

# Health and Safety Bulletin

## Effective health and safety procedures

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### Useful contacts:

HSE website  
[www.hse.gov.uk](http://www.hse.gov.uk)

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Environment Agency  
website:  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

There is an ongoing argument about the necessity for health and safety procedures – on the one-hand supporters suggest having a written procedure is the only way to ensure workers are given the same message about how activities should be completed to minimize health and safety risks, so they are fundamental to reducing risk. Detractors reply that health and safety procedures tend to be long drawn out documents that no-one reads (or has access to), that are only pulled out to show insurers or enforcement agencies – in summary they are purely there to minimize liabilities, rather than risk.

### Legal requirements for procedures

A significant proportion of health and safety legislation demands that organisations develop procedures and/or provide training. Examples include:-

- Health and Safety at Work etc. Act – section 2 requires employers to provide, so far as is reasonably practicable, safe systems of work (such as work instructions, method statements, and permits-to-work) and information, instruction and training
- Management of Health and Safety at Work Regulations – regulation 5 requires employers to have arrangements for the effective planning, organisation, control, monitoring and review of the preventative and protective measures and record these arrangements when they employ five or more employees. Additionally, regulation 8 requires the employer to have procedures for situations where there is serious and imminent danger (e.g. fire, spillage etc.) and regulation 10 places a duty on employers to provide employees with “comprehensible and relevant” information about any risks to their health and safety that have been identified through the risk assessment and the preventative and protective measures that are being taken to control them
- Provision and Use of Work Equipment Regulations – regulation 8 states that persons using equipment (and those supervising them) should be provided with health and safety information (which is easy to understand) where appropriate, and that it should include details of the conditions and the methods by which they should be used and action to be taken for abnormal situations

### How can you make procedures user friendly?

In order for procedures to be effective they need not only to contain the required information, they also need to be perceived as an easily accessible and useful reference for anyone who uses them.

To achieve this, although one person will need to take responsibility for developing the procedures, they will need to involve and consult others. They need to reflect how workers actually approach the task rather than how managers “believe” they carry it out – workers should be involved in the risk assessment and safe system of work, so that the documents produced are accurate and contain practical instructions. In addition, it needs to be presented in a suitable style and format, using words that workers can understand. Giving employees a 12-page copy of a risk assessment to sign achieves very little!

### Conclusion

Providing workers with information and instruction about the risks involved in their work and the risk controls that should be used is not only a legal requirement, it can also be an effective way of minimizing risk.

Clwyd Associates have developed various solutions for their customers – this varies from providing one-page colour-coded summaries, which can be displayed locally as reference information, to more detailed procedures for high risk activities. Both can be used for training.

## Recently issued health and safety information:

- PHE reporting and outbreak action cards <https://coronavirusresources.phe.gov.uk/reporting-an-outbreak/resources/>
- HSE free poster on using disposable respirators <https://www.hse.gov.uk/pubns/disposable-respirator.pdf>
- Guildford Ergonomics – how to work comfortably at home – Youtube video <https://www.youtube.com/watch?reload=9&v=mP3IK7wtfhE>
- Interactive infographic on the risk of lifting at height [http://wisha-training.lni.wa.gov/training/articulate/liftheighttool/story\\_html5.html](http://wisha-training.lni.wa.gov/training/articulate/liftheighttool/story_html5.html)
- Workplace mental health webinar <https://www.shponline.co.uk/watch-workplace-wellbeing-digital-week-webinar/>
- Ansell guide on laundering gloves [http://protection.ansell.com.au/rs/615-TNW-071/images/Ansell\\_Glove%20Life.pdf](http://protection.ansell.com.au/rs/615-TNW-071/images/Ansell_Glove%20Life.pdf)

## 20% of line managers have not had H&S training

IOSH has recently published findings of a YouGov survey of small and medium-sized businesses (SMEs) (completed before the outbreak of the COVID-19 pandemic) focused on the role of line managers in developing and maintaining a good health and safety culture in their workplace (<https://iosh.com/media/8267/managing-your-people-safely.pdf>) – the key findings were

- 96% stated that line managers have a significant influence on ensuring their direct reports are safe and healthy at work
- 82% who have invested in health and safety training for line managers indicated that this had helped drive an improvement in business measures such as reducing the number of RIDDOR reportable accidents, enhancing their reputation with suppliers, increasing productivity (because there are fewer accidents)
- 19% of line managers have had no health and safety training

Considering a recent report estimated the total cost to society of a workplace fatality in Britain is almost £1.7 million, the advantages of providing health and safety training in terms of reducing the risk of having an accident or incident and the potential liabilities resulting from such an event are substantial.

Over the past few months, Clwyd Associates has successfully converted and facilitated all of their existing face-to-face training to a “Virtual Instructor Led Training” (VILT) format – this includes IOSH certified courses, permit training and other health and safety topics. The feedback from participants has been very positive with unsolicited comments such as “great course” and “an interesting and relevant course.”

VILT training has huge advantages for employers under current circumstances, eliminating the management of site visitors and the need for participants to travel, while the technology still allows interaction and effective group exercises.

Please contact us to discuss any of your health and safety training needs at [enquiries@clwydassociates.co.uk](mailto:enquiries@clwydassociates.co.uk).

## Case Law update

*This issue focuses on recent cases involving training and instruction*

A tinplate printing company was fined after an employee suffered a serious crushing and degloving injury to his hand after he became trapped between the rollers of the printing press, whilst trying to rectify an intermittent fault. An investigation by the HSE found that the front guards electronic interlock device had been defeated and there was no risk assessment for fault finding on the printing press and no safe system of work or suitable training for employees. The company was fined **£29,000** and ordered to pay costs of **£1713.40**

A worker was killed at a metal and alloy products manufacturer when he was hit on the head by a swinging load being transported on a crane, even though the crane operator had seen the worker, shouted a warning and stopped the crane. The HSE investigation found that

the company had not reviewed risk assessments and safe systems of work for nine years, many employees who operated cranes had received no refresher training for between 6-10 years and the training programme for new starters was inadequate. The company were fined **£160,000** with **£72,321** in costs

A dairy was fined **£54,000** with costs of **£18,553** after two employees were badly scalded when hot water escaped from the top of a tank. The HSE investigation found the cleaning procedure required a complicated series of valve changes on the tank but there were no written instructions or diagrams on how to do this. One employee opened a valve in error, and compressed air that had built up inside the pipes forced the 70°C hot water out. The water rained down on the workers, badly scalding both of them - they both needed hospital treatment and one had to spend a week in a specialist burns unit.

The HSE inspector who investigated said “The firm has since modified the tank to prevent water escaping, reduced the water temperature to 50 degrees, and provided laminated instructions and photos for the workers.

## About Clwyd Associates...

We are a management consultancy, focusing on health and safety, and SAP based in the Midlands.

We employ consultants with at least 15 years practical experience backed up by recognised professional and academic qualifications - ensuring our clients receive first class service.

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