

Monitoring of Health and Safety Performance 2020/21 – Half year report

| Report to | Date |
|--|------------------|
| Operational Delivery Directorate Board | 22 February 2021 |
| People Directorate Board | 25 February 2021 |
| Commissioner's Board London Fire Commissioner | 10 March 2021 |

| Report by | Report number |
|--------------------------------------|---------------|
| Assistant Director Health and Safety | LFC - 0494 |

Protective marking: **NOT PROTECTIVELY MARKED**Publication status: Published in full

I agree the recommended decision below.



Andy Roe
London Fire Commissioner

This decision was
remotely signed on
Date 07 April 2021

Summary

This is the half-year Health and Safety update and monitoring report for the year 2020/21. This report covers performance against a number of key health and safety indicators and measures.

Recommended decisions

That the London Fire Commissioner notes the report.

Background

1. This is the half year 2020/21 monitoring report. The report provides data on performance, as well as a commentary on the key performance indicators.
2. The report includes an update on:
 - preventive initiatives and interventions;
 - occupational health and wellbeing;
 - workforce liaison (health and safety committees), and
 - premises health and safety audit.

3. The report also includes information on leading indicators of health and safety performance.

Performance monitoring

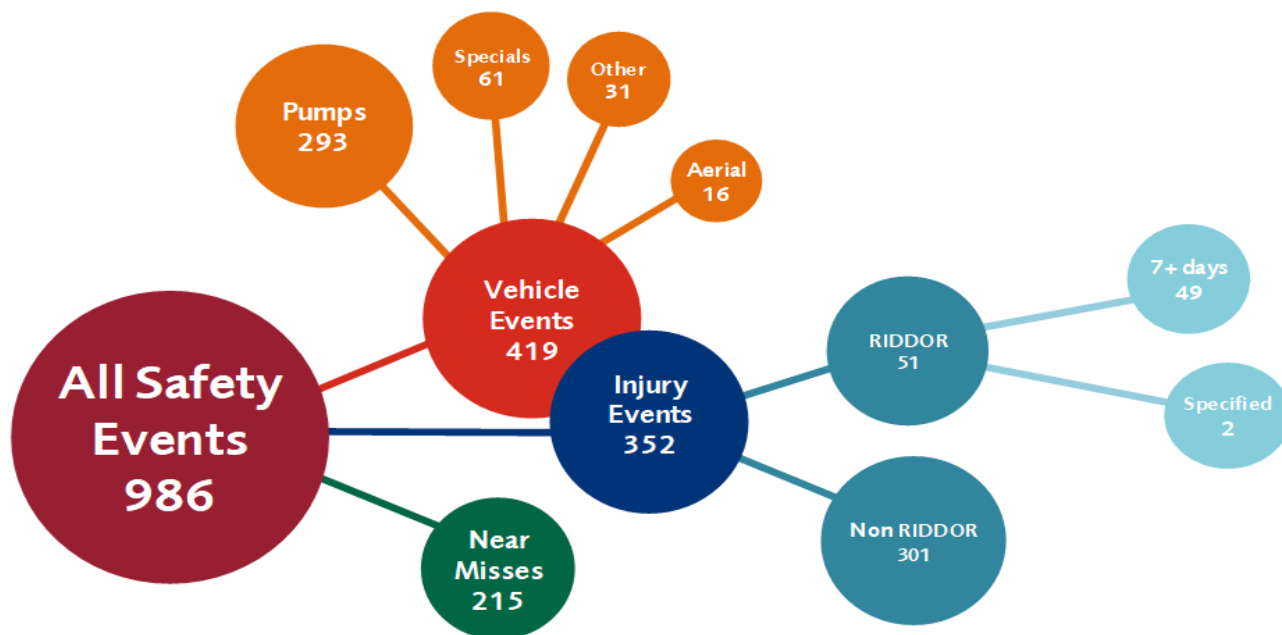
- Information on the 12 months to the end of September 2020 for the three corporate health and safety performance indicators is set out in table 1, with comparative data for 2018/19 and 2019/20. The five year trend indicator reflects the change in performance since 2016/17. For greater clarity, targets are displayed for all indicators, and performance for 2020/21 is colour (RAG) coded to show achievement against the normal target (see key below Table 1).
- All safety events for the period, broken down by type and showing the relationship between different types of event, are shown in table 2.

Table 1 – corporate key performance indicators

| | 2018/19 | 2019/20 | 12 months to end of September 2020/21 | Target 2020/21 | Trend over 5 yrs. |
|--|---------|---------|---------------------------------------|----------------|-------------------|
| | | | | normal | |
| CO 11: RTCs involving Brigade vehicles | 495 | 434 | 419 | 415 | ▼ |
| CO 12: Injuries from operational incidents | 159 | 125 | 137 | 116 | ▼ |
| CO 13: All RIDDOR ¹ injuries | 75 | 56 | 51 | 89 | ▼ |

| | | | |
|--------------|--|--|--|
| KEY | Performance Green – on target | Amber – within 10% of target | Red – more than 10% outside target |
| Trend | ▲ Numbers increasing, good performance trend | ▼ Numbers decreasing, good performance trend | ▼ Numbers decreasing, poor performance trend |
| | ▲ Numbers increasing, poor performance trend | ◀ No discernible trend | |

Table 2 - All safety events



¹ Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

Performance highlights – corporate indicators

6. In the long term there has been a reduction in RIDDOR¹ injuries to staff, which has been sustained over several years. The number of vehicle events has remained relatively static over the last 5 years, although there has been a reduction in vehicle events when compared with 2019/20, and the target is close to being met. The annual performance target for injuries sustained at operational incidents is not being met despite an improvement over the last 3 years. Key indicators highlights are as follows:

