

AUDIT PANEL

Friday, 19 December 2017

Health and Safety Culture Maturity Project

Report by: The Director of People and Change

Report Summary

Overall Summary of the Purpose of the Report

The purpose of this report is to provide a summary of the MPS Health and Safety Culture Maturity project. The aim of the project is to bring the MPS to a 'Level 4' H&S maturity in the medium to high risk areas of the business by FY 2020/21.

Key Considerations for the Panel

At the time of reporting, there are no immediate significant health and safety implications arising from this update report.

Members are invited to review this report and have assurance that the MPS continues to develop a maturing positive safety culture.

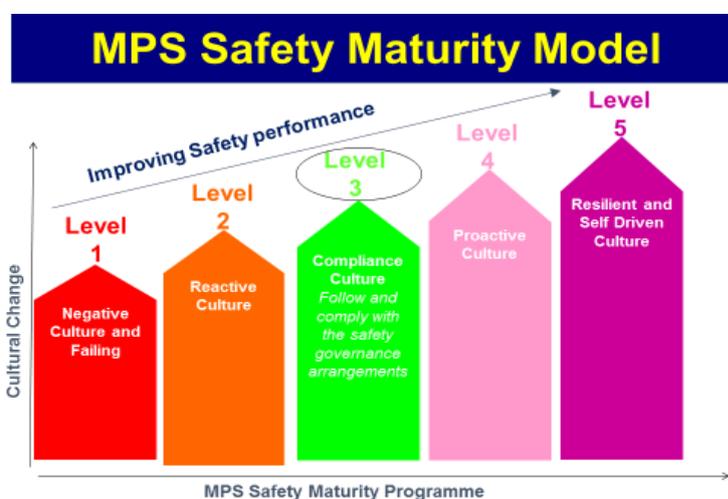
Recommendations

The Audit Panel is recommended to note the content of this report in accordance with the Health and Safety Policy.

SUPPORTING INFORMATION

Health and Safety Culture Maturity Model

01. In 2015 Turner & Townsend completed a high level external independent health and safety audit of safety management across the MPS. The report findings were positive, and noted significant and substantial improvements in health and safety management arrangements since the previous audit in 2009. A component of this audit recognised work to define and deliver a health and safety culture maturity model.
02. The MPS developed model reinforces self-driven compliance within the safety governance arrangements and development of an improved safety culture with underpinning safety behaviours at all levels. The model has been designed to assess the organisational safety culture and provide a roadmap for continuous improvement. A positive safety culture influences human behaviours and ultimately reduces safety related loss (accidents, ill health, infra-structure assets).
03. This model 'scores' the business on a 1 - 5 scale paving the way for targeted improvement initiatives and resource allocation decisions for the next 5 years. Against the maturity model it was the opinion of the external independent health and safety auditor in 2015 that the MPS is already in the region of a level 3 maturity (compliant culture); albeit not yet a self-sustaining compliant culture across all Operational Command Units (OCUs). The aim of the project is to bring the MPS to a 'Level 4' H&S maturity in the medium to high risk areas of the business by FY 2020/21.



04. Safety maturity is measured against the key elements of:
 - Leadership;
 - Policy and governance;
 - Capability management and competence;
 - Communication;
 - Safety risk management;
 - Reactive/proactive monitoring;
 - Wellbeing;
 - Infra-structure and asset management;

- Partnerships, contracts and shared risks;
 - Change management;
 - Assurance, performance and benchmarking; and
 - Audit.
05. The maturity descriptors against each element of this model are attached in the matrix at Appendix 1. Each maturity descriptor in the matrix is underpinned by behavioural safety standards and audit Key Performance Indicators (KPIs). It is against these standards that that performance audits will be carried out.
06. The project also delivers additional safety training competences. Each OCU and department appointed Senior Leadership Team (SLT) lead and Health and Safety Single Point of Contact (SPOC) will undertake National Examination Board in Occupational, Safety and Health (NEBOSH) certificate level 3 training.
07. Safety culture will in the future be monitored by:
- Auditing against maturity standards;
 - Accident, incident investigation and organisational learning reports;
 - Assurance process;
 - Quantifying the safety culture by measuring the safety climate¹;
 - Validation by the external independent health and safety auditor.
08. Overall MPS safety maturity will also be benchmarked against other organisations and industry sectors.
09. The model was endorsed at Management Board on 19 September 2017.

