



Meeting	SPA People Committee
Date	31 May 2023
Location	Virtual Conference
Title of Paper	Health & Safety Report Quarter 4 2022/23
Presented By	Peter Jones, Health & Safety Assistant Manager
Recommendation to Members	Appendix A – For Discussion Appendix B – For Decision Appendix C – For Discussion
Appendix Attached	Appendix A – Health and Safety Q4 Report Appendix B – SPA/Police Scotland Health & Safety Policy – Organisation and Arrangements Appendix C – Health and Safety 3 Year Strategic Action Plan 2021-2024

PURPOSE

The purpose of this report is to provide a strategic overview in relation to health & safety within the Scottish Police Authority (SPA) and Police Scotland.

The SPA and Police Scotland have joint responsibility as “duty holders” in relation to health and safety, with corporate governance duties discharged through the Police Scotland Health and Safety Board. Relevant matters are thereafter escalated via executive members to the Police Scotland Strategic Leadership Board, the SPA People Committee and the SPA Board.

Members are invited to discuss the content of this report and the attached appendices.

1. BACKGROUND

- 1.1 Decisions in relation to Health & Safety are facilitated via a network of local Health & Safety committees/forums within SPA and Police Scotland, with national decisions made at the quarterly Health & Safety Board.

2. FURTHER DETAIL IN RELATION TO THE REPORT

Health and Safety Quarter 4 Report

- 2.1 The Health & Safety Quarter 4 report, attached at Appendix A, details matters such as enforcement activity, proactive preventative work within Custody and Productions areas and accident statistics broken down into assaults and incidents involving during arrest/custody. The report also provides updates on current and emerging health & safety issues and updates regarding the development of policy and practice.

- 2.2 Members are invited to discuss this report.

Health and Safety Policy

- 2.3 The Health and Safety Policy supports the Health and Safety Policy Statement, which is signed annually by the SPA Chair and the Chief Constable, and was last published in April 2022. The policy details the 'organisation and arrangements', including detailed roles and responsibilities required to achieve the organisational commitment to safeguarding employees (and others who could be affected by our activities) in the Health & Safety Policy Statement.

- 2.4 The SPA and Police Scotland are committed to the systematic and periodic review of the Health and Safety Policy and Arrangements and this updated policy, attached at Appendix B, is the product of a review process undertaken during 2022. This policy continues to follow the format of the Health and Safety Executive Health and Safety Management System Model 'Managing Health & Safety (HSG65)'.

- 2.5 During the policy review, consultation was undertaken with the SPA, staff associations, trade unions and Police Scotland departments, which included discussion at the Health and Safety Board, with corresponding amendments made as required. A detailed EQHRIA was also undertaken. The final policy was reviewed by the Health and Safety Board on 8 February 2023, and approved for presentation to the Strategic Leadership Board on 7 March 2023, where the policy was agreed. This policy is now submitted to SPA People Committee for final approval. Following policy approval, the

2023/24 Health and Safety Policy Statement will be presented to the SPA Chair and Chief Constable for signature.

- 2.6 Members are invited to approve the joint SPA/Police Scotland Health & Safety Policy.

Health and Safety Strategic Action Plan 2021-2024

- 2.7 The Health and Safety Strategic Action Plan details the high level actions that support continuous improvement in the management of health and safety, and compliance with health and safety legislation. This 3-year plan is managed, reviewed and updated by the Health and Safety Manager.

- 2.8 Current updates to the Health and Safety Strategic Action Plan are attached at Appendix C. Members are invited to review and discuss the Action Plan.

Annual Health and Safety Report

- 2.9 Following discussion between SPA officials and the Health and Safety

Manger, it was agreed that a health and safety report will be provided to People Committee annually outlining the alignment of strategic priorities, governance and management processes in relation to the effective delivery of the Health and Safety Policy and Management System.

- 2.10 As a result of the recent retiral of the Health and Safety Manager and the ongoing recruitment process for a successor, the development of the Annual Health and Safety Report has been delayed. It is proposed that the annual report will be presented to People Committee at the September meeting for discussion.

- 2.11 Members are invited to note this update.

3. FINANCIAL IMPLICATIONS

- 3.1 While there are no financial implication arising directly from this report, there are financial implications from on-going health and safety related estates works including fire safety actions. A significant number of actions have been identified from the Fire Risk Assessments and also from the on-going Custody Audits.

4. PERSONNEL IMPLICATIONS

- 4.1 There may be issues in relation to Human Resources such as the link between RIDDORs and the number of lost working days. Having a robust Health and Safety Management System in place

with appropriate resources can help the organisation in terms of challenges around physical resources and cost savings.

5. LEGAL IMPLICATIONS

- 5.1 There are legal implications associated with this paper. Police Scotland requires to be compliant with the Health & Safety at Work etc. Act 1974 and Fire (Scotland) Act 2005.

6. REPUTATIONAL IMPLICATIONS

- 6.1 There are reputational implications associated with this paper in relation to failures to comply with legislative requirements, health and safety guidance and established safe systems of work.

7. SOCIAL IMPLICATIONS

- 7.1 There are no currently no social implications.

8. COMMUNITY IMPACT

- 8.1 There are no current implications for community impact.

9. EQUALITIES IMPLICATIONS

- 9.1 There are no current implications for equalities.

10. ENVIRONMENT IMPLICATIONS

- 10.1 There are no current implications for environmental impact.

RECOMMENDATIONS

Members are invited to discuss this report and the attached appendices.

Members are invited to approve the joint SPA/Police Scotland Health & Safety Policy.

OFFICIAL



POLICE
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HEALTH & SAFETY

People Committee

Manager Report
Quarter 4, 2022/2023

Health & Safety Dashboard

Statutory enforcement

H&S enforcement notices

✓ No reportable incidents



Fire safety enforcement notices

✓ No reportable incidents



Breaches of legislation, health & safety guidance

✓ No reportable incidents



10 improvement actions identified and in progress. 8 actions now complete.

Preventative activities

Assurance programme progress

Progress completing programme



% complete for 2021/22

% complete for 2022/23

Progress implementing actions



Custody actions complete

Productions actions complete

Fire safety

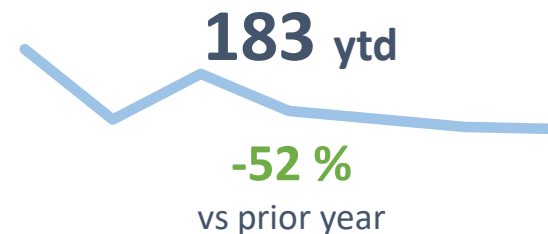
All fire risk assessments current / up to date



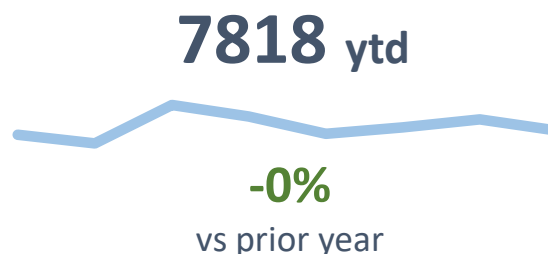
Actions complete (actions raised pre Feb 22)

Incident monitoring

RIDDOR Q1 - Q4 2022/23



Total reports Q1 - Q4 2022/23



Key movements in SCOPE accident reports (movement vs prior year to date for Q1 - Q4)

Assaults ▲ 1% 4820

Increase related to focus on increasing reporting

Slips, Trips & Falls ▲ 5% 323

Increase related to focus on increasing reporting

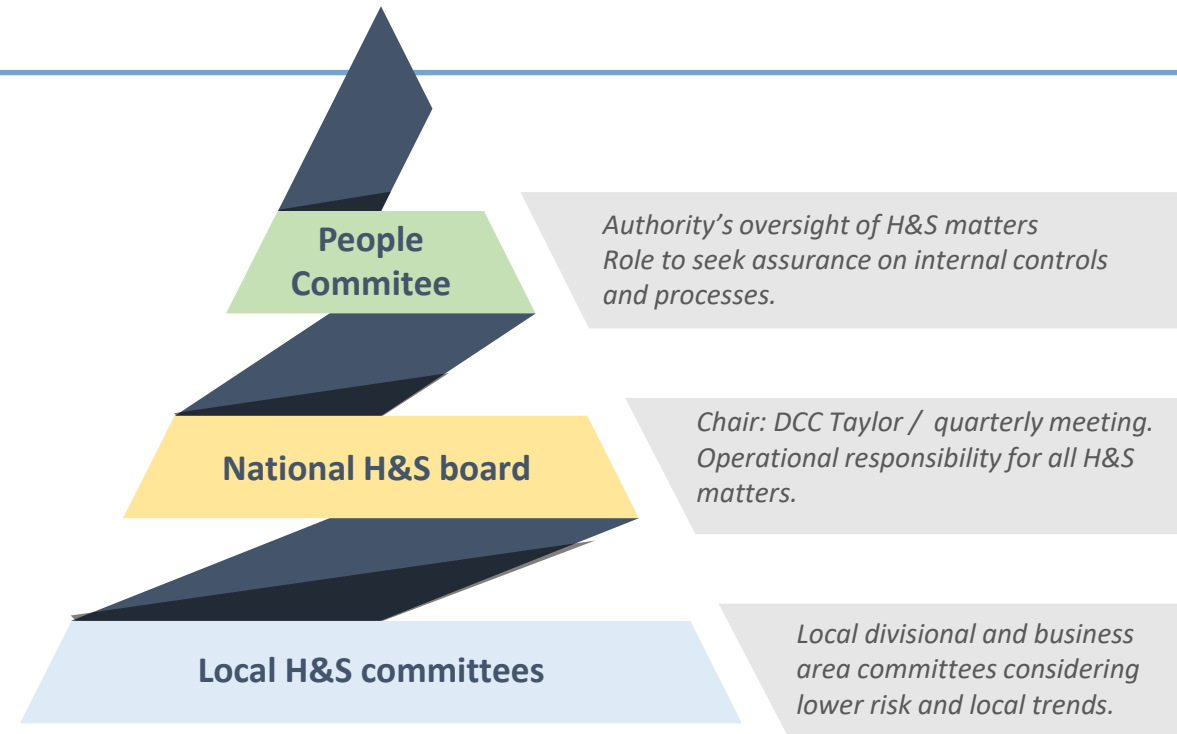
Manual handling ▼ 28% 223

Decrease shown - three year average is 121 across Q1-Q3

1. Assurance Process: Overview

Governance of health and safety

- Health and safety for both SPA and Police Scotland is internally managed by committee and principally the National Health & Safety Board (chaired by DCC Taylor).
- The Board meets quarterly and has representation from all business areas and has operational responsibility for the scrutiny of all health and safety matters.
- The SPA People Committees role is to have oversight that the ethical and legal health and safety obligations are being met.



Reporting and monitoring process



- The service has detailed operating procedures for recording and responding to all type of health and safety related incidents.
- All accidents, incidents or near misses are required to be recorded on the SCoPE system, completing an electronic report.
- Every report is considered by a member of the health and safety team who assesses the severity of the report and decides what level of investigation is required including if a RIDDOR report is required to the Health & Safety Executive (HSE).
- Serious reports, including all RIDDOR reports are passed to the H&S Manager who looks at the root cause, behavioural safety aspects, welfare considerations, etc. and liaises with local senior staff.
- Serious incidents are also escalated through local health and safety committees, National Health & Safety Board with the most serious or unusual incidents being highlighted to the People Committee.
- Following investigation, improvement actions may be raised and monitored.
- Detail of the incidents and responses will be reported and considered at all levels in governance.

1. Assurance Process: *Sources of Assurance*

- There are extensive health and safety controls and sources of assurance across the four lines of defence. This provides a level of assurance to the organisation that there are internal controls in place that can be relied upon to manage health and safety at an operational level. This allows the committee to focus on strategic and serious health and safety issues.
- The following diagram summaries the internal controls and sources of assurances. In addition, a current status update is provided on each control each.



Current update:

On-call continues to be well used.
Team proactive assisting Divisions.
Continue to monitor Covid as we enter the winter period.
Assurance Model audits carried out in Road Policing, "E" and "N" Divisions.

Custody and productions audits in progress.
On track vs audit plan.

All recommendations underway and will be progressed as quickly as possible. There are **no overdue actions.**

There have been **no formal interventions** by HSE or the Scottish Fire & Rescue Service in the current financial year.

The Health & Safety Manager continues to link in with Head of Enforcement at SFRS for advice & guidance.

2. Preventative Activities: *Internal Assurance Work*

Background

- The Health and Safety Team carry out a proactive annual assurance programme of audits every year. This is our second line of defence according to the Authority’s assurance framework. The types of inspection include general review of police stations and SPA premises as well as specific reviews of custody and production facilities.
- The purpose is broadly to check the safety of a building and ensure fire safety, legislation and other best practice guidance is being followed.
- The 2021/22 programme is focused on reviewing primary custody facilities and productions sites.

Data & trend analysis

- To date a total of 51 custody suites and 38 production stores have been audited and this is unique work across UK Forces.
- Police Scotland have designed an audit process based on Home Office standards.
- All findings are tracked and monitored with fortnightly update meetings between Health & Safety, Estates and Criminal Justice.
- Focus is on addressing higher risk actions first.
- Estates are targeting actions raised prior to February 2022 with the aim to complete all of these items by end of the financial year 2022/23.
- 7 x Custody projects commenced in October 22 in following locations: Rothesay, Dunoon, Saltcoats, Kilmarnock, Inverurie, Clydebank, & Bowmore. Rothesay project stopped due to operational issues and will be captured in 2023. Outstanding actions (81 out standing) relate to Rothesay and to custody areas agreed with CSJD to be placed on hold.

Findings from inspections

- The main themes from the audits cover matters such as the standard of fire detections systems, compartmentation standards, possible ligature points, standards of paint and other surfaces.

Findings From Internal Assurance Work

Custody Audits

Priority	Completed	Out-standing	Total	% Complete		
				Oct 22	Jan 23	May 23
Very high	17	0	17	100%	100%	100%
High	281	47	328	68%	68%	85%
Medium	147	29	176	80%	80%	83%
Low	35	5	40	83%	83%	87%
Total	480	81	561	74%	74%	86%

Production Audits

Priority	Completed	Out-standing	Total	% Complete		
				Oct 22	Jan 23	May 23
Very high	0	0	0	-	-	-
High	20	8	28	57%	57%	71%
Medium	10	8	18	56%	56%	56%
Low	14	10	24	31%	33%	58%
Total	44	26	70	56%	49%	62%

Priority definitions:

Very high – risk has an immediate impact on safety where no mitigation is possible and cells or areas must be closed until resolved.

