



# Health & Safety Policy

2022  
Version 4

Policy Refresh  
Policy Department, PFEW

The PFEW Policy Department has embarked on a concerted effort to formulate and/or revise policy documents, titled "Policy Refresh", on key topics concerning its members.

These strategic documents are evidence-based, aligned with PFEW's Business Areas, as well as championed by National Board members.

It is aimed for PFEW to maintain clear policy positions on key topics, that allows members to have clarity on PFEW's official position statements that are backed by evidence.



## HEALTH AND SAFETY POLICY

Version 4

### Policy Principles and Rationale

Representing the wishes of the membership, a policy is required to ensure that officers' physical and mental health needs are prioritized. This policy was developed in response to the concerns raised by the Police Federation of England & Wales (PFEW) Health and Safety leads.

### Objectives of this Policy

- To ensure our members' welfare, health, and safety.
- Ensure all relevant health and safety legislation is complied with.

### Background

The Police (Health & Safety) Act 1997 defines police officers as being 'employees' and 'at work' while on duty for the purposes of health and safety legislation. The Health and Safety at Work etc Act 1974 (HSWA) and the regulations made under it apply to all work activities of the Police Service. The primary duties under HSWA are on employers and since the 1997 Act, chief constables were deemed the employers of police officers and therefore primarily responsible for complying with this legislation. A breach of any of these duties is potentially both a civil and a criminal offence.<sup>1</sup>

It is recognised that officers will inevitably face significant and serious dangers in the course of their work. Health and safety legislation exists to provide protections for both officers and the public, and is not designed to hinder the police's ability to deliver an effective emergency service.

### Policy Statement

PFEW believes that there is no legal reason for the police service to be treated differently from any other service or organisation. Section 2(1) of the HSWA states that it is the central duty of the employer to ensure so far as is reasonably practicable the health, safety, and welfare of all employees. The qualification "so far as is reasonably practicable" is a high standard to meet. The chief constable must consider whether there is a possibility of danger and take all reasonable steps to protect against it. This includes considering risks which are not obvious and showing that it was not reasonably practicable to do more to prevent that risk.

This can be done by adopting suitable robust, proportionate, carefully considered, and non-bureaucratic risk assessments which:

- identify significant risks,
- set out systems of work which specify appropriate control measures, equipment, and competences and
- are effectively implemented.

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<sup>1</sup> HSE Striking the balance between operational and health and safety duties in the Police Service: An explanatory note

[www.hse.gov.uk/services/police/explanatory-note.pdf](http://www.hse.gov.uk/services/police/explanatory-note.pdf)

PFEW maintains that forces should ensure that, whilst dangerous activities may need to be undertaken, the risk involved should be mitigated to an acceptable level.

Proper observance of health, safety and welfare must go hand in hand with the provision of effective policing. In the hazardous police environment, the legislation strives to create work surroundings, which are free, as far as is reasonably practicable, from risk, so that officers' working conditions are as safe as possible.

PFEW understands it may not be possible to control or mitigate all risks. HSWA does not require all risks to be eliminated and it is recognised that even with all reasonably practicable precautions serious accidents and injury may still occur. It should be noted for an offence to have been committed under the H&S Act, there simply has to be a risk of harm, nobody needs to have been hurt.

Police officers can often be faced with unpredictable risks. They could be sent into dangerous situations in circumstances when anyone else would be seeking to get away from the danger. It is therefore vital that forces recognise the challenging nature of operational policing and the hazards faced.

Health and Safety principles must flow throughout the culture of the police service so that the right balance is achieved between operational policing and health and safety duties. Sound Health and Safety Management Systems must be fully integrated into operational policing to reduce risks wherever reasonably practicable.

PFEW is expressly treated as a Trade Union, for the purposes of being appointed as safety representatives and of representing other officers in consultations with chief constables. Section 2(6) of the HSAW (below) imposes a duty on employers to consult with such representatives.

PFEW will work with forces to represent our members and ensure their concerns and safety is at the forefront of all planning considerations.

PFEW takes seriously its own health and safety responsibilities with regards to its staff and is committed to meeting all relevant statutory requirements. It is also vital that, as an employer, PFEW provides a safe working environment for all members of staff.