Safety Maturity Supporting Projects

10. Key aligned supporting projects to the maturity model include:
- eSafety Software which will provide a cloud-based health and safety tool. The new platform will be delivered in a number of phases between July 2017 and the end of the financial year. eSafety has already replaced MetAIR (Met Accident & Incident Reporting system) and will in the future provide an electronic platform for safety inspection, audits, risk assessments, notice board and reports;
 - The Health, Safety and Wellbeing Board has taken the lead for MPS wellbeing matters and a separate 3 year MPS Health and Wellbeing Strategy is being developed for launch before the end of FY 2017/18.
 - The annual health and safety assurance process which will be further developed to underpin the safety maturity projects by assuring on safety culture performance.

Planned Maturity delivery

11. The outline planned maturity model delivery is as follows:

¹ The term 'safety climate' is also used, and has a very similar meaning to 'safety culture'. The use of a 'safety climate tool' is used to measure the perceptions of the workforce on health and safety issues which informs assists validate the safety climate and can be used to assess an improving or deteriorating safety climate.

- November 2017 – MPS Health, Safety and Welfare Board Business Groups leads issue the maturity model to their OCU/Departments;
- March 2018 - Health and Safety Assurance will be given by OCU/Departments against level 3 maturity;
- 2018/19 - OCUs, Departments, MethQ Directorates will be mentored by SHRMT safety advisors against the maturity model; focused at consolidating level 3 maturity with reducing reliance on SHRMT (OCUs, Departments and MethQ Directorates to become self-sustaining at level 3). This work will inform OCUs, Departments, MethQ Directorate targets for maturity objectives for FY 2019/20;
- April 2018/March 2021 - OCUs, Departments, MethQ Directorates and business areas will report on perceived baseline safety maturity as part of the assurance process which will be validated by audit.

EQUALITY AND DIVERSITY IMPACT

- 2.1 The report is an information report and there are no immediate implications on equality and diversity. Equality and diversity impacts will be assessed on individual incidents.

FINANCIAL IMPLICATIONS

- 3.1 There are no immediate financial implications with this project.

LEGAL IMPLICATIONS

- 4.1 This report is an information report, and there are no direct legal issues that arise. Legal advice on individual incidents will be obtained as appropriate and necessary from DLS.

RISK IMPLICATIONS

- 5.1 At the time of reporting there are no immediate significant health and safety implications arising from this update report.
- 5.2 The content of this paper will support the MPS strategic position on health & safety.

CONTACT DETAILS

Report Author:

- 6.1 Nick Kettle and Mike Chinchon, SHRMT.