High – risk has a significant impact on safety and impacts on daily operations but CSJD has put temporary mitigation in place.

Medium – risk has a medium impact on safety. Includes BAU faults, typically reported as P3 – P4 to helpdesk.

Low – risk has minimal impact on safety.

2. Preventative Activities: *Fire Safety*

Background

- There is a legal requirement for all buildings to have a fire risk assessment. We operate a rolling three year programme of fire risk assessments across the estate (~467 properties). The frequency is every 1 to 3 years dependent on the type and size of building and its use based on a set criteria. (All Custody Suites and Residential Sleep risks are assessed annually.)
 - Currently all fire risk assessments are in place.
- On completion of a risk assessment there may be actions identified that require addressing. These are recorded and monitored by the Health and Safety Board.
- We provide fire safety training for all staff and also a specific package for Fire Marshals. Completion rates are monitored by the Health & Safety Board.

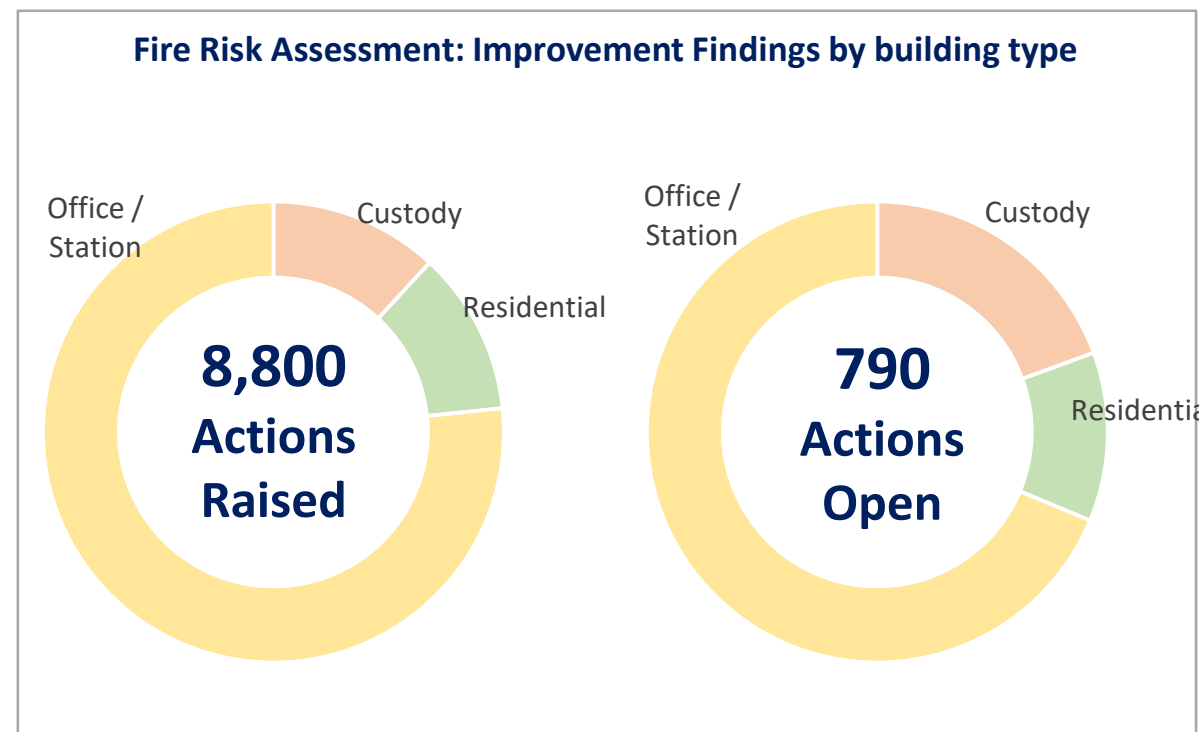
Data & trend analysis

- Estates set realistic targets based on the Mitie fire risk assessment action raised prior to February 2022 to close 775 actions by the end of the current financial year 22/23. The target set has been exceeded as indicated in the table on the right:
- The Estates Team continue to actively address outstanding actions. A number of capital projects in custody areas contributed to addressing actions in regard to fire issues.

Management response

- One of the most significant pieces of work has been to improve the standard of fire detection and warning systems based on the findings of the fire risk assessments. Specifically within custody where we have upgraded facilities to include VESDA. (very early smoke detection apparatus)
- Inadequate standards of compartmentation (i.e. fire doors or gaps in pipework) have also been a theme.

Number of actions:	Completed	Outstanding	Total	% Complete		
				Oct 22	Jan 23	May 23
Very high	10	0	10	-	-	-
High	1071	92	1,163	89%	90%	92%
Medium	6069	618	6687	79%	79%	90%
Low	838	74	912	84%	84%	91%
Very low	18	6	24	62%	75%	75%
Risk retained	n/a	n/a	4	-	-	-
Total	8006	790	8800	81%	81%	90%



3. Incident Monitoring: *Accident Reporting*

Background

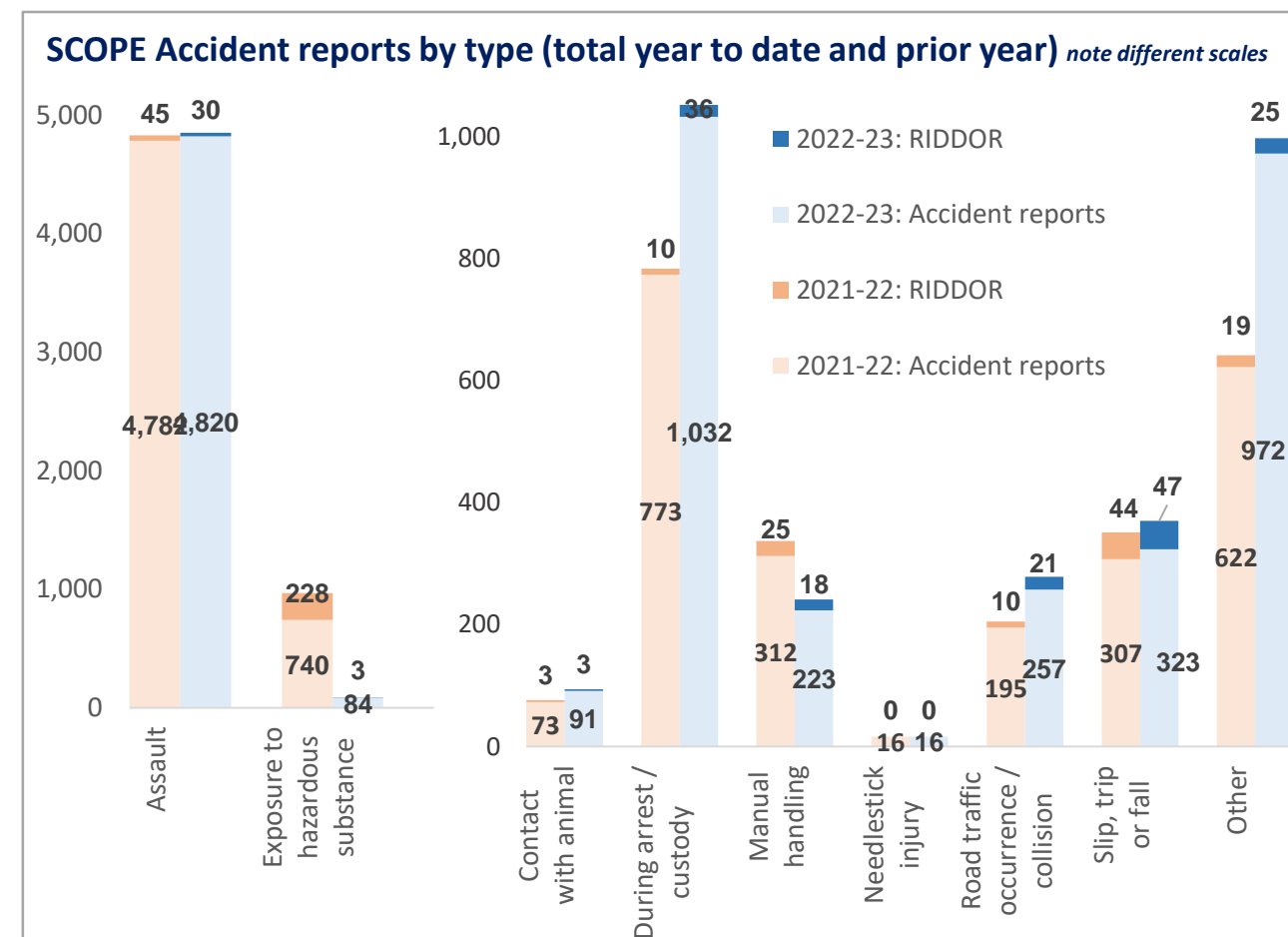
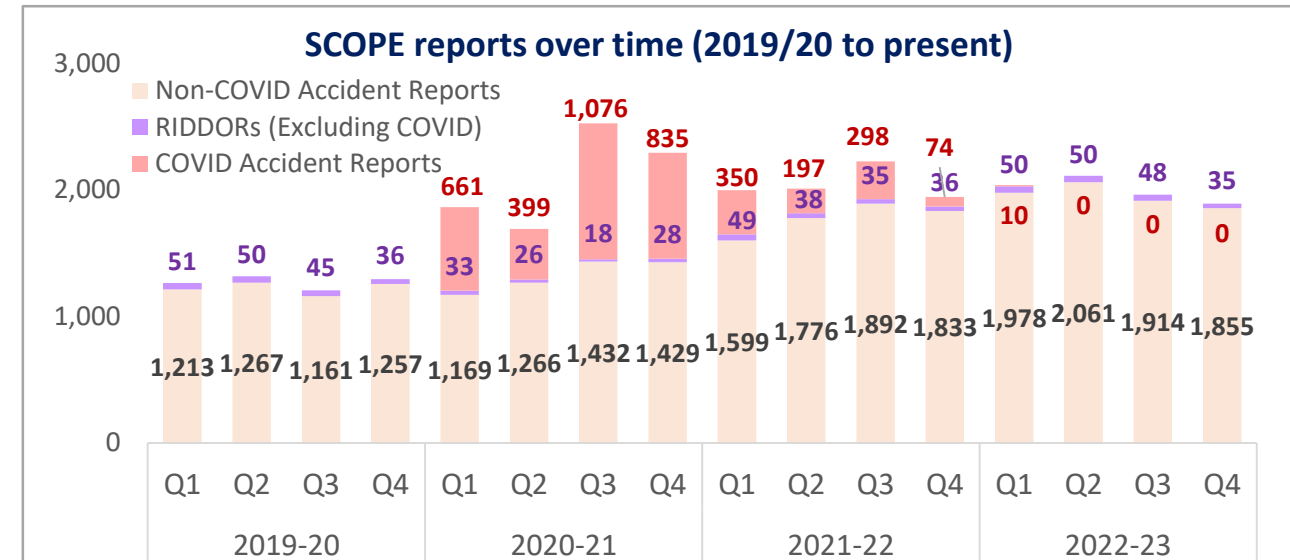
- An accident for this report is defined as unintended incident, which causes physical injury. Accidents can be classified as:
 - major i.e. RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013); or
 - other / less serious accident reports.

Data & trend analysis

- At this point, we can see that the number of RIDDORs remains consistent and within a range between 33-51 with the exception of lockdown periods during 2020-21/22 as these had an impact on “normal” RIDDOR reporting rates.
- We can also see the number of RIDDORs are reflective as a proportion of the amount of SCoPE reports. i.e. as the number of reports rise, naturally the RIDDOR have too.
- Assaults and accidents during arrest / custody are shown in further detail on the following pages.
- We note the increased number of during arrest incidents. This could be as a result of the increased reporting in assaults as these incidents are similar in nature and environment.
- Fall in exposure to substances relates to Covid-19.
- Increase in reporting should be viewed positively and important to note that injuries and generally very minor in nature. Cuts, bruises, etc.
- Reactive and proactive work underway in relation to accidents.

Management response

- Work is on-going to review RIDDORs, manual handling and STFs and will report back to Members.



