

Security Policy

April 2018

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The on-line version is the only version that is maintained. Any printed copies should, therefore, be viewed as 'uncontrolled' and as such may not necessarily contain the latest updates and amendments.

POLICY AMENDMENTS

Amendments to the Policy will be issued from time to time. A new amendment history will be issued with each change.

New Version Number	Issued by	Nature of Amendment	Approved by and Date	Date on Intranet
1.0	Local Counter Fraud Specialist / Local Security Management Specialist, Audit Yorkshire	New policy	Audit Committee on 24 April 2018	April 2018

Contents

Section		Page
1	Introduction	1
2	Aims and Objectives	1
3	Scope of the Policy	1
4	Accountability	1
5	Incident Reporting	3
6	Personal Security	3
7	Crime Prevention	5
8	Assets	5
9	Security of Cash	5
10	ID Cards	5
11	Control of Locks, Keys & Access Control Systems	6
12	Data Security	6
13	Car Parking Security	6
14	Building Lockdown	6
15	Equality Impact Assessment	7
16	Implementation and Dissemination	7
17	Monitoring Compliance with and the Effectiveness of Procedural Documents	7
18	Related Policies and Procedures	7

Appendices

A	Security Contacts	8
B	Violence and Aggression	9
C	Building Lockdown procedure	11
D	Equality Impact Assessment	13

1 Introduction

NHS Harrogate and Rural District Clinical Commissioning Group (The CCG) is committed to ensure effective arrangements are in place for both the personal safety of staff and visitors to their property as well as the property and premises of the organisation themselves.

Violence and aggression is one of the main health and safety risks facing staff who work within the NHS. As a commissioning organisation, the risk is low, however the CCG takes the risk of violence and aggression very seriously and whilst some elements are included within this policy, specific guidance should be sought from the Local Security Management Specialist (LSMS) who provides security advice to the CCG.

The CCG has responsibilities under the Health and Safety at Work Act 1974, particularly in relation to employers, ensuring, as far as is reasonably practicable, the health, safety and welfare of employees at work.

The Management of Health and Safety at Work Regulations 1999 require employers to assess risks to employees and non-employees and make arrangements for effective planning, organisation, control, monitoring and review of health and safety risks.

Responsibility for security rests with all persons working within the CCG.

2 Aims and Objectives

NHS Harrogate and Rural District CCG will:

- Provide and promote, as far as reasonably possible, a safe and secure environment for all staff, visitors and contractors;
- Establish acceptable levels of risk on its premises and for its employees;
- Develop systems and processes to help to ensure the safety of staff at work;
- Develop procedures to deal with reports of crime, threats and damage;
- Raise security awareness in the community;
- Identify security trends and react quickly to remove or reduce risk.
- Work within the context of the work plan of the Local Security Management Specialist

3 Scope of the Policy

The policy applies to NHS Harrogate and Rural District CCG and all its employees and must be followed by all those who work for the organisation, those on temporary or honorary contracts, secondments, contractors and student placements.

Independent contractors are responsible for the development and management of their own procedural documents and for ensuring compliance with relevant legislations and best practice guidance.

4 Accountability

4.1 Audit Committee

The Audit Committee is responsible for approving the CCG's counter-fraud and security management arrangements.

4.2 Chief Officer

The Chief Officer is the Accountable Officer and has ultimate responsibility for Security within the CCG.

The Chief Officer is responsible for ensuring that there is expert up-to-date security advice and services available either within the CCG or commissioned to support the CCG. They are also responsible for ensuring that effective systems and practices are in place to maximise security and for promoting preventative security measures in accordance with the recommendations of NHS Protect and the work plan of the LSMS.

4.3 Heads of Departments and Senior Managers

Individual Heads of Department and Senior Managers are responsible for promoting security within their areas of responsibility. In particular they will be responsible for:

- Ensuring that they and their staff are familiar with the content of the Security Policy and any associated procedures;
- Undertaking risk assessments within their areas of responsibility and acting to remove/reduce as far as possible any security risks identified;
- Ensure that staff who travel as part of their role are aware of, and comply with, the requirements that the motor vehicle they use is covered by a relevant insurance policy which provides cover while the vehicle is on official business including cover against risk or injury, and that where appropriate, the vehicle has a valid MOT certificate. The driver should also have an appropriate driving license and is not aware of any reason why they should not safely and legally drive a vehicle.

