



Meeting	SPA People Committee
Date	28 February 2024
Location	Virtual Conference
Title of Paper	Certificate of Assurance Process
Presented By	Dawn Maclean, Health & Safety Manager
Recommendation to Members	For Discussion
Appendix Attached	Appendix A – Proof-of-Concept Questionnaire Appendix B – Thematic Audit Evaluation Matrix

PURPOSE

The purpose of this report is to provide an overview of a revised Health and Safety Certificate of Assurance process.

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

1. BACKGROUND

- 1.1 The Health and Safety Certificate of Assurance process takes place annually and involves the completion of a paper-based questionnaire by Divisional Commanders/Heads of Department (HoD). The certification process ascertains their understanding of health and safety and divisional/departmental compliance with the Police Scotland Health and Safety Policy and Health and Safety Management System.
- 1.2 A review of the current Certificate of Assurance process determined that the extensive 47-point questionnaire was resource intensive to complete and administer and the broad nature of the questionnaire resulted in insufficient detail being recorded. As a result, the current process was not assessed as fulfilling the objective of providing assurance of health and safety compliance.
- 1.3 In November 2023, approval was given to review and update the Certificate of Assurance process and to pilot a proposed replacement assurance process.

2. FURTHER DETAIL IN RELATION TO THE REPORT

- 2.1 Following review, a revised Certificate of Assurance process was developed. The revised process is a thematic audit undertaken by divisions and departments across the organisation. The audit themes will be identified on a risk basis by the Health and Safety Department and will be facilitated using the force electronic survey tool to record divisional responses and supporting evidence, with the force action tracking system providing an audit trail for any improvement actions arising from the thematic audit.
- 2.2 The thematic audit approach is assessed as being more focussed, with a reduced administrative impact on participants. The process is supported by the Health and Safety Department through direct engagement from Health and Safety Advisors (HSA) assigned to divisions and departments across the force.
- 2.3 The revised Certificate of Assurance process was the subject of a proof-of-concept pilot during January 2024, with two divisions providing detailed responses to a short 4 question online questionnaire focussing on divisional approaches to risk assessment. The proof-of-concept questionnaire is attached at Appendix A.

2.4 Participating divisions were supported to complete the questionnaire by their respective divisional HSA. Following submission, responses were assessed against an audit evaluation matrix, which is attached at Appendix B.

2.5 The audit evaluation assessment identified the following:

- There were some areas that met the HIGH criteria, giving assurance that process is being followed.
- The audit highlighted some areas for development by divisions and the Health and Safety team, which will further support continuous improvement.

2.6 A separate survey was conducted with pilot participants and Health and Safety staff who had been involved in the thematic audit. The participant survey reported the following:

Reflection from Divisional Commanders:

- Straightforward approach, however, support from HSA was required initially.
- Digitising the process worked well, could benefit from more capability to submit more evidence.
- More focussed approach.

Reflection from HSA:

- Both parties benefitted from process in terms of gap analysis.
- Divisional support through the process will be needed from HSAs in initial stages.
- HSAs would gain from more guidance on scoring and expectation aligned with organisational policy and risk appetite.

Updated guidance for HSAs has been developed in response to this feedback.

2.7 The revised Certificate of Assurance process together with the outcomes from the proof-of-concept were presented to the Health and Safety Board on 9 February. Following discussion, the revised Certificate of Assurance process was approved for introduction from April 2024, with thematic audit progress updates and improvement action resolution outcomes being reported to the Health and Safety Board on a quarterly basis thereafter.

2.8 Members are invited to discuss this report.

3. FINANCIAL IMPLICATIONS

3.1 There are no financial implication arising directly from this report.

4. PERSONNEL IMPLICATIONS

4.1 There are no personnel implication arising directly from this report.

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 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 the content of this report and the attached appendices.

Certificate of Assurance Thematic Audit – Divisional Risk Assessment

The question set is presented via a link to Citizen Space which is a system already utilised within Police Scotland for surveys, public consultation etc so no additional cost implications (see image 1 below).

It also provides the capability for evidence to be attached to allow the auditor to scrutinise the information and score accordingly.

For the purposes of the pilot, the following questions were set:

Q1. Describe how you as a Divisional Commander identify hazards and manage the risks associated with health and safety.

Q2. How do you identify control measures and ensure these are managed, reviewed and proportionate to health and safety risks?

