



TRAINING RISK ASSESSMENT AND MITIGATION

BY ANN BUMBAK

All law enforcement training programs present a level of inherent risk. The use of firearms and other weapons, defensive tactics and emergency driving present the highest levels of risk in most law enforcement training environments. However, additional hazards are present when conducting specialized tactical operations training including warrant service, barricade situations, hostage rescues and explosive ordnance disposal (EOD), and when conducting dynamic training events, such as scenario-based or shoot house training for advanced units.

A recent study of 2,561 police injuries over a four-year period revealed that the top cause of injury (23%) was arrest activities (Bullock 2007). Because police work is an intrinsically dangerous profession, often involving tense, physical confrontations, this statistic is not surprising.

The second highest cause of injury to police officers (18%) was identified as training activities. Injuries to officers, whether sustained during training or field operations, are impossible to eradicate. However, it is possible to mitigate both the causes and severity of these injuries by encouraging appropriate safety habits and the systematic implementation of an agency-wide training risk assessment policy. This article explores the process and procedures for development of a well-written risk assessment policy for law enforcement agencies.

Case study

In 2002, Jane, a ten-year veteran female federal law enforcement officer was assigned to a large southwestern United States field office. As a routine part of her duties, she attended mandatory defensive tactics training provided monthly by her agency. The training was conducted in a cement-floored warehouse by contractors who were experienced military personnel. The sessions were typically two to four hours in length, involving aerobic exercise, weightlifting and force-on-force defensive tactics training.

During one session, students were told to practice punches and kicks using cushioned bags. One student held the bag while the other student punched or kicked. Jane, who was 5'1" tall and weighed 120 pounds, was paired with John, a male partner who was 5'10" and weighed 170 pounds. While Jane held the bag for John, struggling against the force exerted by her partner, the instructor ordered John to kick the bag at 100% force. Due to the height and weight disparity between the two partners, John's kick missed the bag and struck Jane's unprotected knee. Jane sustained a lateral tibia plateau fracture — a broken leg at the knee joint — that ended her career.

A subsequent examination of the agency policy on physical and defensive tactics training revealed that no safeguards existed to prevent injuries. No policies governing

the use-of-force under risky conditions existed, nor had the former military trainers been prepared to manage mixed gender units. None of the trainers had considered pairing partners according to height and weight to prevent injuries. Organizationally, the informal policy for physical training was to give the staff complete autonomy with regard to the structure of activities and risk involved. Jane's partner had merely done exactly as he was ordered by a certified trainer. As a result, Jane was permanently injured due to poor organizational risk management.

What is the risk management process?

Risk assessment can be defined as the continuous, systematic process of evaluating risk (Haddow and Bullock 2003). From a training perspective, this process includes examining facilities, equipment, lesson plans and programs in order to better identify the dangers associated with a particular training course. In assessing risk, it is important to use a structured process to ensure that no potential threat is overlooked (Canton 2007).

Risk management is the action taken to mitigate, or lower, the risks identified during the assessment process. For example, when conducting firearms training, risk management means having students wear mandatory ear and eye protection, giving

Figure A:

RISK ASSESSMENT CHECKLIST

Training Course Name _____

Conducted By _____ Date _____

An examination of the course listed above revealed the following identified risk factors:

Firearms use

- High risk: Live ammunition
- Moderate risk: Simulated/dummy ammunition
- Low risk: No ammunition

Defensive tactics session

- High risk: Force-on-force actions (<50% force)
- Moderate risk: Practice sessions (20-50% force)
- Low risk: Demonstration only

Driver training session

- High risk: Driving outside of normal parameters
- Moderate risk: Driving in accordance with traffic laws
- Low risk: Instructor driving only

Physical training session

- High risk: Vigorous, sustained exertion
- Moderate risk: Moderate exertion
- Low risk: Minimal exertion

Attach a description of the mitigation strategies in place to reduce the risks associated with injury.

a safety briefing to all participants prior to hot-zone training and enforcing strict muzzle discipline by requiring all firearms to be pointed downrange. While these actions alone cannot prevent the possibility of injuries, they provide a framework of safe organizational practices that significantly reduces the likelihood of injury.

