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Health and safety committees

Guidelines for operation

Health and safety committees are a long-standing method of communication, both under the Safety Representatives and Safety Committees Regulations and the Health and Safety (Consultation with Employees) Regulations. Shanks also covers health and safety committees as part of its Health and Safety Communications and Consultation company standard (number SHS103). These guidelines give advice on good practice and the operation of health and safety committees, although Shanks fully recognises that health and safety committees are not a company-run body.

1. Purpose of committees

Health and safety committees operate to monitor and, from this, assist in continuously improving the health, safety and welfare of all company employees at their place of work. Recognising that health and safety is a responsibility of everyone, the committees should foster a spirit of co-operation between all employees to ensure ever-improving standards of health and safety.

2. Organisation

Each region of the company has its own health and safety committee - Safety Department keeps a list of which operation falls into which committee. In addition to these region based health and safety committees, 'special interest groups' may be established to consider specific issues or types of operation. However, these are an addition to health and safety committees, not an alternative.

Regional health and safety committees meet at least once every three months. Special interest groups set their own timetable. Extraordinary meetings can be called outside of these timescales if, in the opinion of the committee chair or vice-chair, there is sufficient business of an urgent nature to justify such.

3. Constitution and membership

Each regional health and safety committee comprises:

- A workplace representative for each site/operation in that region
- A management representative for each site/operation in that region
- A representative from Group Safety Department

Workplace representatives on regional committees are:

- If the site/operation in question has union representation and a union safety representative (under the Safety Representatives and Safety Committees Regulations) has been elected, the union safety representative for that site/operation sits on the relevant regional committee and represents all of the workforce at that site/operation

- If the site/operation in question has union representation, but no union member wishes to take the role of union safety representative, a representative of employee safety (under the Health and Safety (Consultation With Employees) Regulations 1996 - HSCER 96) may sit on the regional committee. This representative of employee safety may be a union member or not

Advice note on H&S Committees March 2001

- If the site/operation in question does not have union representation a representative of employee safety may likewise sit on the area committee

Committee meetings should be held during working hours and on premises agreed by the chair or vice-chair. Workforce representatives are paid equivalent earnings for the time they are absent from work to attend meetings. Workplace representatives will be paid reasonable expenses for any costs incurred to ensure they can attend meetings.

4. Functions and objectives

The functions and objectives of health and safety committees shall be as set out in the Safety Representatives and Safety Committees Regulations, the Consultation with Employees Regulations and in the company standard number SHS103 - Health and Safety Communications and Consultation.

5. Chairs and vice-chairs of committees

Each committee shall elect a chair and a vice-chair. If the chair is a management representative then the vice-chair should be a workplace representative and visa-versa. Vice-chairs shall preside in the chair's absence.

6. Minutes and agendas of meetings and secretaries

It is the chair of each committee's responsibility to maintain accurate records of all meetings, to approve minutes for release, to give notice of meetings and distribute the agendas for such, through a nominated secretary. Shanks accepts responsibility to provide the required resources for meetings and any other suitable administration. Minutes from meetings should be signed by the chair of that committee. Copies of all minutes shall be:

- Sent to relevant members of the senior management team
- Sent to each member of the relevant committee
- Displayed on site/operation noticeboards (minutes may also be publicised at sites/operations in other appropriate ways as required)

Any employee can submit an issue for discussion at committee. However, this should be done through a committee member and notified to the committee chair, or vice-chair, through their nominated secretary prior to the meeting (exceptions may be made for urgent and serious issues). An agenda detailing the issues to be discussed and the time and place of each meeting should be distributed to each committee member at least two weeks prior to meetings.

Good practice is that at least the following items should be on each committee meeting agenda:

- Discussion of RIDDOR incidents which have occurred since the last meeting in the region covered by the committee
- Issues raised at a site/operation level for which a negotiated outcome has not been possible
- Issue the committee wishes to raise with Group Safety Department and/or senior managers
- Safety Department report, including any new legislation etc

7. Termination of membership

A workplace representative ceases to be a committee member if:

- They leave the service of the company
- They are transferred to another site/operation
- They are promoted beyond the level of chargehand or equivalent

Health and safety committees are one of the most established forms of safety communication and consultation in the UK - however, they can become staid. Use your committee to raise and solve issues

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The COSHH Reg's

Introduction

The Control of Substances Hazardous to Health (COSHH) Regulations 1994 came into force on 16 January 1995. They replaced the older COSHH 1988 and the Health and Safety (Dangerous Pathogens) Regulations 1981. The COSHH Regulations are widely misunderstood and often ridiculed as the 'Tippex' Regs. Many companies also do not follow COSHH fully and tend to use product data sheets and call them assessments.

COSHH – so complex it got the nickname: 'the Tippex Regs'

The main group of potentially hazardous substances dealt with by Shanks is wastes. However, COSHH often does not deal with wastes in an effective manner because of the variety of wastes accepted and the information available from customers on wastes accepted. As a result Shanks tends to end-up with two types of assessment: Product COSHH assessments (eg, cleaning fluid etc) and general wastes COSHH assessments (eg, household wastes) backed by procedures and systems, such as qualified chemists at special wastes sites and high temperature incinerators.

What does COSHH apply to?

COSHH applies to toxic, harmful, corrosive or irritant chemicals, anything with an MEL (maximum exposure limit) or OES (occupational exposure standard), carcinogens (as noted in EH40 - a reference book produced each year by the HSE), teratogens (those substances which affect unborn children), mutagens, biological agents, dusts and anything else which may pose similar risks.

When determining whether a substance is hazardous and falls under COSHH a range of other factors also need to be taken into account such as different forms of the same substance (dusts, liquid, solid etc) which may pose different problems, cumulative effects of various substances, impurities in substances etc. In addition, for biological agents employers are expected to keep an eye on research even if no classification has been formally arrived at.

All in all then pretty much anything could come under COSHH. However, it is not the intention of COSHH to either cover ground already dealt with by other legislation or hazards controlled by other legislation.

What COSHH does not apply to

COSHH does not apply to: Asbestos and lead, because these substances are covered by their own legislation, radioactive hazards covered by the Ionising Radiation Regulations, substances which are hazardous solely because they are flammable or explosive, substances which are hazardous solely because they are under pressure or hot/cold, hazardous substances used as part of a medical treatment and those used in below-ground mines (ie, deep mines)

In theory, then, the flammable warning symbol should not appear on a COSHH assessment or summary/results sheet for any COSHH assessment. However, summary/results sheets for substances are a convenient place to note whether a substance is flammable or not and such information is often included, although not strictly dealt with by COSHH. Shanks tends to follow this pragmatic approach and often flammable hazards are included in company COSHH assessments, although the Regulations, strictly speaking, does not cover them.

Advice note on COSHH January 2001

Shanks runs a half-day course on the COSHH Regs – would you benefit by attending?

What does COSHH state that employers have to do?

COSHH requires employers to:

- Make a suitable and sufficient assessment of the risks created by any work which involves exposure to substances hazardous to health and review this assessment whenever anything changes or at least every five years.
- Not to carry out such work until such an assessment has been made.
- Whenever reasonably practicable prevent exposure.
- If it is not reasonably practicable to provide adequate controls other than personal protective equipment.
- Where such control measures are not adequate alone provide PPE.
- Where a substances has an MEL reduce exposure to below this (must be achieved or work should be stopped) and, as low as is reasonably practicable (ALARP) – as far below any MEL as can be achieved.
- Where a substance has an OES, reduce exposure to below this, or if exposure is above any OES take measures within a reasonable timescale to remedy the situation.
- Maintain, test and examine any control measures put in place as the result of a COSHH assessment, such as local exhaust ventilation (LEV) which must be tested every 14 months.
- Ensure that if PPE is used that all employees at risk use it and that when the PPE used is not disposable that it is maintained and that records are kept of such (NB. Employees have a duty to wear any PPE required).
- Where employees are exposed to hazardous substances and it is necessary to ensure that controls are being maintained to monitor exposure and keep records of such for at least five years.
- Where it is appropriate to monitor the health of employees exposed to hazardous substances and keep such records for at least 40 years.
- Provide employees exposed to hazardous substances with suitable information, training and instruction regarding hazards and controls. This should include the general results of any monitoring carried out and whether any MEL has been exceeded.

In addition, COSHH includes a list of miscellaneous provisions concerned with issues such as fumigations, prohibition of the use of certain substances, self-employed persons etc.

The above is a long list. However, and in summary, employers must list all hazardous substances being used, assess the risks to health from these, provide suitable control measures (with PPE as a last resort), monitor to ensure controls are effective and inform and train and induct its employees exposed to hazardous substances.

Like all risk assessments COSHH assessments need reviewing

Review of assessments

COSHH requires that assessments are reviewed whenever anything significant changes. This may be related to the hazardous substance itself (such as purchasing a different substance), or the task it is being used in. In any case assessments must be reviewed at least once every five years. In practice, most companies review assessments more regularly than this (Shanks aims to review every three years) as experience shows that after five years very few COSHH assessments are anything like correct – indeed in most cases the hazardous substances on the assessments have normally changed completely. One further reason to review assessments is a change in the state of medical knowledge regarding a substance or a change in/introduction of an MEL or OES for a substance.

Information, instruction and training for employees

All employees must be provided with adequate information and training on any hazardous substances they are exposed to, including the results of any monitoring, details of the hazards faced and the control measures to be used. As with virtually all such training etc requirements this must be recorded.

In summary the information given to employees must include:

- The nature and degree of any risk to their health
- The control measures which are in place and how to use them, including PPE
- What cleaning, storage and disposal procedures are required
- What to do in an emergency
- Monitoring procedures, including access to results
- The role of health surveillance

Shanks COSHH system

Shanks uses consultants to carry out its COSHH assessments. However, these assessments will be useless unless the information provided to the consultants is accurate and that once an assessment has been done that any actions are carried out and employees inducted on the assessment. The system is laid down in Shanks company standard on COSHH.

The system is:

1. Make a list of all hazardous substances used/worked with - try starting with your list of general risk assessments and pick those out which involve hazardous substances, then check this by carrying out a stock-take of hazardous substances on your site/operation

2. Split this list into two:

- Hazardous products used, such as cleaning fluids, degreasers etc
- Hazardous wastes accepted, in general categories, such as 'household waste', 'food wastes' etc

3. Complete a COSHH initial information form for each task involving hazardous substances (make sure the information on the form is accurate or the COSHH assessment results you get back will not be accurate or relevant)

4. Submit the completed form/s to the occupational health consultants

5. When you receive the COSHH assessment results back from the consultants, READ THEM and take note of any remedial actions required. The COSHH assessment results you get back will include as a minimum:

When you get your COSHH assessments back don't just file them

- The outcome of the COSHH risk assessment expressed as 'low', 'medium' or 'high' - if you have a 'high' you must stop working with the hazardous substance until the required remedial actions have been carried out
- The hazards faced including health effects
- Work methods to be used - make sure your employees know what they are
- Control measures to be used, such as LEV - make sure they are used
- Welfare and hygiene requirements
- PPE and RPE requirements
- First aid procedures - make sure your first aiders are inducted on these
- Spillage procedure and other emergency procedures as appropriate
- Environmental monitoring requirements as appropriate
- Health surveillance requirements as appropriate
- Information and training requirements - accurate and high quality COSHH assessments are of little use sat on a shelf which no one knows about

6. Carry out any remedial actions required.

7. Induct your employees on the COSHH assessment results relevant to their jobs **AND** record this induction. If a general risk assessment also exists for the task in question (if not, why not?), append the COSHH assessment result to the general risk assessment and induct employees on both at the same time

8. If anything significant changes - review the assessment. If not review every three years

COSHH assessments and risk assessments

For the vast majority of COSHH assessments there will also be a 'normal' risk assessment. For example, a COSHH assessment on a cleaning fluid used to clean the windows of heavy mobile plant will be linked to a normal risk assessment which assesses the hazards and risks of cleaning windows on heavy plant.

