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|  | **The Police and Crime Commissioner for Cleveland and the Chief Constable Cleveland Police** |
|  | **Assurance Review of Lone Working** |
|  | **November 2018** |
|  | **FINAL** |
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| **Executive Summary** |

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| **OVERALL ASSURANCE ASSESSMENT** |  | **OVERALL CONCLUSION** |
|  |  | |  |  | | --- | --- | | **Overall, the Operations and Emergency Planning Manager exercises good control over Risk Assessments that incorporates ‘Lone Working’, however some weaknesses were identified.** | | |  | **There is no corporate or strategic control over ‘Lone Working’.** | |  | **There is no training log for ‘Lone Workers’.** | |  | **There is no central register to record ‘Lone Working’ incidents or near misses.** | |  | **An appropriate Board should assume responsibility for’ Lone Working’ and have regular reporting arrangements.** | |
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| **SCOPE** |  | **ACTION POINTS** |
| Rationale  This is a periodic audit to review the lone working arrangements for the Force and staff. (Lone Working refers to those Officers and staff who due to the nature of their work may involve them on their own entering into risky situations such as visits to known criminals etc.  Scope  The review included the following areas:   * A corporate/departmental policy and procedures on lone working has been documented, is subject to periodic review and staff are aware of and have access to it; * Staff undertaking lone working are sufficiently managed in line with corporate and departmental policies and procedures (e.g. use of diaries, contact information, scheduled call-in times etc.); * Risk assessments are consistently completed and submitted to a dedicated Force officer (e.g. Safety Advisor), including more detailed risk assessments where the generic assessment is considered high risk; * Risk assessments are periodically reviewed by the Safety Advisor (or equivalent); and * A central register is promptly updated following the receipt of incident reports and access to the register is adequately controlled. There is evidence of review of the register to identify potentially dangerous scenarios. |  | |  |  |  |  | | --- | --- | --- | --- | | **Urgent** | **Important** | **Routine** | **Operational** | | **0** | **1** | **4** | **3** | |

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| **Management Action Plan - Priority 1, 2 and 3 Recommendations** |

| **Rec.** | **Risk Area** | **Finding** | **Recommendation** | **Priority** | **Management**  **Comments** | **Implementation**  **Timetable**  **(dd/mm/yy)** | **Responsible**  **Officer**  **(Job Title)** |
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| 4 | Compliance | At the present time Lone Working is an integral part of risk assessments that are managed by the Specialist Support and Planning Unit (Operations and Emergency Planning Manager). They do not have corporate control and the risk is that some Officers/staff members who have not been risk assessed may be involved in ‘Lone Working’ without having received any instruction or training. It would therefore be an enhanced control feature to have a more corporate approach to ‘Lone Working’ with HR taking a more informed approach to monitor Lone Working arrangements. | Human Resources to have a corporate responsibility for Lone Working and to monitor the Lone Working arrangements. | 2 | *Agree HR to develop short policy statement and link to risk assessment process.*  *N.B. just lone working not to include Agile Working.* | *31/03/19* | *Head of People & Development* |
| 1 | Compliance | As ‘Lone Working’ is not a recognised specific discipline at this time it is not identified as such in diaries or other documents. That said it was apparent that ‘Lone Working’ is adequately covered within the overall risk assessment. The risk here is that many of the staff/Officers did not understand the term ‘Lone Worker’ and as such staff/Officers who have not been risk assessment may find themselves in a ‘Lone Working’ situation without the relevant training or knowledge to deal with any potential threat. | All staff/Officers be made aware of what ‘Lone Working’ is and the requirement to be Risk Assessed if they believe they may be now, or at some future time, Lone Working. | 3 | *Link action 1 in regards to communication.* | *31/03/19* | *Head of People & Development* |
| 2 | Compliance | ‘Lone working’ is not a specific health and safety matter that is used as a driver for lone working activities. Indeed several of the Officers contact regarding ‘Lone Working’ had never heard of the phrase and were not sure what was meant by it. It is, however, clear that it is an integral part of a Police Officers activities and would be included as part of their personal training plan. As such risk assessments are undertaken for all operational staff/officers that would include all known ‘Lone Workers’ and these assessments are managed by the Operations and Emergency Planning Manager. The specific personal risk assessments cover the planned activities for the Officer and this includes ‘Lone Working’. However, there is not a separate specific list of risk assessments that relate specifically to ‘Lone Working’. While this is not an issue and ‘Lone Working’ is included in personal risk assessments, there is no overarching awareness of ‘Lone Working. Indeed, HR do not have any involvement with ‘Lone Working’. It would be good practice as part of the wellbeing initiative to include Lone Working as an integral part of this initiative. | HR to include Lone Working as part of the wellbeing initiative. | 3 | *Included in the wellbeing strategy and delivery plan.* | *31/03/19* | *Wellbeing Manager* |
| 3 | Compliance | It would be good practice to raise the profile and awareness of ‘Lone Working’ within the Force for both Officers and staff. This should be done by having the Lone Worker HSE guidelines clearly present on the Force’s intranet. This was actioned during the audit visit.  In addition, there is a Lone Workers NCALT e-learning package available via the intranet and all “lone workers” should be encouraged to use this training facility. | Human Resources to follow up on the raising awareness initiative and to obtain evidence that Lone Working is fully understood by Officers and staff. | 3 | *HR Business Partners to include Lone Working as a regular agenda item for the HR and Wellbeing performance management pack for review on a quarterly basis.* | *01/11/18* | *Head of People & Development* |
| 5 | Operational | ‘Lone Working’ is an important area for the Force and should be appropriately managed, monitored and controlled. Regular reporting on these should also be made to an appropriate Board to identify trends and to make sure the risks flowing from these areas of actively are adequately controlled, reported upon and appropriate action taken to prevent or reduce the risks in future. | A reporting framework which enables Lone Working to be regularly monitored and reported to an appropriate Board within the Force be adopted. | 3 | *This can be report twice a year at the risk and governance board.* | *31/03/18* | *Dave Moir Head of Specialist Support and Planning Unit* |

