Security Management Policy

Ref:	LSCICB_Est01
Version:	3
Purpose	Details the ICB's aims and responsibility for the effective management of security in relation to staff, patients, visitors, and property. The ICB is committed to the provision of safeguards against crime and the loss or damage to its property and/ or equipment.
Supersedes:	LSCICB_Est01 Security Management Policy and Strategy Version 2.
Author (inc Job Title):	Andy Collins, Security Manager / Mark Jump, Health and Safety Manager
Ratified by: (Name of responsible Committee)	Health and Safety Oversight Group
Cross reference to other Policies/Guidance	The following documents should be consulted alongside this policy: ● Lone Working Policy ● Incident Accident and Near Miss Policy & Procedure
Date Ratified:	21st October 2024
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Review date:	October 2027
Target audience:	All staff employed by LSC ICB including contractors, temporary and agency staff.

This policy can only be considered valid when viewed via the ICB website or ICB staff intranet. If this document is printed into hard copy or saved to another location, you must check that the version number on your copy matches that of the one published.

Document control:		
Date:	**Version Number:**	**Section and Description of Change**
15/12/23	2	Added in an explanation of the ICB's responsibilities as an employer and a tenant across multiple sites.
08/08/23	2	Section 6.2 reference to Chief Officer updated to Chief Executive Officer
08/08/23	2	Section 6.2 – Responsibilities of the CEO. Removed the requirement for a Security Management Director (SMD) which is old legislation.
08/08/23	2	Section – 6.6. Removed reference to SMD with new reporting lines into the HSOG.
08/08/23	2	Section 7 onwards, references to RMCG removed and replaced with Health and Safety Oversight Group (HSOG). Section 7.4 updated to reflect best practice in relation to CCTV and to highlight the ICB is the data controller of CCTV footage.
08/08/23	2	Section 10, approval group updated to reflect HSOG and Executive Management Team.
08/08/23	2	Section 13 – Equality Impact Assessment completed (currently going through process)
02/09/24	2	References and Bibliography- VPR Guidance notes added.

Contents

1. Introduction

The ICB recognises and will ensure that all reasonably practicable measures are taken to deliver a proper secure environment for all who work and visit ICB premises and/or other places of work.

This document has been written in line with NHS Violence Prevention and Reduction standards, setting out key responsibilities for Integrated Care Boards, for its staff and for those services it commissions under the NHS Standards Business Contract, Service Condition 24.

It defines the main functions and responsibilities of those involved in implementing this policy. This document will be available to all employees and providers via the ICB website. It should be read carefully, and its guiding principles adhered to.

2. Purpose

The purpose of this policy and strategy is to detail ICB's aims and responsibility for the effective management of security in relation to staff, patients, visitors, and property. The ICB is committed to the provision of safeguards against crime and the loss or damage to its property and/or equipment.

The ICB will develop a culture which recognises the importance of security:

- Provide and maintain a working environment that is safe and free from the danger of crime for all people who may be affected by its activities including employees, patients, and visitors.
- Prevent loss of/or damage to ICB assets or property as a result of crime, malicious acts, loss, damage, or trespass.
- Maintain good order of premises under ICB control.
- Report all criminal activity to ICB management and ensure a robust response in line with national NHS Violence Prevention and Reduction standards guidance.
- Provide support to staff involved in a security incident and supply up to date information for all parties, especially after an incident.
- Work in partnership with local agencies e.g., police and local authority to ensure a safe and secure environment within all ICBs locations.
- Support all staff who have been a victim of assault (both physical and verbal), through the course of their work, supporting civil prosecution where the Crown Prosecution Service (CPS) will not pursue this.
- Build the internal and external profile of ICB as an organisation that takes security seriously, from prevention of crime through to prosecution of those committing crime against it.

3. Strategy

The ICBs anti-crime strategy sets out its aims to continuously improve its anti-crime provision to safeguard the ICB for the future. In order to ensure this continuous improvement, aligned with NHS Violence Prevention and Reduction standards guidance, NHS Anti-Crime Strategy, there are four strategic aims:

- To provide **leadership** for all ICB crime work by applying an approach that is strategic, co-ordinated, intelligence-led and evidence based.
- To work in partnership with NHS Violence Prevention and Reduction standards, other NHS commissioners and providers, as well as key stakeholders, such as the Police, the Crown Prosecution Service and local authorities.
- To **establish a safe and secure environment** that has systems and policies in place to: protect NHS staff from violence, harassment and abuse; safeguard NHS property and assets from theft, misappropriation or criminal damage.
- To lead, within a clear professional and ethical framework, **investigations** into losses due to criminality and criminal behaviour towards ICB staff.