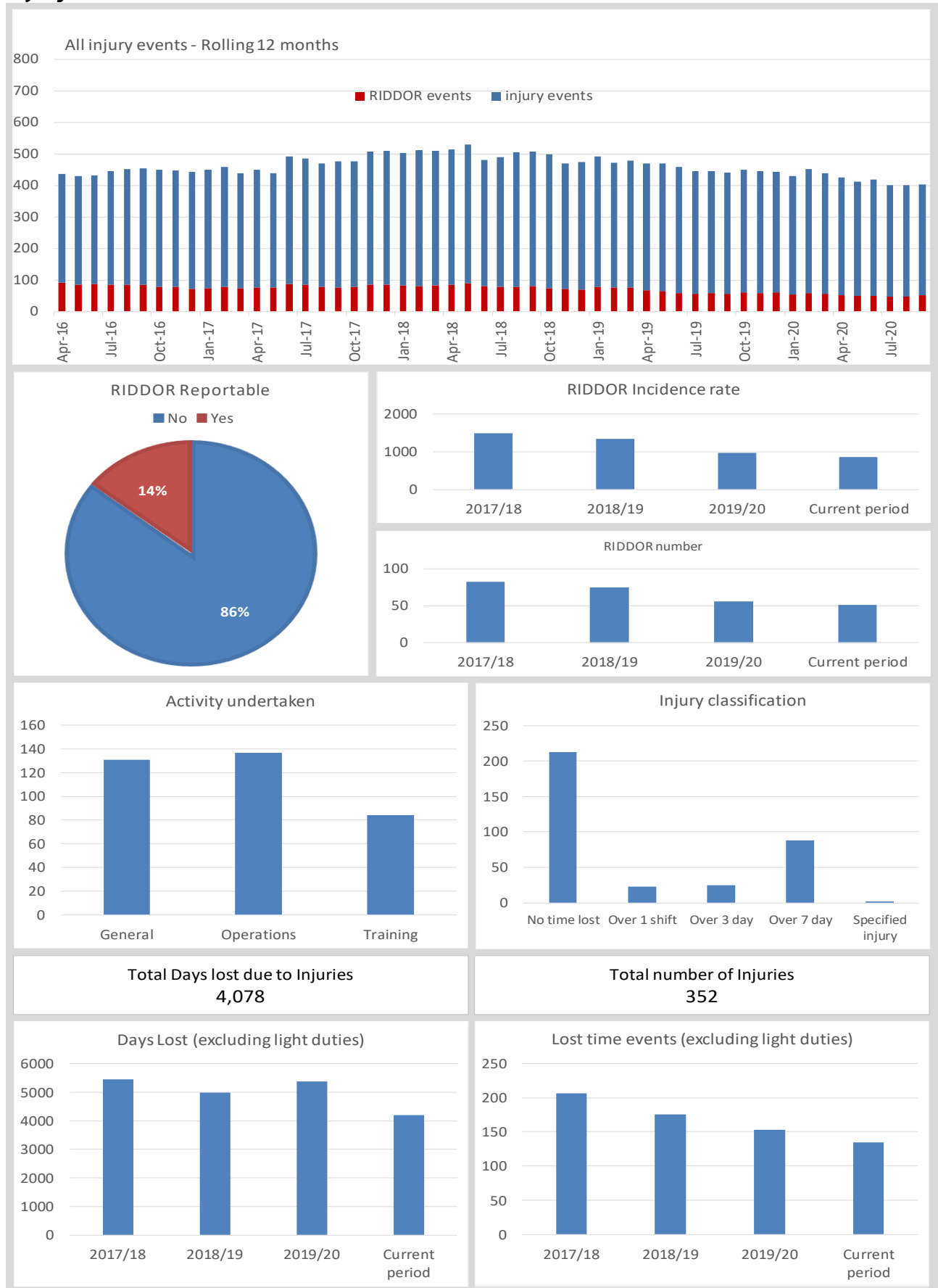
- the total number of **road traffic collisions** (419) indicates an improvement in performance;
- the **injuries from operational incidents** figure has increased during the 12 months to the end of September 2020 (137); it is currently over the target, but the long-term trend indicates a reduction in the number of injuries at operational incidents, and
- the number of **RIDDOR injuries** (51) is a reduction when compared to the outturn for 2019/20, and it is well below target (89).

Summary safety event data:

| | Q2 2019/20 | Q3 2019/20 | Q4 2019/20 | Q1 2020/21 | Q2 2020/21 |
|---------------------------------------|---------------|---------------|---------------|---------------|---------------|
| RIDDOR reportable injuries | Q2 | Q3 | Q4 | Q1 | Q2 |
| RIDDOR Injuries (Total) | 14 | 13 | 13 | 10 | 15 |
| - Fatalities | 0 | 0 | 0 | 0 | 0 |
| - Specified | 0 | 1 | 0 | 0 | 1 |
| - Over 7 day | 14 | 12 | 13 | 10 | 14 |
| - Member of the public | 0 | 0 | 0 | 0 | 0 |
| Work Activity (total Injuries) | Q2 | Q3 | Q4 | Q1 | Q2 |
| Work Activity - General | 39 | 26 | 37 | 32 | 36 |
| Work Activity - Training | 30 | 32 | 26 | 13 | 14 |
| Work Activity - Operations | 37 | 24 | 27 | 45 | 41 |
| - Attending fires | 16 | 11 | 22 | 36 | 25 |
| - Attending RTC | 1 | 4 | 0 | 1 | 4 |
| - Other incidents | 20 | 9 | 4 | 8 | 12 |
| Road traffic collisions | Q2 | Q3 | Q4 | Q1 | Q2 |
| RTC events (Total) | 116 | 110 | 101 | 89 | 119 |

Table 3 - Summary safety event data; showing safety event data by quarter for the current reporting period and the preceding 12 months to allow comparison with the same reporting period from the previous financial year.