3. Incident Monitoring: Assault Reporting

Background

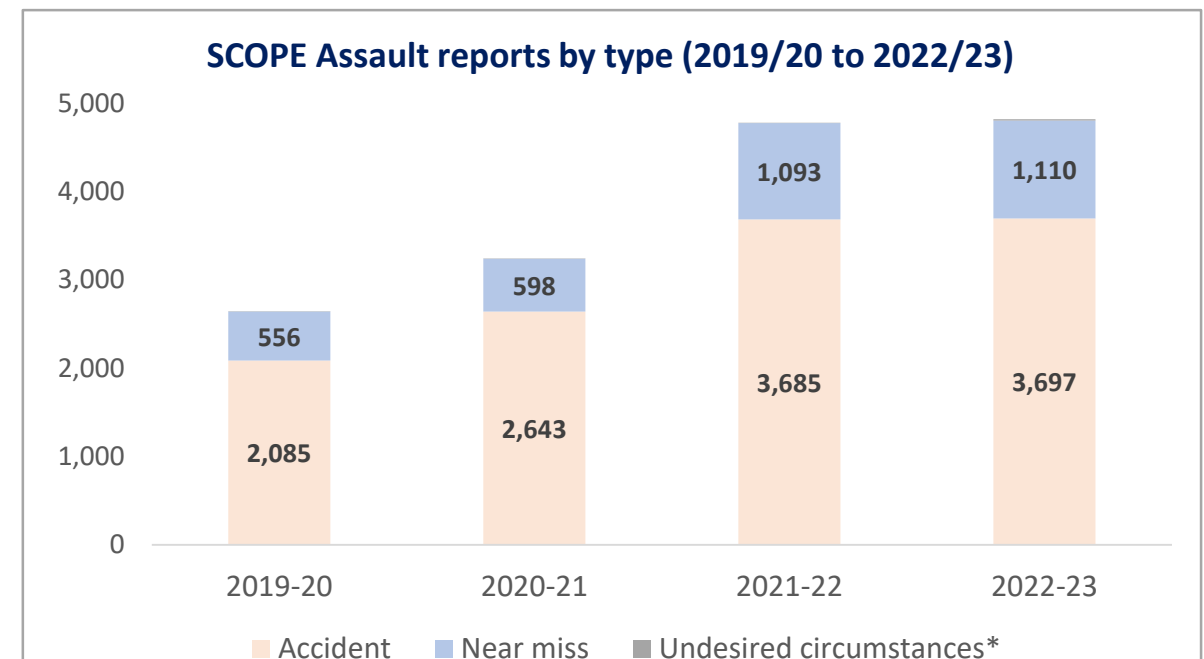
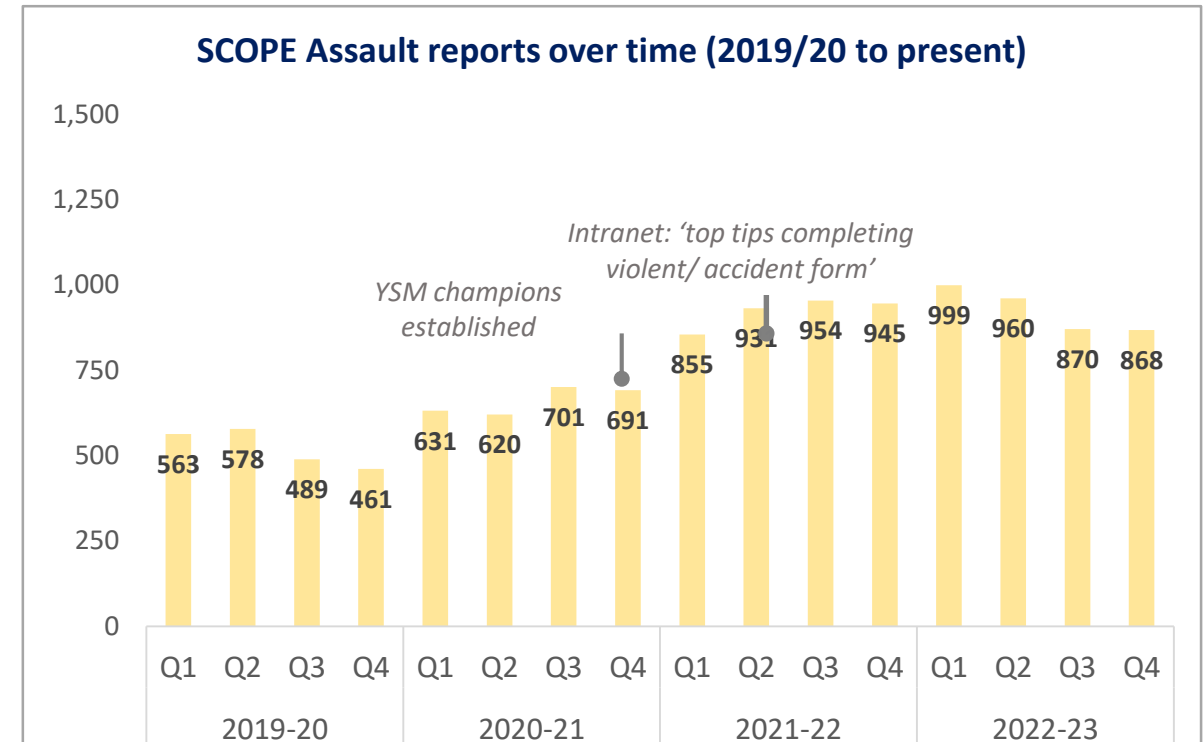
- An assault during arrest is an attack directed to take effect on the person of another. There must be criminal intent.
- An accidental injury, even although caused by a mischievous act or whilst restraining a subject, does not amount to assault.

Data & trend analysis

- The Your Safety Matters (YSM) campaign has aimed to close the reporting gap between crime figures and SCoPE reported assaults has been successful.
- The establishment of the YSM Champions Network encouraged local review, identifying and sharing best practise to improve reporting rates. Furthermore there was publication of a Health & Safety Guide for completing a Violent/Accident Form and the introduction of a process to cross refer all recorded crimes with relevant Health & Safety forms.

Management response

- The Health & Safety Manager will continue to monitor the trends around police assaults to ensure that any increases for other reasons do not go undetected.



* Undesired circumstances: 2019/20, 3 reports; 2020/21, 3 reports; 2021/22, 4 reports; 2022/23, 13 reports.

3. Incident Monitoring: *During Arrest/Custody*

Background

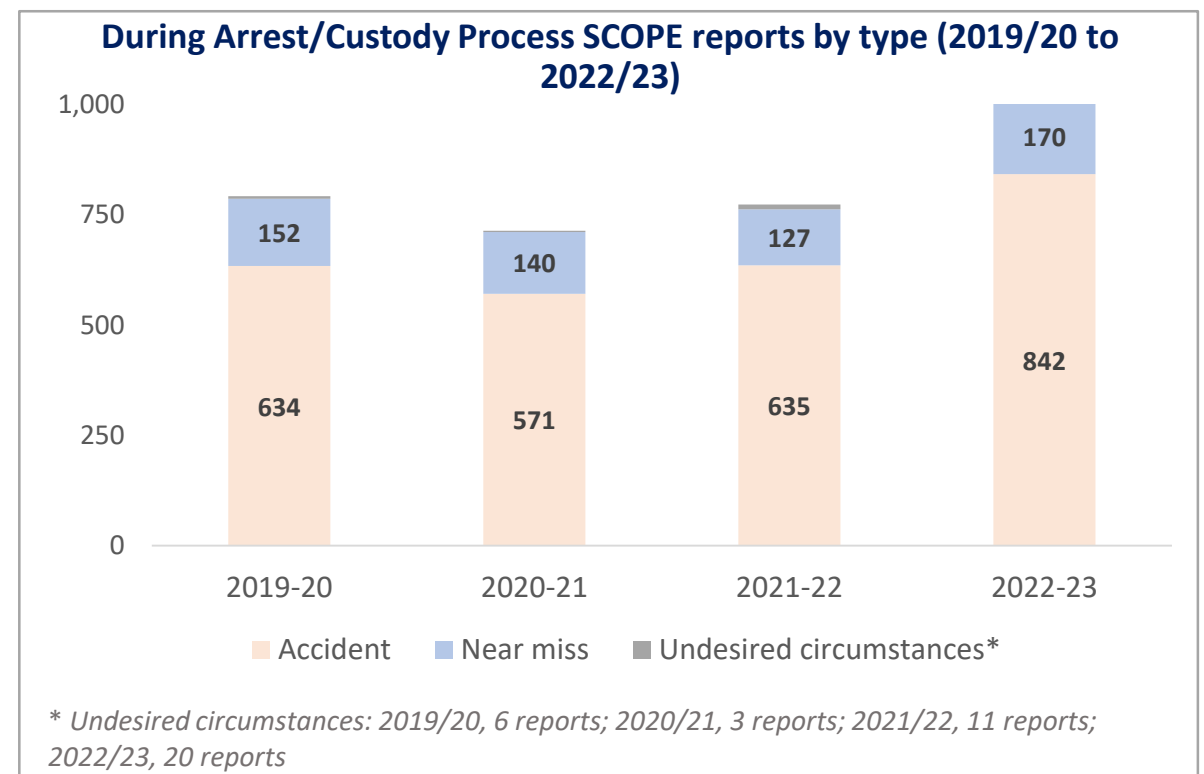
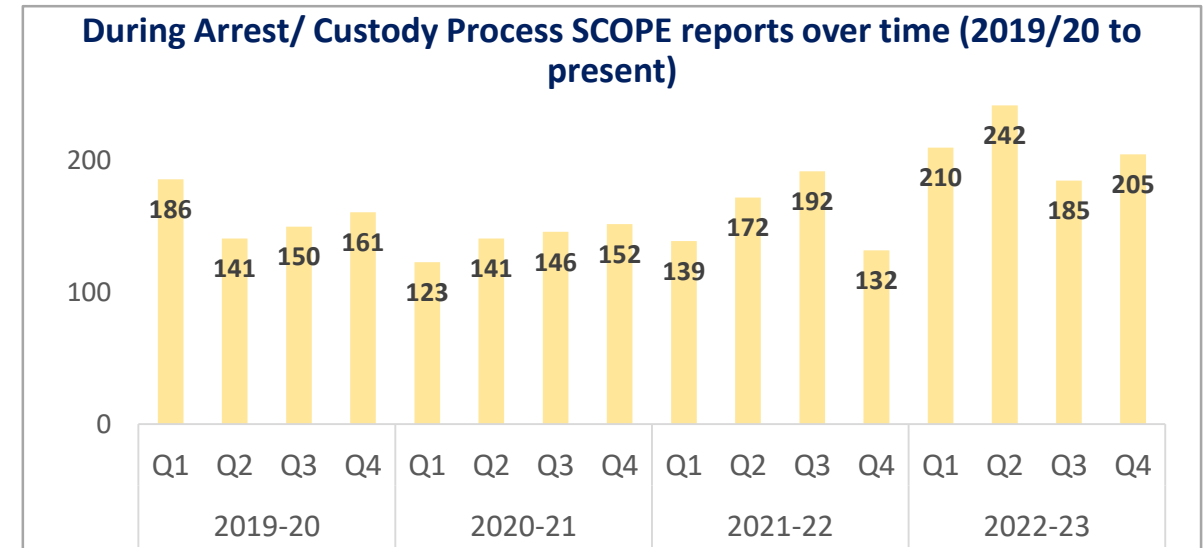
- Accidental/unintentional injury during arrest / restraint of a subject.
- Occurs from the point that a Police Officers detains a person. This includes the period where the individual is transported to custody by police vehicle.

Data & trend analysis

- From the data we can see that there is an upward trend in the reporting of occurrences categorised as During Arrest/Custody Process.
- It is believed that the reporting of these occurrences has been encouraged and influenced by the YSM project as there happen, generally, in similar environments as assaults.
- Examples :
 - An officer who hurt their back whilst restraining a violent person would be categorised as “During Arrest/Custody Process”.
 - A PCSO was assisting with placing a suspect in a cell. The suspect was resisting and during this the PCSO injured their arm on the cell door.

Management response

- Will continue to monitor to establish issues at an early stage.
- Proactive analysis of incidents in underway within CJSD with assistance provided by H&S Team.
- Worthwhile noting the cultural change in areas like this over the last few years where H&S is now right at the top of the agenda.



4. Other developments and preventative activities

Background

- The Health and Safety Team are also focused on initiatives in response to emerging issues as well as proactively seeking to address issues of concern.

RIDDOR Update

- It is difficult to make a direct comparison between this year and previous years RIDDORs due to the pandemic. 2019/20 saw a total of 182 RIDDORs with 109 in September 2019 and 77 in September 2022. A lot of work is going into reducing RIDDORs at this time.
- The Health & Safety Manager continues work to reduce the number of RIDDORs within SPA and Police Scotland.

Formal Inspections

- In the Autumn the Health & Safety Team became aware of what appeared to be an increase in issues across the Police Estate. Based on that Advisors have started a series of formal inspections of premises with a copy of the results sent to Brian Johnstone and Phil Collard. Work is ongoing between the Health & Safety Team and Estates to refine the reporting and recording process to manage issues identified during inspections and monitor resolution. Following implementation of the agreed process, progress updates regarding current inspection issues will be provided to the next Health & Safety Board.

MOE Operations

- A Dangerous Occurrence has been submitted under RIDDOR in relation to a MOE Operation in Edinburgh where two officers were exposed to Asbestos. When the door was removed it was found that a scaffold pole was reinforcing the door behind it and it caused damage to a skirting board with Asbestos behind it. The H&S Team will review the MOE risk assessment.

Health & Safety 24/7 On Call

- Advisors continue to offer this function across SPA and Police Scotland and are being asked to assist at an ever increasing number of complex crime scenes where there are significant risks to officers and staff. Serious fires, often with Asbestos, are common, Cannabis Cultivations and aircraft incidents are among the most significant.
- Recent scenes include the triple fatal fire (“D” Division), officer with serious dog bite, member of the public falling from a police vehicle, etc.

Fixed Wire Testing

- 329 Buildings have undergone a Fixed Wire Test – no building has any C1 actions as these are addressed at the time of testing.
- 48 buildings have satisfactory certificates.
- 281 buildings have unsatisfactory certificates.
- A remedial works programme is in place and being progressed.

4. Other developments and preventative activities

Legionella

- Water management arrangements are in place across the Estate including sampling, temperature checking and flushing.
- Tulliallan - work continues to be carried out dealing with improvement works, along with daily flushing being carried out and temperature checks.
- Water sampling continues to be carried out in the buildings that were originally identified as having positive results.
- The results from the sampling have indicated a number of low level positive results – the rooms identified have been vacated and subject to local disinfection, flushing and retesting – these actions are as per the advice from the Water Subject Matter Expert.
- A tender was recently issued to conduct Water Risk Assessments across Police Scotland estate buildings. The tender closed in early May and it is anticipated that the contract will be awarded shortly for a contractor to conduct Water Risk Assessments.

Reinforced Autoclaved Aerated Concrete (RAAC)

- On 6 April 23, as a result of repair works Police Scotland became aware that RAAC was present in the roof of the Fettes fleet workshop in Edinburgh. RAAC is a light-weight concrete material more commonly found in buildings constructed from 1956 until the 1990's, and is typically found in roof work, walls and flooring. RAAC can be subject to degeneration over time, exacerbated by weathering i.e. water ingress, and presents an issue to public and private sector bodies as it reaches the end of its useful life.
- Structural engineers assessed the condition of the RAAC at Fettes workshop and assessed the roof as a 'red-high risk' requiring immediate attention. As a result, the workshop was closed and business continuity plans put in place. A detailed inspection of the entire Fettes site confirmed RAAC was present in a number of other areas, which have also been closed to staff with business continuity arrangements put in place.
- An immediate review was undertaken of buildings across the whole police estate built, or that had extensions/renovations undertaken, during the time period that RAAC was widely used. This resulted in 65 locations being identified as potentially containing RAAC. Following inspection of these 65 locations, RAAC was only found to be present at 3 locations; Fettes (as per above), Perth and Baluniefield in Dundee.
- In Perth, RAAC is limited to one small area of the site and has been graded as 'green –low risk' by the structural engineer. There are two areas impacted at Baluniefield. One area has been graded as 'red-critical' with staff moved from of the affected area, the other area has been graded as 'medium' with no immediate action is required. Further structural assessments are ongoing in both areas at Baluniefield to identify the required remedial works necessary.