Inform and Involve

- The ICB communicates with other bodies, including providers, regulators and advisory bodies regarding security issues, including violence, theft and criminal damage.
- The ICB carries out risk assessments to identify risks within the organisation relating to the security of its staff, property, premises and assets.
- The ICB will develop proportionate and effective policies to mitigate identified risks.
- The ICB will evidence communication between relevant departments within its organisation, on security matters.

Prevent and Deter

- The ICB risk assess job roles and undertakes training needs analysis for all employees, contractors and volunteers whose work brings them into contact with NHS patients and members of the public. As a result, training provided will be in accordance with NHS Violence Prevention and Reduction standards guidance on conflict resolution training.
- The ICB assess risks to lone workers, including the risk of violence. The ICB will take necessary steps to avoid or control the risks and these measures are regularly and soundly monitored, reviewed, and evaluated for their effectiveness.
- The ICB distributes national and regional NHS Violence Prevention and Reduction standards alerts to primary care contractors, relevant staff and third parties, taking action to raise awareness of security risks and incidents. This process will control, monitor, review and be evaluated.

Hold to Account

- The ICB has arrangements in place to ensure that security related incidents are investigated in a timely and proportionate manner and these arrangements are monitored, reviewed, and evaluated.
- The ICB is committed to applying all appropriate sanctions against those responsible for security related incidents.

4. Scope

4.1 This policy applies to all directorates, services and departments of the ICB including contracted or embedded staff and in all aspects of its activities.

4.2 This policy covers the security of staff, contractors, visitors and property within. It focuses on improving and sustaining physical and personal security.

4.3 The ICBs Security Policy is based on the framework recommended as best practise by NHS Violence Prevention and Reduction standards, which its aim is to:
    To protect the NHS so that it can better protect the public's health.

4.4 The ICB has two headquarters of which it is a tenant, these are Lancashire County Council (LCC), County Hall complex and the Health Innovation Centre (HIC), Lancaster. Additionally, the ICB has agreements in place for the use of facilities at 'touch down' sites (listed in the table below). The landlords are responsible for Health and Safety management throughout their complexes/ sites. The ICB has a duty, as an employer, to assist our landlord's Facilities Management with health and safety arrangements by ensuring there are operational arrangements in place where appropriate e.g. suitable fire warden and/ or first aider provision.

For the purposes of this policy and its associated policies listed on the front page of this document, any reference to health and safety in the context of the

'workplace', 'ICB offices', 'main sites, bases or touchdown spaces', 'headquarters' or 'County Hall' applies to the buildings listed below. Links are provided (where available) to the site information packs which should be read in conjunction with this procedure.

County Hall, Preston – Lancashire and South Cumbria ICB Intranet	Health Innovation Campus, Lancaster – Lancashire and South Cumbria ICB Intranet	Alfred Barrow Health Centre, Barrow
Bickerstaffe House, Blackpool – Lancashire and South Cumbria ICB Intranet	Duke Street, Blackburn – Lancashire and South Cumbria ICB Intranet	Hants Lane Clinic, Ormskirk – Lancashire and South Cumbria ICB Intranet
PALS Primary Health Care Centre, Accrington – Lancashire and South Cumbria ICB Intranet	South Lakeland House, Kendal – Lancashire and South Cumbria ICB Intranet	Yarnspinners Primary Health Care Centre, Nelson – Lancashire and South Cumbria ICB Intranet

5. Definitions

5.1 NHS Violence Prevention and Reduction standards

Is the strategic body of the NHS to guide all NHS organisations to tackle security related issues and provide direction on these matters.

5.2 Physical Assault

The intentional application of force to the person, without lawful justification, resulting in physical injury or personal discomfort.

5.3 Non-Physical Assault

The use of inappropriate words or behaviour causing distress and/or constituting harassment.

6. Roles and Responsibilities

6.1 The ICBs Executive Team acknowledge its responsibilities for security management as employers and commissioners by following NHS Violence Prevention and Reduction standards. This set of standards will be followed by the ICB and a self-assessment will assess compliance, which may result in an audit from NHS Violence Prevention and Reduction standards Senior Compliance and Quality Inspectors.