APPENDICES AND BACKGROUND PAPERS

- 7.1 **Appendix 1** - Health and Safety Culture Safety Maturity Model matrix

Increasing Safety Risk Management Maturity					
	<p>Developing legal compliance, policies, processes and safe systems</p> <p style="text-align: center;"></p> <p>Poor, moving towards developing safety behaviours</p>		<p>Applies and meets corporate governance standards</p> <p>Behaviours - Basic Safety Conscience Safety has Developed</p>		<p style="text-align: center;"></p> <p>Positive Safety Behaviours Change at all Levels</p>
	Level 1 = 'Negative Culture and Failing'	Level 2 = 'Reactive Culture'	Level 3 = 'Compliant Culture'	Level 4 = ' Proactive Culture'	Level 5 = 'Resilient and Self driven Culture'
Leadership	<p>SLT show little or no safety leadership and promote a negative culture and consider safety as a hindrance and of little benefit to business/operational delivery. Positive culture of resistance and a lack of commitment by leaders/managers to accept personal safety responsibilities and accountability. People believe safety is the responsibility of others within the organisation and not theirs.</p>	<p>Acceptance of the need for safety leadership but focused on reactive issues only in the event of incidents or accidents. People believe that development of preventative safety measures sits with the function or corporate body with individuals rarely taking responsibility. Acceptable of poor performance except when under scrutiny.</p>	<p>Effective safety leadership/management demonstrated. All leaders and managers actively meet their responsibilities and display a positive attitude to safety. Everyone is clear on their H&S roles/accountabilities and accept personal responsibility. Good safety performance is recognised whereas poor performance is not tolerated and addressed accordingly. All leadership requirements of the MPS safety management system are met.</p>	<p>All levels of management display clear positive commitment, attitude and leadership to motivate others through their visible actions, planning and decision making. Safety performance is monitored through appraisal processes. Individuals use behavioural interventions with their peers to care for themselves as well as their close colleagues and understand and accept that they shape their own safety performance and behaviour and that poor safety performance is unacceptable and not tolerated. The proactive leadership culture and behaviours are clearly embeded in all business processes, systems and delivery.</p>	<p>Leadership values are proactively demonstrated at all levels of management and safety performance. Individuals believe and are committed to delivering safety excellence as a personal value and their daily actions and behaviours reinforce this commitment as they live the H&S embedded principles both inside and outside of the organisation. Everyone takes a proactive approach to support a culture of looking after themselves, others through behavioural interventions (focus on peer-to-peer and equivalent techniques for the unsupervised worker) that are assessed through a continuous improvement cycle and external benchmarking. The MPS safety leadership culture and beliefs proactively and positively impacts other police forces and external organisations.</p>
Policy/Governance	<p>MPS Corporate H&S Policy and governance arrangements not implemented. No appropriate safety governance in place.</p>	<p>MPS Corporate H&S Policy and governance arrangements identified but poorly implemented and only applied as a result of an accident, incident or when under scrutiny. Safety considerations are not considered or poorly articulated in business, operational policies, toolkits and local instructions and review is only undertaken after incidents occur. Staff not aware of safety governance arrangements and only refer to procedures when there is a heightened focus on H&S such as after an incident, or if they are told to.</p>	<p>The MPS Corporate H&S Policy and Governance is known, understood and implemented within local or business safety governance. Arrangements are in place to undertake regular reviews of local safety arrangements to ensure compliance is maintained with corporate requirements. Safety is considered and articulated in business/operational policies, toolkits and SOPs. All staff are aware and committed to the local safety governance arrangements and feel empowered to identify shortfalls and suggest recommendations for improvement.</p>	<p>Safety governance is completely and effectively documented/integrated in all business/operational systems with staff fully aware and compliant. Full reviews are undertaken regularly by competent people with shortfalls in corporate policy identified and brought to the attention of policy holder along with recommendations for improvement. Safety is always considered as part of the business policy planning process in any new or reviewed project/process with local initiatives incorporated into corporate policy/governance.</p>	<p>Safety governance arrangements are inherently embedded in all activities and the psyche of the organisation; it is adhered to by all employees and withstands churn and change at all levels. MPS policy and governance is seen as police sector best practice and meets review against external standards of excellence.</p>

Note: SMT refers to the business group/OCU Senior Management Team, Board, Chief Officer Group or Command Team.

	Level 1 = 'Negative Culture and Failing'	Level 2 = 'Reactive Culture'	Level 3 = 'Compliant Culture'	Level 4 = ' Proactive Culture'	Level 5 = 'Resilient and Self driven Culture'
Capability management and Competence	No competence standards defined for roles with no or limited training identified and delivered. SLT and staff unwilling to attend as training is seen as a burden with little or no benefit to business/operations.	Safety competencies are defined for generic roles and responsibilities with training identified and delivered on a reactive basis such as after an incident or on request. Shortfalls in staff attendance are present and not effectively addressed. Training abstraction is seen as a hindrance to business and operations.	Mandatory safety competencies are defined for generic roles, responsibilities and grades and management and staff are required to attend. Non attendance of training is identified and dealt with accordingly to prevent reoccurrence. Training competencies are reviewed by SLT to ensure compliance with corporate requirements. Management and staff utilise the skills developed during training to ensure they maintain, deliver and monitor the policy arrangements and develop safety behaviours.	Additional safety competencies are defined for specific roles and grades and identified through skills profiling around business or operational requirements Training Needs Analysis. All safety competencies are included as part of individual Performance Development Review and measured. Training is sourced and delivered against a defined corporate competency framework. Local induction/awareness training is delivered by suitably competent staff. Monitoring of skills undertaken to ensure correct levels of competency are achieved and maintained.	Management link competency to the business or operational planning process to ensure the right skills are available at the right time and place. Individuals are empowered to influence their own safety development and training needs with active support from management. Training uses real work issues in an open and transparent way, with a focus on behavioural change. External benchmarking is undertaken to assess best practice and post training follow up is used to test effectiveness. MPS Competency definitions and training is recognised as police sector best practice and adopted elsewhere.
Communication	Little or no communication on safety at all levels.	Sporadic communication that responds to safety concerns as they arise or where incidents/accidents occur. Communication of limited value and impact and one way.	Formal system of communication known by all is in place focused on driving/maintaining compliance with safety arrangements and providing H&S information. It is both proactive and reactive allowing two way communication between management and staff to ensure safety performance and improvement.	Commitment to H&S and the strategic importance of H&S performance and the drive for continuous improvement are recurring themes integrated into all communication and engagement interventions as part of overall corporate, business and local communication strategies. All staff/officers are integrated into all comms and are empowered to be safety leaders in the workplace.	Safety is at the heart of all communication on all business and operational matters. It is proactive and is focused on preventing incidents and promoting good safety behaviours. Communication is two-way and interactive; where appropriate it validates understanding. All leaders, managers and staff clearly understand the H&S agenda and this is reflected in the content of their daily conversation; they reinforce the words through their visible actions and planning & decision making. Employees understand that they are an important part of the H&S team and accept that they are core to the safety message. Messages are targeted and reinforce the behaviours for a self driven culture.
Safety Risk Management	Officers/staff largely unaware of the hazards, risks of their work activity. No risk	Officers/staff aware of the hazards, risks of their work activity. Risk assessment in place but not 'live' and informing current safe	Hazards are identified, assessed and documented in line with corporate requirements. All control measures are documented and implemented in safe systems of work. The safe systems of work are	Hazard, risk quantification and assessment processes are embedded within all key business/operational processes including change/projects. Mitigation and controls are implemented and are seen as positive and all staff are aware of and understand the control measures required. Assessments/impact statements are	A constant positive state of chronic unease is maintained (haven't had an incident, what has been overlooked and what else needs to be done) with all officers/staff, managers and leaders continuously looking for indications of new/emerging hazards, risks and opportunities. The potential impact of