Respiratory Protective Equipment (RPE) Standard Operating Procedure

- Police Scotland is currently drafting Respiratory Protective Equipment (RPE) procedures intended to enhance the protection provided to police officers and members of police staff from respiratory hazards encountered during routine operational activity.
- The draft RPE procedures identify the Filtering Face Piece 3 (FFP3) disposable face mask as the method of respiratory protection assessed as most suitable for routine policing activities. This type of mask has already been used successfully by officers and staff during the response to the COVID pandemic.
- As the effectiveness of the FFP3 face mask is impacted by the presence of facial hair between the mask seal and the wearer's face, the draft RPE procedures contain provisions for individuals to be exempted from RPE requirements under criteria linked to various protected characteristics. An alternative form of RPE is available for those who are exempt. Statutory consultation is ongoing with statutory staff associations, diversity staff associations, trades unions and the SPA.



Scottish Police Authority
& Police Scotland

Health & Safety Policy



HEALTH AND SAFETY POLICY STATEMENT

The Scottish Police Authority (SPA) and the Police Service of Scotland, (hereafter referred to as Police Scotland) are fully committed to ensuring, so far as is reasonably practicable, high standards of Health, Safety and Welfare with regard to its own employees, Police Officers and all other persons who may be affected by its undertakings. We will comply with the Health and Safety at work etc. Act 1974 and the Police (Health and Safety) Act 1997 and all related legislation.

This policy aims to assist Police Scotland and SPA in maintaining a balanced approach between operational effectiveness and the management and control of the many and varied risks police officers and staff face, while ensuring Police Scotland and SPA continues to deliver excellence in a constantly changing environment.

Managers at all levels of the organisation will be responsible and accountable for proactive leadership in implementing this policy. All employees and contractors must co-operate fully with this policy and have a duty to take reasonable care for their own health and safety and that of others who may be affected by their work.

Together we will, as far as is reasonably practicable:

- promote a positive safety culture to assist with the implementation of our health and safety policy
- ensure sufficient resources in order to comply with this policy including information, instruction and training
- control workplace hazards which could lead to injury, ill health or loss by assessing risk and establishing control measures which are suitable, sufficient and proportionate to the level of risk
- provide a safe working environment
- implement an accident reporting and investigation system
- ensure suitable equipment and safe systems of work
- provide safe access and egress and adequate welfare facilities for all employees
- training and supervision so that all employees are competent to undertake their role
- consult with Police Officer associations and staff trade unions on matters that affect health and safety issues

Statutory Health and Safety compliance will be supported by the appointment of competent persons and, where required, assistance from persons internal and/or external who may provide specialist advice on health and safety matters.

Progress in achieving our goals will be measured by proactive and reactive performance monitoring, and annual health and safety reports will be prepared with the aim of continuously improving health and safety standards and compliance.

The organisational arrangements for the implementation of this statement are set out in the Health and Safety Policy, including roles and responsibilities. The Policy will be reviewed on a three yearly cycle or as required and staff will be informed of any revisions.

Signed:
Martyn Evans
Chair SPA

Date: 3 April 2023

Signed:
Sir Iain Livingstone QPM
Chief Constable

Date: 3 April 2023

Health & Safety Policy

SCOTTISH POLICE
AUTHORITY



POLICE
SCOTLAND
POILEAS ALBA

Health & Safety Policy - Organisation and Arrangements

Policy:	Health & Safety Policy
Owning Department:	Governance Audit & Assurance – Health & Safety
Version Number:	2.1
Published Date:	<i>tbc</i>
Theme(s):	Your Health & Safety



Compliance Record

Equality and Human Rights Impact Assessment (EqHRIA): Date Completed / Reviewed:	17 May 2022
Information Management Compliant:	Yes
Health & Safety Compliant:	Yes
Publication Scheme Compliant:	Yes

Version Control Table

Version	History of Amendments	Date
2	Updated EQHRIA and emphasis on responsibility for local oversight by Divisional Commanders/equivalents	26 June 2022



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Appendices

Appendix A	Health & Safety Hazard Profile
Appendix B	Roles and Responsibilities



1. Overview

The Scottish Police Authority (SPA) and the Police Service of Scotland (Police Scotland) were both formed in 2013. The SPA is responsible for maintaining the Police Service. It is accountable to Ministers and Parliament is responsible for the following functions:

- Allocation of resources
- Holding the Chief Constable to account for all functions, including operational policing and compliance with statutory requirements
- Appointing senior officers and staff
- Requesting information and reports from the Chief Constable if necessary
- Preparation and publishing of Strategic Plan, Annual Plan and Annual Report
- Maintaining forensic service provision

Police Scotland is responsible for policing across the length and breadth of Scotland, some 28,168 square miles and is the second largest policing body in the United Kingdom.

Police Scotland's purpose is to improve the safety of people, places and communities in Scotland. Our focus is on Keeping People Safe which is at the heart of everything that we do.

Our people are our most important resource, and keeping all of our people safe, healthy and well at work is a key aim. Health & safety is therefore a key business objective and we recognise that the effective management of health & safety can contribute to business performance by reducing injuries, ill-health and absence, thus reducing unnecessary losses and liabilities.

The nature of policing generates a diverse and significant hazard profile (as referenced in Appendix A). It is therefore essential to ensure health & safety is embedded in every aspect of our work. This policy aims to achieve this, by clarifying what we will do and who is responsible for our health & safety.

This Policy defines the arrangements for Health Safety and Welfare which are defined in the Health and Safety at Work etc Act 1974 and other regulations concerning workplace conditions. Separate arrangements are in place for Health and Wellbeing.

Coordination between these two branches will take place in areas of mutual interest or where patterns of absence or ill health indicate a need for further investigation in terms of the Workplace (Health, Safety and Welfare) Regulations 1992

1.1. What is this about?

This document is the Health & Safety Policy containing the organisation and arrangements required to comply with the Health & Safety Policy Statement, signed by the Chair of the SPA and the Chief Constable of Police Scotland.

It clarifies the key roles and responsibilities and sets out the components of Police Scotland's Health & Safety Management System based on 'HS(G) 65 Managing for Health & Safety' (HSE Publication).

The Health & Safety Policy Statement and this policy (organisation and arrangements) document set out how SPA and Police Scotland will comply with relevant health & safety legislation.

Health & Safety Policy

The primary piece of health & safety legislation in the UK is the Health & Safety at Work etc. Act 1974. This places a duty on all employers to ensure, as far as is reasonably practicable, the Health, Safety and Welfare at work of all their employees. There are many other pieces of health & safety law from topics ranging from asbestos to noise and working with harmful substances. Those applicable to SPA / Police Scotland are detailed in Appendix A.

1.2. Review of Health & Safety Policy (Organisation and Arrangements)

The SPA and Police Scotland are committed to a systematic and periodic review of the Health & Safety Policy and Arrangements and this review will include an Equality and Human Rights Impact Assessment.

The Health & Safety Governance Framework was introduced in June 2022 and supports the improvement of the organisation's Health and Safety policy, procedures and inspections thereby providing assurances that policies and procedures are being followed and working efficiently and effectively in pursuit of Police Scotland's strategic objectives.

1.3. Who is this for?

This Health & Safety Policy, including organisation and arrangements for compliance with health & safety law, is for all authority and police staff and officers. It applies to all employees. Statutory duties also apply to:

- all persons working with, for, or on behalf of SPA/Police Scotland such as partner agencies, contractors, visitors and volunteers/Special Constables
- others who may be affected by SPA/Police Scotland activities.

For the purposes of health & safety legislation, sworn Police Officers are considered employees of their Chief Officer under The Police (Health & Safety) Act 1997. Therefore, it is the duty of this "Office" to ensure, so far as is reasonably practicable, the Health, Safety and welfare of all sworn Police Officers, as well as staff.

All employees have duties under health & safety law. Responsibilities increase for managers, who have a duty to ensure that work related hazards are identified and controlled as far as is reasonably practicable. They are responsible for the health & safety of all employees within their area of business. Further detail is contained within the Key Information and Manager's sections below.

2. Key Information

2.1 Health & Safety Policy Statement

The Health & Safety Policy Statement is signed by the Chair of the SPA and the Chief Constable of Police Scotland. It is a statement of intent and demonstrates the highest level of commitment to the management of health & safety. A signed copy of the Health & Safety Policy statement is available on the Police Scotland Intranet and must be displayed on health & safety noticeboards within all premises.

[Health & Safety Policy](#)

Recognising the risk to our people and premises from fire, a complimentary Fire Policy Statement is issued annually in tandem with the Health and Safety Policy Statement.

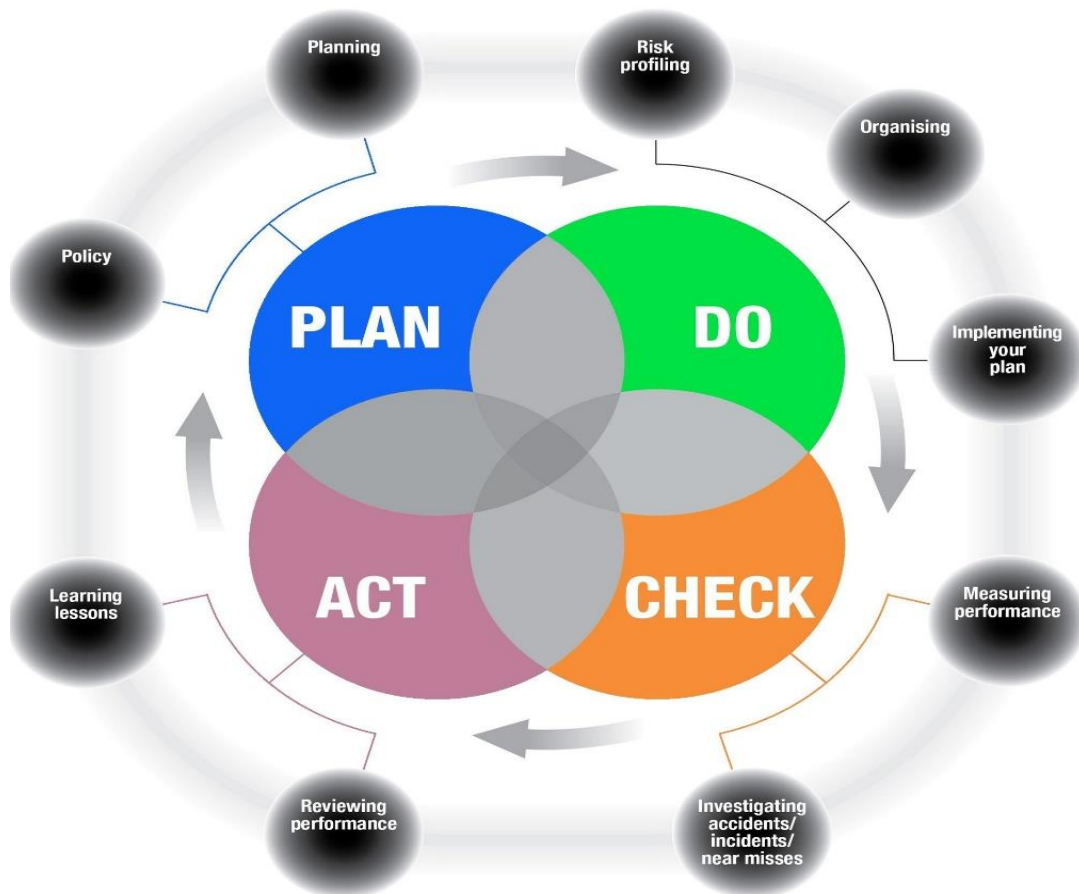
The remainder of this document details the supporting policy – organisation and arrangements – for safeguarding employees (and others) as detailed in the signed Health & Safety Policy Statement.

2.2 Health & Safety Policy – Organisation

a. Health & Safety Management System

To assist the SPA/Police Scotland with continuous improvements in safety performance and compliance with Health & Safety law, a Health & Safety Management System is in place. The Health & Safety Management System is a multi-tiered system comprising the following elements in line with the HSE Publication ‘Managing for Health & Safety (HSG65)’.

Figure 1: Health & Safety Management System – HS(G) 65



In order to follow the above model, SPA/Police Scotland’s strategy includes the following elements, with the overall aim to achieve statutory compliance and reduce work-related accidents and ill health. The roles and responsibilities for delivery are detailed in Appendix B.

Health & Safety Policy



PS/SPA Health and Safety Management System components	
Plan	<ul style="list-style-type: none"> • The Health & Safety Policy (including the Policy Statement) which displays a commitment to health & safety at the highest level. • Procedures which contain clear arrangements and also clear accountabilities in relation to health & safety. • A structured Health & Safety Management System which includes competent guidance and associated tools to enable employees to integrate safety into their roles and tasks.
Do	<ul style="list-style-type: none"> • Systematic identification of hazards and assessment of risk. These will be structured into three tiers – Generic, Specific and Dynamic. • Proportionate risk control measures for identified hazards. This includes arranging and implementing safe working practices and training. • Ensuring the safety of all SPA/Police Scotland premises and equipment.
Check	<ul style="list-style-type: none"> • SPA/Police Scotland must measure performance by monitoring and benchmarking health & safety data with similar forces. • The use of internal KPIs will also be used to ensure progression such as year on year comparisons of accident data and property inspection outcomes. • Collation of data to identify trends and inform strategic decision making and prioritisation.
Act	<ul style="list-style-type: none"> • SPA/Police Scotland is committed to monitoring and reviewing its management system with the aim of reducing accident reoccurrence. • Lessons learned will be disseminated through direct communication with line managers/persons involved and committees as required. • If any improvements can be made at a national level, learning points will be communicated through the use of Safety Alerts and Memos.

b. Documentation

The Health & Safety Management System documentation follows the structure detailed below.