Training risk assessment is a good business practice for all police agencies. In fact, a key requirement for achieving law enforcement training academy accreditation is the existence of a thorough and documented risk assessment process. Like CALEA, the Federal Law Enforcement Training Accreditation (FLETA) standards require

the adoption of a standard risk assessment process by law enforcement agencies. This standard specifically requires a mechanism for the assessment of risks and use of identified safety equipment and procedures to mitigate risks when conducting inherently dangerous training.

Risk classification scales

High-risk training can be defined as training which, by the nature of the activities performed by students or instructors, poses a legitimate risk of serious, permanent or life-threatening injury or death. Some examples of high-risk training activities might include:

- Firearms training using live ammunition
- Emergency vehicle operations
- Force-on-force defensive tactics
- Training in tactical operations
- PT involving vigorous, sustained exertion

Moderate-risk training is training that presents a risk of injury, but is unlikely to cause death. Some examples of moderate-risk training activities could include:

- Firearms training with simulated ammunition, blanks or dummy projectiles
- Vehicle operations in accordance with all traffic laws
- PT involving moderate exertion
- Defensive tactics practice sessions (at 20-50% maximum force)
- Scenario-based training that involves a confrontation with a suspect

Low-risk training can be defined as training that presents a very limited risk of injury. Examples of low-risk training activities may include:

- Classroom-based training
- Simulated firearms training with equipment incapable of firing a projectile (blue guns, red guns)
- PT involving minimal exertion

Training with *high or moderate* risk should receive special attention to the use of mitigation strategies to decrease the inherent risks. Mitigation strategies can take the form of external or internal controls (Reason 1997). *External controls* are the methods involved in planning and safeguards such as equipment, standard operating procedures and supplies on hand. For example, a law enforcement agency can require a certified EMT and defibrillator on site for all force-on-force defensive tactics training sessions conducted. The presence of trained medical personnel and emergency equipment as a standard operating practice reduces the risk of being unprepared for a medical emergency.

Internal controls are the combination of training and experience of the staff members who are tasked with conducting inherently dangerous training. For example, personnel who conduct EOD or firearms training should be fully certified instructor-practitioners who have significant experience in the topic(s) which they are training and attend yearly continuing education training in their specialty areas. The underlying assumption is that the more expertise and experience an instructor has, the greater the likelihood of adhering to policy and ensuring a safe environment for all participants.

Policies should address agency needs

Certainly, law enforcement executives must have the latitude to determine how best to address their own agency’s training risks in terms of policy and procedures. For example, agencies which are not directly involved in delivering emergency driving or firearms training to their personnel obviously do not require comprehensive policies addressing these areas. For agencies that conduct their own high-risk training, risk assessment should be conducted yearly.

Departmental policies with internal and external controls in place should be developed and kept up-to-date.

When using an outside agency or contractor to fill departmental needs for training that can be characterized as high-risk, agencies should review the standard risk management policies in place within the organization providing the training to minimize exposure of staff members to potential injuries as a result of poor mitigation processes. In the case study described earlier, a careful examination of the training environment, use-of-force policy and potential for serious injury could have prevented a career-ending event sustained in the line of duty.

Executives at agencies with a risk assessment process currently in place should ask themselves:

- Have all training programs been evaluated for safety in the past three years?

