

MOPACMAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

17 January 2022

Health, Safety and Wellbeing Performance Paper

Report by: Head of Safety, Health and Wellbeing

Report Summary

Purpose of the Report

The purpose of this report is to provide assurance that the MPS has suitable governance arrangements in place to manage health, safety and wellbeing.

This report includes an update on health, safety and wellbeing governance and provides an overview of performance.

The paper updates on:

- a. Summary injury analysis;
- b. Assurance updates;
- c. Health and safety culture maturity project update;
- d. Notifications and liaison with the Health and Safety Executive (HSE);
- e. Health and wellbeing services;
- f. General health and safety updates.

Key Considerations for the Panel

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

The MPS Safety Management System (SMS) is enshrined in the Corporate Health and Safety Policy; this policy is under the final stages of review by the Health, Safety and Wellbeing Board.

The MPS Health and Wellbeing Strategy 2019-2021 informs the priorities and activities to improve the physiological and psychological health of those who work in the MPS. Work continues to finalise the future Health and Wellbeing Strategy 2022-2025.

The corporate forum for health, safety and wellbeing is the MPS Health, Safety and Wellbeing Board. The Board maintains a robust safety governance framework,

monitors corporate and business group related risks, safety maturity assurance and wellbeing. This Board reports to the MPS Risk and Assurance Board.

Based on the maturity self-assessment reports and Safety & Health Risk Management Team (SHRMT) audits, the MPS continues to demonstrate it is in the region of a level 3 maturity (compliant culture); with evidence reinforcing that the majority is now self-sustaining.

This past year there has been significant demand to support operational and COVID related activity. This has included advisory support at all command levels and deployment of safety and occupational health assets.

Members are invited to review this report and assure themselves that this provides assurance that the MPS continues to have effective controls in place for the management of health and safety risks.

Recommendations

In accordance with the Corporate H&S Policy, this Panel is asked to note the contents of this report.

1. *Injury analysis*

1.1 A comparison of injuries reported on eSafety between October 2020 and September 2021, and between October 2019 and September 2020 indicates that the:

- Total accident injury rate decreased by 7%;
- Major accident injury rate remained the same;
- Reportable lost time injury rate decreased by 25%;
- Injuries to police officers following assault rate decreased by 2%;
- Injuries to Police Community Support Officers (PCSOs) following assault rate increased by 4%;
- Injuries to Designated Detention Officers (DDOs) following assault rate decreased by 18%;
- Slip, trip and fall injury rate remained the same;
- Moving vehicle injury rate decreased by 17%;
- Handling related injury rate remained the same.

1.2 The above injury categories are subject to monitoring and additional analysis to identify trends. The decrease in the injury rate is a positive trend however caution is applied as this may have been influenced by the COVID impact on policing including related lockdown periods.

SHRMT Near Miss Investigations

1.3 All near misses are managed and investigated as appropriate at BCU/OCU and department level. In the period July to September 2021, 435 near misses were reported on the eSafety system.

1.4 SHRMT are investigating one of these incidents whereby officers were attacked by a subject armed with two meat cleavers whilst assisting health colleagues to undertake a mental health assessment. Three key areas to explore have been identified:

- BCU arrangements for planning S135 warrants;
- Rapid entry policy and training;
- Guidance included in the mental health toolkit.

This investigation remains ongoing.

2. *Assurance Updates*

2.1. The last two MPS Health, Safety and Wellbeing (HSW) Boards were held on 03 August 2021 and 03 December 2021. Key items discussed at these boards included:

- COVID-19;
- **Corporate HSW Board Risk Register.** Current Risks are as follows:
 - **Risk 2 – Non-Police Firearms (NPF).** Following SHRMT audits in July 2021 the corporate risk relating to the management of non-police firearms was not closed. Each BCU audited received an individual report outlining the local findings and recommendations. Overall, these audits concluded that this risk was not sufficiently locally controlled at BCU level to close this corporate risk. To