Injury events



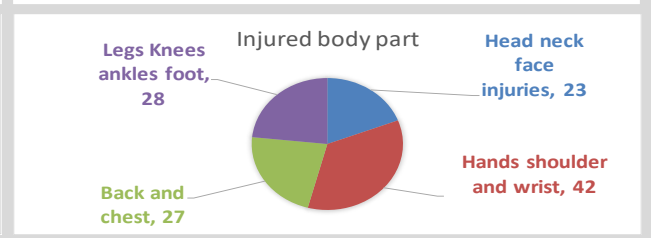
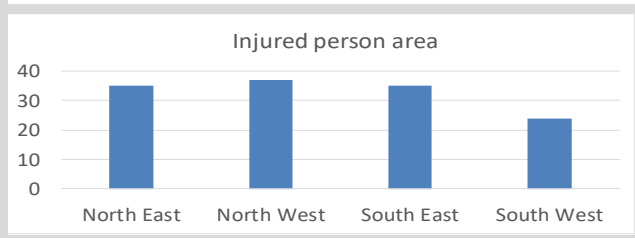
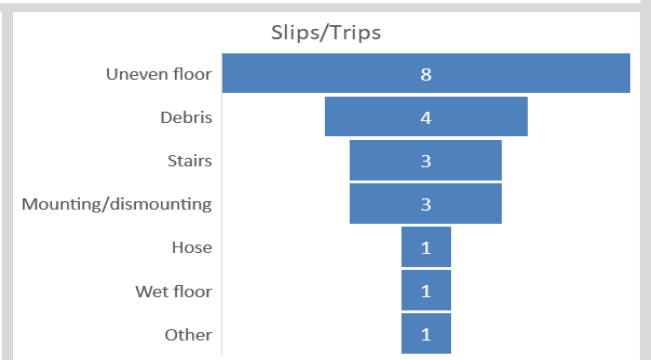
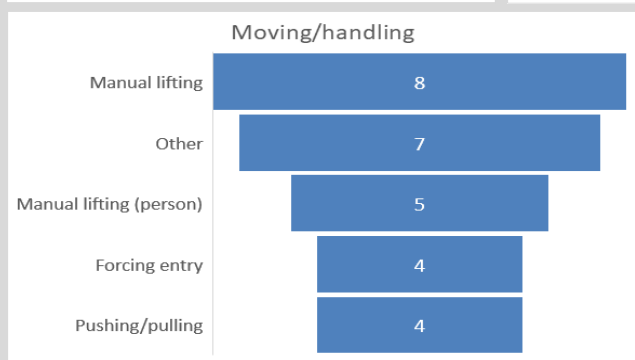
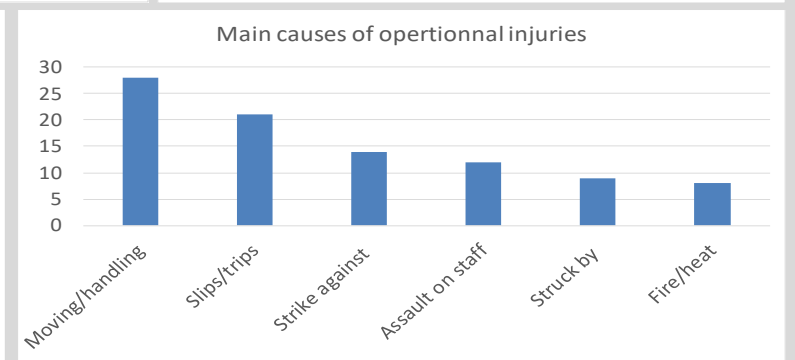
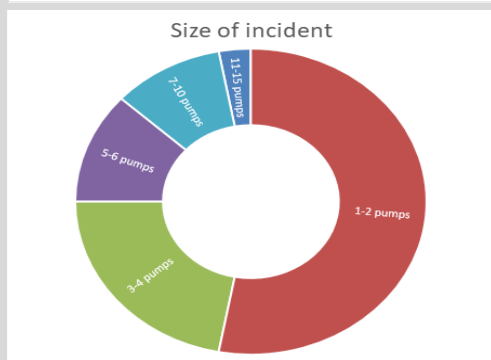
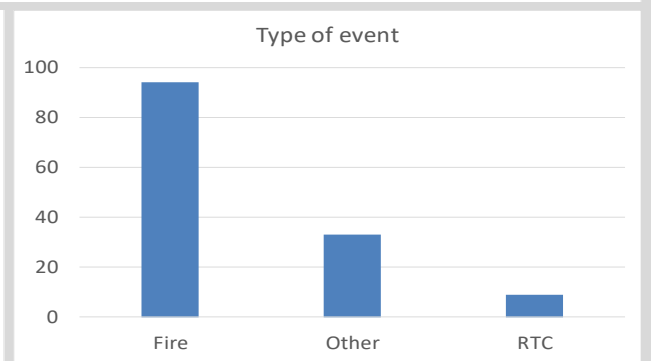
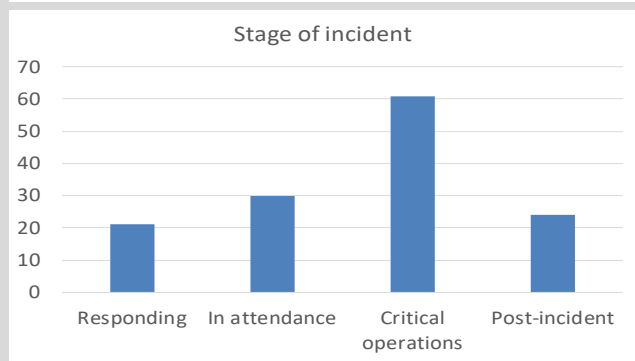
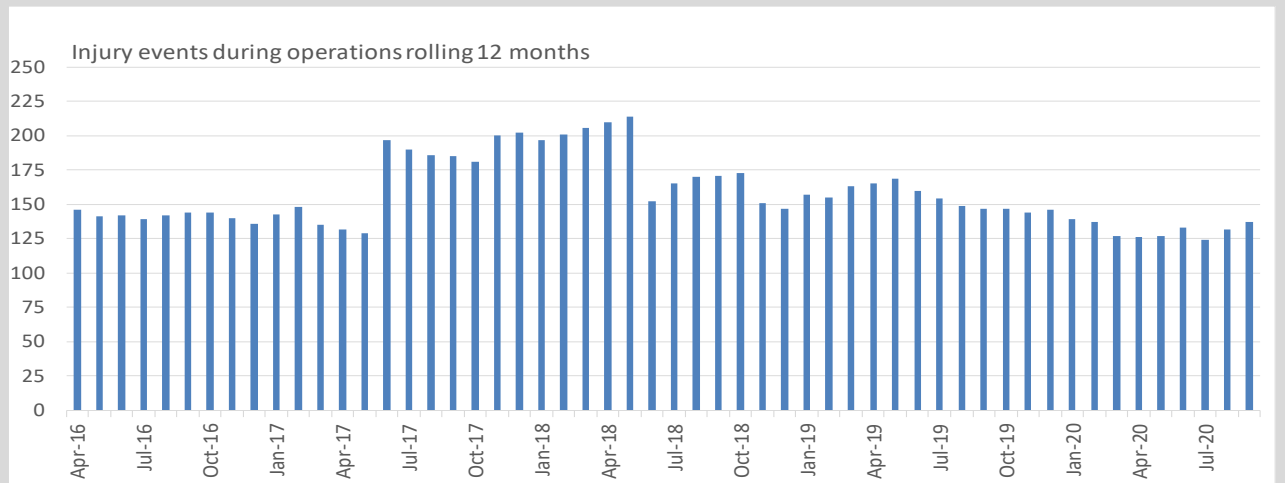
Injury events highlights

7. Overall, the number of injury events has reduced by 8% when compared to the same period last year. RIDDOR events are down 9% to a lowest recorded figure of 51 events in total of which 2 were specified injuries. One specified injury was a broken ankle caused by a trip on a curb at an incident and the other was a fractured foot caused by a slip in an office environment. Of the 51 RIDDOR events, 59% (30 events) occur in operations, 25% (13 events) during general activities and 15% (8 events) during training activities The RIDDOR incidence rate (expressed as number of RIDDOR injuries per 100,000 employees) is also reducing.
8. Most injuries didn't cause a loss in working time and over the past few years there was a significant reduction in both the number of lost working days and the number of lost time events. This reduction can be partly associated with in the drop of the "over 7 days" RIDDOR events. Over 7 day RIDDOR events accounted for 20% of the total number of injury events 5 years ago against 14% during the 12 months to the end of September 2020.
9. Safety events during operations account for the largest proportion of injuries followed by injuries during general activities and during training. Of the 84 injury events that occurred during training activities, 31 (37%) were during training events managed by Babcock. 18 injuries occurred during fitness training.

Management actions to reduce injuries

10. Between 2015/16 and 2019/20 the health and safety team have focused on reducing the number of injuries from slips and trips on our premises and on the incident ground, which was previously the principle cause of injuries to staff. The Brigade introduced a range of control measures to reduce risk from slips and trips over this period, including the specification and introduction of yellow (higher visibility) hose, improving the scene lighting available around the new fire appliances, improving portable scene lighting provision at incidents and introducing specialist slips and trips audits at fire stations to identify and remove slips and trips hazards on fire stations. This has seen the proportion of injuries attributed to slips and trips reduce over this period.
11. Over the same period the proportion of injuries attributed to manual handling as a cause have increased. Going forward, to target a reduction in manual handling injuries the health and safety team are now working with colleagues to reduce the overall weight of commonly used operational equipment, including the breathing apparatus set and the 135 ladder. The health and safety team will further evaluate manual handling injury data to identify the equipment and tasks most associated with manual handling injuries to identify further interventions that can be targeted at reducing manual handling risk.
12. The seatbelt campaign initiated by the Health and Safety team has led to reductions in injuries to firefighters in road traffic collisions. Prior to the start of the seatbelt campaign more than 30 firefighters were injured in road traffic collisions each year and this has reduced to about 10. The seatbelt campaign video and posters produced by the Brigade have been adapted and used by a number of other fire and rescue services in their attempts to improve the wearing of seatbelts amongst their staff.
13. The Health and Safety team have worked with Information Management to introduce a suite of health and safety performance data on Power BI to better allow for the identification of trends that can be targeted for proactive intervention. This data is now being made available to operational managers (Area managers and borough commanders) for their own use.
14. Further actions to reduce injuries that occur on the incident ground can be found in paragraphs 17 through 21.