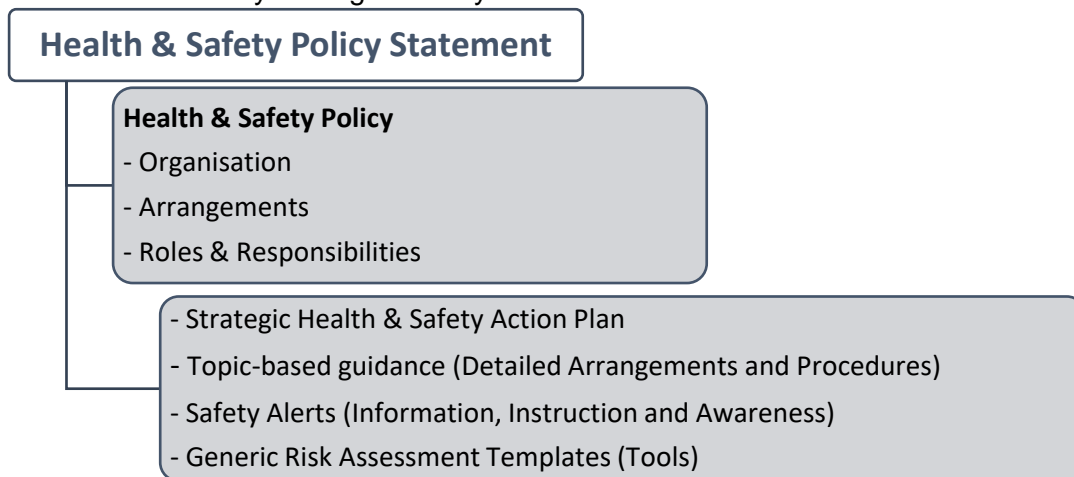


Figure 2: Health & Safety Documentation

Health & Safety Policy



All of the above are accessible via the Police Scotland intranet. More detail follows (Section 2.3) on the specific arrangements to ensure compliance with statutory health & safety duties.

c. Organising for Health & Safety

This section of the Health & Safety Policy aims to clarify specific health & safety responsibilities within defined roles which support the successful delivery of the Policy commitments. As detailed within the Health & Safety Policy Statement at 2.1, it is an employer's statutory duty to protect the Health, Safety and Welfare of their employees and other people who might be affected by their activities. Employers must do whatever is reasonably practicable to achieve this. This means making sure that workers and others are protected from anything that may cause harm, effectively controlling any risks to health or risks of injury that could arise in the workplace.

The SPA Board and the Chief Constable of Police Scotland have overall responsibility for health & safety and ensuring this Policy is implemented across the SPA/Police Scotland structure. Direct responsibilities for health & safety arise for all staff and officers who have line management responsibility for others. These responsibilities are outlined in detail within Appendix B: Roles and Responsibilities. They are also summarised in general terms within the employee and managers sections.

d. Strategic Action Plan

A strategic Health & Safety Action Plan is in place detailing the high level actions that are needed in order to reach the overall goal of continuous improvement in the management of health & safety and compliance with health & safety law where applicable. This plan will be reviewed on a regular basis and will be coordinated by the Health & Safety Manager. Updates on the delivery of actions/outcomes will be provided to the Health & Safety Board and to the SPA Board where required.

e. Organising at local level

All Divisions/Departments are required to develop and implement suitable local arrangements (risk assessments, procedures, method statements and safe systems of work) to give effect to this Health & Safety Policy.

Local arrangements must be developed and implemented to allow for adequate consultation with employees and appointed Staff Association/Trade Union Safety Representatives.

Local arrangements must be developed to monitor safety performance, specifically accidents, results of inspections, Safety Audits, undesired circumstance reports, staff safety training, Fire Risk Assessments, any unwanted fire alarms, and any reports to the HSE under RIDDOR.

Health and safety meetings must be minuted and copies distributed appropriately.

In order to ensure that Divisions manage health & safety effectively, Deputy Chief Constables, Assistant Chief Constables, and Directors shall ensure that:

- the key hazards and significant risks to health & safety are identified within their areas of responsibility and authority
- key responsible persons are identified and that there are clearly established roles and responsibilities for health & safety and
- relevant staff have the necessary training, skills, knowledge and experience to discharge their responsibilities for health & safety effectively.



2.3 Arrangements for the Management of Health & Safety

As detailed above, the nature of SPA/Police Scotland's core business is such that Police Officers and Staff could potentially face a wide variety of hazards during the course of their work activities (see Appendix A). A wide range of statutory duties apply, and arrangements to comply with those duties, form a significant part of the Health & Safety Management System.

2.3a Risk Assessment

Commitment

SPA/Police Scotland is committed to meeting its legal obligations in:

- identifying the types of risks individuals will encounter in operational and non-operational policing activities;
- setting in place all reasonably practicable steps to minimise those risks, including training, equipment and personal protective equipment;
- ensuring workers are aware of and follow SPA/Police Scotland SOPs regarding these situations; and
- providing appropriate training for workers who need to take risk-benefit decisions in the course of operational policing.

To meet this commitment, SPA/Police Scotland has implemented systematic and methodical step by step guidance for identifying risk, assessing tactical options, removing the risk where possible, or otherwise adopting control measures and precautions that are proportionate, reasonable and practical in the circumstances.

This guidance can be used in conjunction with the National Decision Making Model to incorporate the threat assessment as a crucial element of the health & safety risk assessment. Further information on the [National Decision Making Model](#) is available on the intranet.

Individuals will be equipped with the necessary skills, which will vary according to their rank, grade and position, to make appropriate risk-benefit decisions, dynamically assess the situation and make the best possible decision based on:

- the limits of the information to hand;
- the immediacy of the threat;
- the resources and equipment available;
- operational instructions and guidance; and
- training.

Risk assessment – statutory requirements

The law does not require all risks to be eliminated, but does require SPA/Police Scotland to protect their staff and others affected by their activities from risks with the potential to cause significant harm as much as possible. Operational tasks and work activities must be subject to evaluation (suitable and sufficient risk assessment) to:

- identify the hazards (what could cause harm) and the associated risk level (high, medium, low)
- identify who may be harmed (officers, staff, visitors, custodies, third party organisations etc.)
- identify the (proportionate) control measures required (training, PPE, resources, safe systems of work etc.)

Health & Safety Policy

- demonstrate that the risks have been reduced to an 'acceptable' level. This level is defined as 'as low as is reasonably practicable'. This involves weighing risks against the effort, time and cost associated with controlling them and therefore describes the level to which we expect to see workplace risks controlled. This approach also aims to achieve proportionality in risk control.
- weigh up the residual risk with the benefit of performing the task.

Risk levels must be reduced to a level as low as is reasonably practicable within the context of the activity and the changing circumstances of the operational environment. The assessment will detail whether there are enough precautions (control measures) in place, or whether more should be done to ensure that the likelihood and severity of harm is reduced as far as possible.

During a spontaneous incident, a **dynamic assessment of the hazards** should be undertaken and, where required, transferred to an appropriate risk assessment document as soon as it is reasonably practical to do so. The dynamic risk assessment should not be considered as a substitute for a formal risk assessment for all anticipated and planned operational activities.

Where the dynamic assessment reveals that there are no significant risks, then a notebook entry to that effect is sufficient to record the process has been completed.

Health & Safety risks within SPA/Police Scotland

It is likely that most spontaneous incidents and planned operations will present both complex and significant health & safety issues. Even when all reasonably practicable controls have been taken there will often be a residual risk that may well be substantial. Circumstances where there are foreseeable risks include:

- dealing with violent people
- controlling large crowds and managing public disorder
- intervening to protect members of the public in hazardous situations, for example armed interventions or hostage situations
- managing incidents related to natural hazards like open water or sheer drops from cliffs or quarries
- dealing with risks from criminal activities, e.g. illicit drugs, high-speed pursuits and terrorist threats
- scene examination and laboratory work
- dealing with potentially catastrophic road traffic collisions
- operational activities during periods of severe weather
- working with custodies
- using equipment/vehicles
- premises issues

This list is not comprehensive (a broader hazard profile is at Appendix A) but these and other risks can be anticipated and prepared for. The very nature of policing means that staff respond to unpredictable and rapidly changing situations.

Generic Risk Assessments

Generic Risk Assessments (GRAs) in the context of health & safety are available on the intranet and can be accessed via the [Health & Safety Departmental section](#). These have been developed by the Health & Safety Team, setting out examples of the particular risks or risk situations which might be encountered in the operational activities as described.

Health & Safety Policy



SPA/Police Scotland Managers and Supervisors are encouraged to use these assessments when completing individual specific risk assessments. However, GRAs are not a substitute for completing site-specific risk assessments locally and in consultation with staff who work in the specific area.

Managers should ensure that these templates are used to develop local risk assessments for that Division/department, or Command Unit and refreshed (a) on any change, (b) where there is any reason to suspect they are no longer valid or (c) 3 years since original creation.

Once completed these local assessments must be archived and retained according to the Document Retention Policy.

Striking the balance – Health & Safety Executive approach to risk in policing

The SPA / Police Scotland has to send officers and staff into dangerous situations in circumstances when anyone else would be seeking to remove themselves from danger. The Health & Safety Executive (HSE) have produced a guidance document 'Striking the balance between operational and health & safety duties in the Police Service'. This publication clarifies how health & safety law will be applied to operational circumstances of the Police Service. It provides guidance for senior police officers in balancing risks associated with fighting crime and protecting the public, while meeting their health & safety at work obligations to the public as well as employees.

The document clarifies that health & safety duties are not absolute and each is qualified by the test of what is '**reasonably practicable**'. The Health & Safety at Work etc. Act 1974 therefore, **does not require all risks to be eliminated**, and HSE recognises that, even when all reasonably practicable precautions have been taken to deal with foreseeable risks, injuries and deaths could still occur; and **it may be necessary to take some risks to secure a wider benefit to public safety**.

When conducting an investigation into an accident/incident involving an operational Police Officer, the HSE will, for example, consider the actual information about the incident that was available to officers when they had to make operational decisions in what is recognised as dangerous, fast-moving and emotionally-charged environments, but not revisiting decisions made during operations with the benefit of information that could not reasonably have been known at the time.

Further information on [risk assessment and templates](#) for foreseeable scenarios is available on the Police Scotland intranet.

2.3b Accidents and Near Miss Reporting and Investigation

Reporting accidents and near misses at work is a statutory requirement. Reporting allows SPA/Police Scotland and external organisations such as the Health & Safety Executive (HSE) to conduct benchmarking; measure the performance of the Health & Safety Management System; identify where and how risks arise and change over time; to track trends and to investigate serious accidents. These factors have the combined aim of reducing work-related injury and occupational ill health.

SPA/Police Scotland has adopted the SCoPE Accident Reporting Module application to allow uniformity and consistency in the reporting of accidents, incidents and near misses. All accidents and near misses involving Police Officers, Police Staff, and Special Constables must be reported on the SCoPE Accident Reporting Module to allow effective monitoring, reporting, investigation and the implementation of preventative measures.

[Health & Safety Policy](#)

All accidents and near misses involving non-employees (visitors to police buildings, custodies, contractors, must be reported via the [Third Party Accident Injury Report \(076-003\)](#). This form and further information on all reporting is available through the [Accident / Incident / Near Miss Reporting and Investigation Guidance](#).

First line supervisors must conduct investigations into staff accidents and enter on SCoPE/ Injury Report form, the causes and detail any remedial action taken to prevent reoccurrence.

Managers should instigate additional investigations on events which merit greater enquiry than Scope permits. These reports must be sent to the Health and Safety Team. healthandsafety@scotland.police.uk

All accidents and near misses are reviewed by Health & Safety Advisors to ensure that appropriate, proportionate investigation has taken place. Advisors themselves may elect, or be instructed by the H&S Manager, to investigate specific issues.

Trade Union officials and Police Federation representatives may also carry out investigations and Managers must cooperate with these investigations. Where appropriate, joint investigations can take place.

Further information on accident investigation is available on the Police Scotland intranet.

2.3c Additional (topic-based) arrangements

Detailed arrangements (health & safety guidance documents) are available for specific hazards, for example Fire Safety, Hazardous Substances and Display Screen Equipment. The Health & Safety Management System is subject to continuous development and improvement. Over time, guidance documents for other topics will be added to the existing suite of documentation.

2.3d Training

Health & safety training forms an important part of the Health & Safety Management System. The Health & Safety at Work etc. Act 1974 requires employers to provide whatever information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health & safety at work of employees. This is expanded by the Management of Health & Safety at Work Regulations 1999, which identifies situations where health & safety training is particularly important, e.g. when people start work, on exposure to new or increased risks and where existing skills may need updating.

Providing health & safety information and training helps to:

- ensure that people know how to work safely and without risks to health
- develop a positive health & safety culture, where safe and healthy working becomes second nature to everyone
- meet our legal duty to protect the health & safety employees

Effective training:

- will contribute towards making employees competent in health & safety
- can help avoid the distress that accidents and ill health cause
- can help avoid the financial costs of accidents and occupational ill health, such as damaged property and equipment, demotivated staff and increased insurance premiums



Health & safety training courses are provided within Police Scotland. Further detail is available on SCoPE. Training requirements will depend on the person's role and are usually identified during the risk assessment process. Departmental training needs analysis may also assist to identify training requirements.

2.3e Monitoring

The Chief Constable will ensure that the health & safety performance of Police Scotland is monitored effectively and is subject to continuous improvement. To achieve this, the Health & Safety Manager shall develop and implement, as required, a planned programme of Health & Safety Management System inspections and audits to evaluate and establish that:

- the appropriate management arrangements are in place
- adequate risk control systems exist, are effectively implemented, and consistent with the hazard profile of the Service

The monitoring programme will benchmark the health & safety management performance of Police Scotland against internal and external standards as required to ensure that it is operating effectively, and will recognise positive achievements as well as areas for improvement.

A planned programme of actions required to correct any shortcomings will be prepared and implemented as required, as well as any necessary revisions to the Health & Safety Policy and procedures. The Health & Safety Manager will prepare regular reports on the health & safety performance of SPA/Police Scotland for the consideration of the Health & Safety Board and the SPA Board.

To ensure on-going compliance with all Health & Safety Policies, Procedures, Guidance and Legislation in relation to properties/sites, all Divisions will engage in regular Health & Safety and Fire Safety inspections to identify deficiencies and implement corrective actions and improvements. At local level, the responsibility for monitoring the results of these inspections will rest with the Divisional Commander or equivalent. For further information, please refer to the [Health & Safety Inspection Toolkit](#) on the Police Scotland intranet.

2.3f Health and Safety Assurance Statement

The Health and Safety Assurance Statement has been developed for Divisional Commanders (and business area managerial equivalents) to examine their own area of responsibility and from the evidence available, confirm all statutory health & safety requirements are properly implemented within their areas. The ACC (or managerial equivalent) for that area, after appropriate verification, also signs an assurance statement to cover their portfolio areas. The document set can be used as an action plan to track progress and also serves as a form of audit to confirm the uniformity of compliance across PS/SPA. The statements are then used to provide assurance to the Executive that statutory requirements are being met.