4.5 Local Security Management Specialist (LSMS)

The overall objective of the LSMS is to work on behalf of the CCG to deliver an environment that is safe and secure.

This objective will be achieved by working in close partnership with stakeholders within the NHS and external organisations such as the Police, professional representative bodies, and trade unions. The LSMS will aim to provide a comprehensive, inclusive and professional security management service for the organisation, including advice on violent or aggressive situations and work towards the creation of a pro-security management culture within the NHS.

Any security incidents should be reported through the incident reporting procedure.

The LSMS will work with the police in pursuing actions against individuals who commit a violent act against a member of staff.

The LSMS will develop work plans alongside the CCG's security lead, based on previous recommendations from NHS Protect and security risk assessments.

4.6 Security Lead

The Security Lead will support the Chief Officer by:

- Maintaining records of Security Incident Reports;
- Maintaining records of local procedures;
- Maintaining records of Security Risk Assessments;
- Maintaining records of liaison between the owners and all occupiers of any shared premises where NHS Harrogate and Rural CCG staff are employed;
- Working in close partnership with the LSMS reporting incidents in a timely manner.
- The Security Lead is also responsible for keeping an inventory of the CCG's portable assets namely;
- IT equipment – laptops and desktops
- Telecommunication equipment – mobile phones and i-pads

4.7 Employees

Employees of the organisation have responsibility for:

- Taking reasonable steps to ensure their own personal security and that of colleagues and visitors;
- Ensuring that effective measures are taken to ensure that the CCG's premises and property are maintained in a secure condition;
- Taking steps to safeguard against loss of the CCG's property;
- Complying with all the CCG's policies and procedures;
- Taking all reasonable steps to ensure security of their own personal possessions – the organisation takes no responsibility for personal possessions
- Staff who travel as part of their role are aware of, and comply with, the requirements that the motor vehicle they use is covered by a relevant insurance policy which provides cover while the vehicle is on official business including cover against risk or injury, and that where appropriate, the vehicle has a valid MOT certificate. The driver should also have an appropriate driving license and is not aware of any reason why they should not safely and legally drive a vehicle.

4.8 Visitors and Contractors

All visitors and contractors have a general responsibility to give due consideration to security issues and must follow the security procedures of the CCG. All visitors and contractors have a general responsibility to take all reasonable steps to ensure security of their own personal possessions.

The CCG will not accept responsibility or liability for personal property brought into its premises.

5 Incident Reporting

Clear reporting procedures are in place in the event of security related incidents that occur through the delivery of services or on the CCG's premises. The CCG encourages the reporting of incidents as best practice, so that they are in line with reporting requirements and so that all staff can be offered the best advice and support to help protect them, and to ensure continuity of local delivery of services. Please refer to the CCG's incident reporting policy for further information.

6 Personal Security

The CCG will, as far as is reasonably possible, work to ensure the personal security of all individuals whilst undertaking work on behalf of the CCG. It is the responsibility of individuals to take all reasonable steps to ensure that they do not compromise their own security or that of others.

6.1 Lone workers

All reasonable steps will be taken to ensure the safety of employees who, in the carrying out of their job responsibilities, may be required to work alone. This will be achieved by the development of appropriate procedures and working practices and ensuring that staff have the appropriate skills and equipment to enable them to work safely and securely

6.2 Violence and aggression against staff

The Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999 requires that employers have a duty to ensure the health, safety and welfare of their staff.

This Security Policy ensures that NHS Harrogate and Rural District CCG has a clear strategy to tackle violence and abuse against its staff as required by health and safety legislation. However, staff are advised to reference the regulations as guidance.

Within the NHS there are two definitions identifying physical and non-physical assault and one further Health and Safety Executive definition related to violence. They are:

1. Physical assault- 'the intentional application of force to the person of another, without lawful justification, resulting in physical injury or personal discomfort.'
2. Non-physical assault- 'the use of inappropriate words or behaviour causing distress and/or constituting harassment.'
3. Any incident, in which a person is abused, threatened or assaulted in circumstances relating to work. This can include verbal abuse or threats as well as physical attacks.

6.3 Violence and aggression

The CCG believe that all staff and members of the public have a duty to treat each other with dignity and respect and to behave in an acceptable and appropriate manner. Staff have a right to work, as patients have a right to be treated, free from fear of assault and abuse in an environment that is properly safe and secure.