Injury events during operations



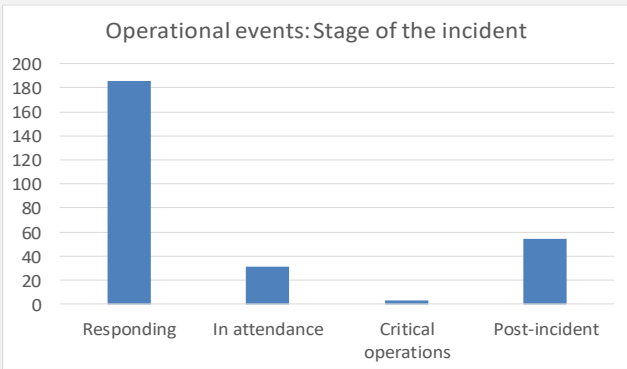
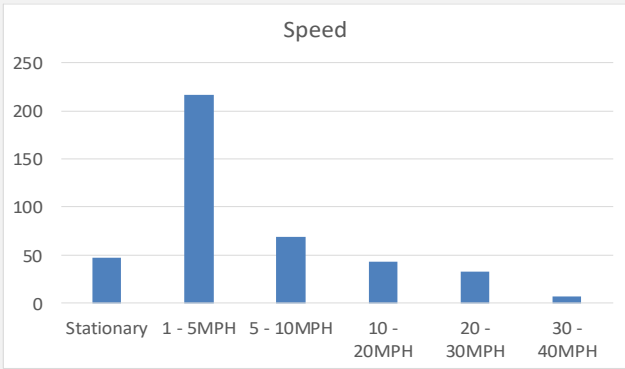
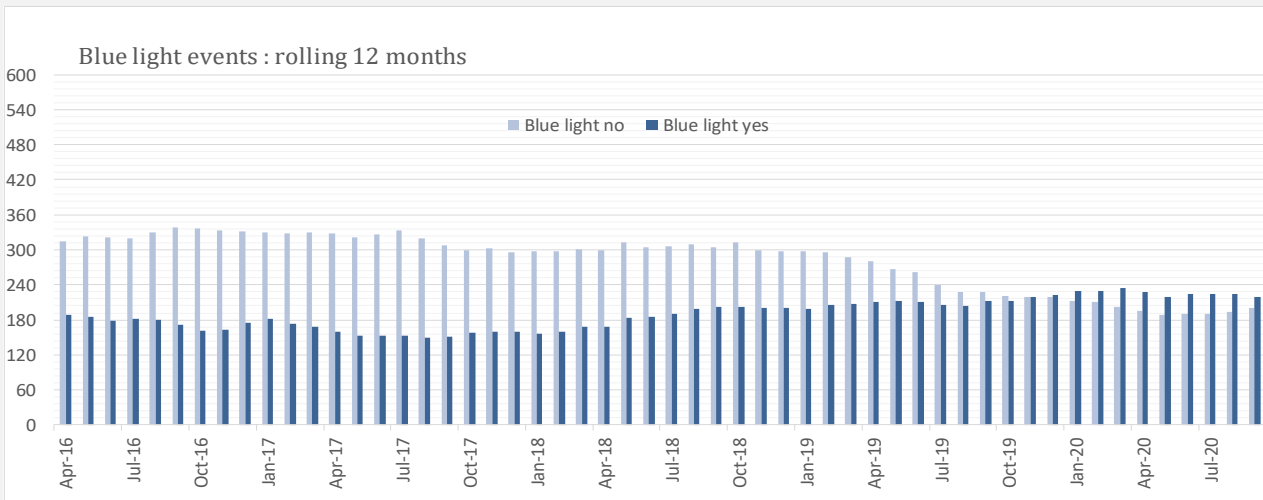
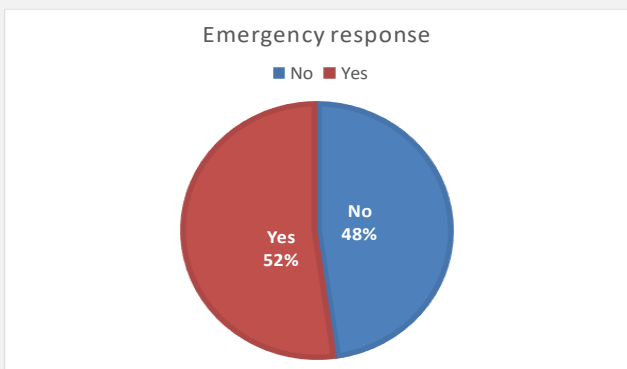
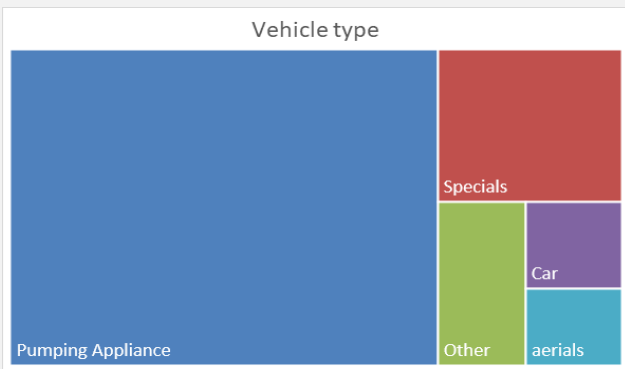
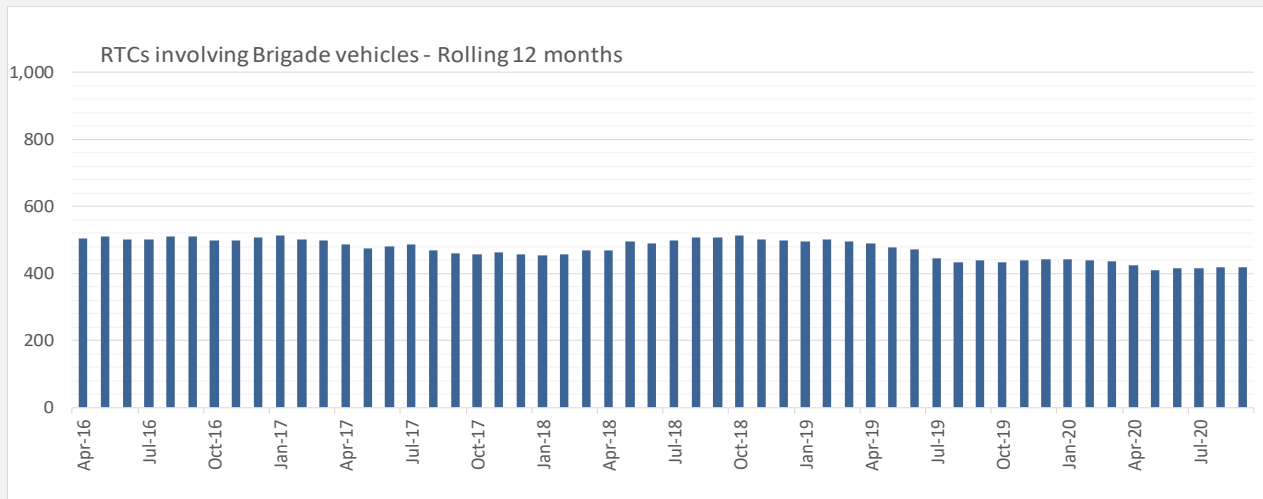
Injury events during operations highlights

15. Injuries contracted during operations are up 12% (137) when compared to the figure for 2019/20. There was an increase in the number in the recent months despite a noticeable downward trend since July 2019. Most of them occur when in attendance at small fire during the critical operations phase of the incident. The recent increase can be partly explained by the occurrence of several events causing injuries to multiple firefighters including an RTC, a verbal abuse event, a ceiling collapse at an incident and injuries while handling a casualty. A total of 1,994 working days were lost due to operational injuries representing half of the total days lost during the period.
16. There has been a 22% reduction in the number of manual handling events during operations when compared to 2019/20. One of the main concerns remains the handling of hoses but other activities such as forcing entry and moving debris on the incident ground are also large contributors to these injuries. The number of slips/trips events remained the same with debris and uneven floors being the main causes.