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	<p>assessments available. No or poor operational mitigation against hazards faced. No documented safe systems of work.</p>	<p>systems of work or adequately capturing activities. Poor mitigation. Review only following incident investigation and/or on direction from SHRMT.</p>	<p>followed. The risk assessments are reviewed in accordance with corporate requirements. Risk assessments are made available to staff and shared with partner agencies, contractors etc.</p>	<p>regularly reviewed to verify they remain in place and current. Individuals at all levels are empowered, where applicable, to influence, change the process/controls where they feel the controls are not adequate to manage the risk or impact identified. Learning is shared across the organisation and with partners and contractors.</p>	<p>'cognitive bias' on safety decision making in understood by all and accounted. Mitigating measures are constantly reviewed and improved. Safety risk identification and management is effectively shared across the organisation at all levels and internal/external supply chain.</p>
<p>Well-Being Management</p>	<p>There is no consideration within the organisation of staff Well-being as a concept.</p> <p>SLT show little or no leadership on Well-being matters and see it as a hindrance and of little benefit to business/operational delivery.</p> <p>Officers and staff are largely unaware of the impact of their work and lifestyle on their welfare beyond obvious physical impacts.</p>	<p>Work activity related aspects of Well-being are addressed by the organisation but only where they are part of existing health, safety, welfare or HR led management arrangements.</p> <p>SLT are aware of aspects of Well-being that have a direct link to their work activity but have limited understanding of preventative measures.</p> <p>Action is only taken by line management when an individual has a work-related problem or there is a direct and obvious issue with an individual's ability to carry out their work.</p>	<p>Core aspects of the MPS Well-being strategy are understood within the organisation but as separate and largely unconnected components across health and safety, occupational health and HR management activities. Well-being activities are seen as led by these central specialist teams and not a function of local leadership.</p> <p>Activities are undertaken by Line Managers and SLTs to inform officers and staff about Well-being issues and their prevention, but only where there is a direct link to work activity and driven by central corporate initiatives.</p>	<p>All aspects of Well-being are understood by the organisation. There is a clear Well-being Policy and governance arrangements, with a joined up and integrated approach across all departments to delivering to defined standards/objectives.</p> <p>Well-being roles and responsibilities and proactive and preventative management arrangements are clearly defined, understood and implemented by all leaders.</p> <p>Line management at all levels has the competence to 'spot' potential concerns before they become an issue and to provide appropriate and timely action and support to individuals.</p> <p>All officers and staff have a good understanding of the wider Well-being issues, both work and lifestyle related, and there is a positive approach by all to preventing issues arising.</p>	<p>Officer and staff work and lifestyle positive Well-being is inherently embedded in the psyche of the organisation. It is understood and proactively supported by all employees - not only in implementing controls and initiatives but in 'looking out for' each other.</p> <p>MPS Well-being strategy, initiatives and achievements are seen as police sector best practice and meets review against external standards of excellence.</p>