The Health and Safety Advisors will audit the responses provided and report to the H&S Manager on any areas of non-conformity.

2.3g Consultation

SPA/Police Scotland is committed to working in partnership with all officers and staff and will consult with them through their Staff Association and Trade Union Safety Representatives.



If an employee is not represented by a Staff Association or Trade Union, they may communicate health & safety issues to the Designated Safety Coordinator within their Division or Department.

Consultation will take place with regard to:

- the introduction of any measures that may substantially affect the health & safety of employees
- the provision of health & safety information and training required under the relevant statutory provisions
- the health & safety consequences of new technologies and equipment introduced into the workplace
- SPA/Police Scotland fully recognise the importance and benefits of employee involvement in health & safety matters and the positive role that can be played by appointed Safety Representatives, under the requirements of the Safety Representatives and Safety Committees Regulations. SPA/Police Scotland will provide appropriate facilities and assistance to enable Safety Representatives to carry out their duties. The Duties of Safety Representatives are outlined within Appendix 2.

2.3h Health & Safety Committees

Consultation on health & safety matters at Committees will take place at a number of levels as detailed below.

The SPA Board and the Chief Constable of Police Scotland are responsible for Health & Safety Policy and effective consultation with Unions and staff association representatives, ensuring its implementation through a strategic planning process utilising chains of command and the Committee and Board structures below.

- **SPA Board**: The SPA Board provides a forum for strategic oversight of the SPA and Police Scotland.
- **SPA People Committee**: This SPA Board receives reports on health and safety issues and also health and welfare information.
- **Police Scotland Health & Safety Board**: The Health & Safety Board provides a forum for minuted consultation, discussion and monitoring of Health & Safety Policy, arrangements, performance and the welfare of employees. The Police Scotland Health & Safety Board is supported by Area/Division based Health & Safety sub-committees. The Health & Safety Committee will be chaired by the Deputy Chief Constable with delegated responsibility for health & safety matters.
- **Local Policing Area and Specialist Division/Departmental Health & Safety Committees**: The North, West and East Area and Specialist Division/Department Health & Safety Committees facilitate two-way communication on health & safety matters between national and Division level. They will provide a forum for minuted consultation, discussion and monitoring of the Health & Safety Policy and arrangements within the Area or Division.
- **(Policing) Division and departmental Health & Safety Committees**: These Committees meet to determine, monitor and review local arrangements. They consider reports from the H&S Advisor, monitor incidents of note including accidents and fires, oversee inspection reports and compliance with training, and provide a forum for minuted consultation, discussion of Health & Safety Policy and arrangements within the Local Division or department.

2.4 Equality, Diversity and Human Rights Considerations

It must be recognised that all people are unique individuals and may have differing needs with regards to health and safety. It's important therefore to involve people when assessing risk and managing health and safety.

The Equality Act 2010 identifies nine 'protected characteristics' which are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Everyone has the right to be treated fairly at work and to be free of discrimination on grounds of the nine protected characteristics. This includes having equal access to the advice they may need to help them do their job safely.

Police Scotland, along with the Scottish Police Authority (SPA), proactively evaluates human rights considerations into Equality and Human Rights Impact Assessments (EqHRIA) – an approach strongly advocated by the Equality & Human Rights Commission (EHRC) and the Scottish Human Rights Commission (SHRC).

The EqHRIA process ensures that Police Scotland and SPA policies and practices are fair and equitable for all members of staff and the public, as well as legally compliant with the Equality Act 2010 Public Sector Equality Duties, and the Human Rights Act 1998

In some circumstances additional control measures may be required, for example emergency egress measures for those with disabilities, reasonable adjustments to display screen equipment and workstations etc. (this list is not exhaustive.) The needs of protected groups should be taken into account when communicating information about information on hazards and safe systems of work/risk controls.

3. Staff/Officers

3.1 What you need to do

Under health & safety law all employees need to:

- take reasonable care to safeguard themselves and others who may be affected by their activities.
- report unsafe acts or conditions. If it is safe to do so, resolve it and report it.
- comply with measures put in place to look after their health & safety (risk control measures etc.).
- report accidents on SCoPE.
- know where to find the Health & Safety Policy Statement
- familiarise themselves with any significant risks and control measures associated with their work tasks
- know how to request first aid assistance
- know what to do in an emergency e.g. if there is a fire in the building

Health & Safety Policy

All staff / officers need to complete mandatory Health and Safety training relevant to their role and maintain compliance with refresher training required.

If staff / officers need any health & safety information, they should ask their line manager in the first instance. Information is also available on the [Health & Safety intranet site](#). The Health & Safety team, staff associations and trade union representatives can also provide advice.

Further duties and detail is given later under responsibilities.

4. Line Manager

4.1 What you need to do

If you are a Designated Safety Coordinator (a role identified within SPA/Police Scotland with specific health & safety duties) or a line manager with responsibility for staff/officers, it is your job to ensure compliance with this Health & Safety Policy and all relevant health & safety regulations within your area of responsibility. More detailed Roles and Responsibilities are covered at Appendix B. Specific tasks include:

- ensuring a Designated Safety Coordinator and Fire Safety Coordinator are identified within your premises.
- understanding what your responsibilities are in relation to health & safety. This includes understanding the 'key information' section and Appendix B of this policy.
- identifying significant hazards and ensuring they are risk assessed. Ensuring risk control measures are identified and implemented. Keeping records. (All records should be retained as per the Records Retention SOP guidance).
- bringing risks and risk assessments to the attention of all relevant employees.
- informing employees of health & safety provisions. It is important to remember not to make any assumptions about how much previous knowledge team members may have due to their age or length of service. Remember, too, that some team members or other individuals may have different communication needs due to disabilities or speaking English as a second language. You should make sure that you explain the health & safety arrangements to all individuals in a way that they will be able to understand.
- ensuring training needs are identified and actioned.
- ensuring that refresher training is completed by due dates.
- ensuring all employees know how to report accidents/incidents/near misses on SCoPE.
- ensuring appropriate investigation of accidents takes place.
- ensuring specific safety issues are addressed in your areas of responsibility including first aid provision, fire safety measures, working with hazardous substances etc.
- consulting with staff, staff associations and Trade Unions if you are making significant changes that could impact on safety.
- ensuring you know where to find health & safety information for example, the [Health & Safety intranet pages](#) and the Health & Safety team contact for your department.

5. Resources

- **Signed Health & Safety policy:**

<https://spi.spnet.local/policescotland/news/Documents/DOC%2020180906%20SPA-PS%20Health%20and%20Safety%20Policy%20Statement.pdf>

- **Reference Documents:**

Health & Safety Guidance and toolkits: (including risk assessment guidance and accident reporting and investigation)

<https://spi.spnet.local/policescotland/org-support/hs/Pages/Guidance.aspx>

- **Workplace Inspection Toolkit:**

<https://spi.spnet.local/policescotland/org-support/hs/ReferenceDocuments/Workplace%20Inspection%20Toolkit.pdf>

- **Police Scotland Safety Alerts:**

<https://spi.spnet.local/policescotland/org-support/hs/Pages/default.aspx>

Forms:

Fire Safety logbook forms and generic risk assessment blank templates:

<https://spi.spnet.local/policescotland/org-support/hs/Pages/Risk-Assessments.aspx>

Useful Links:

HSE website: www.hse.gov.uk



SCOTTISH POLICE

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SCOTLAND

POILEAS ALBA

Appendix A: Health & Safety Hazard and Legislation Profile

The direct adverse impacts of accidents include personal injury and property / equipment damage. However, the indirect impact also includes the cost of abstraction and back fill; costs associated with damage to property and equipment; common law claims; HSE enforcement action and prosecution/fines and HSE 'Fees for Intervention' where statutory breaches are identified during an investigation. Adverse publicity, reputational damage and also a negative impact on staff morale can also occur. In order to adequately manage all of these risks, [a hazard / legislation profile](#) has been published and is available on the H&S intranet page. This document lists many of the hazards that impact on accident rates within SPA/Police Scotland; along with the statutory framework associated with each.



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Appendix B Roles and Responsibilities

The 'employer' is directly subject to the general duties included in the Health & Safety at Work etc. Act 1974 (and the specific duties detailed in other subordinate Health & Safety legislation).

1. SPA Board (& People Committee)

The SPA Board has responsibility for overseeing health & safety within SPA/Police Scotland. This includes ultimate responsibility for the effective strategic leadership of health & safety in relation to all staff under their control within SPA and Police Scotland.

A nominated SPA Director will have responsibility for the health & safety of employees within SPA Corporate.

A nominated SPA Director will be regarded as the Health and Safety champion and liaise with the Health and Safety Manager on Health and Safety matters

The Director of Forensic Services has responsibility for the health & safety of employees within Forensic Services.

The SPA's role in holding the Chief Constable to account also includes obtaining assurance that the Chief Constable ensures Police Scotland adheres to health & safety law.

The SPA Board shall ensure that:

- adequate resources under their control are made available to the SPA CEO, Chief Constable and Director of Forensic Services to ensure the efficient and effective management of health & safety
- visible leadership, and commitment, is evident in relation to health & safety across SPA and Police Scotland
- appropriate management structures are in place to implement this Policy including governance processes, a robust Health & Safety Management System, committee structures and access to competent sources of health & safety advice
- they are fully engaged with the Chief Constable of Police Scotland in setting the strategic direction for health & safety
- the SPA Board is sighted on financial and other implications relating to statutory compliance, to enable the SPA Board to discharge its responsibilities in relation to strategic oversight
- this Policy is reviewed on a regular basis and updated where necessary

The SPA People Committee has responsibility for considering strategic health & safety issues and also Health and Wellbeing issues in more detail as and when appropriate.

2. SPA Chief Executive

The SPA Chief Executive shall

- ensure the SPA Board is sighted on financial implications and other implications relating to statutory compliance, to enable the SPA Board to discharge its responsibilities in relation to strategic oversight;
- demonstrate and ensure visible leadership, and commitment in relation to health and safety;
- meet the obligations and responsibilities of the employer for SPA employees
- ensure adequate resources under their control are appropriately utilised to ensure the efficient and effective management of Health and Safety within SPA Corporate;
- ensure appropriate management structures are in place to implement this policy and for delegating the day-to-day responsibility for such implementation to the nominated SPA Director;
- ensure SPA Corporate's performance is reported to the SPA Board/People Committee (with the support of the SPA/Police Scotland Health and Safety Manager)
- ensure the policy is reviewed and update where necessary

3. Nominated SPA Corporate Director

- implement this Policy and any specific arrangements made under this Policy within SPA Corporate;
- demonstrate strong leadership within SPA Corporate in respect of Health and Safety management
- coordinate their activities with others, where necessary, to secure the effective management of Health and Safety
- ensure arrangements are in place to ensure the Risk Assessment Process is fully implemented with their respective area, with the support of the Designated Safety Coordinator;
- ensure that relevant Health and Safety training is provided, with the support of the Designated Safety Coordinator; and,
- actively consider whether there is a requirement to include specific health and safety objectives within SPA Corporate business plans

4. SPA Director of Forensic Services

- demonstrate and ensure visible leadership, and commitment in relation to health and safety within SPA Forensics;
- ensure adequate resources under their control are appropriately utilised to ensure the efficient and effective management of Health and Safety;
- ensure appropriate management structures are in place to implement this policy and for delegating the day-to-day responsibility for such implementation to Heads of Function; and,
- ensure SPA Forensics' performance is reported to the SPA Board (with the support of the SPA/Police Scotland Health and Safety Manager)



5. SPA Head of Workforce Governance

The Head of Workforce Governance is responsible for:

- providing strategic support and expert advice to the SPA Board/People Committee on Health and Safety matters;
- leading the development and implementation of a strategic programme of governance to ensure the effective oversight and quality assurance by SPA of Health and Safety activities

6. Chief Constable Police Scotland

The Office of Chief Constable is responsible for the discharge of the legal obligations of the Police Scotland. This includes setting the strategic direction for health & safety throughout the Service, thereby promoting a positive health & safety culture. The Chief Constable has ultimate executive responsibility for the effective strategic leadership of health & safety in relation to all staff under their control. The Chief Constable has delegated the day-to-day responsibility for managing health & safety within Police Scotland to the Deputy Chief Constable (DCC) Designate.

The Chief Constable shall ensure that:

- visible leadership, and commitment, is evident in relation to health & safety
- appropriate management structures are in place to implement this Policy and for delegating the day-to-day responsibility for such implementation to Senior Officers/Management, including governance processes; a robust Health & Safety Management System; integration of safety into core business objectives, committee structures and access to competent sources of health & safety advice
- Police Scotland's health & safety performance is reported to the SPA Board and discussed at the SPA People Committee on a regular basis
- with the support of the SPA Board, adequate resources are made available to ensure the efficient and effective management of health & safety
- a proportionate risk assessment process is embedded throughout the Service that adequately identifies the hazards, risks and relevant control measures required to ensure the health & safety of employees and others
- there is access to adequate levels of competent health & safety assistance and advice and that the Service acts on such advice
- an effective Health & Safety Management System is in place and implemented that follows the 'Plan, Do, Check, Act' process following HS(G) 65
- this Policy is reviewed on a regular basis and updated where necessary
- In the interim years, a summary of the policy termed a Health and Safety Policy Statement and a similar Fire Policy Statement will be issued on an annual basis for exhibition on local notices and intranet.