Q3. Outline your processes to ensure that risk assessments have been developed by competent staff and that appropriate consultation has been carried out.

Q4. How do you ensure workplace control measures are effectively and appropriately disseminated within the force/division and are being applied consistently?

Certificate of Assurance - Risk Assessment

4. Describe how you as a Divisional Commander identify hazards and manage the risks associated with health and safety

Management response

Please upload an example of supporting evidence i.e. documentation, screenshots or images

Upload (Required)
Please make sure your file is under 25MB

No file chosen

Image 1: Screen shot from Citizen Space

Response based on findings – Implementation of Controls

BASIC

There is some understanding of the health and safety management system and their responsibilities. This may highlight gaps both in their own knowledge or that of the organisations systems and processes

SUBSTANTIAL

There is clear understanding of the health and safety management system and their responsibilities. This may still generate some slight improvement that can be learned both in their own knowledge or that of the organisations systems and processes

HIGH

There is evidence of significant understanding of the health and safety management system and go above their responsibilities. Best practice may influence organisational change through continuous improvement processes

[Live link to question set - https://consult.scotland.police.uk/audit-assurance/0cdf260e](https://consult.scotland.police.uk/audit-assurance/0cdf260e)

Question Set – Risk Assessment process

Describe how you as a Divisional Commander identify hazards and manage the risks associated with health and safety

BASIC

- They can describe the known hazards with their division
- The hazards discussed would be expected given the nature of the organisation and the management of the risk is limited

SUBSTANTIAL

- There is a documented risk profile available
- There is a systematic approach to reviewing existing risks and identifying new risks

HIGH

- There is a suite of relevant risk assessments
- There is a clear identified process for tracking and documenting risks
- Organisational standard operating procedures are being adhered

Question Set – Risk Assessment process

How do you identify control measures and ensure these are managed, reviewed and proportionate to health and safety risks

BASIC

- Only those risks that pose any imminent danger have been addressed

SUBSTANTIAL

- Risk assessments are recorded, signed and up to date
- Risk assessments cover all associated risks that pertain to the division
- They are in the standard format for Police Scotland

HIGH

- Risk assessments are recorded, signed, and up to date and are subject to document control
- There is evidence of them having been peer reviewed where there are significant hazards

Question Set – Risk Assessment process

Outline your processes to ensure that risk assessments have been developed by competent staff and that appropriate consultation has been carried out

BASIC

- Officers and staff are aware of the risks that pose any imminent danger have been addressed
- There is no evidence of training

SUBSTANTIAL

- Risk assessments are recorded, signed and up to date
- They are signed by competent staff

HIGH

- Risk assessments are recorded, signed, and up to date and are subject to document control
- There is evidence of them having been peer reviewed
- Training records exist for those completing risk assessment

Question Set – Risk Assessment process

How do you ensure workplace control measures are effectively and appropriately disseminated within the force/division and are being applied consistently

BASIC

- Officers and staff have some knowledge of the suitable workplace control measures outlined
- There is evidence of some communication

SUBSTANTIAL

- There is evidence of controls being applied
- There are safe systems of work to coincide with the risk assessment and are being consistently applied
- Workplace control measures are discussed regularly

HIGH

- Controls are proportionate to the risk and are achieved
- They are reviewed after an incident and monitored for suitability
- Staff are fully briefed, and checks are made regularly to ensure controls are being applied

Evidence examples – Risk Assessment process

- General and specific Risk assessments;
- Induction processes
- Too much/too little in terms of hazards and risks (this might be a judgement call based on tolerance and from what you observe from conversations and whether you can see that there is a poor safety culture)
- Use of the hierarchy of controls i.e. PPE is not the first line of defence;
- Specifying legislation or internal guidance as the source of truth;
- Committee minutes, SMT action logs, debriefs etc;
- Training records;
- Signatures of authorised competent persons;
- Dates/version control;
- Evidence of challenging behaviours
- ScoPE reports

Health and Safety – Response and Recommendations

Scope	Findings	Recommendations
Describe how you as a Divisional Commander identify hazards and manage the risks associated with health and safety		
Management response:		

Health and Safety – Response and Recommendations

Scope	Findings	Recommendations
How do you identify control measures and ensure these are managed, reviewed and proportionate to health and safety risks		
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Health and Safety – Response and Recommendations

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