Think of all the components of a task COSHH may be just one of several

Eg, Task: Cleaning windows on heavy mobile plant

- Normal risk assessment - covers physical risks, such as falling off the plant, slips and trips etc
- COSHH assessment - covers hazardous substance risks, such as the cleaning fluid which may be an irritant

Any employee carrying out the above task needs to know about both the physical risks and the substance risks.

For each COSHH assessment you have ask the question: "Which normal risk assessment does this relate to?" - then match them up and induct your employees on both at the same time.

COSHH is a complex and difficult topic.
If you have any queries
contact Safety Department and ask.

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Investigating incidents

More than 300 people die in Britain every year through accidents at work. In addition, it is estimated that British industry looses in excess of £3 billion a year as a result of accidents and incidents at work. One of the main ways companies can control these losses is by investigating incidents and accidents and ensuring that they do not happen again.

It is vital that all incidents and accidents are investigated and, if at all practical, measures put in place to stop them happening again. While a small number of accidents, such as wasp and bee stings, may appear to have no practicable solution, the vast majority do. It is the law of probability that if a company has a high number of minor accidents, sooner or later it will have a serious or fatal one. Minimising minor accidents reduces this risk.

The law

Under the Reporting of Incidents, Diseases and Dangerous Occurrences Regulations (RIDDOR) specified serious incidents and accidents must be reported to the Health and Safety Executive (HSE). The types of incidents which must be reported fall into a few main categories: Deaths, serious injuries, injuries which result in the victim being off work for more than three days, diseases associated with work and specified dangerous occurrences.

Failure to report RIDDOR incidents is a criminal offence and individual site managers may be held liable. Incident reports may be initiated by safety representatives, site first aiders etc, but it is the site manager who is responsible in the end.

Also under the law all first aid treatments must be recorded - hence the first aid section on Shanks incident reporting form (form No. FHS337). It is an offence not to record first aid treatments and anyone reporting an incident must complete the first aid section of the incident reporting form.

The law implies that remedial actions to prevent the reoccurrence of incidents must be carried out. Certainly if the HSE investigates an incident and finds out that a similar incident took place in the past and no, or ineffective, remedial actions were taken to prevent reoccurrence, it is unlikely to view the issue favourably. Shanks incident investigation form (form No. FHS349) is formatted to fit with the requirement for remedial actions to be recorded.

Categories of accident and incident

While RIDDOR lays down a variety of categories of serious incident, the law does not state how more minor incidents should be reported. Shanks reports incidents internally under four main categories (these are the categories used on the back page of the Safety Solutions newsletter):

- RIDDOR reportable dangerous occurrences and accidents
- Non-RIDDOR reportable minor accidents – those which involve injury, but not serious enough to be categorised as RIDDOR reportable
- Non-RIDDOR reportable dangerous occurrences - incidents outside of RIDDOR which do not involve injury to a person, but which do involve property damage
- Near misses - incidents which do not involve either injury or property damage, but which could have.

Advice note on
Incident investigation
March 2001

Please ensure when reporting an incident the correct box must be ticked at the top of the reporting form.

Investigating incidents and accidents

In too many cases accidents and incidents are put down to human error such as carelessness. While human error or behaviour may be a factor in many accidents, there are nearly always other issues which contributed. Even if human error is the major cause, there are remedial actions which can be taken such as additional training. The whole aim of incident reporting is NOT to blame to a person - it is to ensure that lessons are learnt and that incidents do not happen again.

All accidents involve unsafe acts by a person or persons and unsafe conditions in the environment they were working in. For example, a driver slipping from the access ladder to an item of heavy plant may have faced outwards instead of exiting backwards (an unsafe act), but the condition of the ladder, muddy, damaged etc (an unsafe condition) may also have been a factor. When investigating accidents and incidents both the unsafe acts and conditions must be sought, rather than just blaming carelessness.

For the majority of accidents and incidents there will be an obvious cause or causes. However, there will also be underlying causes. For example, a collections driver strains his shoulder pulling a wheelie bin across gravel. The unsafe condition would be that the surface the bin was on was not level and firm, the unsafe act was that the driver tried to move the bin without getting help. These may be the obvious causes of the incident, but the underlying causes may be a lack of training, insufficient manpower on the job, poor risk assessment of the customer premises etc.

For all incidents and accidents the final report should include:

- The unsafe acts which resulted in the incident
- The unsafe conditions which resulted in the incident
- The obvious causes of the incident
- The underlying causes of the incident
- What remedial actions are to be taken to stop a reoccurrence

Tips and suggestions

When investigating an incident all those who were involved, including witnesses, should be interviewed and a clear picture of what happened built. These interviews should take place as soon as possible after the incident took place - time dims and alters memory. It may be useful to take photographs of the incident location or any equipment which was involved. It may also be helpful to measure distances and other parameters. Environmental conditions, such as the weather, lighting etc may be valuable information. For example, there is a world of difference between a fall from a height on a calm sunny day and one which took place in the dark, in a rainstorm with a 40 mile per hour wind blowing.

All incident report forms should be sent to Safety and Insurance Department within 72 hours of an incident taking place. This may be difficult if the incident involves time off from work - that is the 'time off' box on form FHS337 cannot be completed until the amount of time off is known. In these cases the form should be sent and the final amount of time taken off noted on a follow-up report or Safety Department informed by telephone. All boxes on incident report forms must be completed. If a box is not relevant, such as no first aid treatment required or no time off work was involved, then this should be noted rather than leaving the box empty. Also remember to include any relevant information, such as whether the correct PPE was being worn. In all cases if you have any problems or are unsure about filling in an incident report form, or want advice on causes of incidents or remedial actions, contact Safety Department.

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Reporting rules

reporting accidents and incidents

This advice note is a guide to which forms to use when reporting workplace accidents and incidents, who they need to be sent to, who should fill in the forms and the type of information which should be included. It does not deal with how to investigate incidents (this is covered by the 'investigating incidents' advice note and training course), nor does it cover incidents such as car crashes. Shanks company standard on incident and accident reporting should be read in alongside this note.

There are three basic forms to use when reporting workplace incidents:

The incident reporting form (FHS337) - ideally this should be completed by the person who had the accident (unless, of course, they are in hospital etc) and signed by them. It is the victim's account of what happened. All applicable sections of the form MUST be completed - the form is approved by the Department of Social Security and is a legal document. The form MUST be signed by a manager who should also check to ensure the form is completed to a good quality before signing it.

The incident investigation form (FHS349) - ideally this should be completed by the manager, but this may be delegated to a chargehand or similar. However, the manager MUST sign this form as a true account. Please note that sections of the form referring to risk assessments etc apply as much to third parties as Shanks own employees.

Both the incident reporting and investigation forms are of the 'copy-through' type. For both forms the white copy MUST be sent to Safety Department and the pink copy MUST be sent to Insurance Department - these copies MUST be sent within 72 hours of the incident occurring (if it is not known how long an injured person may be off work for, write down when he/she first went off work and call Safety and Insurance departments when they return). The yellow copy stays on site.

The RIDDOR (Reporting of Incidents, Diseases and Dangerous Occurrences Regulations) reporting form (F2508) - more serious incidents may fall under the RIDDOR Regulations and are reportable to the HSE (Health and Safety Executive). If you believe the incident is RIDDOR reportable you MUST contact Safety Department as soon as possible. Safety Department will give you advice on how to complete the form and whether the incident is RIDDOR reportable or not (there is also an advice note 'RIDDOR or not RIDDOR' which may be useful for you to consult before phoning Safety Department for advice).

The RIDDOR Regulations are criminal law - failure to report RIDDOR reportable accidents is a criminal offence and the responsible manager may suffer prosecution (it is also a very 'black-and 'white' offence - was the accident RIDDOR reportable? Did you report it? If not you have committed a criminal offence). Because of this **ONLY** managers can sign the RIDDOR form and **ONLY** managers should fill them in. You have ten days to get the RIDDOR form to the HSE - this is plenty of time to find a manager and fill in the form to a good quality (some parts of the UK now have telephone reporting of RIDDORs – contact Safety Department for advice).

Advice note on
Incident reporting
March 2001

In addition, dependant on how well the RIDDOR form is completed and what is written on the form the HSE may or may not decide to visit your site/operation, issue an enforcement notice or start a prosecution. ALWAYS contact Safety Department when completing a RIDDOR form and ask for advice. If it would be helpful fax a draft of the RIDDOR form to Safety Department for comment.

Reporting an accident - the basic process

1. Decide whether the accident is likely to be RIDDOR reportable or not. If you believe it is, contact Safety Department as soon as possible for advice.

2. If Safety Department confirms that the accident is RIDDOR reportable the RIDDOR form will need to be completed and sent to the HSE (please note that for some RIDDOR reportable accidents the HSE must also be informed by telephone - so ask Safety Department for advice). The RIDDOR reporting form **MUST** be signed by a manager.

3. Whether the accident is RIDDOR reportable or not, an incident reporting form (FHS337) will need to be completed, ideally by the victim. The form **MUST** be sent to Safety and Insurance departments within 72 hours.

4. For all accidents an incident investigation form will also need to be completed and signed by the manager. This form **MUST** be sent to Safety and Insurance departments within 72 hours. Managers are expected to carry out any remedial actions identified from the investigation form. For example, if there was no risk assessment for the task, why not? Does one need to be carried out? If not, why not?

5. Safety and/or Insurance Department may contact you to ask for further information, for example if an insurance claim seems likely.

6. For more serious accidents you may be asked to attend an Incident Review Committee. This Committee is aimed at conducting high-level investigations into more serious accidents and collecting evidence which may be needed at a later date. You will be contacted by Safety and/or Insurance Department, which will give you advice on what to do, if you are asked to attend a Committee meeting.

- Take accident and incident reporting seriously - it is a prime managerial duty
- The RIDDOR Regulations are criminal law - managers may suffer prosecution if their duties are not discharged
- Poor accident and incident reporting and evidence keeping may result in managers, and other employees, being in breach of the law and/or accruing liabilities for Shanks - the company is unlikely to be happy about this
- If you have any queries contact Safety Department
- If you think you have a RIDDOR accident or incident - contact Safety Department

Keep this advice note with your accident book and use it

Note – RIDDORs can now be reported centrally to the HSE by telephone on 0845 300 9923, fax on 0845 300 9924 and by E-mail on www.riddor.gov.uk (all calls charged at local rate) rather than to your local HSE office.

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Safety advice for all of Shanks UK operations

On-site safety inspections

This advice note is an addition to company standard SHS111. (which details the procedure to be followed for on-site safety inspections). The note provides additional guidance, tips and advice for those carrying out on-site safety inspections using form No. FHS111, or an approved alternative. This note, and the company standard, should be read by all those who carry out on-site inspections and, ideally, this note should be kept in the front of the site or operation inspection file.

Introduction

On-site safety inspections are normally carried out by the site/operation manager and safety representative. The inspections should not take more than two or three hours and are in support of the inspections carried out by Safety Department. These two types of safety inspection (on-site and Safety Department) together provide a view of site/operation safety which is both informed in terms of operational factors and specialist safety advice - they are complimentary.

Who carries out on-site safety inspections?

Normally the site/operation manager and safety representative carry out the inspections. However, the task can be delegated provided this does not become the norm. On occasion other site employees may be involved. For example, if a specialist area is being inspected it may be desirable for a specialist site employee to take part. Other 'visiting' inspectors could be employees from power stations, workshops etc.

Whoever carries out the inspection, the site/operation manager should sign the form (No. FHS111) as agreeing to the recommendations, comments and timescales for remedial action put forward. If the site/operation manager does not agree with all the comments and recommendations made this should be stated on the form.