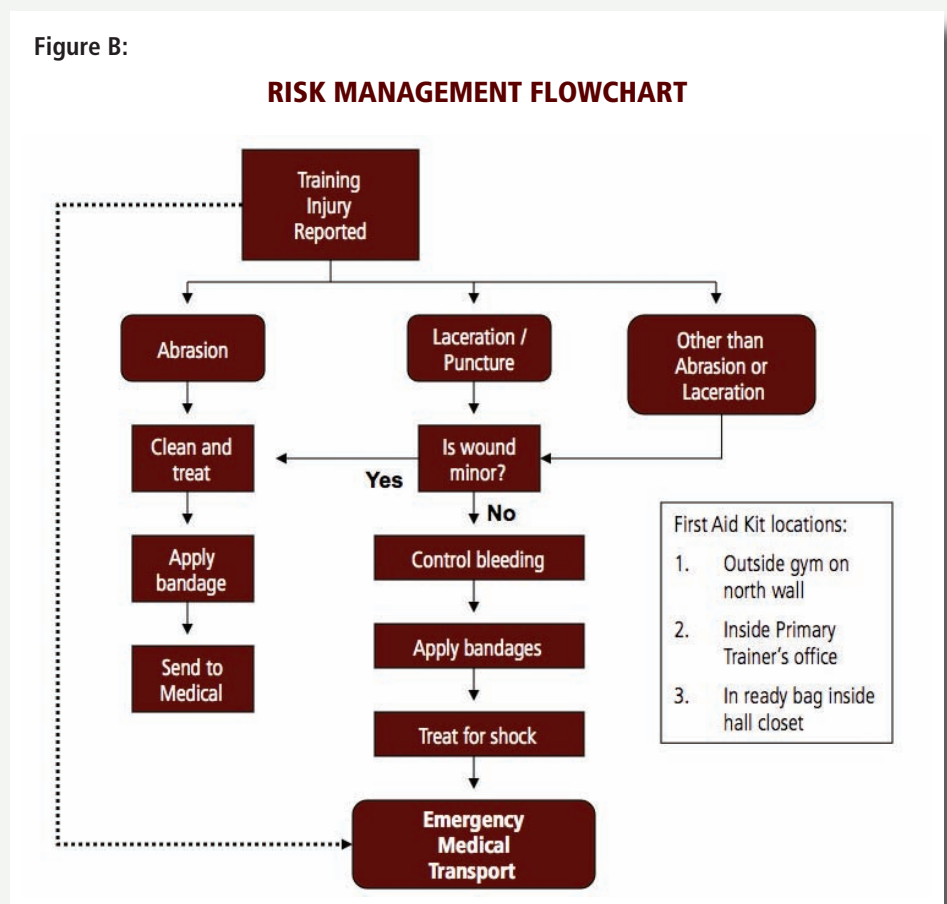
- How many injuries have occurred during training?
- How many of these injuries were preventable?

For agencies without a risk assessment policy in place, three key questions to begin the development of a risk assessment policy are:

- What risks are trainees and/or staff exposed to in the training environment?
- What steps are taken (or can be taken) to minimize exposure to those risks?
- Does the agency promote a culture of training safety?

In examining the answers to these questions, executives can begin to formulate the areas of vulnerability for their training programs.

Figure B:



Developing risk assessment tools

In addition to developing a risk assessment policy, consider the use of a set of risk assessment tools to evaluate training programs, as these can allow trainers to more easily and accurately assess risks. Figure A illustrates an example of a checklist that could be used to determine the level of risk and mitigation strategies involved in a training course. A checklist of this sort can be used to measure all training courses with the same yardstick, according to the activities planned and safeguards in place.

Figure B illustrates a risk assessment policy flowchart to manage wound identification and personnel actions to be taken in response to a training injury. This type of flowchart provides a plan for management of injuries that occur during training, to ensure the actions taken comply with policy without the need to refer to a cumbersome organizational rules handbook during or immediately after an incident occurs.

Conclusion

One in five officers who are injured in the line of duty sustains the injury during training. Injuries will inevitably occur during law enforcement training. Preparation, in the form of adequate mitigation strategies and standard operational practices, can reduce the severity and consequences of line of duty training injuries.

A risk management program for law enforcement agencies, developed to decrease the risks associated with police training, should be focused on identifying and assessing the risks of the training provided and identifying strategies to protect staff and students from injury, especially during high-risk training involving use-of-force and firearms. ◀◀

References

Bullock, T. "Police office injury study." *VMLIP Law Enforcement Newsletter*, Volume I, Issue 2, 2007. <http://www.vmlins.org/Newsletters/Law/injury.htm> (February 9, 2011).

Canton, L.G. *Emergency Management: Concepts and Strategies for Effective Programs*. Hoboken, NJ: John Wiley & Sons, 2007.

Federal Law Enforcement Training Accreditation Board. "FLETA standards and procedures." Glynco, GA, 2010.

Haddow, G. and Bullock, J.A. *Introduction to Emergency Management*. Burlington, MA: Butterworth-Heinemann, 2003.

McNamee, D. "Business risk assessment." Institute of Internal Auditors, Altamonte Springs, FL, 1998.

Reason, J. *Managing the risks of organizational accidents*. Brookfield, VT: Ashgate Publishing Co, 1997.

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