6.2 Chief Executive Officer

The Chief Executive Officer (CEO) is responsible for raising the profile of security management work within the organisation and Board level, gaining their support and backing for important security management strategies and initiatives. The CEO has overall responsibility, in conjunction with the Director of Corporate Governance, for ensuring compliance with all aspects of appropriate operational security matters.

The Local Security Management Specialists (see page 8 for more detail) has responsibility for implementing all aspects of operational security matters with support from the Corporate Governance Team; they will ensure the following aspects are considered:

- Security Management Policy compliance.
- Appropriate policies are developed.
- Arrangements and appropriate levels of provision are in place for security management to take place effectively. This should be reviewed annually.
- Ensuring reports and returns are made to NHS Violence Prevention and Reduction standards.
- Serious incidents and criminal acts are reported internally and investigated.
- Working with the police and/ or Violence Prevention and Reduction Lead in seeking prosecution of perpetrators of criminal acts, violent behaviour and verbal abuse.
- Providing feedback to staff involved in the more serious incidents.
- Ensure security management objectives are discussed and reviewed at a strategic level within the organisation.
- Ensure strategic management and support of security management work within the organisation and leads on seeking assurance from providers regarding their compliance with security management requirements through contract monitoring processes (NHS Standards Contract, service condition 24).
- Ensures assurance is actively sought from providers and measures are in place to ensure this takes place regularly.

6.5   **Directors** – It is the responsibility of all Directors to:
- Disseminate the Security Management Policy within the area of their responsibility.
- Ensure the co-ordination of security issues with other employers who share the worksite with the ICB.
- Ensure the implementation of the Security Management Policy within the area of their responsibility by providing support and advice to their managers.

6.6   **Violence Prevention and Reduction Lead**

The Commissioning Support Unit (CSU) will provide the ICB's nominated Local Security Management Specialists (LSMS), they will provide professional skills and expertise to tackle security management issues on behalf of the ICB.

The overall objective of the LSMS will be to work on behalf of the ICB to deliver an environment that is safe and secure for all staff to the highest standards.

The VPR Lead will:
- Prepare a written work plan and prepare annual reports on progress against the plan.
- Complete Commissioners Self Review tool, in conjunction with the ICB, and

submit to NHS Violence Prevention and Reduction standards annually.

- Provide advice and support to the ICB on all security matters.
- Ensure the ICB is meeting the standards laid out in NHS Violence Prevention and Reduction standards.
- Be responsible for advising on the security of all the locations within the ICB, carry out inspections, write reports and advise the ICB on all matters of security.
- Work closely with NHS Violence Prevention and Reduction standards and respond to all initiatives and disseminate security alerts to the ICB.
- Provide advice to managers at all levels on security matters/measures and deal with the management of violent and aggressive behaviour.
- Provide assistance to managers implementing risk reduction measures and post- incident management.
- Monitor the effectiveness of implementation of the Security Management Policy by means of security surveys/ risk assessments.
- Report the results of security surveys/ risk assessments undertaken to the appropriate Manager and the Health and Safety Oversight Group (HSOG).
- Assist local managers in carrying out investigations into security related incidents, liaising as required with the police, NHS Violence Prevention and Reduction standards, Legal Protection Unit and assisting in evidence gathering for submission to Court as part of the prosecution process.
- Deliver awareness sessions to staff on this Policy and to create a pro-security culture within the ICB.
- To foster links with local agencies and bodies, such as the Police, Crime Disorder Partnerships and other security professionals in Neighbouring organisations.
- Provide advice, guidance and assistance to managers undertaking security risk assessments.

6.7 Managers

It is the individual manager's responsibility to ensure that safe and secure environments are maintained that all incidents are reported in full and that appropriate action is taken when and where necessary. Security is the responsibility of all managers who must ensure that preventative measures for the safety of staff and property are in place. They should ensure that the right policies, procedures and systems are in place in their local areas and that such policies are kept under constant review.

Line managers and heads of department should also:
- Ensure that arrangements are made to secure the Department/ Directorate out of working hours, together with the safe custody of keys (where applicable).
- Ensure the setting of any security alarm or device to protect the property out of hours (where applicable).
- Seek advice from the VPR Lead to ensure that the highest standard of security is maintained within their Department/ Directorate.
- Ensure all staff employed by the ICB, staff from other organisations working

in NHS Midlands & Lancashire CSU (MLCSU), contractors and official visitors wear an ID badge at all times.