How often should on-site inspections take place?

Safety Department produces a schedule each year stating how often inspections should take place. For most major sites and operations this will be monthly, for others bi-monthly and for some quarterly.

On which day in the time period set the inspection takes place is up to the site/operation manager, but obviously holding one inspection on the 31st of one month and another on the 1st of the next is not good practice. It may be appropriate to time inspections to coincide with specific events, the time of day (for example, during the hours of darkness in the winter months) or weather conditions to get a good spread of potential hazards etc.

Cross-over inspections

A cross-over inspection is when someone from another site or operation is invited to take part in a site/operation's regular on-site safety inspection. This type of inspection should take place whenever there is a safety issue which either cuts across site/operation boundaries or requires specialist knowledge. Whenever an 'outside' inspector takes part in a safety inspection this should be noted on the on-site inspection form No. FHS111 (space is provided for the cross-over inspector to sign).

Advice note on
On-site inspections
March 2001

For some sites/operations inviting an employee from a neighbouring site/operation to take part in an inspection will be relatively simple. For more geographically remote sites this will be more difficult. Safety Department staff should be contacted if difficulties are being experienced to allow special provisions to be made.

The sections on the on-site inspection form

Form No. FHS111 is split into four sections (three inspection sections - sections 1, 2 and 3. and a comments' section - Section 4.). Section 1. deals with specific issues, such as fire extinguishers, items of plant and first aid boxes. Section 2. looks at any new or changed operations, waste types etc which may have safety implications. Section 3. focuses on tasks.

Section 1.

The list given in Section 1. is a guide only. It is not intended that every box must be ticked for every site/operation. For some sites/operations many of the items listed will be relevant and for others only a few. There is a space provided to add issues and items not on the form as required. Some items need not be checked at every inspection. For example, if fire extinguisher dates have been noted at one inspection and have six months left to run they need not be checked at the next inspection.

Likewise Section 1. is not intended as a replacement for the work of Safety Department. For example, one item in Section 1. deals with any 'worrying incident trends'. It is not intended that site employees carry out in-depth statistical analysis of incidents (unless they wish to), but site employees will know if some types of incident are becoming common or not. The list should be treated as a series of prompts and not a strict set of commands.

Section 2.

This section deals with new issues or changes which may have safety implications. For example, a new waste type may be causing problems or a new piece of plant may have some safety failings. Section 2. is an opportunity for such issues to be addressed and to alert Safety Department to them. Section 2. will not always need to be completed if nothing has changed or is new on site or at your operation.

Section 3.

The task section allows specific tasks or operations to be informally audited. A task should be chosen (for example, sheeting a bulker at a transfer station) and audited compared to any work instruction or risk assessment covering the task. Any discrepancies between risk assessment, work instruction and the way the task is actually carried out should be noted. The aim of this section is to ensure that work instructions, risk assessments and the way tasks are carried out are in-line, up to date and relevant.

All sites/operations have risk assessments which require reviewing at least once a year, if not more frequently. One way of completing Section 3. is to pick a risk assessment due for review and use it for Section 3. so completing the section and carrying out the risk assessment review at the same time.

For any site or operation the balance between sections 1, 2 and 3. will vary. For example, a large landfill will have more points to note in Section 1. than a vehicle operation.

Alternatives to using FHS111 - write your own inspection form

For sites/operations of a specialist nature and for which the standard on-site inspection form FHS111 does not apply well, managers may design their own on-site safety inspection form to use instead of FHS111. However, such forms must follow the basic format of FHS111 and also be approved by Safety Department before being used.

How should I prepare for an on-site safety inspection?

Obviously Section 3. of the on-site safety inspection needs the greatest preparation: A task needs to be chosen, relevant risk assessment and work instruction copied and issues such as weather conditions considered. Overall, site/operations managers and safety representatives, or their delegated employees, need to co-ordinate their time. With cross-over inspections this is an important consideration when three, or more, peoples' time needs to be scheduled. If you are delegating an on-site inspection to another employee please ensure they have read the work instruction and this guidance note plus any other advice which may help.

Who should receive a copy of the inspection form?

Copies of completed inspection forms should be sent to the relevant line manager and a site copy retained in file. If actions have been given to site, or other, employees these should receive a copy with their action and time to be completed by highlighted.

Safety Department will check that on-site inspections are being carried out during its annual audits of sites/operations. Should sites/operations not be complying with the schedule, Safety Department may ask for monthly copies to be sent to it as a check measure.

The target for compliance with the on-site safety inspection schedule produced by Safety Department is 85%. Safety Department will monitor compliance and will report on any serious lapses from this target level.

If you have any queries regarding on-site safety inspections please contact Safety Department or ask for advice during your next Safety Department inspection. Other advice can be gained from safety representatives' guidance publications, the union and official publications.

Conducting your own safety inspections is a legal duty and shows that you as a manager or a safety representative are taking safety seriously

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Safety advice for all of Shanks UK operations

The final check

Permits to work (PTWs) are not new – they have been used in the chemical industry for at least five decades. However, they are not widely used in waste management and Shanks only introduced a general PTW system some ten years ago. This advice note should be read alongside Shanks company standard on PTWs (SHS104). In addition both a full training course on PTWs and a toolbox talk to reinforce use with 'responsible persons' issuing PTWs are available through Safety Department.

Note – this advice note covers the general PTW system used at Shanks dry waste sites. Shanks special waste sites use a multiple PTW system more appropriate to the types of task carried out on chemical sites. However, the general principles are the same (for instruction on the multiple PTW system see company standard SHS116).

What are PTWs for?

PTWs are used for tasks which are **BOTH**:

- High hazard/risk **AND**
- Not routine

High hazard/risk means that if the controls required to be in place to ensure safety are ignored, or not in place then the outcome is likely to be serious. For example, working at a height is high hazard and should fall protection not be used and a person slips the outcome is unlikely to be a minor injury.

Not routine means a task which is not part of day-to-day operations. Experience shows that more accidents occur during non-routine tasks than routine and that if this non-routine task is high risk that the outcomes will be serious (if not fatal). For example, a guard may be removed from a conveyor system every day for cleaning. This may be high hazard (if correct lock-off is not in place), but is a routine task. Using a PTW for such routine tasks will tend to become simply a paperwork exercise and not the final check it should be. In such circumstances additional fixed controls should be placed (for example in this case interlocking on the guard) backed by a strict operating procedure, training, supervision etc to control the risk.

The final check

Tasks which are high hazard and not routine need to have a 'safe system of work' in place. A safe system of work comprises all of the required controls to do the task safely. For example, below are some of the types of controls which may need to be in place for confined space entry:

- Training and supervision
- Breathing apparatus and other PPE
- Air monitoring before and during entry
- Rescue provision, such as 'A' frame and winch
- Three-man job (one man in and two men out)
- Use of intrinsic equipment (non-sparking equipment for use in potentially flammable atmospheres)
- Communication systems
- A written procedure for the task

Advice note on PTW issue April 2005

All of the above controls are the 'components' of a safe system of work. The risk assessment for the task should list these components and is the 'index' for the safe system of work.

Should one or more of the above components **NOT** be in place then the safe system of work is likewise not in place. For example, if breathing apparatus is available but the persons involved have not been trained in its use the safe system of work is not in place. Or, if all personnel are trained and have understood the written procedure, but no rescue equipment has been provided again the safe system of work is not in place.

A PTW lists the components of the safe system of work **AND** then acts as a final check that **ALL** of these components are really in place **BEFORE** the task is carried out.

In synopsis PTWs are:

- For tasks which are high hazard/risk and not routine
- Are a final check that all the required controls (components of the safe system of work) are in place before the task commences
- Are a record that the above process has been followed

PTWs can also serve other functions, such as a record and confirmation that a task has been stopped, but the above is the main use. **NOTE – a PTW is NOT a risk assessment, or a safe system of work on its own – it is a checking system to ensure these are in place**.

Tasks a PTW is required for

The type of tasks which require a PTW to be used are determined by risk assessment. However, Shanks has carried out central risk assessments and determined that PTWs **MUST** be used for the below types of task:

- Hot work outside of a workshop or designated workshop area on site
- Confined space entry
- Working at a height
- Major mechanical maintenance, repair, commissioning etc
- Electrical work of a specified nature
- Trenching and pitting in areas where underground services may be present

Company standard SHS104 defines what the above are in detail. For example, working at a height does not normally include use of MEWPs (mobile elevating work platforms such as cherry pickers) – persons doing the task are protected by a handrail. But, would include harness work during construction and similar tasks. Make sure you are clear about what tasks PTWs are required for under SHS104 and if in doubt **ASK**.

In addition to the above PTWs should be used for other types of task based on risk assessment. This assessment should at the least include:

- The nature and severity of the hazard/s faced – what is the likely severity of outcome should controls fail or not be in place?
- Who is doing the task – for non-Shanks employees, such as contractors, the assumption should be for a PTW to be issued unless a risk assessment finds otherwise
- How many people are doing the task – the more people involved the more likely a failure in controls
- Whether the task is one of a series of tasks the progression of which is critical – PTWs can be used to control the progress of a task, such as by splitting the task up and requiring a new PTW for each stage
- The nature and complexity of likely control measures – the more measures and the more complex the more likely a failure
- The environment in which the task will be carried out – hazards such as heat, slippery conditions etc need to be accounted for

In particular when contractors are involved the use of a PTW should be seriously considered. For example, a contract fitter carrying-out work on a bailer in the MRF should be working under a PTW as confirmation of lock-off is critical to such tasks and contractors may not have Shanks safety culture.

Roles in PTWs

Specific roles for personnel involved in PTW issue are covered in SHS104. However, and in practical terms, there are two main roles:

> **The responsible person** – the Shanks employee who issues the PTW and checks that all required controls are in place before work starts
> **The nominated person/s** – the people (Shanks employees or others such as contractors) who will actually do the work

The role of the responsible person issuing the PTW is to:

- Check that **ALL** the required controls are in place **BEFORE** work is carried out (this may include physical controls such as lock-off or human based controls such as training and competence)
- Check that these controls continue to be in place during work
- Check when the work has finished that waste materials etc have been removed, the job is really completed, all nuts and bolts have been replaced and that the plant is safe to put back into use etc **BEFORE** signing-off the PTW as complete

The role of the nominated person/s is:

- To obey all the controls and use them
- Finish the job adequately including any waste removal, checking of systems etc **BEFORE** asking for the PTW to be completed

NOTE – the use of a PTW is an independent check that all components of a safe system of work are in place before work commences. Because it is an independent check nominated persons (ie, those actually doing the work) **CANNOT** also act as responsible persons. That is **YOU CANNOT ISSUE PTWS FOR YOURSELF**.

Process for issuing PTWs

Having decided that a PTW is required the responsible person who will issue the PTW must first check that the controls are suitable. This may include checking that risk assessments and/or method statements, operating procedures are in place for the task and that those who will do the task have been inducted on them. It may also include checking training status, such as inspecting breathing apparatus training certificates or CITB cards etc.

Next, using the risk assessment/method statement/operating procedure for reference note on the PTW form all of the controls to be used. The PTW form (FAD401) includes boxes and 'tick-lists' to help with this. The responsible person may also add in additional controls. For example, if a method statement being used by a contractor specifies lock-off the responsible person may add that multiple lock-off (one padlock for the contractor and one for Shanks) is better and should be used. Such additional controls need to be noted on the PTW form,

To assist with checking controls Shanks also uses a PTW checklist (FAD408). This is a more in-depth list of the types of control which may be required for specific types of task. Shanks insists (see SHS104) that a PTW checklist is completed for all confined space entry and hot work outside of workshops and workshop areas. For other types of task the checklist is not mandatory, but may be useful as a 'memory jogger'. If a checklist FAD408 form is used, it must also be completed before work commences as for the PTW itself.

