against each of these, using the following system.

**Figure 4: Assurance Levels for Individual Standards in People / Property Safety**

<b>Assurance level</b>	<b>Descriptor</b>	<b>Score</b>
High Assurance	<ul style="list-style-type: none"> <li>The standard is broadly being met.</li> <li>Where there are some outstanding actions there is confidence that these will be delivered.</li> <li>Health and safety advisors must make clear in the notes what outstanding actions are required.</li> </ul>	1 point
Medium Assurance	<ul style="list-style-type: none"> <li>Significant actions are required to meet the standard.</li> <li>Health and safety advisors must make clear in the notes what outstanding actions are required.</li> </ul>	0.5 points
Low Assurance	<ul style="list-style-type: none"> <li>Little to no work has taken place to meet the standard.</li> <li>Health and safety advisors must make clear in the notes what outstanding actions are required.</li> </ul>	0 points
NA	<ul style="list-style-type: none"> <li>The standard does not apply.</li> </ul>	NA

- 6.35. Assurance levels are averaged across categories and turned into a percentage.

- 6.36. When the Health and Safety Service reviews a department's safety performance using the People / Property Safety Standards, they will be assigned a management risk rating.

<b>Performance in People / Property Safety</b>	<b>Assurance level</b>
76% - 100%	High (1)
51% - 75%	Medium (2)
26% - 50%	Low (3)
0 – 25%	Very Low (4)



## Overall risk to the organisation

- 6.37. The inherent risks and management risks are combined to get an overall view of safety risk to the organisation from the department's activities. These results are used to target the support of the Health and Safety Service as well as determining how much support a department receives.

		<b>Assurance Level</b>			
<b>Inherent risk</b>		High (1)	Medium (2)	Low (3)	Very Low (4)
	Low (1)	1 Low Risk (Self-assess)	2 Low Risk (Self-assess)	3 Medium Risk	4 Medium Risk
	Medium (2)	2 Low Risk (Self-assess)	4 Medium Risk	6 High Risk	8 High Risk
	High (3)	3 Medium Risk	6 High Risk	9 High Risk	12 Very High Risk
	Very high (4)	4 Medium Risk	8 High Risk	12 Very High Risk	16 Very High Risk

## Presenting Results of Safety Reviews

- 6.38. When conducting a safety review, health and safety advisors must clearly articulate why the assurance level has been given and what is required to achieve a higher level of assurance. They must listen to and consider alternative views.

## Audit Reports, Action Plans and Monitoring Actions

- 6.39. Following a safety review a report will be produced for the relevant risk owner, this report will be published at the Strategic Health and Safety Board. This report will contain an action plan outlining high, medium, and low risk actions, with suggested time scales. Departments will be given sufficient time (at least 2 weeks) to comment on how they plan to close the actions off before the report is published at the Strategic Health and Safety Board.
- 6.40. Health and safety advisors must use their professional judgement to determine the degree of monitoring required to ensure actions are completed. For example, the default position is that high risk actions will be monitored until conclusion.

## Dispute resolution

- 6.41. Where there is a disagreement on compliance levels, the matter must be passed to the Head of Health and Safety Service for consideration. Every



effort will be made to reach a consensus. If it remains to professional view of the Head of Health and Safety Service that agreement can't be reached, as a last resort, the following process will be used.

- a. The compliance report will be produced with the view of compliance from the Health and Safety Service's perspective.
- b. The department will be given a section to make their comments and perspective clear.
- c. The matter will be discussed through the **Strategic Health and Safety Board**.

**END**