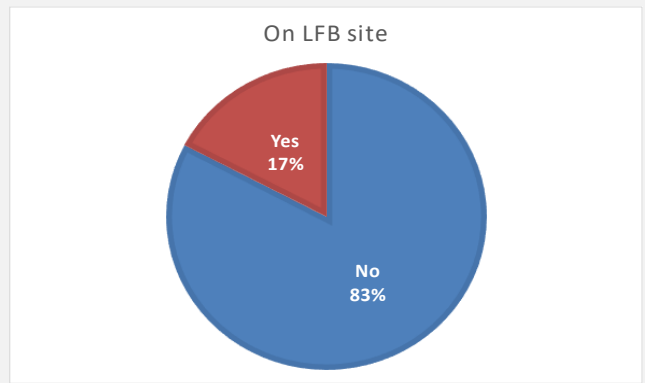
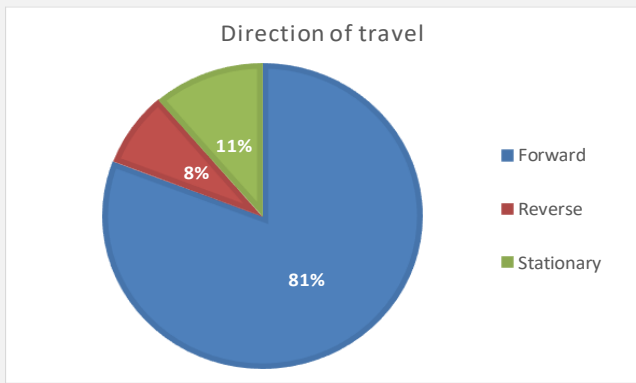
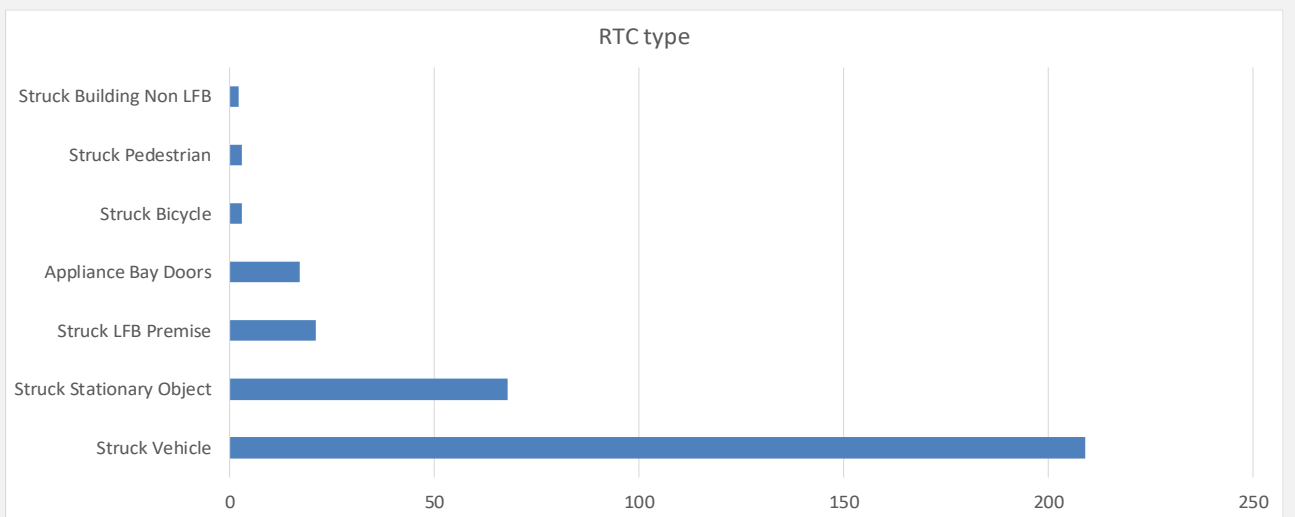
Management actions

17. A range of activities are currently in progress to further target reductions in injuries on the incident ground. The Health and Safety team will be working with colleagues to introduce an improved incident ground safety management model that will see the introduction of operational risk assessment (known as 'analytical risk assessment' in national operational guidance) and the identification of training needs for staff allocated to be safety officers on the incident ground (including Sector Commander Safety).
18. Arising from investigation into the Grenfell Tower fire and serious accident investigations (SAIs) the specification of breathing apparatus (BA) radios has been reviewed to improve the transmission power available for radios used in the built environment from 1 watt to 4 watts. These radios will be introduced shortly, with other improvements to the BA radio and BA set interface also being brought online soon. This will improve communications on the incident ground, particularly when fighting fires in the built environment. All firefighters involved in BA operations will have a radio rather than just one per BA team.
19. Also, in response to Grenfell there has been a variety of work targeted at reducing risk from human factors, which are commonly identified as underlying causes in safety events. A broad range of actions will lead to multiple improvements in safety management including a renewed focus on raising awareness of human factors in incident command and other operational training, improvements to the content, format and accessibility of operational policy and a review of human factors in the selection and promotion of staff.
20. Forcing entry to premises is an activity that has been highlighted as causing a significant proportion of operational injuries and with greater potential to cause specified injuries (more serious injuries such as fractures). Health and Safety have been liaising with operational policy to assist in the review of forcing entry policy, equipment and training with a view to reduce both the frequency and potential severity of injuries.
21. The Health and Safety team are working with Information Management to improve the analysis of health and safety data via Power BI. The Health and Safety team will work with Information Management to integrate data from Sphera with established incident monitoring data to better identify trends in operational injuries that can be targeted for proactive intervention.