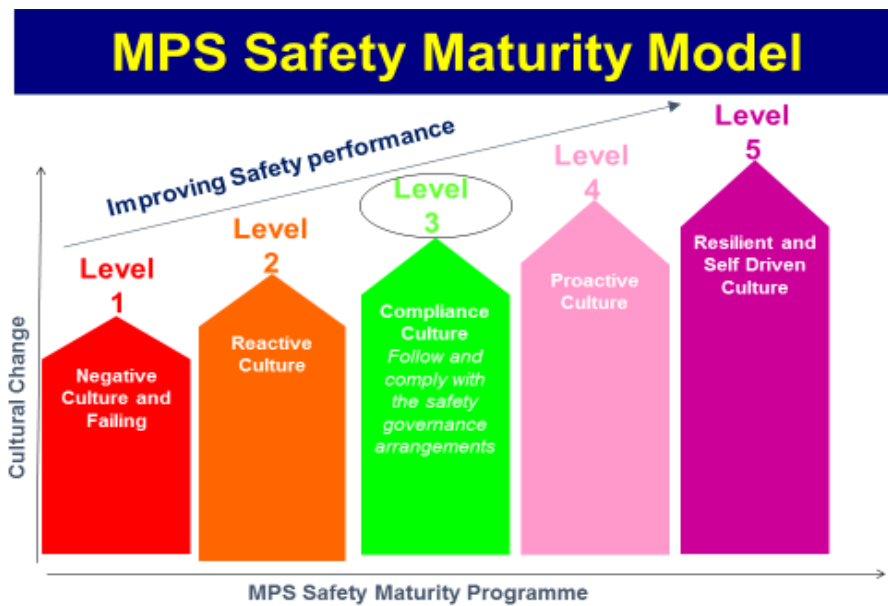
address the findings raised from the BCU NPF audits, a Gold Group has been formed. The overall objective of the Gold Group is to address the shortfalls in performance identified, to increase the rate of compliance with the handling procedure ensuring a consistent approach across the BCUs and to provide assurance to the MPS Health, Safety and Wellbeing (HSW) Board. Further proactive work via the Firearm and Explosive Sub Group continues to promote communications, support compliance and promote a consistent approach across the MPS including:

- Raising awareness of guidance/policy across the MPS with regards to the correct handling of NPF and unintentional discharge;
 - Intranet articles, blogs, Metflix Videos;
 - Promoting firearms SPOC toolkit;
 - Posters display in all police station front counters.
- **Risk 3 – Water Intervention.** A working group under Met Operations Health and Safety (H&S) lead has been established to review and address recommendations from the external independent audit report. Ongoing work includes:
 - A refresh of the corporate BCU risk assessment template;
 - Refresh of water intervention awareness training to new recruits including specific risks associated with water intervention: open-water spacial disorientation, cold water shock, entrapment, floods and contamination, lack of visibility and hazards in combination;
 - Future SHRMT water intervention equipment audits in 2022.
 - **Risk 17 – Compliance with Working Time Regulations.** Compliance with Working Time Regulations is subject to quarterly reports at the MPS Health, Safety and Wellbeing Board by relevant Chief Officer Leads. Data indicates the MPS was 98 to 99 per cent compliant between Jun-Nov 21 (non-compliance is based on the numbers of police officers working more than 48 hours, averaged over a 17 week reference period, that have not opted out of the Working Time Regulations);
 - **Risk 28 – Health & Wellbeing (H&W) Services.** The mitigation to address this original service delivery risk is now considered closed. Elements of this risk and action taken has been verified by a DARA related audit. The HSW Board will review the outcome of the Operation Sedgebrook Human Resources (HR) Silver Group reviewing Health and Wellbeing (H&W) services for any further learning before this risk is formally closed. This work is expected to report to the next HSW Board in March 2022;
 - **Risk (35) - Analysis and Cross Correlate Multiple Data Sources at Business Group Level.** This risk relates to the capability and capacity of collating, reviewing and analyzing H&S data and correlation with related operational data. Strategy and Governance are developing a new reporting dashboard which will address the data and reporting elements associated with this risk. This work is expected to report to the next HSW Board in March 2022;

