Health and Safety Risk Management Policy

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Policy statement and principles

What

This policy outlines NZ Police principles for, and the approach to, managing risks to our workers and others as defined by the [Health and Safety at Work Act 2015](#) (HSWA).

Why

NZ Police must comply with the [Health and Safety at Work Act 2015](#) (HSWA). The following sections of HSWA inform this operational policy:

- **Section 30 Management of Risks** - This requires PCBUs to eliminate risks to health and safety, so far as reasonably practicable and if it is not reasonably practicable to eliminate risks to health and safety, to minimise those risks so far as reasonably practicable.
- **Section 36 Primary duty of care** - This requires PCBUs to ensure, so far as reasonably practicable, the health and safety of workers at work for the PCBU, workers whose activities are directed or influenced by the PCBU and other persons, from work carried out as part of the conduct of the business or undertaking.

The [Health and Safety at Work (General Risk and Workplace Management) Regulations 2016](#) have further requirements around the maintaining and review of control measures to mitigate risk.

How

Health and safety risks can be managed by following a four-step process (WorkSafe 2017):

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ACT

Take action on lessons learnt

- Regularly review the effectiveness of control measures at scheduled periods.
- Review incidents or near misses and talk to your workers to check that the control measures are effectively eliminating/minimising work risks.
- Use the results of your reviews, investigations into incidents or near misses, and monitoring results to continuously improve control measures.

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PLAN

Assess risk and identify control measures

- Identify hazards that could give rise to work-related health and safety risks.
- Assess work risks to decide which risks to deal with, and in what order.
- You must eliminate or minimise risks so far as is reasonably practicable.
- Engage with your workers and their representatives when identifying and assessing risk, and when making decisions about the ways to eliminate or minimise the risks.

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CHECK

Monitor performance of control measures

- Implement appropriate means for workers to report incidents, near misses or health and safety concerns.
- Monitor workplace conditions and worker health so far as is reasonably practicable.
- Engage with your workers and their representatives when making decisions about procedures for monitoring.

②

DO

Implement control measures

- Implement control measures that effectively eliminate or minimise the risk.
- Give preference to control measures that protect multiple at-risk workers at the same time.
- Personal protective equipment (PPE) should not be the first or only control measure considered.

Note: A more detailed description of this process is described after the roles and responsibilities section of this policy.

Terms and definitions

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Term	Definition or explanation
Control measure	A way of eliminating or minimising risks to health and safety.
Hazard	Something (an activity, circumstance, event, substance, or behaviour) with potential to cause harm.
Health and Safety Risk	The likelihood that a hazard will cause harm in combination with the consequence of injury, damage or loss that might occur.
Critical health and safety risk	Risks with the greatest credible potential to kill or cause life-threatening or life-altering injuries or illness. This includes risks with a low likelihood of occurrence.
Hierarchy of controls	If a risk cannot be eliminated, a PCBU must then minimise the risk so far as reasonably practicable.

Reasonably Practicable (Section 22 of HSWA 2015)	What is or was reasonably able to be done to ensure health and safety taking into account and weighing up relevant matters including:
	
	    - the likelihood of the risk concerned occurring or workers being exposed to the hazard
	    - the degree of harm that might result
	    - what the person concerned knows, or ought reasonably to know, about:
	        - the hazard or risk
	        - ways of eliminating or minimising the risk
	    - the availability and suitability of ways to eliminate or minimise the risk
	    - after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.
	
	Control measures can only not be implemented where cost is grossly disproportionate.

Risk Assessment	A formal process of identifying hazards, assessing the risk they generate and then either eliminating or controlling (minimising) the risk.