Road Traffic Collisions

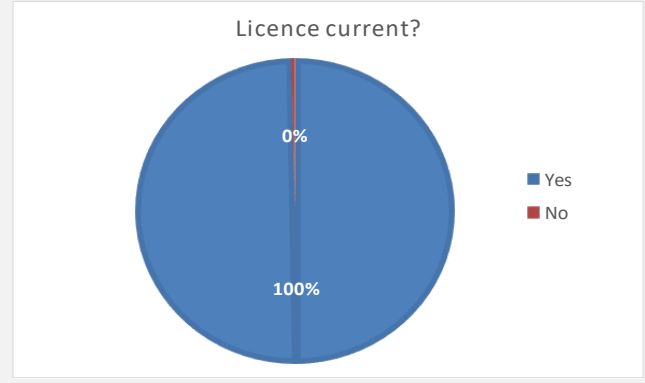
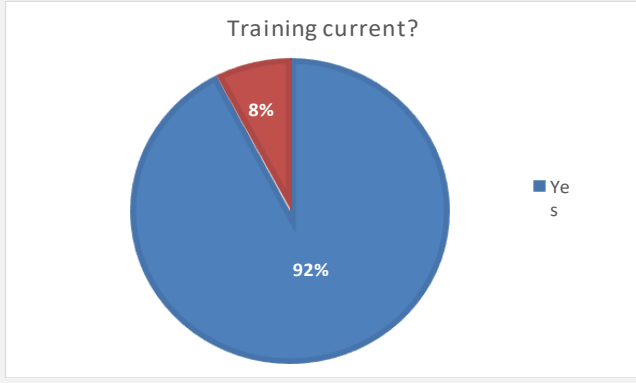
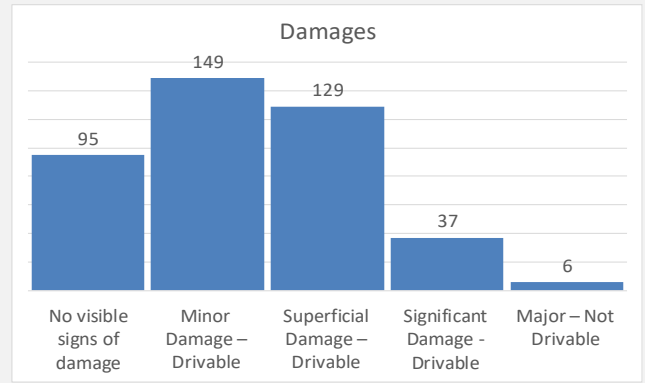
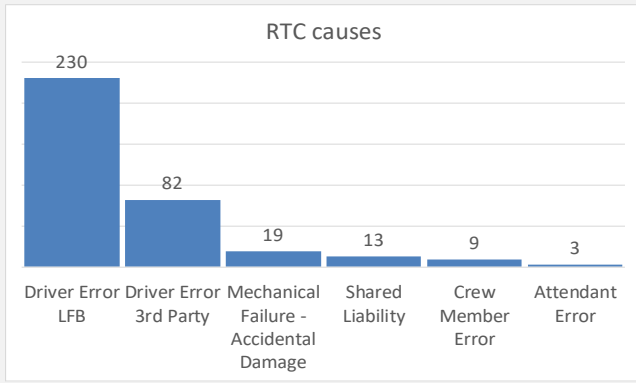


Road Traffic Collisions (Cont.)



Injuries to LFB staff
8

Injuries to members of the public
15



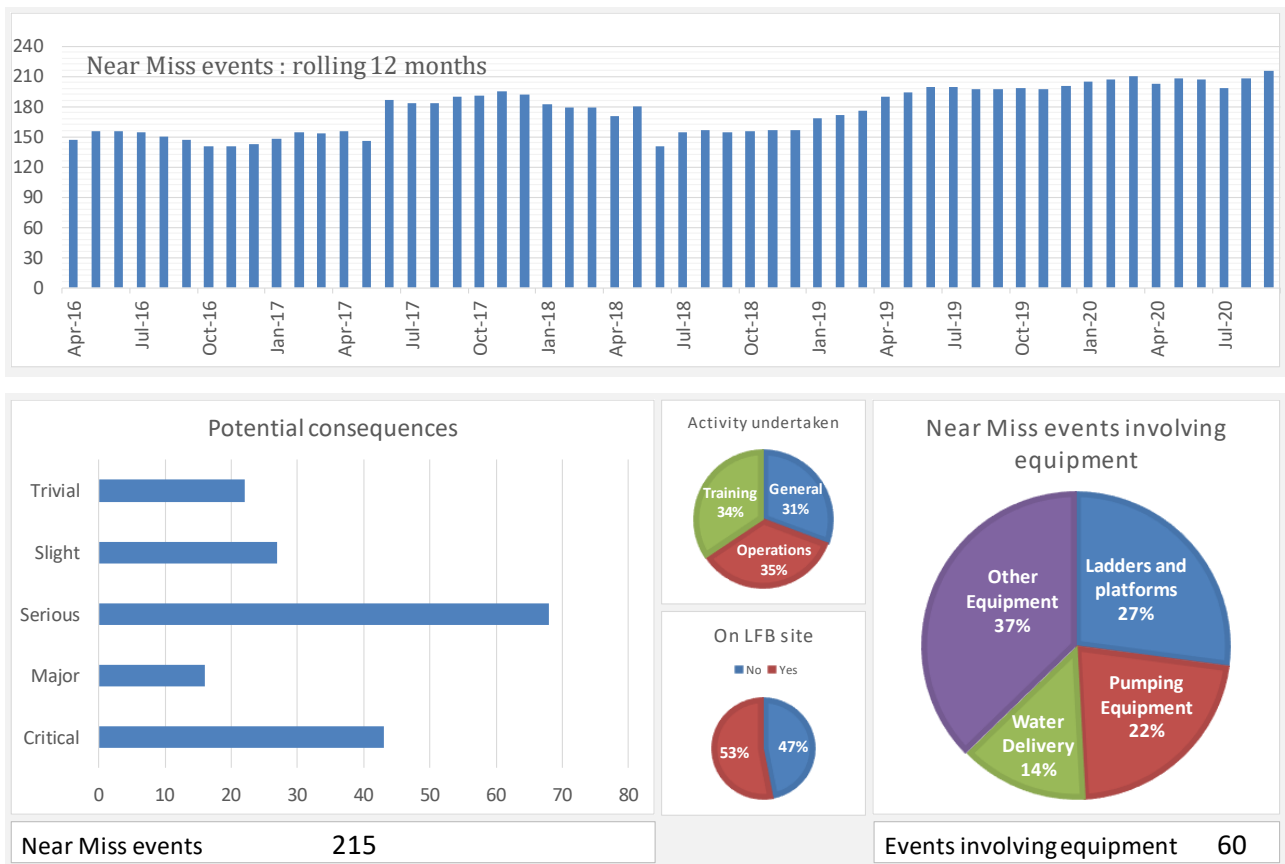
Road Traffic Collisions highlights

22. Performance for the period at 419 vehicle events represents a drop of 3% when compared to 2019/20 during which 437 events were reported. The number of events involving pumping appliances has decreased by 6%, but we have seen a 7% increase in the number of blue light events. This increase is mainly associated with the rising number of RTCs involving pumping appliances responding to an incident where a 5% increase was noted. The majority of these events involved a collision with a third party vehicle and were recorded as LFB driver error.
23. The number of injuries that occur in RTCs remained stable when compared to 2019/20 where 9 Brigade staff were injured and 12 members of the public.

Road Traffic Collisions - Management actions

24. The introduction of the series 3 fire appliances saw improvements in the visibility of the appliances to other road users and pedestrians through high visibility Battenberg marking and through additional blue light repeaters/side lights.
25. The Emergency Response Driver refresher training programme started in Q2 2017/18. This training includes a reassessment of driver skills in accordance with the Joint Emergency Services High Speed Driver Training (HSDT) codes of practice. A significant proportion of staff have completed the Emergency Response Driving Revalidation training for appliances and cars, and these are programmed to be completed for all staff by April 2021 and January 2022 respectively.
26. A Management of Occupational Road Risk (MORR) group has been initiated; this meeting is designed to bring together various stakeholders with potential to influence occupational road risk including fleet design and maintenance, driver policy, driver training and the monitoring of trends in order to further reduce road traffic collisions.
27. Recent analysis of safety event data has shown that road traffic collisions attributed to LFB driver error can broadly be assigned to 3 groups; *recognition* errors, where a driver fails to identify, recognise or see an obstacle or a change in road conditions, *decision* errors, where the driver is aware of a hazard but makes an error of judgement in how they respond to it, and *performance* errors, where the driver identifies a hazard and responds to that hazard but fails to execute the action correctly. A large proportion of RTCs occur when turning at junctions or onto side roads, predominantly resulting in nearside appliance damage through contact with parked third party vehicles. The Health and Safety team will raise these at the MORR group with a view to identifying vehicle design, driving policy or training interventions to further reduce these collisions.
28. A pilot of the CCTV system installed on fire appliances has been completed and a report is being prepared to inform a wider roll out of vehicle CCTV capability.