- **Risk 36 – COVID.** This risk relates to the wellbeing of officers and staff at a time where usual working practices are challenged due to COVID. All controls remain in place and subject to regular review;
 - The risk register heat map is attached at Appendix 1.
 - Review of business group safety maturity;
 - **Review of MPS H&S Policy.** The MPS H&S policy has been reviewed. The new policy arrangements will now encompass wellbeing into these policy arrangements recognising current Board and maturity assurance arrangements, organisation structure changes, changes in Board and organisational titles/terminology. It is anticipated that this policy will be republished in early 2022;
 - Inclusion of health and wellbeing in the H&S maturity model. At the time the maturity model was launched it was agreed that a separate thematic area of H&W would be launched separately once the other thematic areas of the model were maturing. The Board have now agreed to include an H&W thematic in the MPS maturity matrix; the finalised new thematic is attached at Appendix 2. These standards will not 'go live' until the 2022-2025 health and wellbeing strategy is finalised. SHRMT will include these standards in future audits once the 2022-2025 H&W strategy is approved;
 - HSW performance updates including police weapon unintentional discharges, non-police firearm management, injury analysis, near misses, airwave radio near misses, custody successful interventions, Health and Safety Executive reporting, safety maturity, COVID-19 support, Occupational Health and Wellbeing, Working Time Regulation compliance;
 - Property Services (Estates and Fire Safety Compliance) Performance updates;
 - HSW Board annual plan.
- 2.2. The Chair of the Board has now transferred from Chief Corporate Services to Deputy Assistant Commissioner (DAC) Corporate Services.
- 2.3. Both Boards, with the support of the MPS COVID-19 Gold Commander, reviewed the Health and Safety implications and mitigation to the COVID-19 pandemic. This included a review of business group level risk and response.

3. *H&S Culture Maturity Assurance*

- 3.1. The MPS has agreed and implemented a health and safety (H&S) culture maturity model. This model 'scores' the safety culture in a Basic Command Unit (BCU) and Operational; Command Unit (OCU) on a 1 – 5 scale.
- 1- Negative or failing culture;
 - 2- Reactive culture;
 - 3- Compliant culture;
 - 4- Proactive culture;
 - 5- Resilient and self-driven culture.



- 3.2. The aim of the project is to now bring the MPS to a 'Level 4' H&S maturity by the end of FY 2022/23.
- 3.3. This process is also designed to support business groups, BCUs and OCUs with a framework to drive a maturity focused approach/compliance at safety meetings. This includes the completion of a health and safety culture maturity assurance self-assessment which is reviewed and updated at every quarterly HSW meeting.
- 3.4. The MPS H&S maturity programme and self-assessment reporting process is now embedded. BCUs and OCUs now provide quarterly maturity self-assessment assurance to their Chief Officer Group and six monthly at business group level to the MPS HSW Board. These statements give a self-assessment of H&S maturity status and plans to embed/improve maturity.
- 3.5. SHRMT are undertaking a programme of audits to verify performance in accordance with the H&S maturity matrix. The question set assesses compliance with the requirements of level 3 (compliant culture). In summary as at 01 October 2021:
- 60% of FLP, 67% of MO and 100% of SO have been audited.
 - All units have been assessed as demonstrating 'conformity' to level 3 compliant culture;
 - It is planned that all BCU/OCUs will have been audited against level 3 compliance standards by the end of FY 21/22.
- 3.6. Based on the maturity self-assessment reports and SHRMT audits, the MPS remains in the region of a level 3 maturity (compliant culture); with evidence that this compliant culture is now self-sustaining.
- Next Steps towards a Level 4 Proactive Culture**
- 3.7. Work continues to consolidate this self-sustaining compliant level 3 culture and develop initiatives/behaviours towards a level 4 proactive maturity. The

following activity will be the focus for 2022 to develop, support and commence embedding this level 4 culture:

- Enhancement of SHRMT maturity mentoring, assessment and auditing skills;
- BCU/OCU & Business Groups mentored by SHRMT focused at strengthening level 4 maturity with a reducing reliance on SHRMT expertise (BCU/OCU & Business groups becoming proactive and self-reliant);
- BCU/OCU commence self-auditing;
- Review of level 4 maturity standards to capture learning from level 3 compliance audits and development of additional business group level maturity guidance;
- Reinforcing the requirement/understanding that any change in culture to be sustainable;
- SHRMT commence level 4 maturity audits;
- Corporate communication strategy to capture level 4 proactive culture with practicable examples of level 4 culture and behaviours including:
 - The underpinning standards of the level 4 proactive culture standards and documenting relevant evidence;
 - Proactive leadership culture and behaviours in all business processes, systems and delivery;
 - Individuals at all levels are confident that they are in a culture where they feel comfortable using behavioural interventions with their peers to care for themselves as well as their close colleagues; with a belief that they understand and accept that they shape their own safety performance and behaviour and that poor safety performance is unacceptable;
 - Safety governance is embedded, documented and proactively implemented in all business /operational systems/delivery where all officers/staff feel empowered and encouraged to identify shortfalls and suggest improvements;
 - Safety competencies are proactively considered as part of performance development including monitoring and assessment of skills;
 - Continuous improvement is integrated into all communications and engagement strategies;
 - Hazard and risk quantification assessment is embedded in all business planning. Mitigation is seen as positive, empowering all officers/staff to influence and control hazards, risk quantification and mitigation;
 - Developing a constant positive state of chronic unease (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/changing hazards, risks and opportunities;
 - Inclusion of health and wellbeing as a further catalyst to reduce sickness and drive performance;
 - Mitigating measures are constantly reviewed and improved.