### **Procedures/implementation**

PFEW will push to ensure that health and safety considerations are fully integrated into force operational policies and guidance. We will consult with our members on matters affecting their health and safety.

There is a statutory requirement under Section 2(6) of the HSWA for employers to consult with their safety representatives. Regulation 4A of Safety Representatives and Safety Committees Regulations 1977 states that every employer shall consult safety representatives in good time on the introduction of any health and safety measure which affects those who the representative represents and so that the representative can provide feedback which seeks to improve the working conditions for all.

PFEW is committed to improving working conditions and protecting officers from accidents and ill health and will push forces to comply with this requirement. We will provide information, training and continuous professional development to our Health and Safety Representatives to equip them to influence forces to keep their officers safe.

PFEW will ensure forces take seriously their health and safety responsibilities to:

- maintaining a health and safety compliant working environment, especially with regards to the adequate control of health and safety risks arising from the duties of police officers,
- consulting with their safety representatives on matters affecting their health and safety,
- providing the necessary equipment, information, training, and supervision for officers,
- preventing accidents and cases of work-related ill health, including issues relating to infectious diseases and other contagions,
- recognising the impact policing has on the physical and mental health of officers and the supportive measures available to assist officers.

The Service's commitment to reducing absence will not be effective unless working hours and workload are reduced to enable a proper work life balance and the first step would be to ensure they do not exceed the WTR's recommendation of 48 hours average per week. Excessive hours are known to lead to health problems, stress, and higher accident rates. We have consistently supported the government's approach to introducing a work life balance and are firmly of the view that this will be helped by strict adherence to that legislation which promotes a healthier and safer workplace for all.

PFEW considers it vital that forces adhere to the principles within the HSWA relating to the recording and investigation of accidents and near misses. We believe this will assist in promoting wellbeing and reduce absences. We also support detailed recording of both physical and mental health injuries of officers connected to the workplace and will push for more effective management of this. It is only by understanding the numbers and reasons for such occurrences that changes can be made to protect officers from further injury.

In addition, PFEW supports the Health and Safety Executive's Strategy for 'The Health and Safety of Great Britain: Be part of the solution' and will encourage forces to use the Executive document as a way of reducing sickness absence.

PFEW firmly believes that an effective occupational health policy should include the use of rehabilitation programmes to facilitate the earlier return to work of individuals who have had prolonged periods of absence.

PFEW is equally committed to providing a safe working environment for our staff. We will consult with the representatives of our employees e.g. the Staff Forum, on matters affecting their health and safety and provide relevant information, equipment and training, as appropriate.

Responsibility is delegated to the National Secretary and/or appropriate sub-committee.

## Evidence

This section details some key results from the PFEW 2018 Demand, Capacity and Welfare Survey in relation to officer safety.

### Exposure to hazards (safety)

- **76.1%** of respondents from relevant frontline roles (Neighbourhood, Response, Roads Policing, Operational Support, Investigations, and other) indicated that they are *often* or *always* single-crewed; **almost three percentage points higher** than in the 2016 iteration of this survey (**73.3%**).
- When opening this question to all respondents, the proportion that reported being *often* or *always* single-crewed was **74.9%**.
- **41%** of respondents reported that the fear of future violence from members of the public concerned them '*a lot*' or '*very much*.'

- Exposure to potentially traumatic incidents was assessed via a bespoke scale developed for the 2018 Demand, Capacity and Welfare Survey. The scale consists of 20 incidents that could be considered extremely stressful, upsetting, or dangerous. Key results from the scale include the following:
  - Almost all officers (**99.6%**) reported experiencing one or more of these types of incidents in the line of duty at some point during their service, and **61.7%** indicated that they had experienced at least one of these types of incidents within the previous 12 months.
  - **44%** of respondents (who had also reported being an Authorised Taser Officer) reported that they have had to discharge a Taser to protect themselves, a member of the public, or a colleague at some point during their service.
  - **39%** reported that they have been involved in a serious road traffic accident at some point during their service.
  - **21%** reported that they had been exposed to a toxic substance in the line of duty at some point during their service.