Near misses



29. The number of near misses reported has increased during the period. This is encouraging because it allows the Brigade to improve the identification of emerging trends and proactively implement risk controls to prevent injuries or damage.
30. Data shows that staff are more likely to report a near miss in relation to their fire station work environment than in relation to operations on the incident ground, despite the majority of safety events occurring during operations.

Management actions

31. The Health and Safety team have introduced a new Station Officer role to focus on the evaluation, allocation for investigation and follow up of actions associated with near miss events in order to better identify trends that can be targeted for proactive intervention at an organisational level.
32. Staff will shortly be able to use the tablets on appliances to report injuries, road traffic collisions and near misses through the safety event reporting database (SERD, provided by Sphera). It is envisaged that making reporting available at the incident ground via mobile devices will improve near miss reporting further.

Emerging trends and risks

33. **Attacks on Brigade staff** recorded on the Incident Monitoring System (IMS) have increased in Q1 and Q2 of 2020/21 as detailed in the table below. This was mainly caused by an increase in the number of reports of verbal abuse against firefighters when attending incidents. This increase has not been associated with an increase the number of physical injuries caused by acts of physical violence. It will, however, need to be closely monitored as additional preventive measures might be needed in the future.

| Attack Type | 2018/19 | 2019/20 | Q1 and Q2 2020/21 |
|---|-----------|-----------|-------------------|
| Harassment | 7 | 4 | 2 |
| Objects thrown at firefighters/appliances | 5 | 5 | 5 |
| Physical abuse | 6 | 5 | 5 |
| Verbal abuse | 65 | 57 | 55 |
| Other acts of aggression | 9 | 5 | 7 |
| Grand Total | 92 | 76 | 74 |

34. The health and safety team will raise this increase of attacks on Brigade staff with the communications team in order to identify any opportunities for a campaign to proactively reinforce the Brigade's commitment to tackle workplace violence against our staff.
35. The risk to staff from **fires involving lithium ion batteries** in electric vehicles and in building energy storage solutions is rapidly escalating with their increasing use. Large lithium ion batteries are becoming more and more commonplace and when damaged can burn very hot, explode and produce toxic gases including hydrochloric and hydrofluoric acid gases. They are difficult to extinguish and can spontaneously reignite after long periods of time. There have been a number of significant safety events around the world that have led to serious firefighter injuries and they represent a growing risk to firefighters in London. The health and safety team, alongside colleagues in operational policy, have been closely monitoring this risk and have led in producing an awareness video for firefighters and in continuing work, including nationally with national operational guidance, to consider operational approaches to dealing with lithium ion battery incidents. The lithium ion battery awareness video, which was facilitated by the health and safety team in cooperation with other agencies and academics has been shared nationally. There are plans to produce a secondary video focussing specifically on fire and rescue service operational response to lithium ion battery incidents.

Work-related health and wellbeing

36. **Covid risk management**; the coronavirus pandemic has dominated the work of the health and safety team in Q1 and Q2 2020/21. This has involved assessing and managing the risks to staff from coronavirus, both in existing fire and rescue service operations and in new operations to support the London Ambulance Service and others. Together with Operational Policy and Assurance, Property, Procurement, People Services, Fire Stations and Strategy and Risk a range of control measures were identified and implemented to reduce the risks to staff. This has led to the assessment and management of risks in our work activities, our workplaces and for individual staff. Brigade risk assessments and operational guidance were used to inform the national guidance for managing the risk from coronavirus through the National Fire Chiefs Council (NFCC). Work to manage the risks from coronavirus continues.

37. **Incident ground air monitoring**; work continues to manage the risks from exposure to the carcinogenic products of combustion (contaminants). The Health and Safety team are currently working with Brigade scientific advisors to monitor air quality on the incident ground at key locations such as the BA entry control point, the pumping bay of the appliance supplying water and the command unit to determine the risk to staff from smoke in these areas. Mobilising arrangements for scientific advisers and the measurement protocols have been agreed with the first incident ground measurements due to be carried out in February 2021.
38. **Grenfell Firefighter Study**; the Grenfell Firefighter Study being completed by Imperial College in collaboration with the Brigade has commenced. Approximately 250 staff have already volunteered for the study and these staff are being scheduled to attend appointments at the Royal Brompton Hospital over the coming months. Further requests for volunteers, with a target of over 1,000 attendees, will be periodically advertised.
39. **5G masts electromagnetic fields (EMF) measurements**; working with Property, EMF measurements were conducted on 2 LFB sites to ensure the exclusion zones were appropriate to control the risks to staff from exposure to non-ionising radiation. The report, currently under review by Bureau Veritas, will inform the premises risk assessment. Guidance related to aerial training in station yards will then be issued to each site.
40. **Working from home**; due to the coronavirus pandemic working from home has been essential for a large proportion of staff. Working from home is likely to be sustained at a higher level even when the coronavirus pandemic is controlled. The health and safety team have been monitoring individual risk with regard to working at home, providing advice to staff about working safely and comfortably, and where required ensuring that relevant additional equipment is provided for staff.
41. **Raising awareness of job roles with occupational health practitioners**; A joint project has started between health and safety, the wellbeing team and the chief medical officer to match individual job role characteristics with the demands that will be placed on the employees undertaking such roles. This will encompass physical demands as well as the psychological pressures a particular job role will involve. This long-term project will hopefully result in a better match of individuals against any specialisms that will be required from them.
42. **Enhanced Routine Periodic Medicals (ERPM)**; The recently introduced ERPM is now being provided for Brigade staff who are exposed to real fire training environments for extended periods. It is intended that the provision of this more comprehensive health check will be offered to operational staff within other higher risk groups when practical.