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<p>Reactive/Proactive Monitoring</p>	<p>No or poor injury reporting. Only major incidents that will not go unnoticed are reported and these are rarely followed up. Accident reports are superficial. Investigation rarely takes place. Near misses are not reported or considered. No workplace inspections.</p>	<p>Workplace injuries are reported with poor investigations being conducted; often prompted by safety professionals that lead to little or no local adopted learning. The significance of near misses is not understood by staff and officers leading to chronic under reporting. Workplace inspections are carried out on an adhoc basis and not always documented with safety issues not being brought to the attention of management.</p>	<p>Line managers report all accidents and near misses in a timely manner in accordance with corporate requirements; they are thoroughly investigated with captured learning outcomes and preventative measures identified with action plans developed to prevent recurrence. Injury and near miss data is used for safety analysis at relevant safety meeting to identify trends. Workplace inspections are carried out and documented in accordance with corporate requirements and any shortfalls or failings rectified or raised with management for resolution.</p>	<p>All incidents or near misses with corporate implications are reported to relevant business group for further review in a timely manner or acted upon where received. Investigations of all incidents and near misses with corporate implications include both personal and job factors in the root cause analysis with nominated line management leading the investigation. Individuals, teams and staff representatives (Federation/Trades Unions) are involved or consulted during investigations. Proactive workplace/environmental monitoring is built into all business processes and is effectively implemented with corrective actions tracked and closed out. Analysis is proactive and focused on looking for ways of improving H&S.</p>	<p>A 'no blame' reporting culture is in place so that officers/staff have the confidence/feel empowered to raise/report concern when non compliant activity is observed to maximise learning opportunities. Those involved in investigations are committed to finding the true root causes and evaluation of controls, with managers and staff acceptance that near misses are learning opportunities. Existing risk management and control systems are re-evaluated using findings with managers not only actively involved in investigations and follow up but also in pro-actively learning and sharing outside their immediate areas of operation. Data from a wide range of sources (not just safety data and from both internal and external sources) supports analysis and acts as a challenge for improving performance. Findings or recommendations are shared with external organisations where exposure to similar safety hazards and risks are present.</p>
<p>Infra-structure and asset management (including equipment)</p>	<p>The organisation does not manage its infra structure to minimum statutory compliance levels. Equipment is not maintained nor is safety considered during selection. There are no equipment related safe systems of work. Staff are not trained to use equipment</p>	<p>Infra structure is repaired or maintained to meet statutory compliance only after failure. Equipment is not maintained and only fixed on failure or where instructed, with poor or no planned maintenance schedules. Safe systems of work for equipment are rarely followed. Staff training is poor and does not fully cover equipment use.</p>	<p>All infra structure is maintained to statutory compliance levels. Defects are identified before they fail through documented preventative monitoring and maintenance. There are processes to ensure equipment is appropriately selected to ensure safety compliance. Equipment is subject to regular inspection programmes by competent people. All equipment has appropriate safe systems of operation and staff are appropriately trained.</p>	<p>All Infra structure is maintained to a high standard of maintenance and subject to regular inspection/audit. Defects rarely occur and any faults are rectified promptly. All equipment is selected and suitable for the task with safety as a key consideration for selection. Equipment is subject to a robust inspection/maintenance programme. Equipment life is clearly defined with replacement programme implemented. Staff receive the required training to ensure safe use and maintenance of equipment.</p>	<p>Infra-structure and equipment assets are seen as a vital component of every business/operational delivery with safety selection and suitability the primary element. Property and asset management programs exceed industry standards with individuals actively engaged in learning and sharing and managers driving continuous improvement.</p>