Any act of violence or aggression, including verbal aggression, should be reported via the Incident Reporting process. Where the perpetrator is an employee of NHS Harrogate and Rural District CCG, the incident should be reported to the victim's line manager.

Any incident resulting in an individual being off work for seven days or more or unable to carry out their normal duties for seven days or more will be reported by the CCG to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).

If identified, risk assessments will be carried out by the LSMS to identify potential triggers for violence and aggression.

There are a number of sanctions available to the CCG in dealing with visitors who behave in an inappropriate manner. These range from discussion and verbal warnings to an Acknowledgment of Responsibility Agreement and to implement/take legal actions.

Advice and support on dealing with the aftermath of a violent or aggressive situation should be obtained from the LSMS.

Appendix 2 provides a brief outline of items to be considered when dealing with incidents of violence and aggression.

7 Crime Prevention

Proactive crime prevention and security awareness will help to ensure a safe, secure environment. Staff should make every effort to counter the threat of crime, as follows:

- All suspicious activity must be reported. Any occurring on the CCG's premises are to be reported to the Security Officer and an Incident Reporting Form completed electronically;
- All incidents of crime must be reported, both to the police and to the LSMS;
- All property belonging to the CCG must be clearly marked / labelled;
- Missing items must be reported to line managers;
- Personal valuables must be kept secure, out of sight and not left unattended;
- Offices and other rooms must always be left secure. All windows and blinds (where available) must be closed at the end of the day;
- Staff must only let visitors into the building that they know and that they are aware are due at the CCG. Staff must not allow 'tailgating' to occur as they enter or leave the building.

8 Assets

The CCG is committed to ensuring the security of all the assets of the organisation including buildings, plant and equipment. It is essential that the maximum amount of equipment is available for use at all times and therefore all personnel have a responsibility for ensuring that the organisation's items that they use during the course of their work are kept safe and secure and are protected from the possibility of theft.

9 Security of Cash

Cash from any source should be held in a secure place and must be deposited with the finance team.

Cash must be stored in a safe. A safe is available in the finance department. Access to the safe is managed by and limited to authorised finance staff only.

10 ID Cards

All staff must wear their issued ID cards whilst on NHS Harrogate and Rural District CCG's business outside of the CCG's offices. Lost or stolen ID badges must be reported to the security lead or line manager as soon as possible and must be logged using the electronic incident reporting process in accordance with the incident reporting policy. Staff are encouraged to wear their ID cards within the CCG's offices to assist visitors and new starters to identify members of the CCG.

Visitors and contractors must report to the appropriate reception area and collect a visitors badge so that they are identifiable on the premises. For health and safety purposes, this is supported by a signing-in and signing-out register.

Staff are advised to challenge any unknown individual who is present within the work place without the appropriate identification.

Identity badges and security fobs must be recovered on the termination or suspension of employment or contract and any records updated accordingly.

11 Control of Locks, Keys and Access Control Systems

All keys, fobs and access codes must be kept secure. Procedures and systems must be in place to ensure that appropriate records are kept of staff who are issued with keys.

Lost or missing keys and fobs must be reported as soon as possible to the Security Lead.

Access control systems can be put in place to help protect people, property and assets in the NHS. Proper access controls that staff use and have confidence in can help *deter* and *prevent* security-related incidents. Essentially, they should be designed to ensure that members of staff, patients and the public only have access to areas they need to enter.

Through the use of risk assessment and crime prevention surveys, LSMSs and NHS Property Services can identify those areas of greatest risk where access controls should be in place.

Any system is only as good as the people who use it. Staff must adhere to procedures on access and the use of such equipment. For example, staff must not lend access cards to others or wedge doors open and to be aware of the possibility of 'tailgating'. Where number pads or similar locking devices are used, managers and staff should also be required to change codes on a regular basis and not divulge the codes to those who are not entitled to access those areas.

12 Data Security

The Senior Information Risk Owner will be responsible for the development and implementation of security systems to ensure the security of the organisation's electronic data/information systems and to ensure compliance with current legislation and guidance. See the Information Security Policy for further guidance.

13 Car Parking Security

Vehicles and their contents are left at the owners own risk.

The CCG also accepts no liability for bicycles parked or left on its premises.