Leading indicators

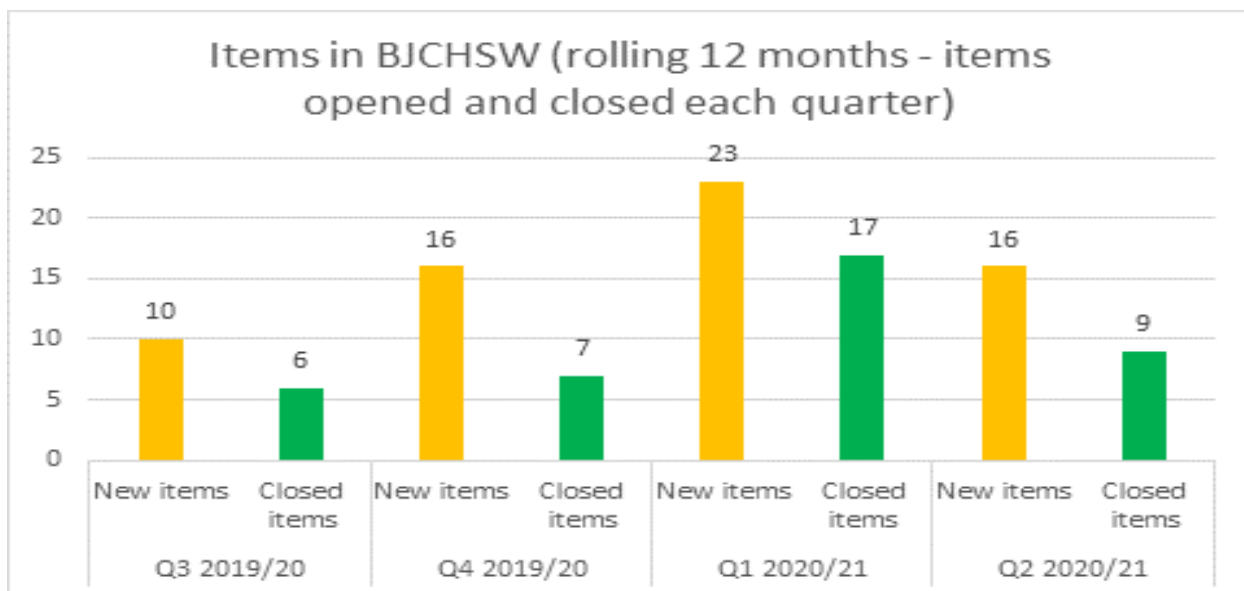
43. The number of late **local accident investigations** detailed in the table below is high and the health and safety team are focussing on reducing this number by discussing this issue with area DACs during quarterly H&S review of performance meetings. Events under the *Investigation in progress* column are those still under investigation by the local accident investigator (LAI); events under the *Quality check* column are being reviewed by the person undertaking the quality check and those under *final review* are events awaiting closure by the Health and Safety team.

| | All LAIs not completed within 28 days at the end of Q4 2019/20 | | | | All LAIs not completed within 28 days at the end of Q1 2021/20 | | | | All LAIs not completed within 28 days at the end of Q2 2020/2021 | | | |
|------------|--|---------------|--------------|-------|--|---------------|--------------|-------|--|---------------|--------------|-------|
| | Work flow status | | | | Work flow status | | | | Work flow status | | | |
| | Investigation in progress | Quality check | Final review | Total | Investigation in progress | Quality check | Final review | Total | Investigation in progress | Quality check | Final review | Total |
| North West | 43 | 15 | 0 | 58 | 18 | 9 | 4 | 31 | 29 | 10 | 5 | 44 |
| North East | 34 | 12 | 0 | 48 | 25 | 6 | 3 | 34 | 37 | 14 | 5 | 56 |
| South West | 38 | 7 | 3 | 48 | 4 | 4 | 5 | 13 | 1 | 3 | 3 | 7 |
| South East | 15 | 12 | 1 | 28 | 18 | 3 | 1 | 22 | 30 | 12 | 0 | 44 |
| Total | 130 | 46 | 4 | 182 | 65 | 22 | 13 | 100 | 97 | 39 | 13 | 151 |

44. There was a clear reduction to the number of outstanding events in the South West area during the past two quarters. This was the result of the close monitoring undertaken by the area performance team.
45. No **premises health and safety audits** have been conducted since March 2020 due to the coronavirus pandemic. It is anticipated that the health and safety team will continue with the 3 years audit cycle during Q1 2021/22.

Workforce liaison (Brigade Joint Committee for Health, Safety and Welfare, BJCHSW)

46. Brigade Management have continued to meet regularly during Q1 and Q2 with staff side safety representatives regarding health and safety issues relating to operational policies and procedures as well as the introduction of new equipment and initiatives. The table below gives a picture of the volume of items being introduced as consultative items and the volume of items being closed over the last year.



Conclusions

47. For the 12 months to the end of September 2020, performance on the key indicators showed that:

CO 11: RTCs involving Brigade vehicles has reduced but was orange status at the end of the period (actual - 419 and target - 415);

CO 12: the injuries from operational incidents has increased and the target is not currently being achieved (actual - 137 and target - 116), and

CO 13: the all RIDDOR injuries total is being met and is well below the target (actual - 51 and target - 89).

Equality impact

48. The London Fire Commissioner and decision takers are required to have due regard to the Public Sector Equality Duty (s149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.

49. It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.

50. The protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), Race (ethnic or national origins, colour or nationality), Religion or belief (including lack of belief), Sex, Sexual orientation.

51. The Public Sector Equality Duty requires us, in the exercise of all our functions (i.e. everything we do), to have due regard to the need to:

- a) Eliminate discrimination, harassment and victimisation and other prohibited conduct;
- b) Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it, and
- c) Foster good relations between people who share a relevant protected characteristic and persons who do not share it.

52. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- a) Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic;
- b) Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it, and
- c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

53. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
54. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
 - a) Tackle prejudice, and
 - b) Promote understanding
55. An Equality Impact Assessment (EIA) has not been undertaken specifically for this report. An EIA is not required because this report provides health and safety performance information in relation to current workplace policies, work activities or initiatives, which should already have had an analysis of equality impact conducted as part of their development where required.
56. This report is consistent with the Brigade's aims under the Diversity Policy and Equality at Work – Code of Practice to behave in a professional manner and impose professional standards on our staff. Monitoring and managing the impact of safety events enables the Brigade to develop a workforce that is well trained, motivated and respectful to one another. This will not only help us to provide more responsive services, but it will also help to build confidence in each community of a professional and representative workforce.

Procurement and Sustainability

57. There are no implications for procurement arising from this report. The report is consistent with the objective under the Brigade's Sustainable Development policy to 'promote and encourage good health and physical, mental and social wellbeing' through business as usual activities detailed in the report, and the monitoring of performance data to reduce the impact of injuries and other safety events.

Workforce impact

58. This report provides information relating to the performance of the Brigade against key health and safety indicators. No specific consultation with the workforce has been undertaken in the preparation of this report but the report is made available to trade unions via the Brigade's Committee for Health, Safety and Welfare (BJCHSW) following approval.

Finance comments

59. The Chief Finance Officer has reviewed this report and has no comments.

Legal comments

60. Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
61. This is a performance monitoring report for noting only, therefore no direct legal implications arise.
62. The Commissioner is under a statutory duty to comply with the Health and Safety at Work etc. Act 1974 ('the Act'). Section 2 of the Act imposes a general duty on the employer to 'ensure, so

as is reasonably practicable, the health, safety and welfare at work of all of his employees.' This general duty extends (amongst other things) to the plant and systems of work, the provision of information, instruction, training and supervision, and to the provision and maintenance of a working environment that is, so far as reasonably practicable, is safe, without risks to health, and adequate as regards facilities and arrangements for welfare at work.

63. In accordance with Section 2(6) of the Act, it is the employer's duty to consult any such representatives with a view to the making and maintenance of arrangements which will enable him and his employees to co-operate effectively in promoting and developing measures to ensure the health and safety at work of the employees, and in checking the effectiveness of such measures.
64. The work undertaken and described in this report discharges the aforementioned duty and contributes towards the Commissioner's compliance with other obligations set out in the Act and subordinate legislation made under it. Measuring performance on Health and Safety matters also enables the Brigade to remain efficient and effective.