Once the responsible person has satisfied themselves that issues such as risk assessments, method statements, training status etc are adequate and that the planned controls to be used are also adequate, the next step is a physical check that all physical controls are actually in place. This may include checking that lock-off has been put in place and, if appropriate that equipment has been de-energised, that the correct PPE etc is being worn, air monitoring has been done, traffic management controls such as cones are in place etc etc.

THIS CHECK MUST BE DONE IN PERSON - it is not possible to sign a PTW to allow work without the responsible person making a personal check that controls are in place. A PTW is a final check that all the required components of the safe system of work (the required controls) are actually in place before work starts. This cannot be done from an office – it **MUST** be done in person.

The responsible person must also confirm with the nominated person/s that they understand the controls and accept them (for details of sign-off by the nominated person/s see SHS104). The PTW may then, provided all is well, be signed by the responsible person and work can commence.

Checks during work

In addition to checking that all controls are in place before work starts, the responsible person must also check during work to ensure that controls remain in place and that work is progressing in a safe manner. For example, if a task will take six hours the responsible person may check every two hours to ensure controls are still in place and that all is well. If the controls are not still in place (for example a contractor may have removed lock-off part way through a task) then the work **MUST** stop and the PTW must be cancelled. A new PTW will be needed once controls have been restored before work re-commences (plus the usual personal checks etc and provided the responsible person is content that controls will remain in place).

Careful consideration to the time limit set on a PTW must also form part of this checking during work. For example if a contractor states that a job will take four hours the PTW should be issued for this time period only. If the work goes on beyond the time estimated then it is likely that the task is not going to plan and the responsible person needs to be aware of this and any problems/delays which have taken place.

Checks after work has been completed

Once work has been completed the nominated person/s doing the work will contact the responsible person for the PTW to be signed as completed. As for checks before work and during work, the responsible person **MUST** make a personal check before signing a PTW as being complete. Often it will not be possible for such checks to be comprehensive. For example, checking the mechanical quality of work carried out inside a machine if it has been reassembled. However, examples of the checks which may be relevant are:

- All waste materials from the task have been removed
- Tools and equipment have been removed
- All guards and plates have been put back (including checking all bolts and fastenings have been replaced)
- Power leads, pipework etc are in a suitable condition and have been securely attached
- Any checks such as circuit testing have been carried out

Only after the responsible person is content that the work is really complete and that any equipment etc is safe to restart should the PTW be signed as completed. This has practical as well as safety implications. For example, if a contractor has not replaced all the bolts in a guard and has already left site what are the chances of getting them back to replace the missing bolts? **Note** – lock-off must only be removed after the above checks have been made.

For some types of task it may also be required to carry out a test start before signing the PTW as complete. For example, a test start on a conveyor and a check that all emergency stops, interlocks etc work before signing the PTW as complete. Again, should an interlock, for example, fail to work the chances of getting a contractor back immediately to fix the problem are slight.

Cancelling PTWs

PTWs can be cancelled (signed off as complete) if the work has been completed, but can also be cancelled for other reasons and there are circumstances when work is not complete, but cannot continue. For example, a repair on an item of equipment may require a spare part the contractor does not have with them. Work may need to stop until the spare part can be obtained. The PTW can still be signed off as cancelled, **BUT**:

- The controls such as lock-off aimed at ensuring the equipment etc is not used while it is incomplete and unsafe to use **MUST** remain in place
- **ALL** relevant persons must be informed that the equipment etc is not safe to use (placing signs may assist)
- A new PTW must be raised when the work is to recommence, including a personal check as for the original PTW that all controls are really in place before work recommences

PTWs can also be cancelled because of emergencies and 'problems'. For example, if during a confined space entry task continuous monitoring shows that a flammable atmosphere is present then work **MUST** stop until this has been controlled. As proof that work has been stopped the PTW must be cancelled and a new one raised when work recommences. The same principle applies should there be a fire or other emergency. Again the PTW must be cancelled and new one raised when work recommences. As above, the new PTW **MUST** include the required personal checks that all controls are in place etc.

Note – the cancellation boxes on the PTW form (both for nominated person and responsible person) include a 'delete as applicable' option as to whether the work has been completed or not, or has been left in a safe or unsafe condition. For emergencies, problems etc resulting in work being stopped the 'not complete' and 'unsafe' options should be used in the cancellation boxes.

For advice on PTWs, or for training, contact Safety Department.

PTWs are for high hazard non-routine tasks

PTWs are a final check that ALL required controls are really in place BEFORE work commences

Responsible persons MUST check in person that all required controls are in place BEFORE work commences, during work and at the end of work

Make sure you use PTWs for appropriate tasks
Make sure they are issued correctly

PTWs are for high hazard tasks – the type that if it all goes wrong you may have serious or fatal accident – make sure you use PTWs and use them correctly

Safety advice for Shanks UK operations – issued by Safety Department

advice solutions.

Safety advice for all of Shanks UK operations

Assessing the risks

Introduction

Risk assessments have been a legal requirement in the UK since 1993 and have undoubtedly contributed to the improvements seen in British safety performance during the past years. The incidence of fatal accidents in the workplace in Britain is less than a third of that in Germany, France, or the USA – and far lower than the figures for other countries. Other factors have been at work, but the role played by risk assessments cannot be overestimated.

The UK has fewer accidents than most other countries - risk assessment has been a major factor in this

Legal requirements

Risk assessments were introduced under the Management of Health and Safety at Work Regulations (the 'Management Regs'). These cover a wide variety of issues from temporary worker control and safety advice to health surveillance and emergency procedures. However, the main requirements in terms of risk assessment are contained in regulations 3. and 8, which require:

- That employers make and record suitable and sufficient assessment of the risks their employees face at work and those other people (such as temporary workers, contractors and members of the public) may face as the result of their activities.
- That these assessments be reviewed whenever it is suspected that they are no longer valid, or if any significant change/s have been made.
- That control measures aimed at eliminating or reducing the risks identified by assessments are put in place.
- That employees are informed of the risks they face, the results of any assessments for the work they do and the control measures put in place (this also applies to temporary workers and contractors in terms of the risks Shanks poses to such groups).

In essence employers must carry out risk assessments, put in place controls based on these and induct, train and inform employees on relevant assessments and controls. In addition, to prove that these requirements have been met, all of the above must be recorded. Risk assessment has become the basis for the majority of health and safety regulation and legislation. In virtually all cases the approach taken to health and safety now starts with 'make a risk assessment'.

Shanks system

Shanks has in excess of 130 operations in the UK covering a wide variety of tasks carried out by thousands of employees. To cover these Shanks also has in excess of 4,000 risk assessments. This is a huge system and cannot be managed without a common approach.

Shanks system is also based on the fact that the best people to carry out risk assessments are those who actually do the work, albeit supported by other employees trained in risk assessment. Many companies do not follow this approach and hire consultants to carry out their risk assessments. However, the problem with this is that assessments rarely reflect what actually goes on and are often not communicated to employees. There is no point in producing a risk assessment if no one knows about it and nothing is done with it.

Advice note on Risk assessment January 2001

Company standard SHS101 is Shanks management document on risk assessments. However, the assessment system is complex and this advice note should be read by all those involved in risk assessment. In addition, Safety Department holds regular risk assessment courses and at least one employee involved in writing risk assessments for a site or operation must have been on this course.

Definitions

Before looking at the risk assessment process some of the words used on the risk assessment form (FHS508) need to be explained. In particular the column headings on the form: Hazard, risk, personnel, current control, severity (S), likelihood (LI), low/medium/high (L/M/H), additional control required, action taken and action time.

Think:

HAZARD
RISK
WHO IS AFFECTED
CONTROLS
LIKELIHOOD/SEVERITY
RISK RATING
ADDITIONAL CONTROLS
WHO WILL DO THEM
BY WHEN

Hazard - a hazard is anything which has the potential to do harm. For example, a bottle of concentrated acid in a locked cupboard is a hazard, as is an item of heavy plant with its engine turned off - hazard is potential, not whether it will cause harm. This is important when non-normal operations are considered, such as the hazard of moving parts which are normally guarded.

Risk - risk is the potential outcome of the hazard. Using the two examples above, if the bottle of acid is taken out of the cupboard the risk of chemical burns arises, for the item of heavy plant starting the engine and moving it produces the risk of collision either with another object or a person.

Personnel - this is the person/s the risk may affect. For example, the bottle of acid may result in burns to a chemist and the moving heavy plant may collide with a banksman. It is not only employees who are at risk - assessments should also, where appropriate, include temporary workers, contractors, visitors etc who may be affected by the risk. In extreme cases this may include members of the public outside of a site, such as on the public road.

Current control - these are the controls which are already in place for the task being assessed. For example, gloves and safety glasses should already be worn when handling acid and banksmen should already be trained and wearing high-vis clothing.

Severity (S) - this is likely severity of the outcome. For example, if the bottle of acid is small and full PPE is worn the outcome may only be a small chemical burn, whereas an item of heavy plant colliding with a banksman is likely to be serious, if not fatal. The severity must take into account any current controls.

Likelihood (LI) - this is likelihood of the risk being realised. For example, if the bottle of acid is handled by a trained and aware chemist the likelihood of it causing burns is less than if it is handled by an untrained temporary worker. For the item of heavy plant, a trained banksman wearing high-visibility clothing is less likely to be hit than an untrained one without high-vis - he is also less likely to be hit at a site which accepts 50 lorries a day than at one which accepts 500.

In Shanks' risk assessment system numbers are used to score both severity and likelihood on a scale of 1 to 5. In both cases it is important not to overestimate severity (all accidents no matter how minor could result in death, but this is often not the most likely or probable outcome) nor to underestimate the likelihood (a 1,000 to one risk faced everyday for a working life is almost certain to occur).

Risk factor - low/medium/high (L/M/H) - multiplying the scores given to the severity and likelihood together will give a number from 1 to 25 which will fall into either the low, medium or high categories as defined on the risk assessment form. While different people carrying out an assessment may allocate different numbers to severity and likelihood (although the variation is often less than might be expected), the low/medium/high columns at least give a priority in which risks can be tackled.

All risks identified as high must be tackled as soon as possible - consideration must be given to whether work may need to be stopped, or not commence, until suitable controls can be put in place. Risks in the medium category should be tackled as soon as practical. Although some may not be possible to eliminate completely, the aim should be to reduce them to low. Scoring a risk as low does not mean it can be ignored, particularly if there is a quick and easy control measure which can be put in place. For example, dust in the eye is very unlikely to kill anyone, but if supplying safety glasses would be effective, this is a quick, easy and economic control and should be put in place.

Additional controls required - if the risk identified is high or medium (or in some cases low) then additional control measures should be considered. This may be additional PPE, extra training, different work systems, better guarding for machines, more information for employees, better discipline, using a different type of chemical or item of plant, changing or writing a formal procedure for the work etc. One fault many people make when considering additional controls is to leap straight for more PPE - other, and probably more effective, controls should be considered first.

Action taken - this is who will carry out the action needed to put the additional control in place. Who this is will depend on the control: If a control involves spending money the site/operation manager may be the best person, if the additional control is dust monitoring Safety Department will need to contacted to arrange this etc.

Action time - it is no good thinking-up additional controls if they are not put in place. The 'action time' column is the date by which the control will be in place. Sometimes it is not possible to give an accurate date, but at least an indication can be given. Significant additional controls can be placed in the site/operation improvement programme.

Overall risk rating - this gives an overall view of the task. If all of the risk factors identified are low, then the overall risk rating is low. If any of the risk factors identified is high or medium, then the overall risk rating is medium/high (see below on frequency of risk assessment reviews).