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| **Operational Effectiveness Matters** |

| **Ref** | **Risk Area** | **Item** | **Management**  **Comments** |
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| 1 | Directed | Consideration be given to raising the profile of Lone Working as a separate Health and Safety requirement and to have a distinct Incident and Near Miss Register to record all events with a clear audit trail of actions taken to prevent or reduce the risk of future occurrence. Officers to be required to maintain, use of diaries, contact information, scheduled call-in times etc. to control and monitor Lone Working situations. | *A mechanism has now been produced whereby NCALT eLearning packages covering lone working can be accessed by all members of staff. To support this, HSE guidance documents on lone working have been uploaded on the Specialist Support and Planning Unit share point.* ***The Brief*** *dated 1/11/2018 has circulated this information to all staff.* |
| 2 | Compliance | Consideration be given to creating and maintaining a Central Register to record Lone Worker incidents and near misses. | *A mechanism for near miss reporting is in existence and is suitable to record lone worker incidents* |
| 3 | Compliance | Staff to be informed and trained in identifying and reporting Lone Working near misses. | *The near miss reporting process has periodically been relayed to all staff since the current procedure was introduced in 2014.Given the very low numbers of reports received re-iteration of the process and the definition of a ‘near miss’ would be advantageous.* |

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| **Detailed Findings** |

**Introduction**

1. This review was carried out in September 2018 as part of the planned internal audit work for 2018/19. Based on the work carried out an overall assessment of the overall adequacy of the arrangements to mitigate the key control risk areas is provided in the Executive Summary.

**Background**

1. With reduced funding it is now more common for Police personnel to be working alone rather than in pairs or groups. Lone working is therefore widespread throughout the Force.

**Materiality**

1. A significant proportion of the Forces' employees spend some of their time working alone and as a potential high risk appropriate monitoring and training is essential.

**Key Findings & Action Points**

1. The key control and operational practice findings that need to be addressed in order to strengthen the control environment are set out in the Management and Operational Effectiveness Action Plans. Recommendations for improvements should be assessed for their full impact before they are implemented.

**Scope and Limitations of the Review**

**Rationale**

1. This is a periodic audit to review the lone working arrangements for the Force and staff. (Lone Working refers to those Officers and staff who due to the nature of their work may involve them on their own entering into risky situations such as visits to known criminals etc.

**Scope**

1. The review included the following areas:

* Home and Lone working guidance is available on the Force intranet; this has been produced by the Health and Safety Executive. Staff undertaking lone working are sufficiently managed in line with corporate and departmental policies and procedures (e.g. use of diaries, contact information, scheduled call-in times etc.);
* Risk assessments are consistently completed and submitted to a dedicated Force officer (e.g. Safety Advisor), including more detailed risk assessments where the generic assessment is considered high risk;
* Risk assessments are periodically reviewed by the Safety Advisor (or equivalent); and
* A central register is promptly updated following the receipt of incident reports and access to the register is adequately controlled. There is evidence of review of the register to identify potentially dangerous scenarios.