14 Lockdown

Lockdown is the process of preventing freedom of entry, exit and movement around a CCG or other specific building/area, in response to an identified risk, threat or hazard that might impact upon the security of staff or indeed the capacity of that facility to continue to operate. Lockdown procedures may be activated in response to any number of situations, but some of the more typical might be:

- A reported incident/civil disturbance in the local community (with the potential to pose a risk to staff in the building)
- An intruder on the premises (with the potential to cause a risk to staff);
- A warning being received regarding a risk locally, of air pollution (smoke plume, gas cloud etc);
- The close proximity of a dangerous animal roaming loose.

See appendix 3 for the lock down procedure.

15 Equality Impact Assessment

NHS Harrogate and Rural District CCG aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others.

The organisation uses a single equality impact assessment for all of its policies and procedures. The Equality Impact Assessment for this policy is included at Appendix 4.

16 Implementation and Dissemination

This policy will, following ratification by the Audit Committee, be disseminated to staff via the organisation's intranet and communication through in-house newsletters.

This Security Policy will be reviewed every three years or when procedural, legislative or best practice changes occur.

The policy can be accessed via NHS Harrogate and Rural District CCG's internet.

17 Monitoring Compliance with and the Effectiveness of Procedural Documents

Performance Indicators will include:

- Number of security incidents reported;
- Risk assessments;
- Evidence of security mitigation.

21 Related Policies and Procedures

- Serious Incident, Incidents & Concerns Policy;
- Incident Reporting Procedure;
- Information Governance Policy;
- Lone Worker Policy;
- Business Continuity & Strategy Policy
- Information Security Policy
- Local Anti-Fraud, Bribery and Corruption Policy

Appendix A

Security Contacts

In all Emergency situations the Police must be contacted first on: 999

Managers are responsible to escalate appropriate security contact details to their staff and to ensure staff are aware of the local security arrangements. Community staff must agree local lone working procedures and police and other emergency contact procedures within their own departments.

Out of hours Support:

The **CCG's on-call manager** should be contacted out of hours on **07534 904270**

NHS Property Services on-call manager can be contacted out of hours on **0300 3038590**

The Police for non-emergencies can be contacted on **0845 6060606**

Appendix B

Violence and Aggression

1 Definition of terms used

Physical assault as defined by the Security Management Measures 2004 is “the intentional application of force to the person of another without lawful justification resulting in physical injury or personal discomfort.”

Non physical assault as defined by the Security Management Measures 2004 is “the use of inappropriate words or behaviour causing distress and, or constituting harassment.” Non physical assault can arise from abuse or threats via the telephone, letters or email as well as be face to face abuse.

Unacceptable standards of behaviour:

- unnecessary excessive noise, e.g. loud or intrusive conversation or shouting;
- threatening or abusive language, e.g. involving excessive swearing or offensive remarks;
- derogatory, racial, sexual or ageist remarks;
- malicious allegations relating to members of staff, other patients or other members of the public;
- offensive sexual gestures or behaviour;
- abusing alcohol or drugs (however all medically identified substance abuse problems will be treated appropriately);
- threats or threatening behaviour;
- violence;
- persistent and abusive telephone calls or
- illegal activities e.g., drug dealing, theft, wilful damage to Trust property.

Examples of unacceptable behaviour include:

- offensive language, verbal abuse and swearing which prevents staff from doing their job or makes them feel unsafe;
- unwanted or abusive remarks;
- negative, malicious or stereotypical comments;
- invasion of personal space;
- brandishing of objects or weapons;
- near misses, i.e. unsuccessful physical assaults;
- physical assaults;
- offensive gestures;
- threats or risk of serious injury to a member of staff, fellow patients or visitors;
- bullying, victimisation or intimidation; *
- stalking;
- spitting
- alcohol or drug fuelled abuse;
- unreasonable behaviour and non-cooperation Destruction of or damage to property.

* allegations of such behaviour between staff will be dealt with by NHS Harrogate and Rural CCG's Dignity in the workplace policy and procedure .

2 Risk Reduction Measures

2.1 Public Access

Some areas of healthcare buildings and grounds need to be open to the public. However, uncontrolled access to all areas may expose some staff to unnecessary risk. Risk assessments need to take this into account and to consider measures such as:

- careful positioning of entrances;
- good lighting of entrances and other access routes and thoroughfares; and
- relocation of work activities which do not need to be in public areas.

3 Action in the case of unacceptable behaviour from Visitors

Sanctions may be implemented against visitors. Visitors who display unacceptable behaviour should be asked to desist and offered the opportunity to explain their actions. Failure to comply with the required standards of behaviour will result in security staff being called and the appropriate senior manager to ask the offending person to leave the premises. If they refuse to leave then the police should be called. On no account should NHS Harrogate and Rural District CCG staff attempt to physically remove an individual.