Steps in risk assessment

Rushing at risk assessment is likely to result in all risks not being covered

Compiling risk assessments for a site or operation must be carried out in a systematic manner. If risk assessments are written 'on the spur of the moment' or without consideration it is likely that significant tasks and risks will be missed. Likewise, there is little point in writing risk assessments if those employees affected are not inducted on them. Below are the basic steps in initiating risk assessments for a site or operation:

1. Make a list of all significant tasks carried out

The method used to do this will vary from site to site and operation to operation. For example, with a MRF the best approach may be to consider the steps waste goes through from coming onto the site to leaving as separated recyclable materials. For a vehicles operation a good starting point may be to list the types of HGV used, such as REL, TRV etc.

Whatever approach is taken both normal and non-normal operation must be considered. For example, the operation of a bailer at a MRF or transfer station may be one risk assessment, but clearing blockages and maintaining will be another, or at a vehicles operation how are HGVs serviced and repaired and where? Likewise other factors relevant to an assessment may need to be included, such as if the task involves a chemical, or is in a dusty environment, a COSHH assessment may have an input.

Some types of operation lend themselves to grouping risk assessments. For example, it may not be practical to have a risk assessment for every customer site served by a vehicles operation, but an assessment on the general risks faced can be completed. Likewise some items of maintenance carried out by a fitter may present the same risks no matter where they are or what the machine - these can also be grouped under a general risk assessment.

The list of risk assessments arrived at will form a 'risk assessment register' for the site/operation and will sit in that site/operation's Management Plan. This list may need to be added to or subtracted from as activities change, such as a new type of collections lorry in a vehicles operation or stopping using liquid trenches at a landfill site. However, this list will form the basis of what assessments are written. At this stage it is useful to 'sit back' and ask "have we missed anything out". There is no single way to produce a valid list of the risk assessments a site or operation should have, although some are a legal requirement (see below). If you have any problems or queries ask for advice from Safety Department.

2. Legally and policy required risk assessments
Some risk assessments are required by the law, such as for first aid. Others are required by Shanks' own policies, such as traffic management at sites. Safety Department will advise sites and operations of these and will include them on risk assessment registers if they are missed out.

3. The risk assessment register and Management Plans
A risk assessment register must be compiled by all sites and operations and the list of tasks identified in this register included in the Management Plan (the register is the 'working document' and the list in the Management Plan the formal record). The register needs to include whether the site/operation has all the required assessments, if not when they will be in place by, when assessments are due for their next review and whether all relevant employees have been inducted on the assessments. For advice on layout of your register and the inclusion of a task list in your Management Plan contact Safety Department or Management Systems Department. Significant assessments yet to be written can be added to the site/operation improvement programme.

Periodically sites and operations must update their risk assessment registers to ensure that reviews are being carried out and that the registers are still valid. Safety Department may also, for areas of operation which are common across Shanks, produce advice and guidance on risk assessments and the composition of assessment registers.

The best people to do risk assessments are those who actually do the job

4. Carry out the assessments
As stated above the best people to carry out a risk assessment are those who actually do the job. However, help will also be required from an employee trained in risk assessments. The best results are obtained by a risk assessment team comprising of those who do the job and experienced and trained risk assessors. At the very least the team should consist of one person who does the job and one person who has been on Shanks risk assessment course. The first time an assessment on a particular task is written it may take a considerable period of time to produce a good quality assessment. Advice may also need to be sought on specialist topics and/or further information may be needed before an assessment is completed. Once a risk assessment has been completed it should be ticked-off on the risk assessment register as being done. Please note that the site/operation manager must sign the assessment to confirm that he/she agrees with the assessment.

5. Induct and train employees
Employees should be inducted on the assessments relating to their job. For some employees this may only mean a few assessments, while for others a wide range of assessments may be relevant. The risk assessment itself may highlight training needs and these, likewise, will need to be addressed.

A record of inductions on risk assessments must be kept. This is best achieved by using the table used to record company standard inductions. A copy of this form should be appended to each risk assessment and include the names and signatures of all employees inducted on the assessment. Any additional training identified by a risk assessment should be recorded in the normal manner in the employee's training record file. Please note that copies of reviewed assessments and records of induction must be kept for five years.

In line with Shanks 'new employee induction procedure' all new employees must be inducted on the risk assessments relevant to their job and this recorded on the new employee induction form, as well as on forms appended to the individual assessments.

Records of inductions on assessments will be audited during Management Systems and Safety Department visits and they may also be required during BSI audits. In addition, should an accident occur and the Health and Safety Executive investigate the inspector will almost certainly want to see the relevant risk assessment and proof that the employee injured was inducted on it - if no assessment or record of induction exists a prosecution is likely.

Out of date assessments are often as bad as having no assessments

6. Review of assessments
Risk assessments must be reviewed:

- If any significant factor changes
- An additional control has been identified - ie, the review date should be the date by when the control will be in place
- If a significant accident occurs doing a task for which the assessment is relevant
- If requested by a union safety representative or non-union representative of employee safety
- If requested by a non-company person, such as a customer
- If none of the above are relevant assessments should be reviewed either every two years or every three dependant on the overall risk rating for the task. If a task has been given an overall risk rating of low, then a review is due after three years.
- If a task has been given an overall risk rating of medium/high, then a review is due after two years.

If there has been no change since the last assessment it is acceptable to copy the risk assessment and simply change the review date. If there has been no change it is not required to complete a further induction form, although a re-enforcement induction may be required. If any changes have been made, however, a new induction form must be completed and appended to the new risk assessment. Once an assessment has been reviewed, whether there have been any changes or not, it must be ticked-off on the risk assessment register for the site/operation.

Think – do I need a written procedure?

Procedures identified from risk assessments

One obvious control measure which may be identified from a risk assessment is a procedure, as part of a 'safe system of work', for the task being assessed. Such procedures may already be in place in the form of:

- A company standard
- An operating procedure laid down in a manual, such as the operating manual for an item of plant
- Maintenance and other procedures laid down by a manufacturer
- A working plan under a site waste management licence or an IPC authorisation
- Planning permissions and operator's licences
- Law and codes of practice, such as the Highway Code, trade body codes etc
- Other procedures, such as traffic management plans
- Forms which proscribe a procedure, such as checklists provided by manufacturers

It is not the point of risk assessments to duplicate procedures which are already in place as a control measure. However, risk assessments may identify tasks where a procedure is required, but does not exist. In these cases one should be written. In other cases the procedure may rely on information from a wide variety of sources, or in a form which is not easily understood. Again, writing a procedure may be necessary in these cases. One of the considerations is the audience who will be inducted and their ability to take in information.

One example of the above are tasks which are carried out regularly, but involve exposure to a hazard, such as clearing blockages on a bailer. In this case a simple procedure, including lock-off etc, should be written and relevant employees inducted on it. Such procedures become part of the risk assessment and should be appended to it.

No matter where a procedure comes from, be it written by Shanks employees or sourced from outside the company, consideration must be given to the target audience, as stated above. For example, the procedure for putting on and adjusting a harness to be used while sheeting a bulk waste lorry will be provided by the manufacturer of the equipment. In addition to inducting site employees on the procedure it would be wise to give copies to drivers visiting the site and put a poster sized version next to the equipment - remember risk assessments and the controls identified apply to non-employees also.

The following are all also risk assessments:

COSHH assessments
DSE assessments
manual handling assessments

COSHH and risk assessment

Some of the tasks carried out by Shanks involve the use of, or working with, a hazardous substance. In line with the COSHH Regulations, and company policy, in these cases a COSHH assessment must be available. The whole of the COSHH assessment need not be included in the risk assessment, unless there are relevant control measures pointed out in the COSHH assessment which should be included in the risk assessment. However, the contents of the COSHH summary sheet will be relevant. Any COSHH summary sheets relevant to a risk assessment should be copied and appended to the risk assessment, in the same way as for written procedures as above. When induction is carried out with employees on a risk assessment this COSHH summary sheet should be included - in particular this will apply to first aiders and those involved in storing hazardous materials.

Conclusions

Risk assessments are all about listing hazards, assessing the risks presented by these, putting controls in place and informing employees about the risks and controls relevant to their jobs. They are also about proving that this process has taken place. If Shanks is to continue to improve its health and safety performance it is essential that risk assessments are given the time and resources required. If you have any queries regarding risk assessments contact Safety Department for advice. Look at your site/operation's risk assessments and consider:

- Are all the assessments required in place?
- Is there an up to date list of these assessments in the site/operation Management Plan?
- Are the assessments up to date and reviewed?
- Have all employees been inducted on the assessments relevant to their job and the tasks they do?
- Have these inductions been recorded?

It has been proven that risk assessments reduce accidents. However, this is only the case if all tasks are covered, the assessments are of a good quality and up to date and those carrying out the tasks are aware of them and have been inducted - is this the case for your site/operation? And - if in doubt, contact Safety Department.

Risk assessments are the basis for virtually all modern health and safety practice – if in doubt about anything on risk assessment contact Safety Department

Advice note on Risk assessment January 2001

Safety advice for Shanks UK operations – issued by Safety Department

advice solutions.

Safety advice for all of Shanks UK operations

Selection and specification of personal protective equipment (PPE)

Detailed advice on the identification, provision, use, maintenance etc of PPE is contained in Company Standard SHS 110. The purpose of this document is to provide some practical guidance on selecting the correct type and specification of PPE to be used.

It is a legal requirement, reflected in SHS 110, that PPE is the last means of protection when all others have proved either impractical or insufficient. The identification of the requirement to use personal protective equipment will be as a result of:

- a COSHH or other risk assessment
- information from a waste or chemical supplier
- a risk assessment
- an investigation into an injury or incident

Having identified the need to provide PPE, it is important that the items in question comply with the following criteria:

- that they are suitable and sufficient for the identified need
- that they conform with the approved standards for this particular item.

Suitability

A key factor to be considered when selecting personal protective equipment is ensuring that the item affords adequate protection against the identified hazard. Some items are supplied to provide straightforward protection against a simple hazard, for example a safety helmet against falling objects. Most items, however, have been developed to protect against more than one hazard. A full face vapour mask will protect the respiratory system against airborne vapour, gases etc and the eyes against high-speed solid objects and dust. Similarly, safety boots are available that will protect the foot against heavy objects and some classes of chemicals.

It is therefore vital that if the correct PPE is to be selected and that the person responsible is fully aware of all the hazards involved. This means not only assessing the information provided by the assessments etc above, but also an appreciation of the practical circumstances out on site and the range of tasks being undertaken by those who will be wearing the items provided. It is legal requirement that all PPE issued in the EU must meet the following requirements:

- compliance with the appropriate European or British Standard (BS or BSEN standard)
- carry sufficient information to enable the user to determine whether it is adequate for the job.

Before these arrangements were put in place, PPE was available whose suitability and quality could not be confirmed or verified.

Advice note on Selection and specification of PPE
March 2003

It may still be possible to purchase cheap imported items such as unmarked pvc and rubber gauntlets. These should be avoided at all costs.

Information on the type of protection afforded will be shown either by a standard symbol in the case of gloves, coveralls etc or in the form of technical data for ear defenders and respirators, their associated cartridges and filters. Details of these can be found in most PPE suppliers catalogues. In some cases, it may be necessary to obtain additional information from manufacturers, for example to confirm that a particular type of glove will provide protection against an individual chemical.

The suitability of personal protective equipment may also be affected by the weather and time of year. Hi Visibility clothing is required on most Shanks sites but during the summer months these can attract flies on waste sites making employees uncomfortable. Therefore it is acceptable to use the orange hi viz vests from June to September when, in general the weather is clearer. However if visibility is reduced due to adverse weather during these times the site must revert back to the yellow clothing as these offer much higher visibility

Sufficiency of PPE items

Having confirmed that an item is in principle suitable to provide the type of protection needed, it may be necessary to confirm that the level of protection is adequate. This is particularly true for protection against chemical hazards.