## Violence and injuries

### 1. Unarmed attacks

- **Almost a third** (31%) of respondents reported being the recipient of *unarmed physical attacks at least monthly* over the previous 12 months.

*Who is most often affected by unarmed attacks?*

- A statistically significant relationship was found between *unarmed physical attacks* and role, rank and gender.
- A **higher proportion of male, and a lower proportion of inspecting ranks** reporting that they had been the victim of *unarmed physical attacks* at least once a month in the previous year.
- The role with the **highest proportion of respondents** reporting that they had been the victim of *unarmed physical attacks* at least once a month in the previous year was *Custody* (**70.3%**) followed by *Response* (**59.8%**).

### 2. Armed attacks

- **30%** of respondents indicated that they had been *attacked with a weapon at least once* over the past 12 months.

*Who is most often affected by armed attacks?*

- From the three variables examined (role, rank and gender), only an officer's *role* was found to be significantly related to the frequency of *attacks with a deadly weapon*.
- The role with the **highest proportion of respondents** reporting that citizens had directed the use of a deadly weapon at them at least once a month during the previous year was *Operational Support* (**8.7%**), followed by *Response* (**6.6%**).

### 3. Injuries caused by work-related violence

- Respondents reported a total of **1,648 incidents** that resulted in injuries due to work related violence that **required sick leave or days away from normal duties to recuperate** in the previous 12 months.
- At least **13,069** days of sickness absence or relief from normal duties were incurred as a result of injuries arising from **work-related violence**; representing, on average, **4.2** days per respondent that reported being injured in this manner.

*Who is most often injured by work-related violence?*

- A statistically significant relationship was found between *injuries due to work-related violence* and role, rank and gender.

- A **higher proportion of male, and a lower proportion of inspecting ranks** reported that they had suffered an injury due to *work-related violence*.
- The role with the highest proportion of respondents reporting injuries due to *work related violence* in the previous 12 months was *Response (38.2%)* followed by *Custody (31.9%)*

### Injuries caused by accidents at work

- Respondents reported a total of **1,123** incidents that resulted in injuries due to work-related accidents that **required sick leave or days away from normal duties to recuperate** in the previous 12 months.
- At least **9,455** days of sickness absence or relief from normal duties were incurred as a result of injuries arising from **work-related accidents**; representing, on average, **4.6** days per respondent that reported being injured in this manner.

*Who is most often injured by work-related accidents?*

- A statistically significant relationship was found between injury due to *work-related accidents* and *role*.
- The **highest proportion of respondents** reporting injuries due to a *work-related accident* in the previous 12 months was *Roads Policing (22.7%)* followed by *Response (22.1%)*.

### Access to equipment (protection)

- Whilst **52.2%** of respondents want to have access to *double-crewing at all times* whilst they are on duty, only **8.2%** actually report this to be the case.
- Although **57.6%** of respondents *want to have access to Taser at all times* whilst they are on duty, only **16.4%** actually report this to be the case.
- **65.1%** of respondents (who reported that Taser was applicable to their role) reported that they *want more access to Taser than they currently have*.
- **78.5%** of respondents reported that they *always* have access to a *baton* whilst they are on duty, making it by far the most readily available form of personal protective equipment/measure, followed by *incapacitant spray (76.9%)*.

### Scope of the Policy

This policy applies to all police officers.

### Key Stakeholders

- The National Police Chiefs' Council (NPCC)
- The Association of Police and Crime Commissioners (APCC)
- Home Office, UK Government
- PFEW Membership
- Local Branch Chairs and Secretaries
- Her Majesty's Inspectorate of Constabulary and Fire Service (HMICFRS)
- College of Policing
- Chief Police Officers' Staff Association (CPOSA)

This is not an exhaustive list

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**Policy Review**

Recommend to review after the 12 month period.

**Policy Document – Versions**

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| Version 4 | Drafted by PFEW Policy Department | Policy Approved on:<br>17 <sup>th</sup> August 2022 | Policy to be revised in:<br>16 <sup>th</sup> August 2023 |
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**Approved by National Board on: 17<sup>th</sup> August 2022**