3.8 These next stages are designed to benchmark the organisation against the level 4 safety maturity culture model, to provide a roadmap for continuous

improvement, and development, achieving a balance between systems and safety behavioural aspects at all levels across the business. It is anticipated that the MPS may see some command units achieving and consolidating level 4 proactive culture in FY22/23.

4 Notification and liaison with external enforcing agencies (HSE)

- 4.1 SHRMT currently investigates all accidents that fall within the HSE investigation criteria. This position is agreed with the HSE who will periodically review selected factual investigation reports.
- 4.2 The following investigations have been commissioned by SHRMT against the Health and Safety Executive selection criteria:
- May 2021 – During an MPS training course, an officer was burned when the wind changed direction during a pyrotechnic demonstration. The injury has been reported to the HSE as an over 7-day injury and SHRMT have worked with MO19 to prepare an investigation report. There were a number of learning points and action has been taken to prevent a reoccurrence including the production of a training pack relating to the use of pyrotechnic;
 - May 2021 – Whilst stopping a vehicle, the driver has driven the vehicle, in an apparent deliberate act, towards the officer and mounting the pavement. The officer sustained a broken leg and injuries to his head and hand. The circumstances have been investigated and report complete;
 - October 2021 – Following being booked into Custody, a detainee has punched and kicked the escorting DDO. The DDO has lost consciousness as a result of being punched and sustained extensive facial bruising. SHRMT have initiated an investigation with Met Detention. HSE have requested the investigation report upon completion.
- 4.3 **Operation Sedgebrook** – The HSE were notified of the fatal shooting of an officer at Croydon Custody suite on Friday 25 September 2020. The following action has been taken and support ongoing:
- SHRMT safety review report has been endorsed by the Gold Group;
 - OH continue to support officers/staff and relevant investigative groups as appropriate;
 - A review of OH and wellbeing interventions that were put in place in relation to Op Sedgebrook is complete. The draft report is now subject to peer review circulation;
 - A task and finish group reviewing the need for, and options to report/record traumatic exposure is complete and the draft report is now subject to peer review circulation;
 - The HSE have also commenced a work related death investigation. This HSE investigation remains ongoing.

5 Health and Wellbeing Services

The Met Mobile Wellbeing Service (MMWS)

- 5.1 The Met Mobile Wellbeing Service (MMWS) was launched in March 2020. The core of the MMWS is based on a mobile health educational service supported

with the use of a wellbeing bus (Mercedes Sprinter van) to run throughout much of the year across MPS sites with health coaches and on-site with a mobile health screening capability. The service is delivered by a team of three health specialists that bring together occupational health, sport sciences, nutrition and healthcare.

- 5.2 The COVID-19 pandemic had an initial profound impact on the MMWS that resulted in their early activities being moved into the electronic space, with the production of a number of wellbeing webinars and seminars, the presentation of health and wellbeing advice across the MPS and the provision of electronic support/resource guides for officers/staff to proactively manage their health and wellbeing during lockdown. These workshop and webinar led activities have been well received and have reached out to over circa 8000 officers/staff via 59 health webinars. These webinar/workshop events will now remain a future service of the MMWS
- 5.3 Face to face mobile wellbeing services, with the health bus, recommenced in 2021 visiting BCU/OCUs promoting health education activities including physical health checks, in addition to the individual tailored support and advice. The physical health assessment includes screening of:
- Height/ Weight/ BMI;
 - Blood Pressure;
 - Cholesterol;
 - Cardiovascular Disease & Diabetes Risk;
 - Lifestyle habits.
- 5.4 In total, 75 site visits have been made and all Front Line Policing (FLP) BCUs will also have been visited. Demand for this bespoke health service remains high. 94% of attendees to this service stated they would very likely use the service again and 89% stated they would change their life style as a result of the screening service and advice given. The feedback indicates this service is a highly valued, is influencing drive positive health outcomes and engagement. The data produced by this service is already shaping inform future health risk considerations and interventions.