7. Deputy Chief Constable (DCC) Designate (Responsible for Health & Safety)

The DCC Designate is responsible for:

- demonstrating strong leadership in respect of Health & Safety Management (Leading by Example) in order to promote a positive health & safety culture
- chairing the Police Scotland Health & Safety Board
- the participation in and compliance with health & safety requirements of their respective senior management
- working directly with the Health & Safety Manager in keeping up to date with changes in relevant Health & Safety Legislation, Standards and Good Practice
- where relevant, making the Chief Constable aware of health & safety issues within the Service
- ensuring a comprehensive organisational and management structure is in place to implement the aims and objectives of the Policy and procedures
- achieving continuous improvement in health & safety performance, whilst seeking to maintain best value and efficient policing

8. Director of People and Development

The Director of People and Development has particular responsibilities in relation to all officers and staff. This role directly covers Human Resources, Policy formulation and health & safety. The Director of People and Development is responsible for:

- implementing this Policy and any specific arrangements made under this Policy within their scope of authority and responsibility
- demonstrating strong leadership within their area in respect of health & safety management (Leading by Example)
- liaising with the DCC on all relevant health & safety requirements
- consulting with Staff Associations, Trade Unions or employee representatives on health & safety matters where relevant in terms of P&D business, policies and procedures
- promoting and monitoring of the Health & Safety Management System and advising senior colleagues on Policy developments, revisions and related issues
- ensuring resources are made available within their area for the efficient and effective management of health & safety

9. Assistant Chief Constables, SPA/Police Scotland Directors

All are responsible for:

- implementing this Policy and any specific arrangements made under this Policy within their scope of authority and responsibility
- chair area/specialist area/departmental committees where required
- demonstrating strong leadership within their Division/Department in respect of health & safety management (Leading by Example)
- coordinating their activities with others, where necessary, to secure the effective management of health & safety
- Monitoring arrangements, and providing periodic feedback to the DCC/SPA or department on health & safety performance

- arrangements to ensure the Risk Assessment Process is fully implemented with their respective Division
- ensuring that relevant health & safety training is provided to Senior Officers/Managers
- ensuring that health & safety objectives are part of their business plans within their scope of authority and responsibility

10. Chief Superintendents, Superintendents, Chief Inspectors / Area Commanders, Heads of Departments, Heads of Function

All are responsible for:

- assisting the DCC, ACC and Police Scotland / SPA Directors in implementing this Policy and any specific arrangements made under this Policy within their scope of authority and responsibility
- ensuring the implementation of the Health & Safety Policy and procedures, within their area of responsibility. They will also give due care and consideration to the Health, Safety and Welfare of all staff under their supervision and others who may be directly affected by their operational decisions.
- setting the standard within their area of authority in respect of health & safety management (Leading by Example)
- taking on the responsibilities of the '**Designated Safety Coordinator**' for premises specific health & safety management where applicable. (Where multiple Divisions/Departments are operating within one building, one senior manager can take on the role as the Designated Safety Coordinator for the premises. The Department with the largest footprint / head count usually has overall responsibility to ensure this happens).
- notifying their respective Senior Management following an incident/accident that is reportable to the HSE under RIDDOR (Reporting of Incidents, Diseases or Dangerous Occurrences Regulations)
- ensuring that all incidents/accidents within their Division/department are reported and investigated appropriately and recommendations recorded on Scope, are implemented to prevent recurrence
- ensuring that relevant health & safety training is provided to Managers
- ensuring that meetings are undertaken to review health & safety performance within their area of responsibility
- monitoring that health & safety risk assessments and 6-monthly inspections are carried out within the specified timescale, that the results are recorded and actions closed.
- monitoring health & safety issues within their area of responsibility

11. Inspectors, Line Managers, Supervisors

All are responsible for:

- the effective implementation of this Policy and any specific health & safety Guidance within their area of authority and responsibility
- implementing local arrangements to ensure that responsibility and accountability for is clearly established in their area of authority
- ensuring Health & Safety 6-Monthly Inspections are carried out as delegated by the Designated Safety Coordinator. Ensure that actions are recorded and closed appropriately and records are kept.
- making local arrangements to ensure that all members of staff are able to familiarise themselves with the Health & Safety Policy
- ensuring that health & safety information is communicated to all staff within their area of authority, including necessary information, instruction and training on the use of equipment, plant, substances and machinery
- ensuring that all incidents/accidents within their Division/department are reported and investigated and that recommendations are implemented to prevent recurrence. To update SCoPE or other reports with causes, and remedial actions. To cooperate with H&S Advisors, Trade Unions or Federation Representatives undertaking investigations.
- coordinating their activities with others, where necessary, to secure the effective management of health & safety
- providing periodic feedback to the relevant senior manager on health & safety performance
- ensuring the provision of relevant CE approved Personal Protective Equipment (PPE) for employees and ensuring that the employees wear the PPE and carry out the required PPE checks
- developing lines of communication with employees to report health & safety issues/concerns/queries

12. Estates and Facilities Management

Shall be responsible for:

- statutory examination, testing and inspections of applicable systems, equipment or machinery covered by Legislation, Statute, Codes of Practice or Standards
- the retention of appropriate and accessible records of the above.
- the maintenance and construction of buildings, premises and service installations both in terms of reactive and planned activities in a manner that satisfies any relevant statutory duties including CDM, Fire Safety, Asbestos and other relevant legislation
- liaison with relevant service management and employees in relation to maintenance and construction work
- ensuring all Contractors and Subcontractors engaged by SPA/Police Scotland will be vetted as to their suitability and competence to carry out the work. This includes risk assessment and safe systems of work as required. This will be an integral part of the procurement/contracting process.
- Arranging periodic Active Site Inspections.
- the implementation of the Health & Safety Policy and procedures within their areas of responsibility

- ensuring due care and consideration to the Health, Safety and Welfare of all staff under their control and for the actions of others who may be directly affected by their activities

The SPA will monitor the performance of Estates Management through their committee structure.

13. All Staff/Officers

All SPA/Police Scotland staff and officers have a key role as an effective health & safety culture can only be achieved through their commitment, involvement, co-operation and feedback with regard to health & safety issues.

Whilst at work, all staff are responsible for:

- taking reasonable care for their own health & safety, the health & safety of other colleagues, contractors and members of the public, who may be affected by their actions or failures to act while at work
- cooperating with SPA/Police Scotland, by complying with Health & Safety Policy and arrangements and all measures in place to protect their health & safety.
- not intentionally or recklessly interfering with or misusing anything provided in the interest of health & safety
- taking appropriate advice from SPA/PS in the event of an emergency or when faced with a situation involving serious or imminent danger.
- procuring, using, storing, transporting and properly maintaining equipment, materials and substances provided by the SPA/Police Scotland in accordance with legal requirements and any information, instruction and training
- immediately reporting any damage or defects to premises, vehicles or equipment and any that is, or has become, unfit for purpose, ill-fitting or lost
- considering holding a confidential discussion with their line manager where a medical condition and/or medication is taken that may adversely affect their ability to fulfil their duties safely; including the need for reasonable adjustments. The exact nature of the condition does not need to be disclosed, however employers need to know if there are any additional risk factors that need to be managed in relation to the work activity.
- reporting all events including accidents, near misses, hazards, cases of occupational ill health, dangerous occurrences to their line manager or supervisor
- participating in accident investigations
- cooperating with any enforcing officer. e.g. Health & Safety Executive (HSE) or Scottish Fire & Rescue Service
- maintaining good housekeeping principles and adopting clean and tidy working standards
- being familiar with the emergency procedures, including first aid, escape routes and assembly points, relative to their place of work
- attending and adhering to relevant training for their specific role to ensure that they are competent to perform their duties safely

Failure to comply with the Health & Safety Policy or health & safety procedures may be regarded as a disciplinary matter.



14. Health & Safety Manager

Under Regulation 7 of the Management of Health & Safety at Work Regulations 1999, the Health & Safety Manager is appointed as being the competent person to assist in undertaking the measures needed to comply with the requirements imposed under health & safety legislation.

The Health & Safety Manager will support the Chief Constable and members of the Senior Leadership Team with their responsibilities to administer and monitor the implementation of this Health & Safety Policy and the Health & Safety Management System by:

- assisting with the development and implementation of the Health & Safety Management System and report directly to the DCC.
- Liaising with the wider leadership team on any matters requiring their attention
- assisting Management with their general duties under the requirements of the Health & Safety at Work Act 1974 and associated legislation
- advising SPA/Police Scotland Executives on any relevant changes to health & safety law
- attending incident or accident scenes to provide specialist advice.
- providing guidance on safe systems of work; and safe working procedures
- be the single point of contact with the Health and Safety Executive. providing expert witness evidence in legal proceedings.

15. Health & Safety Advisors

Shall be responsible for:

- promoting a positive health & safety culture to secure the effective implementation of the Health & Safety Policy
- establishing professional relationships at all levels within SPA/Police Scotland and with key external stakeholders
- interpreting health & safety law and implications for the SPA/Police Scotland
- developing and formulating health & safety policies and guidance
- assisting in the establishment and maintenance of risk control standards relating to the places of work, equipment, plant and substances in use, including assisting Divisions/Departments with the risk assessment process
- shaping policies, plans and recommending appropriate monitoring control measures, employing active and reactive approaches
- maintaining the procedures for recording, reporting, investigation and analysis of accidents, incidents and cases of ill-health
- recommending when training is required and define the objectives, content and refresher periods required for approval.
- delivering approved health & safety training
- acting as the Competent Advisor the areas within their allocated portfolio
- provide comprehensible reports to Health and Safety Committees within their allocated portfolio.
- attending the scenes of incidents, crimes and events to give specialist advice.
- conducting research on Health and Safety issues.
- leading on complex accident investigations
- providing expert witness evidence in legal proceedings.

- Carry out audits on a proactive and reactive basis and report the findings impartially.
- Abide by professional memberships codes of practice and disciplinary code.

The Health & Safety Manager and all Health & Safety Advisors are authorised to exercise the following to ensure the effectiveness of the SPA/Police Scotland's Health & Safety management system:

- the right to enter any SPA/Police Scotland premises for health & safety purposes, including inspection and audit
- to issue an inspection report detailing any breaches of statutory requirements, Policy/procedures that have taken or are likely to take place
- in the event of a major incident/accident, to require that plant and equipment are not disturbed to enable measurements, statements, photographs or any other relevant information to be gathered
- to require those employees who possess knowledge or information relevant to any health & safety issue or investigation, to give that knowledge/information either verbally or in a written statement
- to require assistance and co-operation within a person's limits of responsibility/authority
- to impound any items required for health & safety investigation
- to inspect and take copies of any records; books; documents or databases or any other such information or images on any SPA/Police Scotland storage device that may be required by them as part of their investigations
- where a Health & Safety Advisor is of the opinion that a building or structure is a serious danger to staff or others, they may, in consultation with the Health & Safety Manager take proportionate action which may include the closure of any premises or suspension of a crime scene until a suitable safe system of work can be implemented

16. Staff Association and Trade Union Appointed Safety Representatives

- In keeping with the legislation to be facilitated to meet their obligations
- inform Divisions of their intention to carry out inspections, and to provide written reports following such inspections
- wherever possible, inspections will be carried out in conjunction with other associations/TU's and health & safety personnel to reduce abstraction and improve efficiency
- carry out inspections of the workplace every six months or immediately following notifiable incidents or diseases and dangerous occurrences. (It is important that Divisions/premises have systems in place to bring such matters to the attention of the Trade Union Safety Representatives as soon as is practicable).
- investigate potential hazards and dangerous occurrences in the workplace and to examine the cause of accidents at the workplace. Contribute to discussions on methods of eliminating/reducing risk. Make recommendations on any matters arising to appropriate management
- investigate complaints by any employee they represent, relating to the employees health & safety and to make representations on any matters arising to Divisions/premises
- make representations to Divisions/premises management on general matters affecting the health & safety at work of members of staff
- attend meetings of the Health & Safety Board, Area and Division Health & Safety Group Meetings in order to ensure relevant issues are raised and addressed.

- encourage safe and healthy working among the employees they represent.
- work closely with the Health & Safety Manager and Health & Safety Advisors in a collaborative way in order to improve health & safety across the organisation.



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Year 1 Actions – 2021/22

Year 2 Actions – 2022/23

Year 3 Actions – 2023/24

Objective:	There is both a legal requirement and a moral obligation that Health & Safety within SPA/Police Scotland is led from Police Scotland Executive with support and governance from SPA Board Members and that the safety of Police Officers, Police Staff and members of the public is always considered first in any activity.			
Leadership				
Complete				
Action By	Objective	Actions	Owner	RAG Status
Year 1	To ensure that the work carried out under the National Health & Safety Board's 3 Year Strategic Action Plan, is embedded within Police Scotland.	DCC to approve and support implementation of 3 year strategic consolidation action plan.	Chair – Health & Safety Board	June 2021: Regular reports to HSB, PPMB, SLB and SPA People Committee.
Year 1	To ensure that the Annual Health & Safety Report is developed and that this document is used to further raise the profile of Health & Safety and to inform stakeholders.	Health & Safety Manager to continue to develop the Annual Report with copies sent to the Health & Safety Executive and SPA.	Health & Safety Manager	June 2021: Actioned each year in April.
Year 1	Provide reinforcement information, instruction and training to Executive Members of both Police Scotland and SPA including SPA Board Members.	Board Members and Executive Members to attend training to improve knowledge and understanding in relation to the legal requirements and responsibilities of Police Scotland and SPA. This will also provide an update on organisational progress and further assist with cultural change.	Chair – Health & Safety Board Health & Safety Manager/SPA	June 2021: Work now underway to develop training packages. August 2021: Work has slowed due to staff shortage but will be picked up as soon as possible. March 2022: Delayed due to Covid-19. May 2022: Draft package ready but delayed by lack of

Action By	Objective	Actions	Owner	RAG Status
				resources and backlog of H&S work. Awaiting approval of updated H&S Policy and Governance Framework. August 2022: Awaiting approval of updated H&S Policy to include in training.
Year 2	Look to improve H&S supervision by local supervisors (SGTs, Inspectors, Ch. Inspectors) across the organisation including staff equivalents. SPF	<ul style="list-style-type: none"> Communicate standard & expectations Develop any training as required 	Health & Safety Manager	March 23: Training packages have been developed and engagement is ongoing with LTD in relation to uploading the training for delivery via Moodle.
Year 3	Provision of reinforcement training to senior officers across Police Scotland and particularly within Custody Division which has been recognised as high risk area.	<p>Responsible senior managers – Superintendents/equivalent senior managers to attend Health and Safety reinforcement training covering legal requirements, responsibilities and managing Health & Safety.</p> <p>This will also provide an update on organisational progress and further assist with cultural change.</p>	<p>Chair – Health & Safety Board</p> <p>Health & Safety Manager</p>	

Objective:	To achieve a good foundation SPA/Police Scotland must make appropriate arrangements to have a Health & Safety Policy which commits the organisation to meeting recognised Health & Safety standards, a system for capturing areas where improvement can be made and mechanisms to review and then plan for any required changes.
Management Systems	

Action By	Objective	Actions	By Whom	Status
Year 1	Continue to review the Health & Safety Policy Statement and Fire Safety Policy Statement annually and ensure that it remains fit for purpose and is embedded throughout Police Scotland/SPA and is displayed within buildings and on the Intranet.	Annual review to be undertaken of H&S Policy Statement.	Health & Safety Manager	June 2021: These documents are reviewed annually.
Year 2	Review Health & Safety Policy, roles and responsibilities and other arrangements.	Review to be undertaken of H&S Policy.	Health & Safety Manager	March 2022: Tasked within the Team. May 2022: Work underway. June 2022: H&S Policy reviewed and to HSB in June. (Michelle Small) March 2023: Following HSB endorsement, Policy approved by SLB. To People Committee for final approval – May 23.