Respiratory protection

These range from simple orinasal particulate filters which provide basic protection against low concentrations of dust, through more complex full face vapour masks with cartridges that will protect against a range of chemical hazards, up to airline fed full face breathing apparatus.

In order to make the correct decision on the type of RPE to be provided, those responsible for specifying RPE must be aware of the level of contamination in the atmosphere. Filters or cartridges are available to provide protection against the following:

Chemical classification	Identification code
Dust	P
Organic vapour	A
Inorganic gas	B
Acid gases	E
Ammonia	K
Particulate	P

Assigned protection factor. This is the degree of practical protection that any mask and filter combination will provide to the wearer. In practice, the amount of protection may be higher, but these factors have been assigned taking into account the different sizes and shapes etc. of wearers' faces and is shown by numbers 1 to 3 (normally given in the booklet with the mask etc). Typically, a filter/mask assigned protection factor 1 will provide protection up to 4 times the occupational limit, 2 up to 10 times and 3 up to 50 times. All filters are given individual assigned protection factors and management must review the technical specification of masks and their filters in order to make a correct decision on what is to be specified.

Gloves

This can be a difficult area in that few gloves will provide comprehensive protection against the full range of hazards encountered. The decision regarding protection against inorganic substances is fairly straightforward. However, most organic wastes contain a range of substances and using one type glove may not be sufficient to give adequate protection. It may therefore be necessary to provide a main glove and under-glove in certain circumstances, for example pvc gauntlets and thin nitrile liners. In addition, gloves are certificated to provide protection against physical hazards:

- cut (note – puncture protection is different and specialised)
- tear
- abrasion

The technical information from the supplier is particularly important to ensure that the correct choice is made. In addition, the environment, such as damp and wet from wastes, needs to be accounted for.

Coverall suits

The general rules regarding the provision of coveralls are similar to those for gloves. They are issued to provided general or specific protection to the wearer against chemical hazards. These can range from basic substances, such as inert sludges etc, up to concentrated, high hazard organic or inorganic chemicals. As with RPE, these garments have been assigned type numbers to signify the type of use for which they are recommended.

General use	Type number
Low hazard limited spray	6
Dry particle	5
Liquid chemical; heavy overspray	4
Liquid chemical; jet spray	3
Liquid chemical; immersion	2
Gas tight	1

Again, the manufactures/suppliers should be contacted for technical advice to confirm that a particular design and specification of suit will provide adequate protection again individual chemicals or chemical categories.

Ear protection

Under current legislation, the use of ear defenders is either recommended or mandatory, dependent upon the results of a noise assessment. Broadly speaking, they fall into two main categories; insert (plugs) or muffs. As with most other items of PPE, ear defenders come with detailed technical specifications. In the case of both types, this will include:

- the general degree of protection afforded (the 'assumed protection' usually specified in dB(A))
- the specific protection against specific noise frequency ranges (usually specified in dB)

In order to confirm that the correct items are being provided, the technical specification will need to be reviewed alongside details of the noise survey for the area or task in question.

Eye protection

This is more involved than generally realised. On some sites, protection may be needed from solid, liquid and gaseous hazards. Safety glasses are often provided as standard, but some task-based risk assessment may identify scenarios where safety glasses are not sufficient. In these cases, additional provision in the form of goggles, visors or even full face vapour masks should be considered. The latter will almost certainly be required if gaseous hazards are identified as they will provide both eye and respiratory system protection.

Safety boots

These are fundamentally provided to protect the wearer from heavy objects that may impact upon their feet. Additional features are steel soles to protect the bottom of the foot and specialised boots which will afford chemical protect. The latter are usually constructed of materials such as rubber, rather than leather. Again, the supplier will provide technical advice and information where needed. Please note that lace-up boots should be used by drivers and on dry waste sites, while 'riggers' are only suitable for special waste treatment, transfer etc sites.

Safety advice for Shanks UK operations – issued by Safety Department

advice solutions.

Safety advice for all of Shanks UK operations

Traffic Management – the highest risk

Waste management and large traffic movements go hand in hand - Shanks' sites see more than 6,000 HGV traffic movements a day - more than two million lorry movements a year. Put this together with the fact that more people are killed at work by being hit by a vehicle than any other type of accident and the risks are obvious.

This experience is shared by the waste management industry in general – traffic accidents are the most common cause of fatal accidents in waste management. Out of an average of some 15 – 17 fatal employee accidents a year in waste management around 9 – 10 are from traffic, both on site and off site.

Despite this traffic management has not historically been a large concern to the waste management industry - compare the average transfer station or landfill site weighbridge and entrance area to a large distribution warehouse or yard. While some would say that the two are completely different, they are all materials handling centres accepting HGVs. All have offices, weighbridges, private car and pedestrian routes etc. If risk assessment shows that a landfill site entrance area needs a pedestrian crossing, it should have one.

The law and guidance

The Management of Health and Safety at Work Regulations 1992 require all significant risks to be assessed. In addition, the 'Workplace' Regulations require employers to plan safe traffic and other routes. As well as the law itself there is plenty of guidance issued by the Health and Safety Executive (HSE) on traffic, such as HSG136 on traffic in the workplace.

The importance of traffic management in waste management was formally recognised by the HSE in 2004 when it published specific guidance for the industry – all site managers should have seen and read this guidance because it sets the standard to be followed (available from Safety Department). Undoubtedly should a fatal traffic accident occur this guidance will be used as evidence in court as to the standard expected.

Shanks systems for traffic management

As one of the highest risks people on waste management facilities face, traffic movements are a must for risk assessment. However, risk assessment of traffic movements and the production of traffic management plans is a complex area. This note gives guidance on the issue and, along with company standard SHS105 'Traffic Management', should allow comprehensive plans to be produced and put into action.

In addition a traffic management safety seminar is available from Safety Department – this can be delivered at site level to managers and supervisors involved in producing and enforcing traffic plans. This course includes practical examples and exercises for candidates.

Advice note on
Traffic Management
February 2005

Risk assessments and plans for traffic management

Traffic management needs more planning than most risk assessments and other documents, such as site maps, may be required to back-up the standard Shanks' risk assessment form. Below is a 'step by step' approach to traffic management risk assessments and plans. Not all the steps may be applicable to your site and some steps will need repeating if you are splitting your site into areas for assessment.

1. Decide whether you will assess the whole of you site in one go or split it into sections. For small transfer stations etc one assessment may be fine, but for large sites, such as landfills and large sites or complex traffic operations, such as MRFs, it may be wise to carry out more than one assessment. For example, on a landfill you may opt to do one assessment for the site entrance and weighbridge area and another for the tipping face. For a MRF you may split assessments into external traffic flows and internal flows, such as in the MRF building and outside it. If you do opt to split your assessments remember they do relate to each other, for example the forklift which operates both inside and outside a MRF building. At a treatment plant you may want to split the assessment into a reception area and rest of site area.

2. Obtain a plan for your site: Most sites have a site plan supplied by surveyors, in a CDM file or produced by a consultant for planning etc with site roads, entrance areas etc marked on, or at least have a map in their Management and Emergency plans. Some sites may need to use a general plan and mark on any roads, gates etc. If you have not got a site plan, investing in one would help – and not just for traffic management plans. For moving areas, such as landfill site tipping faces, a brief sketch of a typical face at your site may be the best available. If you are splitting your traffic risk assessment plans/sketches for both areas will be needed.

3. Take some coloured pens and mark on the plan HGV routes, private car routes, where pedestrians walk and other traffic movements such as forklifts etc, using a different colour for each. Do not forget site car parks and the routes cars take to get to them, drivers who may need to walk from weighbridges to offices, delivery vans, the milkman, shortcuts employees may take etc. In particular think about visitors to your site, if applicable, such as school groups etc.

4. Study the plan and traffic routes marked on it. Do traffic flows cross at any point? Where does traffic queue? Where do pedestrians cross or run alongside traffic routes and where are pedestrians and traffic in the same area at the same time? Are there are bends or junctions with poor visibility? Where do HGVs stop to un-sheet or sheet? Can people step out of buildings into a traffic flow? The above is not a comprehensive list and any traffic management hazard should be noted.

5. Write down all the traffic hazards discovered above on Shanks' standard risk assessment form. For each hazard identify the risk involved - for example, drivers crossing traffic to the site office (a hazard) are at risk of collision with traffic. For special wastes, remember to include the hazards associated with the wastes in HGVs, including when they are stationary and/or unloading.

Of particular importance is any area where traffic and pedestrians are present at the same time. These should be split into **HIGH RISK AREAS** and **MEDIUM RISK AREAS**. For example:

High risk areas – all areas where lorries or plant reverse, loading and unloading areas, tipping halls and faces etc
Medium risk areas – general site roads, weighbridges etc

The above areas will be used below under controls and rules to be applied.

6. Note down the current controls for each hazard, such as signs, barriered areas, road markings, hi-vis clothing, training, banksmen (only to be used if there is no other option and as a last resort), traffic controllers etc.

7. Think of any additional control measures required. For guidance see the Health and Safety Executive's guidance note 'Managing Vehicle Safety at the Workplace', the waste management industry specific guidance and company standard SHS105.

Additional controls could include priority signs, making clear who has right of way, stop signs, pedestrian crossings and walk ways, box junctions, restricting the number of vehicles in one area at any one time (such as no more than two vehicles to tip at any one time), traffic controllers etc. Write down these additional controls, who will implement them and when by.

8. Record your traffic management plan. For fixed areas such as site entrances and transfer stations this should be as a plan/sketch with traffic flows, signs, give way points and other traffic management tools marked on. You will almost certainly have to back this up with a brief description of the plan detailing numbers of HGVs allowed in an area at any one time, the duties of traffic controllers and banksmen etc. For some areas a written description, detailing such issues as the number of HGVs allowed on a tipping face at any one time, may be the main part of the plan, such as on landfill tipping faces.

9. Append your traffic plan and description to the risk assessment and then communicate it to everyone on site. For example, everyone should know what is the maximum number of lorries allowed to tip at once. More than communicating the plan, train all those who need to enforce it, such as traffic controllers including what to do if a driver breaks the rules.

You may wish to produce a synopsis of your traffic plan to hand to drivers along with Shanks site rules booklet or other site rules documents. Examples of synopsis traffic plans are available from Safety Department.

10. Review the plan whenever anything significant changes such as increased traffic movements, a change in tipping area etc. You should also review the traffic management risk assessment each time you have a traffic accident on site. For example, if an item of heavy plant collides with a third party lorry – review your assessment as part of the investigation into the incident. If not review the plan along with your other risk assessments.

At the end of the above process you should have: A risk assessment (or more than one if you opted to split your site down) detailing hazards, risks, current controls and additional controls required, a plan/sketch of the area being assessed with controls, traffic flows etc marked on it and a written description of the controls to be used.

Traffic management not only makes sites safer, it can also improve turn around times, help with driver discipline and reduce traffic accidents and their costs. If you are unsure about any aspect of traffic management contact Safety Department for advice or wait until your next Safety Department inspection and ask. Poor traffic management is one of the major causes of serious accidents.

Controls and rules

Because traffic management is critical to safety on waste management sites Shanks has set some fixed rules in this area (many of these simply reflect the guidance given by the HSE in its publications).