Roles and responsibilities

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Role	Responsibility
All workers	- Follow all reasonable instructions to manage risk by using controls identified by the organisation and your own work group. - Report emerging risks to line manager. - Request support from Health and Safety representatives if a known risk is not being managed at a local level. Follow escalation pathways (see H&S Committee TenOne page for details).
Work Group Lead	- Create, maintain and review regularly (annually), a risk register related to your work group as each work group will have role specific risks. - Engage with workers when assessing work risks and how to manage those risks. - Provide guidance and support to workers in managing health and safety risks (e.g. SOP's, SWMS etc).
District Health and Safety Advisor	- Support workgroups in undertaking risk assessments, task analysis and any other risk identification tools which enable completion of a risk register. - Remind workgroups to review risk registers annually or if there is a major incident which shows controls are not effective.
Safer People Group	- Owner of this operational policy - Ensure NZ Police remain aware of current and emerging health and safety risks, including critical risks. - Provide analysis of best practice and innovation to inform ongoing improvements in Critical risk management.
National Health and Safety Committee	- Provide support to workgroups who have escalated a health and safety risk which has not been able to be resolved at a local level.
Health and Safety Advisory Group	- This advisory group ensures the application and administration for prioritising our verification activities to address material risk to Police, and to establish a way to prioritise recommendations made and robust reasoning for rejecting recommendations.
Health and Safety Governance Group	- This governance group approves overarching Wellness and Safety systems and content, including organisational policy and process and procedures relating to wellness and safety. Monitors strategic indicators of critical risk management performance and progress towards strategic goals; and seeks assurance in relation to necessary corrective actions.

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1. Plan: assess risk and identify control measures

Assessing Risk

There are several methods which can be used to assess risk. The NZ Police Health and Safety Risk assessment form can be found [here](#).

Please consult with your District Health and Safety Advisor if you are unsure of how to proceed with a risk assessment.

Risk types

Risk type	Examples	Health/injury consequence
Physical environment	Machinery and equipment Noise volumes Electrical/power Trips, slips and falls Extreme heat and cold temperatures	Fractures, lacerations, death Hearing loss Shock, burns Musculoskeletal injury (sprains/strains) Heat stroke, hypothermia
Biological	Blood and bodily fluids Air born infectious disease Bacteria, mould, bites	Illness Infection
Hazardous substances	Hazardous chemicals (toxic, carcinogenic, sensitising, corrosive, irritants) Dust Fumes (diesel/petrol) Asbestos	Lung disease Dermatitis Burn Cancer
Job design/process	Ergonomics Manual handling Repeated, sustained awkward movements Shift work Inadequate training and supervision Unsuitable equipment Hours and pace of work	Musculoskeletal disorder/injuries Fatigue Burnout
Psychosocial	Violence and aggression Bullying Excessive work demands	Stress Depression Anxiety PTSD

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New risks may be introduced into the workplace in the following ways:

- new technology
- new equipment or machinery
- modified equipment
- change in process
- new workers
- societal changes in attitude
- new premises or protective security requirements
- working from home.

Where there is significant change proposed, which may impact the work done, the workplace, the equipment used, or new designs proposed, then health and safety must be considered prior to implementing any change:

- What new or emerging risks have been identified?
- How can these risks be controlled to ensure no harm comes to workers and others as a result of the change?

It is recommended that when a new hazard is identified, the workgroup affected should seek advice from subject matter experts, health and safety specialists, and the workers that may be impacted by any change to ensure the associated risk is managed so far as it reasonably practicable. Those who do the work must be involved as their expertise can provide clarity on whether control measures will work.

How do workers identify new risks?

There are two methods to identifying risks, proactive and reactive identification.

Proactive identification

- Task analysis.
- Planned risk assessments which can be a formal process or by completing a dynamic risk assessment using TENR methodology.
- Routine audits.
- Staying up to date with requirements of legislation, regulations and standards.
- Regular safety inspections.
- Line up/pre-start meetings.
- Critical risk verification programme.

Reactive identification

- Health and safety incident reporting (Near miss, incident with injury, notifiable incidents).
- Adverse results from employee health monitoring.

How do workers report new risks?

All workers are required to report new risks so they can be controlled to prevent harm occurring.

Risks are reported through MyPolice > create incident, or by using the hazard and risk notification form below.