1. The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Internal Audit Plan.

**Disclaimer**

1. The matters raised in this report are only those that came to the attention of the auditor during the course of the internal audit review and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

**Risk Area Assurance Assessments**

1. The definitions of the assurance assessments are:

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| **Substantial Assurance** | There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved. |
| **Reasonable Assurance** | The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved. |
| **Limited Assurance** | The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved. |
| **No Assurance** | There is a fundamental breakdown or absence of core internal controls requiring immediate action. |

**Acknowledgement**

1. We would like to thank staff for their co-operation and assistance during the course of our work.

**Release of Report**

1. The table below sets out the history of this report.

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| **Date draft report issued:** | 16th October 2018 |  |
| **Date management responses received:** | 19th November 2018 |  |
| **Date final report issued:** | 22nd November 2018 |  |

1. The following matters were identified in reviewing the Key Risk Control Objective:

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| **Directed Risk: Failure to direct the process through approved policy & procedures.** |

* 1. The Force do not have a separate Policy and/or Procedure for ‘Lone Working’. They do, however, use the Health and Safety Executive (HSE) Guidance document on Lone Working as a corporate procedure.
  2. The use of the HSE Lone Working Guide is seen as good practice as the HSE will maintain this Guide and will also have version control over the document.
  3. Staff/Officers who are lone workers do not receive specific ‘Lone Working’ training, however, lone working is an integral part of their personal training plan. All Operational Officers are risk assessed to include lone working and these assessments are managed and monitored by the Operations and Emergency Planning Manager.
  4. Staff/Officers are therefore not currently aware of ‘Lone Working’ as a specific issue, although they would have been risk assessed and these assessments would have included lone working. It may happen that for any staff/Officer who are not risk assessed that they may on occasion lone work and this may not be identified. It would therefore be good practice to raise the awareness of ‘Lone Working’ within the Force to all staff and Officers.

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| **Operational**  **Effectiveness Matter: 1** | **Consideration given to raising the profile of ‘Lone Working’ as a separate Health and Safety requirement and to have a distinct Incident and Near Miss Register to record all events with a clear audit trail of actions taken to prevent or reduce the risk of future occurrence. Officers to be required to maintain use of diaries, contact information, scheduled call-in times etc. to control and monitor ‘Lone Working’ situations.** |

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| **Compliance Risk: Failure to comply with approved policy and procedure leads to potential losses.** |

* 1. As ‘Lone Working’ is not a recognised specific discipline at this time it is not identified as such in diaries or other documents. That said, it was apparent that ‘Lone Working’ is adequately covered within the overall risk assessment. The risk here is that many of the staff/Officers did not understand the term ‘Lone Worker’ and as such staff/Officers who have not been risk assessed may find themselves in a lone working situation without the relevant training or knowledge to deal with any potential threat.

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| **Recommendation: 1** | **All staff/Officers be made aware of what ‘Lone Working’ is and the requirement to be risk assessed if they believe they may be now, or at some future time, Lone Working.** |
| **Priority: 3** |

* 1. There is a difference between Lone Workers and Home Workers, this being as below.

A ‘Lone Worker’ is an employee who performs an activity that is carried out in isolation from other workers without close or direct supervision. Such staff may be exposed to risk because there is no-one to assist them and so a risk assessment may be required.

‘Home Workers’ are defined as people working from their homes or from other premises of their choosing other than the workplace, for payment, which results in a product or service specified by the employer. Homeworkers do not own or operate the business they work for.

* 1. The Force Officer, who manages risk assessments, is the Operations and Emergency Planning Manager. Risk assessments are undertaken for all operational Officers. This risk assessment includes Lone Working, as required, but is not specific for Lone Working.
  2. Lone working is not a specific health and safety matter that is used as a driver for lone working activities. Indeed, several of the Officers contacted regarding Lone Working had never heard of the phrase and were not sure what was meant by it. It is, however, clear that it is an integral part of a Police Officers activities and would be included as part of their personal training plan. As such, risk assessments are undertaken for all operational staff/officers that would include all known ‘Lone Workers’ and these assessments are managed by the Operations and Emergency Planning Manager. The specific personal risk assessments cover the planned activities for the Officer and this includes ‘Lone Working’. There is, however, no separate specific list of risk assessments that relate specifically to ‘Lone Working’. While this is not an issue and ‘Lone Working’ is included in personal risk assessments, there is no overarching awareness of ‘Lone Working’. Indeed, HR do not have any involvement with Lone Working. It would be good practice as part of the wellbeing initiative to include Lone Working as an integral part of this initiative.