The Chief Officer may decide to continue to exclude any individual removed from the premises. Depending on the seriousness of the incident the LSMS may need to be involved to consider appropriate action against individuals.

3.1 Legal Action

NHS Harrogate and Rural District CCG may consider a range of legal sanctions which can be taken against individuals who abuse organisation staff. This range could include criminal prosecution and ASBOs through to civil injunctions. The relevant action will depend on the circumstances of the case and will be based on legal advice.

Appendix C

Building Lockdown Procedure

The purpose of this procedure is precautionary but puts the building in a state of readiness (Whilst retaining a degree of normality) should a situation escalate.

In line with the Building, Staff and Security Profiles, the following actions will be implemented during a lockdown:

Lockdown arrangements

- Set the outer building door to the off position from the control panel located on the reception desk – or the required actions to manage access control in different areas (security threat may not only be external).
- Refer to staff action cards to support individual roles during lockdown
- Identify staff to man doors and manage any access requirements.
- Identify staff to inform manager of situation to provide guidance for lockdown.
- Inform the Manager on call by telephone. The rota and Manager contact details are in the business continuity folder kept in the post area of reception.
- Inform all staff in the building by email letting them know how often they will receive updates on the situation. Request that staff who are expecting external visitors contact the visitors to alert them of the situation.
- **Contact the emergency services to report the incident and gain advice.**

Lockdown Action Card

Role

- **Communicate lockdown status (Control)**
- Lock all exit/entrance points to the building.
- Alert On Call Manager for instruction and support.
- Communicate lockdown to all building occupants via all medium available. Ensure “this is not a drill / practice” is communicated.
- Keep building occupants updated on the status of the incident.

- **Implement assigned responsibilities (Control)**
- If required call 999 and request assistance as needed.
- Start incident log/book
- If riot or malicious individuals outside, close any curtains/blinds/security grills and if safe to do so secure the car park stair gate by the main entrance, stay away from windows and doors.

- **Building Occupants**
- If riot or malicious individuals outside, close any curtains/blinds, stay away from windows and doors.
- If expecting external visitors to the building try to contact them to advise of the situation.
- Await instructions, updates and – or all clear.

- **Recovery**
- Resume normal operation asap
- Ensure any aftercare where required and debriefing are carried out.

**Appendix D
Equality Impact assessment**

Title of policy	Security Policy	
Names and roles of people completing the assessment	Alec Cowell, Head of Finance	
Date assessment started/completed	February 2018	February 2018

1. Outline	
Give a brief summary of the policy	<p>The aim of this policy is to create a safe working environment to protect staff and visitors to property occupied by NHS Harrogate and Rural District CCG</p> <p>This policy applies to all employees of NHS Harrogate and Rural District CCG staff (including those on temporary or honorary contracts, secondments, pool staff and students)</p> <p>Lone working policy. Incident reporting policy. Data protection policy. Lone worker policy. Serious Incident Reporting Procedure. Integrated Risk Management Framework.</p>
What outcomes do you want to achieve	<p>To provide a safe working environment.</p> <p>Safety of staff, staffs belongings and assets belonging to the CCG</p> <p>NHS Harrogate and Rural District CCG staff. All visitors to CCG occupied premises</p>

2. Analysis of impact			
This is the core of the assessment, using the information above detail the actual or likely impact on protected groups, with consideration of the general duty to; eliminate unlawful discrimination; advance equality of opportunity; foster good relations			
	Are there any likely impacts? Are any groups going to be affected differently? Please describe.	Are these negative or positive?	What action will be taken to address any negative impacts or enhance positive ones?
Age	None identified		
Carers	None identified		
Disability	None identified		
Sex	None identified		
Race	None identified		
Religion or belief	None identified		

Sexual orientation	None identified		
Gender reassignment	None identified		
Pregnancy and maternity	None identified		
Marriage and civil partnership	None identified		
Other relevant group	None identified		
If any negative/positive impacts were identified are they valid, legal and/or justifiable? Please detail.		None identified	

4. Monitoring, Review and Publication			
How will you review/monitor the impact and effectiveness of your actions	Not Applicable – no actions required.		
Lead Officer		Review date:	

5. Sign off			
Lead Officer			
Director		Date approved:	