- Ensure that all staff are made aware of this Security Policy and fully understand its content and their responsibilities.
- Assess the impact on security of new projects and changes.
- To carry out security risk assessments and ensure that appropriate measures are in place.
- Ensure all staff receive appropriate security training by means of a training needs analysis and risk assessment for their role.

6.8 ICB Employees

- ICB employees are expected to co-operate with management to achieve the aims, objectives and principles of the Security Management Policy. Great emphasis is placed on the importance of co-operation of all staff playing their part in observing security and combating crime.

- ICB employees have a number of duties and responsibilities regarding security, these include.
- Staff should ensure they keep property and assets of the ICB secure at all times. Loss of equipment supplied by the ICB may be investigated by LSMS and not replaced. Staff may have to fund replacement equipment, through their own department budget, should they lose or damage through negligence, any property or assets of the ICB.
- Staff should be aware of their responsibilities in protecting at all times, the assets/property of contractors, visitors and the ICB. Where specific security procedures exist, staff must abide by them at all times. Where staff know or suspect a breach in security, they must report it immediately on an Incident Form or to their manager, or LSMS.
- All staff are reminded that it is a criminal offence to remove property belonging to the ICB without written authority. Failure to seek appropriate authority from their line manager could result in disciplinary action or criminal proceedings being taken against them.
- Staff are responsible at all times, for the protection and safe keeping of their private property. The LSMS will, if requested, advise staff on the security of their property. Any loss of private property must be reported without delay. If private property has been stolen, then it is the owner's responsibility, not the ICB's responsibility, to contact the police. Theft will be seen as from the person not the ICB by the Police.
- The ICB will not accept liability for the loss of, or damage to private property including motor vehicles or other modes of transport. Motor vehicles brought onto the ICB's car parking facilities are entirely at the owner's risk.
- All staff, visitors and contractors working on behalf of the ICB or its representative, must wear an approved security identification badge and/ or pass at all times, and challenge colleagues or strangers for not wearing them.
- Should a member of staff be vulnerable for any reason or have a disability that could impact upon their security needs, they should bring this to the attention of their line manager who will make the necessary arrangements

for drawing up a Personal Security Plan if required.

- Report all security related incidents, including violence and aggression, theft or loss through the ICB incident reporting procedures, ensuring that line managers are fully aware of the circumstances.
- Be aware of security issues at all times and not allow anyone to tailgate them through controlled access doors. All staff must use their fobs to gain access through all doors at all times.

6.9 Staff from Other Organisations

Staff from other organisations e.g. Midlands and Lancashire CSU, should be made aware and read the details of the ICB's Security Management Policy. Where required, the ICB will ensure adequate liaison is established between other bodies to ensure consistency of procedures and guidelines.

ICB staff visiting or working at other organisations should familiarise themselves with security arrangements for that location and if necessary, risk assess any perceived risks outlined in this policy.

7. Risk Management

The ICBs risk management policy should be followed and can be found on the ICB website. Follow link:
https://www.healthierlsc.co.uk/application/files/3616/7111/6039/LSCICB_Corp12_Risk_Management_Strategy_and_Policy_V1_071222.pdf

The ICB has identified the following potential security related concerns for its organisation:

- Physical assault against staff
- Non-physical assault against staff
- Harassment of staff by another
- Theft of ICB property
- Theft of personal belongings
- Criminal damage
- Unauthorised intruders

Following a review of the above areas of concern the ICB does not currently feel that they require inclusion on the ICBs corporate risk register; however, these will be monitored and further discussed as part of the Health and Safety Oversight Group's (HSOG) regular review of Health and Safety, Security and Fire arrangements. Should the group feel it necessary then a risk assessment will be completed following the ICBs Risk Management Policy to analyse the impact and likelihood of those potential risks and escalate any that meet the threshold for a corporate risk register.

7.1 Managing Physical Security

The following steps should be taken annually to ensure the management of physical security is maximised at all times:

- A site wide risk assessment of all physical security in place at all buildings under the control of the ICB.
- An assessment must take place to improve or increase security after an incident or new vulnerabilities are realised by the ICB.

7.2   Visitors/Contractors

- Contractors and other personnel, who visit the ICB, are to be issued with a visitor's identification badge that must be displayed at all times when personnel are on the premises.
- This will be signed for in the register held at the appropriate reception area. The member of staff who is responsible for the visitor/contractor will then arrange for them to be escorted to the relevant department.
- On leaving, the visitor's badge should be reclaimed. All relevant times should be recorded in the register held within the department.