Areas which must be considered in traffic plans

While it may not always be practical to apply the below 100% on waste management sites all traffic plans should aim at least to:

- Have one-way systems in place
- Where one-way systems are not practical sufficient room must be available for traffic to pass safely
- Have separate walkways for pedestrians away from traffic routes
- Where this is not practical roads must be wide enough for traffic and pedestrians to move safely – road markings at least should be put in place where practical and preferably kerbing and/or physical barriers
- Reversing should be reduced to a minimum
- Where reversing cannot be eliminated areas where reversing takes place will **ALWAYS** be **HIGH RISK AREAS**
- Physical barriers, kerbs etc should be preferred over road markings, signs procedures etc
- Road markings and traffic signs and where they need to be
- Heavy traffic (HGVs etc) should be separated from light traffic (cars, vans) as soon as possible from the site entrance, and preferably at the entrance (separate entrances for HGVs and cars is the ideal)
- Visitors to site (from delivery vans to school groups) should not be able to drive onto site accidentally – it should be obvious where the operational part of the site starts and that non-HGV etc traffic must not continue
- Site entrances should be clearly signed and room left to avoid queuing onto the highway
- If practical weighbridges should be designed so that drivers do not need to leave their cabs
- If drivers do need to leave their cabs safe access to the weighbridge it required
- Avoid blind corners, sharp bends and inclines
- Protect vulnerable facilities, such as landfill gas compounds, storage tank bunds etc, with barriers
- Sudden drops and banks to be protected with bump banks, barriers etc
- Banksmen and a last resort and must only be used when tipping articulated bulk lorries (to co-ordinate plant operations) or if not to have one would pose a greater risk – the general rule is avoid banksmen

Traffic plans should include the above areas and, where practical, include the above.

High risk areas

In high risk areas Shanks sets distinct rules – these **MUST** be followed and unlike the above are not 'areas for consideration'. High risk areas include:

- Any area where lorries or plant reverse
- Tipping, loading etc areas where traffic is moving
- Any other area defined by risk assessment

One of the main rules in traffic management is:

IF THERE ARE NO PEDESTRIANS IN AN AREA THEN THEY CANNOT BE HIT BY A VEHICLE

This simple rule is often overlooked by managers. Because of this rule in high risk areas:

- Only those performing essential tasks are allowed on the ground while traffic is moving – **NO ONE ELSE**
- Essential tasks include opening lorry back doors, operating skip motor controls etc
- Essential tasks **DO NOT** include litter picking, sampling, inspecting etc (note – in the past there have been occasions when regulators have asked for litter pickers etc to be put into high risk areas – any such request **MUST** be passed to Safety Department **BEFORE** any action is taken – human life comes above having some litter on the floor)

Even for those performing essential tasks:

- The absolute minimum time must be spent on the ground – eg, lorry drivers **MUST** return to their cabs as soon as they have finished opening doors, operating external controls etc
- Only one person is allowed out of lorry cabs to perform essential duties such as opening lorry back doors
- Safety distances (see below) **MUST** be enforced at all times while traffic is moving

Safety distances

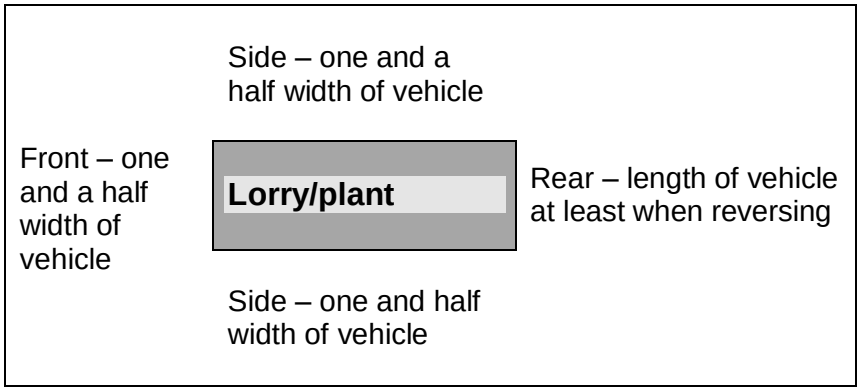
When traffic is moving pedestrians can only really be safe is they are not in the area at all or if they are protected by a physical barrier (such as a wall or raised kerb). Where this is not practical, such as lorry drivers opening doors etc as above, the primary control is to keep moving traffic away from them while they are on the ground.

Below are safety distances for lorries and heavy mobile plant. Enforcing these distances is a matter of constant vigilance and procedures. For example:

- Limiting the number of lorries allowed in a tipping hall to maintain the below safety distances
- Instructing plant operatives to stop their vehicle when drivers are out of their cabs in a MRF tipping area
- Holding a lorry at the edge of a reversing area until the driver of another lorry is back in their cab before proceeding

Safety distances – lorries and heavy mobile plant

In high risk areas moving lorries and plant **MUST NOT** come within the below safety distances of pedestrians unless they are protected by physical barriers such as high kerbs etc



Safety distances – lorries and heavy mobile plant

No one inside line while vehicle is moving

If any pedestrian comes within the above safety distances the lorry or item of heavy plant **MUST STOP** until the pedestrian has left the area, moved out of distance, got back into their cab etc.

Standards for vehicles

Shanks may not be in control fully of standards for third party lorries such as reversing bleepers fitted, orange beacons fitted etc. However, it is very much in control of the standards it applies to its own vehicles.

Some of these are laid down by specific law, such as rear-view cameras on compaction waste collection lorries such as RELs etc (a legal requirement of the Supply of Machinery Regulations). Others are the result of indirect law. For example the Provision and Use of Work Equipment Regulations (PUWER) requires good all-round vision and warning of operation and this needs to be proved. Employers such as Shanks need to prove they have met these requirements.

There are three main areas for vehicle safety standards:

- The driver/operator has good all-round vision – that is they can see any pedestrian around them
- Any pedestrian is aware there is a vehicle around – reversing bleepers etc
- That the vehicle is generally safe to use – such as brakes working etc

Standards - lorries

Standards for lorries are often set by direct law, such as the need for two mirrors of an adequate design. However for Shanks lorries:

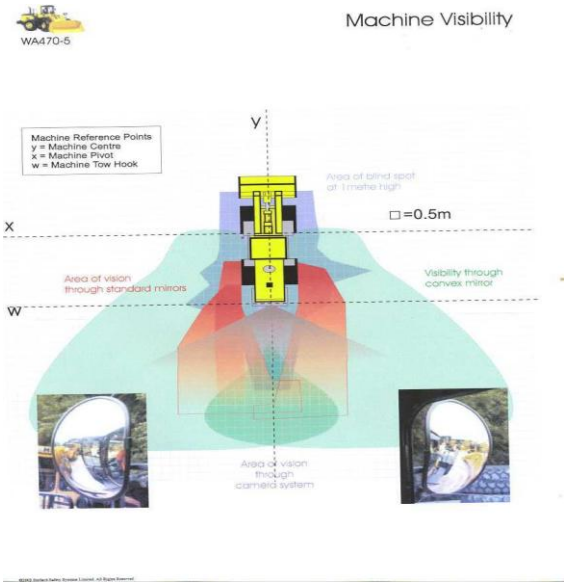
- Reversing bleepers, or similar, **MUST** be fitted and used at all times when on customer of disposal sites (on the road restrictions sometimes apply in residential areas during night-time)
- Reversing lights and all other required lights in working order
- Mirrors **MUST** be fitted and be in good condition and kept clean
- Rear-view cameras are required on all compaction dry waste collection vehicles (RELs, FELs, TRVs etc) – it is illegal to take a lorry onto the road without this being in place and working
- Orange flashing beacons must be fitted and used

Standards heavy mobile plant

All Shanks heavy mobile plant should have had a vision assessment (see Shanks advice note on assessing vision from plant available from Safety Department). The aim is for the plant operator to be able to see all round their item of plant. This can be achieved by:

Mirrors – the standard mirrors fitted to some items of plant do not give good vision and additional/different mirrors may be required
Reversing camera – if good all round vision cannot be achieved by mirrors then reversing cameras must be fitted. This is an obvious requirement on plant such as dumpers, but not likely to be required on counterbalance forklifts

The below example vision splay shows what a difference a vision assessment and adding better mirrors and a camera can have.



Example vision splay for a loading shovel. This shows the view from standard mirrors (red), the improved view from convex mirrors (green) and from the reversing camera (grey)

As for lorries, all Shanks plant must have fitted and working:

- Reversing bleepers or similar (such as white noise reversing alarm)
- Reversing lights and all other required lights (orange beacon) working
- Mirrors **MUST** be fitted, adjusted and kept clean
- Reversing camera if all-round vision not achievable with mirrors

For both lorries and heavy mobile plant if the above are not in good working order the vehicle **MUST NOT** be used until repairs etc can be made.

Other devices can be fitted to support the above, such as rear radar devices which sense an object, such as a person, and sound an alarm, or automatically stop the item of plant. Careful consideration of the effectiveness of such devices needs to be made. For example, on landfill sites rear radar is often impractical because of rough ground or seagulls flying through the radar beam. In addition, such devices should be considered only as a back-up to audible and visual warning of reversing and good all-round vision.

Daily checks and defect reporting

Having mirrors, reversing cameras, orange beacons etc is all well and good, but they must also be maintained in good working order. Key in this are daily checks and defect reporting.

Shanks has well developed systems for daily checks and defect reporting for lorries and mobile plant. It is a legal requirement that these checks are made – not just a Shanks policy. In particular defects which relate to vision and visibility of lorries and plant must be corrected before the vehicle is used.

Safe systems of work

No matter how much physical control is placed on traffic management there are times at waste management sites when pedestrians and vehicles will be in the same area at the same time. The above safety distances accept this (but only after assessment shows that the pedestrian is really carrying-out an essential task, that the minimum amount of time is spent on this and the minimum number of pedestrians are present).

The aim of any traffic management system of work is to:

- Incorporate the above requirements, such as one-way systems, standards for plant etc
- Place physical controls, such as barriers, signs etc
- And, where the above are not sufficient on their own back these up with procedures and systems

Such systems may include limiting the number of vehicles allowed in any area at one time. For example, limiting the number of lorries allowed in a transfer station tipping hall at any one time. Systems may also include splitting traffic, such as into tipping lorries and compactor ejecting lorries, or during works on a site splitting site from contractor traffic.

However, to do any of the above lorries will need to be controlled at some point, to wait, where to go etc. This is a common issue for many sites and may be controlled by:

- Physical systems such as traffic lights and/or barriers which lift (these can be operated by a traffic controller direct or on remote control, such as from a control in an item of plant)
- A traffic controller who stands at the entry to a high risk area and controls the entry of vehicles into it, or who directs traffic in different directions
- Stop signs, direction signs and instructions on signs etc (although these tend not to be effective as some drivers will ignore them)

Automatic systems, such as traffic lights, or remotely controlled systems, such as a raising barrier controlled by a remote control in an item of plant or weighbridge, can be useful. However, they rely on issues such as the operator being in 'line of sight' with the control, availability of power supply etc. At some point human intervention is likely to be required, either to direct/control traffic or to enforce traffic rules.

In general there are two levels of ‘human’ intervention:

- Banksmen
- Traffic controllers

Banksmen

These are formally trained employees who co-ordinate vehicle movement and/or operation. Banksmen are a last resort and should only be used where there is no other realistic alternative, such as when tipping articulated tipper lorries on a landfill site.

Traffic controllers

These are employees who control traffic movements. They must not be pedestrians on the ground in high risk areas. Examples of traffic controller duties include:

- Standing on the boundary between a high and medium risk area controlling traffic flow into the high risk area. For example, a traffic controller who controls how many lorries are allowed into a tipping hall
- Enforcing traffic rules with drivers

Traffic controllers can be plant operators provided that adequate communication between controller and lorries can be arranged. Devices such as cab mounted loud hailers can be used to allow better communication and control of drivers in high risk areas.

Whatever procedures and rules are put in place these rely on human intervention and must not be used instead of physical controls. Human based controls, such as instructing an employee not to walk on a tipping floor will not be 100% effective and with traffic one mistake is all it takes.

Other documents

The below documents may be used in conjunction with this advice note when compiling traffic management plans and assessments:

HSG136 managing vehicle safety in the workplace (HSE guidance)
Transport in waste management facilities (HSE guidance)
SHS105 traffic management (Shanks company standard)
Traffic management presentation (Shanks training course presentation)

All of the above, plus examples of traffic plans etc, are available from Safety Department.