Future Health and Wellbeing (H&W) Strategy

- 5.6 Work has now commenced to assess future health risks and the needs of MPS officers/staff to inform develop the next H&W strategy.
- 5.7 The MPS H&W offer to officers and staff has improved considerably under the 2019-2021 Health and Wellbeing Strategy; nevertheless, it is recognised that the H&W landscape continues to evolve. There is an increasing recognition of:
- Health challenges including the impact of policing on mental health;
 - New emerging health threats such as COVID-19 - including the potential legacy left by “long COVID” and impact on NHS services;
 - Workforce expectations and maturing H&W culture;
 - Future health interventions and use of technology to diagnose and prevent ill health.

- 5.8 The draft strategy document captures:
- H&W global trends;
 - Assessment of what other uniform services are doing;
 - Where the MPS is today;
 - The case for change;
 - Options to build a more resilient and healthier MPS.
- 5.9 The proposed new strategy assesses these emerging health risks and the needs of our officers/staff to inform develop the next H&W strategy. This proposed strategy sets out:
- The MPS ongoing commitment to improve the H&W for officers and staff, building on the 2019-2021 successes;
 - Provides a flexible road map to recognise the changing operational environment, the changing age demographic of officers/staff and emerging technologies to monitor, diagnose and support health related conditions;
 - Focus on physical, mental, social and organisational elements of wellbeing to address the broader set of factors which need to be in balance - importantly recognising each employee as a “whole person” whose wellbeing varies over time.
- 5.10 To achieve this in the strategy, a future MPS integrated workplace wellbeing model (figure1) considers all aspects of H&W and includes:
- **Healthy Organisation** - developing the Met’s leadership, culture and engagement around workplace wellbeing, driving “healthy high performance”;
 - **Healthy Body** - ensure our people are encouraged and supported to look after their physical wellbeing;
 - **Healthy Mind** - support our people to look after their mental wellbeing and build personal resilience;
 - **Healthy Work** - design jobs, equipment, and integrate wellbeing risk assessment into every day management tasks;
 - **Healthy Life** - support and encourage our people to live physically and mentally healthy lifestyles, both in and out of the workplace.



Figure 1 – Integrated Workplace Wellbeing Model.

- 5.11 The strategy and integrated proposed workplace and wellbeing model will support:
- Embed H&W in the psyche and belief of the workforce;
 - Maximise the psychological and physiological resilience of our officers and staff;
 - Support improve performance, attendance and engagement of our people.

Work continues to finalise this 2022-2025 strategy which will be presented to a future MPS People and Learning Board in 2022.

6 General Health and Safety Updates

- 6.1 The following summarizes the continued COVID-19 activity by SHRMT, Occupational Health & Wellbeing (OH&W) and Property Services Compliance Team:
- Health, safety and wellbeing support and advice at Gold;
 - Embedded health, safety and wellbeing support and advice at Silver including MPS Chief Medical Officer (CMO), Senior SHRMT Advisor and Property Services Compliance Team;
 - Head of Safety, Health and Wellbeing, and Property Services Compliance Team support to COVID-19 tier one consultation;
 - Support and advise on safety assessment of specialist safe systems of work, equipment and PPE;
 - Increased capability of the Employee Assistance Programme (EAP) and OH Managers Advice Line (MAL);
 - Provision of individual vulnerability health assessments;
 - Reporting and near miss arrangements for COVID-19;
 - Development and advice on COVID-19 building risk assessments and arrangements including COVID 19 aware buildings;
 - Validation/assessment of PPE procurement process;
 - RIDDOR/COVID related statutory reporting arrangements, dangerous occurrence, workplace disease reporting and investigation arrangements;

7 Equality and Diversity Impact

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.

8 Financial Implications

The report is an information report and there are no immediate financial implications arising.

9 Legal Implications

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 MPS Directorate of Legal Services.