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| **Recommendation: 2** | **HR to include’ Lone Working’ as part of the wellbeing initiative.** |
| **Priority: 3** |

* 1. In addition, it would be good practice to raise the profile and awareness of ‘Lone Working’ within the Force for both Officers and staff. This should be done by having the Lone Worker HSE guidelines clearly present on the Force’s intranet. In addition, there is a Lone Workers NCALT e-learning package available via the intranet and all ‘Lone Workers’ should be encouraged to use this training facility At a meeting with the Operations and Emergency Planning Manager this suggestion was accepted and it was agreed that the relevant documents would be placed onto the intranet and to progress informing all staff/Officers of this reference material. Following the meeting it was confirmed that the relevant documents have been uploaded to the intranet and instruction give for an all staff/Officer notification to be issued drawing attention to the Lone Working guidelines/procedures.

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| **Recommendation: 3** | **Human Resources to follow up on the raising awareness initiative and to obtain evidence that Lone Working is fully understood by Officers and staff.** |
| **Priority: 3** |

* 1. At the present time ‘Lone Working’ is an integral part of risk assessments that are managed by the Specialist Support and Planning Unit (Operations and Emergency Planning Manager). They do not have corporate control and the risk is that some Officers/staff members who have not been risk assessed may be involved in ‘Lone Working’ without having received any instruction or training. It would therefore be an enhanced control feature to have a more corporate approach to ‘Lone Working’ with HR taking a more informed approach to monitor ‘Lone Working’ arrangements. Appropriate guidance and training should therefore be made available and coordinated for all staff/Officers. In providing this training a clear definition of ‘Lone Working’ should be made to avoid any misunderstanding.

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| **Recommendation: 4** | **Human Resources to have a corporate responsibility for ‘Lone Working and to monitor the ‘Lone Working’ arrangements.** |
| **Priority: 2** |

* 1. Risk assessments would be undertaken at an early stage in an Officers career (before ‘Lone Working’ commences). The risk assessment is driven by the expected operational duties for that Officer and tailored to their requirements. Should an Officer's duties include ‘Lone Working’ then this would form part of the risk assessment.
  2. The Specialist Support and Planning Unit (SSPU) manages the risk assessment process. They produce risk assessments which are applied force-wide. If an individual/ specialist role requires a risk assessment then the management of the department in which that role sits will approach SSPU to undertake that risk assessment. SSPU will also deliver risk training to all new Officers, Specials and PCSO’s as well as Police Search Advisors and licensed search staff. Any reminders for follow up training is the remit of Training Administration, managed by Sopra Steria, who hold the details of frequency-based training.
  3. While an incident register does not exist all incidents are reported, reviewed and any lessons learnt progressed. Staff/Officers are also encouraged to report all “near misses”, however, these are not always apparent at the time and therefore very few are reported. For the current year only three near misses have been reported and all of these are building related and have been resolved as part of facilities management. Although staff have been informed about the near miss procedure it would be good practice to continue to raise its awareness, as this would be a very helpful tool in helping to prevent actual incidents.

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| **Operational Effectiveness Matter: 2** | **Consideration given to creating and maintaining a Central Register to record Lone Worker incidents and near misses.** |

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| **Operational Effectiveness Matter: 3** | **Staff to be informed and trained in identifying and reporting Lone Working near misses.** |

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| **Operational Risk: Failure to identify opportunities to operate more efficiently or to be prepared for forthcoming changes.** |

* 1. ‘Lone Working’ is an important area for the Force and should be appropriately managed, monitored and controlled. Regular reporting on these should also be made to an appropriate Board to identify trends and to make sure the risks flowing from these areas of actively are adequately controlled, reported upon and appropriate action taken to prevent or reduce the risks in future.

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| **Recommendation: 5** | **A reporting framework which enables Lone Working to be regularly monitored and reported to an appropriate Board within the Force be adopted.** |
| **Priority: 3** |

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