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Year 1 & on-going.	Carry out a series of National Custody Audits, Production Store Inspections and Office Inspections across Police Scotland.	<p>Work with CJSD to continue the current and highly successful Custody Audits and develop a programme of Production Store Inspections.</p> <p>Develop a programme of Office Inspections across Police Scotland.</p> <p>All the above will be carried out in conjunction with Scottish Police Federation and Trade Unions.</p>	Health & Safety Manager	June 2021: Custody & Productions Audits on track.
Year 3	Develop a formal Audit process for Police Scotland premises.	An audit process for use by Safety Advisors linked to the above audits of Police Premises.	Health & Safety Manager	
Year 1	Ensure that Risk Assessments are embedded across the organisation.	<p>As an organisation we expect all areas of the business to have up to date site specific Risk Assessments in place. Risk Assessments to be reviewed annually and be readily available.</p> <p>There is a requirement for Senior Managers to ensure that this happens.</p>	Health & Safety Manager	Mar 23: This action is monitored via reviews of divisional/ departmental Assurance Model submissions. Further review is undertaken during Assurance Model audits, with 4 divisional audits conducted to date, where publication of local risk assessments was confirmed. Review will continue during forthcoming audits.

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Year 1	Ensure that COSHH & DSEAR Assessments are embedded across the organisation.	As an organisation we expect all areas of our business to have up to date COSHH & DSEAR assessments in place for any chemicals used or stored. Assessments to be reviewed annually and be easily available. There is a requirement for Senior Managers to ensure that this happens.	Health & Safety Manager	December 2021: Actioned to Safety Advisor CS to progress. May 2022: Following a review of signed Assurance Model forms no Divisions or BU has raised any concerns about duties under COSHH.
Year 2	Ensure that Generic Risk Assessments are held on the Intranet and regularly reviewed and updated.	The Health & Safety Team to host up to date Generic Risk Assessments on the Intranet. These form the basis of site/role specific Risk Assessments.	Health & Safety Manager	July 2022: Good progress made with a number of GRAs reviewed and updated. Mar 23: Work had been paused due to other demands. Review and update of the remaining GRAs will be progress during Year 3.
Year 2	Produce a suite of detailed Health & Safety guidance documents to complement the Health & Safety Policy. These will be electronically available across the organisation.	Review to be undertaken of H&S Guidance.	Health & Safety Manager	***This was an area requiring additional work from the previous Action Plan*** July 2022: The following guidance documents have been published: Risk Assessment Guidance, Accident/Near Miss SOP, H&S and Fire Inspection Guidance. Further guidance will be published in line with

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				organisational need.
Year 1	Ensure that the Assurance Model continues to be embedded across Police Scotland.	<ul style="list-style-type: none"> • Ensure that Assurance Model forms are circulated to Divisional Commanders and Heads of Business Areas on an annual basis. • Information gained will be used to improve the efficiency, effectiveness and reliability of the total Health & Safety Management System and used to draw up plans for any corrective actions as required. 	Health & safety Manager	<p>June 2021: Work on-going with good progress. Looking to add a Covid-19 question set for 2022/23.</p> <p>December 2021: Recommendations from P&A Assurance Audit.</p> <p>May 2023: 2023/24 process has commenced and collation of divisional/departmental assurance model forms in 94% complete.</p>

Objective:	SPA/Police Scotland will look to improve employee performance by increasing an employee's ability to perform through learning, normally by changing the employee's attitude or increasing his or her skills and knowledge.
Training & Development	

Action By	Objective	Actions	By Whom	Status
Year 1	Continue to embed staff Health and Safety knowledge and awareness.	Develop an accredited corporate e-learning programme with the key essential packages for: <ul style="list-style-type: none"> • Risk Assessment • COSHH • Manual Handling, etc. • Roles & Responsibilities – Supt & above. 	Health & Safety Manager (Training Working Group)	June 2021: Training restarted following Op Talla but there is a backlog to clear. August 2021: Slow progress due to staff shortages. May 2023: A number of training packages have been developed and work is ongoing with LTD to upload to Moodle, although LTD capacity is an issue.
Year 1	To create a training package in relation to Dynamic Risk Assessment which will be compulsory for all Police Officers an operational staff including C3.	<ul style="list-style-type: none"> • Explanation of DRA • 4 scenarios to work through • The consequences of wrong choices 	Health & Safety Manager (Training Working Group)	August 2021: Work has slowed due to staff shortage but will be picked up as soon as possible. May 2022: Package complete.
Year 1	To ensure that a training package is created in relation to accessing the Railway Network which will be compulsory for all Police Officers an operational staff including C3.	<ul style="list-style-type: none"> • Use of SC numbers • Need for caution & stop • SC numbers unique to the individual service 	Health & Safety Manager (Training Working Group)	June 2021: Work underway. March 2022: Update awaited from Safety Advisor JK. (Charlene

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				Smyth) March 2022: Training passed to LTD for Moodle.)
Year 2	Provide a training package for CJSD Productions Staff.	Develop an accredited corporate training programme specifically for CJSD Productions Staff.	Health & Safety Manager (Training Working Group)	March 2022: Package passed to MMcH for delivery.) June 2022: Delivery awaited due to staff shortages. Jan 2023: A training package has now been developed and planning is progressing in relation to delivery.
Year 3	Understand workforce attitudes towards Health and Safety.	Carry out HSE Climate Survey or similar Analyse survey results and identify next phase.	Corporate Communications/ ICT	

Objective:	Identifying the key risks is essential to improving Health & Safety. By endorsing the Health & Safety Action Plan SPA/Police Scotland is committing to reducing risk. To achieve this SPA/Police Scotland require to identify the key Health & Safety issues within its business and identify measures to eliminate or control them.
Risk Management	

Action By	Objective	Actions	By Whom	Status
Year 1	Continue to implement measures to reduce the number of RIDDOR accidents across the organisation using the accident data as a benchmark.	<ul style="list-style-type: none"> Target Divisions with the highest numbers 	Health & Safety Manager	July 2021: Work on-going to look at repeat victims with YSM Team. December 2021: Work planned now that Op Urram is over. March 2022: 30% reduction in RIDDORs.
Year 1	Embed the already robust arrangements for the management of Fire Safety across all areas of the organisation.	<ul style="list-style-type: none"> Comprehensive Fire Risk Assessment Electronic Management System All premises assessed Provision of competent advice 	Health & Safety Manager	June 2021: On track. May 23: Hard FM provider fully on schedule regarding the Fire Risk Assessment programme.
Year 1	Review and continue to raise awareness of the organisations Safety Alerts & run targeted campaigns. i.e. Tick prevention, Butane Honey Oil	<ul style="list-style-type: none"> Investigate Twitter Account 	Health & Safety Manager	June 2021: On track. May 23: Health and safety Alerts and other briefings posted via the Intranet as required. Social media strategy will be considered by the new H&S Manager.
Year 1	Continue to review requirements under the Control of Noise at Work Regulations 2005 including an up to date risk assessment covering the hearing of Police	<ul style="list-style-type: none"> Embed the use of noise cancelling headsets Continue to work on the development of solution for Response Officers. 	Health & Safety Manager	***This was an area requiring additional work from the previous Action Plan*** June 2021: Papers to June

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	Officers and Police Staff on front line duties.			HSB. March 2022: Approved at HSB and by DCC Taylor. May 23: Procurement undertaken and rollout of headsets about to commence.
Year 1	Continue to embed the use of RPE across the organisation.	<ul style="list-style-type: none"> • Face fitting • Facial hair • Types of mask linked to task 	Health & Safety Manager	<p>June 2021: Good progress via Op Talla.</p> <p>March 2022: SLWG looking at this.</p> <p>March 2022: SLWG paper complete.</p> <p>May 2022: Supt Gibson presented paper to ACC Speirs.</p> <p>July 2022: Placed on the risk register.</p> <p>December 2023: Paper to SLB for the CC.</p> <p>April 2023: RPE Policy approved by SLB. Work ongoing to develop and implement RPE procedures.</p>
Year 1	Seek formal assurance from the Head of Estates that a suitable, comprehensive Contractor Policy is in use.	<ul style="list-style-type: none"> • Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Oct 21: Confirmed by head of Estates</p>
Year 1	Seek formal assurance from the Head of Estates that Asbestos Surveys, plans, Asbestos Registers are in place, available	<ul style="list-style-type: none"> • Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Oct 21: Confirmed -</p>

	for inspection at sites and kept fully up to date.			Asbestos Registers are all in place and available on sites. Estates are also in the process of implementing a new asbestos management system to hold all this information centrally.
Year 1	Seek formal assurance from the Head of Estates that a Water Risk Assessments are in place and that suitable control measures have been implemented to control the risk from Legionella, etc.	<ul style="list-style-type: none"> Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Oct 21: Confirmed - Water Risk Assessments are to be overseen with the awarding of a contract for completion and management.</p>
Year 1	Seek formal assurance from the Head of Estates that a suitable Permit to Work scheme is in use by Estates and that we have a published policy.	<ul style="list-style-type: none"> Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Nov 21: Confirmed - PTW process is managed by our Hard FM Services provider and is a contractual responsibility.</p>
Year 1	Seek formal assurance from the Head of Estates that hard wired mains testing has been carried out in all premises, remedial works have been completed and certificates of completion issued to Police Scotland.	<ul style="list-style-type: none"> Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Oct 21: Confirmed. Fixed Wire Testing is completed and managed under the</p>

				Hard FM contract.
Year 1	Seek formal assurance from the Head of Estates that all external cladding on police premises complies with Fire Safety guidance.	<ul style="list-style-type: none"> Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Nov 21: Building cladding is compliant as per time of construction and any relevant changes to legislation.</p>
Year 1	Seek formal assurance from the Head of Estates that Portable Appliance Testing has been carried out and is up to date in all premises.	<ul style="list-style-type: none"> Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Oct 21: Confirmed - PAT Testing is completed and managed under the Hard FM contract.</p>
Year 1	Seek formal assurance from the Head of Estates that all lightning protection systems are maintained, tested and fully operational.	<ul style="list-style-type: none"> Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Oct 21: Confirmed - Completed and managed under the Hard FM Contract.</p>
Year 1	Seek formal assurance from the Head of Estates that all gas installations and gas mains across the estate are the subject to regular inspection and maintenance and are fully operational.	<ul style="list-style-type: none"> Response required to be held on record on behalf of DCC Taylor. 	Head of Estates	<p>June 2021: Confirmation requested from Estates.</p> <p>Oct 21: Confirmed - Completed and managed under the Hard FM Contract.</p>

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HEALTH AND SAFETY STRATEGIC ACTION PLAN (3 YEAR) APRIL 2021 – 31 MARCH 2024

Year 1	Ensure that progress is made in relation to the management of Working Time within the organisation.	<ul style="list-style-type: none"> Recording of working time Cultural change 	Director Helliker	<p>August 2021: Initial discussions with Wellbeing Manager.</p> <p>November 2021: In discussions with partners to see what systems they use and paper to HSB.</p> <p>March 2022: Following discussions between Scope Management and ASPS it has been agreed that there is a system in place to record working time and that we must continue to encourage greater levels of compliance'.</p>
Year 2	Continue to embed the current robust process for Health & Safety at complex scenes linking in with multi-agency partners.	<ul style="list-style-type: none"> Risk Assessments Hazard Check Lists Competent Safety Advisors Link to Structural Engineers 	Health & Safety Manager	<p>March 2022: H&S Team On-call approved to start in May 2022.</p>
Year 2	Continue to review requirements under the Control of Vibration at Work Regulations 2005 including an up to date risk assessment covering all areas of the organisation including operational risks.	<ul style="list-style-type: none"> Fleet Workshops Grounds maintenance ICT Operational MOE, boats, motorbikes, mountain bikes, helicopter, etc. 	Health & Safety Manager Fleet Manager	<p>***This was an area requiring additional work from the previous Action Plan***</p> <p>August 2021: Good progress and paper discussed with DCC Taylor.</p> <p>November 2021: General: Risk assessments for protestor removal were</p>

				<p>completed before COP.</p> <p>Fleet: All Vehicle Workshops risk assessments and training complete. Some initial equipment roll out has started in the west but will not be completed until the next financial year.</p> <p>Estates: Staff to have monitoring system early in the next financial year.</p> <p>11/03/22: Finance approved, contractor attending to install kit and training will be given by May 2022.</p> <p>Update paper to H&S Board on 25/3/22 closing off this project.</p>
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Objective: Accident Investigation & Management	Accidents in the workplace no matter how minor should not be tolerated. Proactive accident reduction has whole cycle benefits to business operations and investment in identifying, analysing and managing accidents is seen as the first base for improving Health & Safety. Comprehensive analysis and statistical reporting allows management to take decisions based on real data.
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Action By	Objective	Actions	By Whom	Status
Year 1	Continue to work with the APU to embed the analysis and further interpret data from recorded accidents/incidents to inform trends and agree target reductions.	<p>Scope Accident Reporting Database has limited facility to collect and analyse real data.</p> <ul style="list-style-type: none"> • Continue to develop reporting template • Provide reports as required • Graph trends 	Health & Safety Manager	June 2021: On track. May 23: Suite of Power BI dashboards now supporting data collation and analysis, which underpins action and decision making.
Year 1	Continue work ongoing via the YSM SLWG to review the accident reporting process via Scope.	<ul style="list-style-type: none"> • Review of accident reporting form 	YSM	June 2021: On track. May 23: Proposed changes to the accident reporting form under consideration by SCOPE management.
Year 2	To develop a more mature process for Safety Advisors around the investigation of accidents.	<ul style="list-style-type: none"> • Process • Form 	Health & Safety Manager	June 2021: Complete May 23: The Health and Safety Accident Investigation form has been published and is accessible in the Force Intranet.

MONITOR and REVIEW