10 Risk Implications

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

11 Contact Details

Report author: Nick Kettle, Stephen White and Catherine Daghish

12 Appendices and Background Papers

Appendix 1 – MPS Health and Safety Risk Heat Map, December 2021

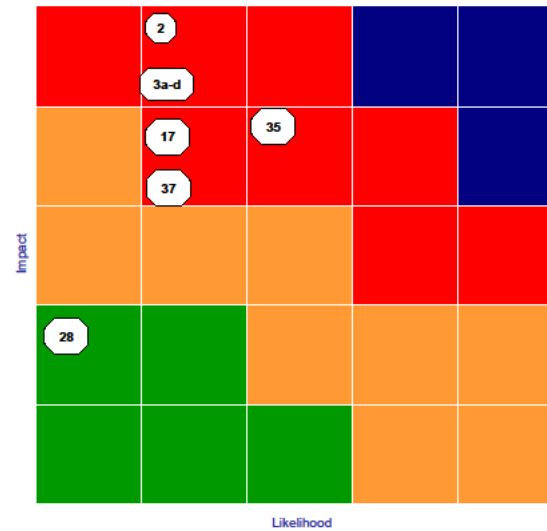
Appendix 2 – H&W Maturity Standards

13 Appendix 1 – MPS Health and Safety Risk Heat Map, December 2021

APPENDIX 1



MPS Health and Safety Board December 2021 – Risk Heat Map

Ref	Risk Trend	Risk Description	Risk Lead
2	↔	Unsafe handling of non-police firearms.	Commander Armed Policing
3a-d	↓	Inappropriate response to water related incidents.	Commander Armed Policing
17	↔	Compliance with the Working Time Regulations (WTR) and excessive working hours.	All business COGs.
28	↓	Wellbeing arrangements	Head of Safety Health and Wellbeing
35	↓	Analysis and cross correlation of multiple data sources to assess H&S risks/compliance at Business Group Level	Head Safety, Health and Wellbeing, and all Business COGs
37	↓	Wellbeing of officers and staff at a time where usual working practices are challenged due to COVID	Head Safety, Health and Wellbeing



Risk Trend key - Improved (↓), Worsened (↑) or is Unchanged (↔)

14 Appendix 2 – H&W Maturity Standards

Increasing Safety Risk Management Maturity					
	Developing legal compliance, policies, processes and safe systems  Poor, moving towards developing safety behaviours		Applies and meets corporate governance standards Behaviours - Basic Safety Conscience Safety has Developed	 Positive Safety Behaviours Change at all Levels	
	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'
Health and Wellbeing Management	There is no consideration of staff health and wellbeing as a concept. SLT show little or no leadership on health and wellbeing matters and see it as a hindrance, and of little benefit to business/operational delivery. Officers and staff are largely unaware of the impact of their work and lifestyle on their health and wellbeing beyond obvious physical impacts.	Work activity related aspects of health and wellbeing are addressed by the organisation but only where they are part of existing health, safety, wellbeing or HR led management arrangements. SLT are aware of aspects of health and wellbeing that have a direct link to work activity but have limited understanding of preventative measures. 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.	Core aspects of the MPS Health and Wellbeing Strategy are understood and locally implemented. Health and wellbeing is led by local leadership with processes in place to build their local health and wellbeing strategy implementation, knowledge and skills.. Local initiatives align and complement to the corporate strategy and service offers. Line management at all levels have the competence to appropriately address health and wellbeing concerns when they arise. All officers and staff have an understanding of health and wellbeing issues including support services available.	All aspects of health and wellbeing are understood. There is a clear health and wellbeing strategy and governance arrangements, with a joined up and integrated approach across all departments to deliver to defined standards/objectives. Health and wellbeing activities, roles, responsibilities, proactive and preventative management arrangements are clearly defined, understood and implemented by all leaders. Local initiatives promote and complement the corporate strategy and service offers. Line management at all levels have the competence to 'spot' potential concerns before they become an issue and to provide appropriate and timely action and support to individuals. All officers and staff have a good understanding of wider health and wellbeing issues, both work and lifestyle related, and there is a positive approach by all to preventing issues arising.	Positive health and wellbeing 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. MPS health and wellbeing strategy, initiatives and achievements are seen as police sector best practice and externally as standards of excellence.