https://tenone.police.govt.nz/page/hr-info/people-and-capability-group/safer-people/safer-people-forms
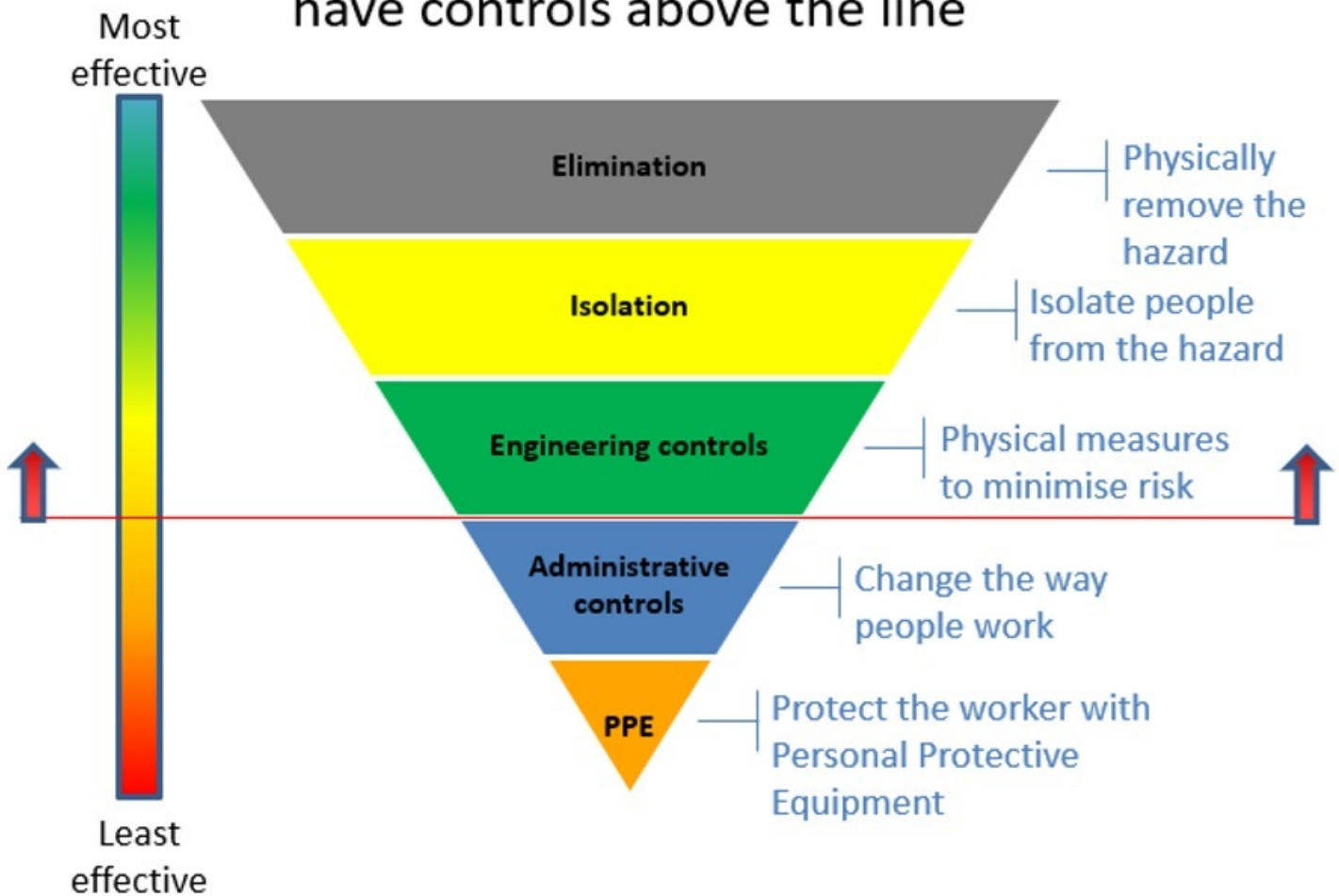
Identifying control measures

Controls are those things that are used to minimise a risk when the risk cannot be eliminated. The first step is to try and eliminate the risk. If this is not reasonably practicable to do, the risk is minimised so far as reasonably practicable.

The below hierarchy of controls shows the most effective to least effective control mechanisms. Controls above the yellow line are the most effective.

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Hierarchy of controls

For critical controls the aim is to have controls above the line

Most effective

Least effective

Elimination — Physically remove the hazard

Isolation — Isolate people from the hazard

Engineering controls — Physical measures to minimise risk

Administrative controls — Change the way people work

PPE — Protect the worker with Personal Protective Equipment

When using the hierarchy of controls to minimise risk, you first take one or more of the following actions that are the most appropriate and effective, taking into account the nature of the risk:

- substituting with a lower risk activity or substance e.g. substituting a hazardous chemical with a non-hazardous option.
- isolating the hazard/preventing people from coming into contact with it e.g. spit hoods, Perspex barriers in vehicles.
- applying engineering control measures e.g. cell design, barriers, extraction ventilation, fitting guards to machinery

If, after applying these higher order control measures a risk remains, you minimise this by putting in place administrative control measures.