7.3   Staff Identification

The ICB Security Management Policy requires that all staff wear identification badges at all times. Photographic identification badges for staff will be produced by the Midlands and Lancashire CSU and issued via your line manager.

7.4   CCTV

The installation of CCTV at sites identified as benefiting from the facility is for the primary purpose of deterring criminal activity against the ICB, its staff or visitors. An annual review of CCTV need or requirements will take place following an incident or identified vulnerabilities were it is deemed necessary to strengthen the security of the ICB and its staff.

- Adequate CCTV signage will be in prominent place, advising members of the public that it exists.
- Where crime is committed any relevant data captured by CCTV will be used as evidence to support criminal or civil prosecution of the perpetrator/s. This may include the use of third parties data e.g. Landlords CCTV.
- The ICB will be the data controller for the CCTV data. Access to images will be governed in accordance with ICO guidelines (in accordance with the Data Protection Act, Section 29) and Subject Access Requests.

7.5   Access Control and Fobs

ICB staff will be issued with a fob for access to the buildings and areas they are employed to work within.

- Fobs will only be issued to employed staff (including those working as embedded or at the discretion of the relevant Executive Director) or visitors who have business at ICB and have signed for their use. Visitor fobs must be returned at the end of each day.
- Data in relation to the activity of fobs will be recorded by the access control

computer and this data may be used in the prevention or detection of crime, in accordance with the Data Protection Act, Section 29 and Subject Access Requests. It must not be misused for any reason. It may also be used for a fire register should the need arise during a drill or fire situation. All staff are therefore required to present their fobs on entry and exit of the main building regardless of the position of the main doors.

7.6 Loss of ICB Equipment/Assets

The ICB will provide staff with equipment e.g. iPads and laptops, for staff members to conduct their work. Staff must take care of equipment and ensure it is secure at all times. Staff must take care when off site and travelling to another meeting or venue, with ICB equipment/assets.

Staff who are deemed to have acted carelessly with ICB equipment/assets may be subject to disciplinary proceedings.

Should a department want to replace this item then replacement would be at the discretion of the relevant Executive Director.

8. Reporting and Review of Security Incidents and Lessons Learnt

- The ICB should follow its own incident reporting procedures to report security related incidents.
- The VPR Lead should review all security incidents; including security related Serious Incidents and report to the HSOG on steps required following LSMS findings.
- Lessons learnt from security management related incidents will be reported to the HSOG for review and implementation.

9. Security Management Awareness

- The VPR Lead will attend staff training sessions to raise awareness of Security Management within the ICB.
- Additional training will be based on training needs analysis e.g. Conflict Resolution training.

10. Monitor and Review of Policy

The effectiveness of this policy will be monitored by the HSOG. This group will advise on necessary changes to the policy and inform the ICB Executive Meeting of those proposed changes for further ratification. The Group will review the security related incidents, security related risk assessments and statistical analysis of security reports given to the group.

This policy will be reviewed annually by the HSOG and in accordance with the following as and when required:

- Following legislative changes
- Publication of good practice guidance
- Case law
- Significant incidents reported
- New vulnerabilities identified
- Changes to organisational infrastructure

11. References & Bibliography

NHS Violence, Prevention and Reduction Standards

https://www.england.nhs.uk/wp-content/uploads/2020/12/B0319-Violence-Prevention-Reduction-Standards.pdf

B0989-NHS-violence-prevention-and-reduction-standard-guidance-notes.pdf (england.nhs.uk)

CCTV Code of Practice

https://ico.org.uk/for-organisations/guide-to-data-protection/key-dp-themes/guidance-on-video-surveillance-including-cctv/about-this-guidance/

12. Related Policies

The following documents should be consulted alongside this policy:
- Lone Working Policy
- Incident Accident and Near Miss Procedure

13. Equality Impact Assessment

Equality, Health Inequality Impact and Risk Assessment

Security Management Policy and Strategy

Lancashire and South Cumbria HC Partnership

Current Status		**Review Date**
Stage 1 Approved		24/08/2023
Person Responsible		**Service**
Debra Atkinson		Corporate
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Explanation

This policy details the ICB's aims and responsibility for the effective management of security in relation to staff, patients, visitors, and property. The ICB is committed to the provision of safeguards against crime and the loss or damage to its property and/ or equipment

Supplementary Files

📕 **Item 6.2 - LSCICB_Est01 Security Management Policy and Strategy V2 (draft).pdf**
(278843 bytes) - *Attached below*