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Partnerships, Contracts & Shared Risks (PS)	Contractors are non compliant and safety was not considered as part of their selection. There are no safety rules for contractors. Priority is to get the job done in quickest and cheapest way. In cases where a contractor does not work safely they are not stopped from working.	Contractors are generally selected on cost with limited safety consideration. Control of contractor guidance is available but not followed unless there is an incident. Contractors are expected to be competent and work safely but with little or no monitoring or induction. In cases where a contractor does not work safely they are stopped from working but only after repeated warnings. Sanction is rarely taken.	The MPS Contractor Management framework is understood and implemented. H&S criteria are included in the contractor tender process and safety capability is assessed to ensure they meet all H&S standards, training, capability and competency. Work plans/activities incorporate any legal standards and H&S requirements, with contractors following pre-approved method statements. Control of contractor guidance is in place with induction provided and enforced by monitoring/auditing performance. Sanction is taken when contractors have safety related failings.	Pre-qualification of contractors/suppliers requires mandatory evidence of a defined organisational H&S management system with certifications in place (if appropriate) and contractor H&S performance and behaviours are treated as a key differentiator in selection. Contractors and core suppliers feel a part of the MPS and are supported in training/knowledge to meet specific MPS H&S competence requirements. Contractors identify and assess risks and impacts and include documented controls in their work plans/submissions. Contractors are regularly supervised by their own management from the contractor organisations and are monitored by MPS to ensure they meet or exceed required contractor performance. Contractors/suppliers/MPS take	Full Integration of the contractor's/Suppliers/MPS H&S Management Systems with evidence to support the link between contractor/supplier H&S performance and selection. Contractors/suppliers are indistinguishable from MPS staff and meet the same behavioural standards and performance. Contractors/suppliers meet the highest industry standards and are amongst the leading safety performers in their field.
Change management	No consideration given to the safety impact of change on the organisation. No safety impact statements written.	There is little consideration for safety in the management of change. Safety impact statements only written when requested.	Any change management process considers and assesses the safety impacts on both the organisations' activities and employees. Suitable and sufficient mitigating controls are agreed and implemented to reduce safety change impact and risks to an acceptable level. These mitigation measures are regularly tested through the life of the change programme to verify that mitigation remains in place and where required amended.	Safety change management process and impact assessments are embedded in all change programmes as a proactive measure from inception to programme end. Safety is regularly assessed throughout the programme life and, if required, processes and mitigation are promptly readjusted and communicated. Safety assessments and mitigation is shared with others involved to prevent a silo mentality.	Safety considerations frequently drive the change management process. Safety is automatic and at the forefront of any change management process to ensure a resilient and self driven culture is delivered and maintained. Change management processes are seen as an industry leader and adopted by others.
Assurance, Performance & Benchmarking	No benchmarking on past performance.	Benchmarks performance at H&S forums/meetings only undertaken where instructed or as a result of an incident/accident. Limited organisational learning and improvements identified.	Local benchmarking of safety performance is regularly undertaken to compare current performance against historical performance. Organisational Learning is identified during benchmarking and leads to safety improvements through revision of local safety management systems and the development of new initiatives.	Proactive benchmarking of safety data is undertaken to compare current and past performance against other internal business or operational areas and comparative external organisations to identify and share organisational learning and areas for improvement. Recognised as safety performance champions. Improvements to safety management systems are adopted and implemented throughout the organisation.	The MPS is acknowledged within the policing community as the benchmark for safety performance excellence in policing . Regular and transparent benchmarking is undertaken against all industry sectors. The MPS is seen nationally and internationally as a leader in benchmarking.

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Audit	No audit process is in place.	Audits are only done in response to an adverse event and the review of the H&S management system is done on an ad hoc basis.	<p>A formal local annual HS review is undertaken on HS management systems leading to completion and submission of the assurance letter. Areas of shortfalls are identified and action taken to rectify issues.</p> <p>SHRMT audits are carried out against thematic themes to ensure compliance with current MPS standards to ensure that the safety governance framework remains operational. Recommendations are tracked and where required poor or inadequate performance is identified and recommendations submitted to improve performance and where required repeat auditing takes place. Auditing is primarily driven and undertaken by safety specialists.</p>	Regular proactive local audits focused on thematic topics are undertaken by competent people to review safety performance and feed back to business managers their compliance and performance status. Managers welcome such feedback and act promptly on the findings. Audit outcomes are shared amongst other similar business areas to maximise learning and corrective actions.	Auditing and the results are driven and undertaken by all areas of the business including cross auditing. Periodic staff safety surveys are carried out at a local, business and MPS-wide level. Audits and surveys are seen as an essential part of the transparent continuous improvement cycle with findings from analysis shared internally and externally to influence the self driven culture. Improvements to safety management systems and thematic themes developed by the MPS are adopted and implemented in other police organisations and environments nationally.