Finally, if a risk still remains, you minimise the remaining risk by ensuring the provision and use of suitable personal protective equipment (PPE).

PPE is only used when other control measures alone can't adequately manage the risk. PPE should not be the first or only control measure considered and WorkSafe expects you to give preference to other control measures that protect multiple at-risk workers at once.

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2. Do: Implement control measures

Types of control measures

This table provides examples of different types of control measures.

Action	What is this?	Example
Eliminating	Removing the sources of harm e.g. equipment, substances or work processes	- Removing a trip risk or getting faulty equipment repaired. - Prefabrication of components to eliminate cutting (to eliminate risks from airborne contaminants, vibrations and noise). - Using non-toxic glue instead of a toxic glue. - Using water-based paint instead of solvent-based paint.
Substituting	Substituting (wholly or partly) the hazard giving rise to the risk with something that gives rise to a lesser risk (e.g. using a less hazardous thing, substance or work practice).	- Buying quiet plant, equipment and vehicles. - Using methods that produce less vibration (e.g. using a cut off saw instead of an angle grinder).
Isolating/preventing contact	Isolating the hazard giving rise to the risk to prevent any person encountering it (e.g. by separating people from the hazard/preventing people being exposed to it). Isolation focuses on boxing in the hazard or boxing in people to keep them away from the hazard.	- Fitting screens or putting up safety barriers around the hazard for example: - Perspex barriers in I Car's, spit hoods. - Well-designed cells in custody units and prison escort vehicles.
Using engineering control measures	Using physical control measures including mechanical devices or processes.	- Modifying tools or equipment, or fitting guards to machinery. - Using extraction ventilation to remove harmful substances.
Using administrative control measures	Using safe methods of work, processes or procedures designed to minimise risk. It does not include an engineering control measure, or the wearing or use of personal protective equipment.	- Requiring all people to walk only within the painted pedestrian zones when on the factory floor. - Having emergency plans and evacuation procedures in place. - Having exclusion zones so workers don't unnecessarily go near noisy or dangerous equipment or tasks.
Using personal protective equipment (PPE)	Using safety equipment to protect against harm. PPE acts by reducing exposure to, or contact with, the hazard.	- Using safety glasses, overalls, gloves, helmets, respiratory gear and earmuffs associated with jobs such as handling chemicals or working in a noisy environment. - PPE is the least effective type of control and should not be the first or only control measure considered.

As soon as possible after you have made a decision as to what the most effective control measures are, you should:

- implement the control measures (e.g. install engineering control measures, put in place administrative control measures or PPE, change work procedures, processes or equipment, document your safe work procedures, and/or make changes to the work environment or facilities), sign off a training document if required

- ensure your workers know about the potential risks, what the control measures to manage the risks are and why it's important to use them, and how to apply them

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- review and update your emergency procedures/plan if needed.

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3. Check: monitor performance of control measures

Control measures should remain effective, be fit-for-purpose, be suitable for the nature and duration of the work and be implemented by workers correctly.

Monitoring the performance of control measures will show you if your control measures are working effectively.

Data to show effectiveness of control measures can be gathered by reviewing near miss and incident reports, completing critical risk verification and monitoring results of health monitoring.

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4. Act: take action on lessons learnt

All policies, processes and systems should have a regular review date and a review/audit process to check that they're being followed and are still fit-for-purpose.

Review incidents and near misses to identify their causes and what you need to change to prevent them from happening again.

Talk to your workers on an ongoing basis to check if the control measures are effectively eliminating/minimising work risks.

Use the results of your ongoing worker conversations, reviews/audits, investigations and workplace/worker health monitoring to help you to continually improve the effectiveness of the control measures.

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Resources and references

- Safer People
- Health and Safety at Work Act 2015
- Health and Safety at Work (General Risk and Workplace Management) Regulations 2016
- WorkSafe NZ (2017). Identifying, assessing and managing work risks, Quick Guide

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