Traffic management is critical to good levels of safety on waste management sites

- **Plan for good traffic management**
- **Enforce good traffic management**
- **Maintain good traffic management**

Safety advice for Shanks UK operations – issued by Safety Department

advice solutions.

Safety advice for all of Shanks UK operations

Training and competence

Training standards, matrices and training records

Introduction

The law, good practice and the simple requirement of 'getting jobs done' require companies at least meet minimum standards in terms of the training given to and competencies held by their employees. This is obvious in many cases. For example, vehicles operations must have drivers with valid HGV licences, all sites an appropriate number of trained first aiders and any employee issuing permits to work must have been trained in their use - all legal requirements.

Beyond these minimums most companies will set their own standards to improve their business, limit potential liabilities and develop their employees. Shanks is one such company and has a strong belief in training to improve both employees and company.

In addition to providing training and ensuring that any required competencies are held, companies also have a duty to record training and keep copies of qualifications. For many types of training this is a legal requirement, such as being able to prove that employees have been inducted on risk assessments (Management of Health and Safety at Work Regulations). Failure to keep such records may result in a criminal prosecution.

For other types of training the keeping of records limits potential liability, such as being able to prove a person has been trained as a defence in a civil claims case. For example, under the Woolf Reforms solicitors can ask for proof of training on plant under the Provision and Use of Work Equipment Regulations.

The above, while simple in outline, is complex and difficult to achieve in practice, particularly for diverse and geographically spread companies such as Shanks. The company standard (SHR100), 'induction and training' sets the standards expected and who is responsible for meeting these. It also describes the system. This advice note supports and expands on the training and competency issues in the training and induction standard. NB. There is a separate advice note on induction which is available from Safety or Management Systems Department.

Training matrices

Every site/operation/department must have a training matrix - it is the manager's responsibility to compile this. At its simplest the training matrix will consist of a table with a list of employees down one side and a list of types of training/competencies across the top (or visa-versa if you wish). As a minimum each site/operation training matrix must include:

- All the employees at that site/operation/department
- All of the minimum standards for training/competencies laid down in the 'minimum standards for training and competence' for the type of site/operation in question (see below)

Advice note on Training
April 2001

- Any specific training/competence standards required by other documents, such as site licences etc

Tips for compiling and using training matrices

Part of a simple example training matrix is shown below. Using this example:

Training\employee	Joe Bloggs	AN Other	John Smith	Fred Bloggs
Initial induction	Done 12/05/90	Done 06/09/87	Done 14/11/98	Done 23/06/92
Company standard induction	Done 13/04/01	Done 14/04/01	Done 13/04/01	Booked for 19/04/01
Risk assessment induction	Done 13/04/01	Done 14.04/01	Booked for 18/04/01	Booked for 19/04/01
IOSH Managing Safely	NA	NA	Done May 2000	NA
COTC	NA	NA	Five units done	NA
Plant training	Done Renewal due May 2002	Done Renewal due May 2002	NA	Done Renewal due May 2002
First aider	NA	Qualified Renewal due June 2002	NA	NA
Fire training	Done 11/08/99	Done 11/08/99	Booked for 17/06/01	**Needs booking**
Permits to work	NA	Done 13/06/00	Done 13/06/00	NA

For training which needs to be renewed the date of renewal can be noted. For example, if a driver's ADR licence needs renewal in June 2002, then this should be noted in the relevant box. Likewise if training has been booked, but has not taken place yet this date could likewise be noted in the relevant box (to avoid confusion colours or shading can be used - see below). Colours and/or shading can be used to good effect on training matrices. For example:

- If an employee has the required training/competency the relevant box could be coloured green (if the training needs renewal, the date for renewal can be noted in the box)
- If the employee does not have the required training/competency but has been booked on a training course the box could be coloured amber (with the date for the course also noted in the box)
- If the employee does not have the required training/competency and no training has been booked the box could be coloured red - ie, an issue which needs urgent attention

Of course shading can be used instead of colour (in the above example, dark grey is used to show training which needs booking and light grey training which has been booked). By using colours or shading managers can more easily prioritise training needs, the booking of courses and tracking achievements. However, try not to get ‘bogged down’ with your training matrix – if one side of A4 with lines drawn on it is appropriate, so be it.

Any training needs identified, new training needs (such as from a change in the law), minimum training/competency standards (see below) etc should be fed into the training matrix. For example, if a new employee is taken-on he or she may need training. In this case the employee and their training needs should be added to the matrix next to his/her name and a date/s for when the training will be carried out.

As 'living' documents training matrices are best kept on a computer programme, such as a spread sheet or table in a word processing package, which can be easily updated. However, for smaller sites/operations a simple written document may be sufficient. In either case training matrices must be updated regularly if they are to be effective. However, old training matrices may be needed as evidence and should be filed for six years.

Training/competency standards and their use

Attached as appendices to the company training and induction standard (SHR100) is a series of minimum training/competence standards (your copy will only have the minimum training/competence standard for your type of operation). These appendices cover the critical types of operation and activity carried out by Shanks, from recycling facilities and landfills to sales and high temperature incineration. For each type of operation a series of training/competency levels are set which must be reached (for the majority of the standards the level set is a legal one).

If one or more of the minimum standards required is not held by a site/operation/department (for example, no one at a landfill site has been trained in incident investigation) then a course should be booked as soon as is practical. Likewise if an employee leaves the company the training/competencies held by that employee need to be removed from the training matrix and plans made to replace them.

Of course the minimum training/competency standards laid down in SHR100 are only a starting point. They describe what the law and good practice require, not what may be desirable or in the company's further interests. Training matrices need to contain more than the minimum standards if they are to be effective and promote continuous improvement.

Minimum training/competency standards - example definitions

The minimum training/competency standards laid down in SHR100 are quoted as titles, such as 'COTC' or 'team brief'. Below are given expansions of some of the standards laid down as examples of how the standards work.

Initial induction - every employee must have been inducted into Shanks using form FHR120. Even if the employee has transferred from another site/operation parts of the induction process must be repeated, for example fire exit location, who are the first aiders etc.

Company standard induction - all employees must be inducted on the company standards and operating procedures relevant to the tasks they carry out and this induction repeated each year. Managers can sometimes become confused as to who needs inducting on which company standard. The best approach is to ask the question 'who carries out this task?' For example, a company standard on the operation of a type of waste vehicle obviously requires drivers of that vehicle to be inducted on the standard. The company standard on health and safety communications need only be of interest to the manager, safety representative and perhaps supervisor - ask the question 'who carries out safety communications?'

Risk assessment induction - all employees must be inducted on the risk assessments relevant to the tasks they carry out and this induction must be repeated each time the assessment is reviewed (see SHS101 risk assessment for details). Of course the same applies to COSHH assessments.

COTC - Certificates of Technical Competence (COTCs) are required for many waste management facilities by law. The Environment Agency (EA) and the Scottish Environmental Protection Agency (SEPA) set occupancy standards for COTCs which vary dependent on the type of operation. For example, special waste treatment plants are required to have a COTC holder on site all the time they are open.

IOSH Managing Safely - The Institute of Occupational Safety and Health (IOSH) Managing Safely qualification is an examined and nationally recognised basic safety qualification for managers and supervisors. Shanks has set as a standard that all operational managers must obtain this qualification, or an equivalent, and courses are arranged through Safety Department.

Risk assessment - risk assessments are required under safety law. In order that these are of a good quality at least one person on each site/operation must have attended a risk assessment course, available through Safety Department.

First aid - safety law requires sites and operations to have an appropriate number of trained first aiders. There are two types: Qualified first aiders (who have been on a four day course) and appointed persons (a one day course). Shanks sets a minimum standard of one first aider to every 25 employees. Courses are available through Training Department or locally.

Fire training - this includes use of fire extinguishers etc. The standard set quotes the percentage of employees who must have been through fire training, which is available through Training Department.

There are many other training standards set down in the appendices to the company training and induction standard. The above examples, however, should give a guide to how each one is to be treated. If you have any queries on training and induction please contact one of the following:

- For general training advice - Human Resources Department
- For safety training advice - Safety Department
- For operations training advice - Training Department
- For company standard training - Business Management Systems Department

Finally, those companies which carry out the most training are normally the ones which are most profitable and those which keep good training records have the least prosecutions. Training is essential to a company's success.

Training is often a legal requirement, not a luxury

Being able to prove training is also often a legal requirement – ensure your training records are complete and up-to-date

Even when not a legal requirement, training is often a practical requirement

Safety, health and environment advice for Shanks UK operations – issued by SHE Department

SHE advice

SHE advice for all of Shanks UK operations

CDM Regulations – who does what

This advice note gives guidance on the roles allocated to various persons/bodies under the Construction Design and Management Regulations (CDM Regulations) and should be read in conjunction with the Shanks CDM Company Standard. Those in charge of CDM projects should also be familiar with the Health and Safety Executive's code of practice on the CDM Regulations (available from SHE Department).

Although Shanks is not a construction company, at one time or another virtually all of the Company's sites will be subject to construction work. This can range from civil engineering work on a landfill site through to building a new recycling factory. ~~or demolishing storage tanks at a special waste site.~~

The Construction Design and Management Regulations (the CDM Regulations) are aimed at controlling such works, in particular the contract nature of the majority of such, and allocating responsibilities to the various parties involved.

The reason that the CDM Regulations exist is that the construction industry has a notoriously bad accident record. There are several reasons for this including:

- The nature of the work carried out often presents significant risks (in particular demolition, working at heights and confined spaces).
- Often a whole series of contractors and sub-contractors are involved and co-ordination is, at best, difficult.
- The culture of the construction industry is, largely, of 'get the job done' due to time constraints.
-
- Lack of time, financial or other resources allocated by Clients

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The key aim of the CDM Regulations is to integrate health and safety into the management of the project and to encourage everyone involved to work together to improve the planning and management of projects from the very start. It also identifies hazards early on, so they can be

eliminated or reduced at the design or planning stage and the remaining risks can be properly managed.

Guidelines for establishing whether CDM applies and whether the projects require notification to the HSE are set out in the Shanks CDM Company Standard. As are the requirements for the Health and Safety Pplan and Health and Safety Ffile but the duties imposed on the relevant parties by the regulations require further clarification.

Application of duties under the CDM Regulations

One of the main problems in construction projects is the number of parties typically involved and that duties which need to be carried out can 'fall between the lines'. Confusion between parties has been a major c~~v~~ause of accidents in the past. The Regulations define five groups involved in construction work:

The client – this is the person for whom the work is being carried out (for example, Shanks would normally be the client for civil engineering works on its sites).

The CDM ~~C~~co-ordinator~~planning supervisor~~ – this is the person, or group of persons or company appointed by the client to oversee the works. Note – the CDM Co-ordinator~~planning supervisor~~ must be appointed early enough in the project to ensure the competence of designers and contractors.

The designer – the person or group of persons who prepares drawings, designs structures. ~~etc (for example, if the project is the installation of new storage tanks etc at a special waste site, the designer is likely to be a chemical engineer).~~ It is possible for several designers to be appointed to design different structure on the same project.

The p~~P~~~~p~~rincipal c~~C~~~~c~~ontractor – this is normally the main contractor involved (there may only be one contractor involved, but normally there will also be other sub-contractors etc).

Contractors – any other contractor not the principal contractor, such as sub-contractors.

Each of the above persons or groups of persons has specified duties under the CDM Regulations:

The Client

The client is the person the work is being carried out for, even if this is an internal client – for example, one department in a company carrying out construction work for another department. The client may appoint an agent to act on his behalf, but must be reasonably satisfied that this agent is competent. The client's duties are:

- ✓ Notify the HSE of the appointment of any agent acting on his behalf (in these cases the legal duties of the client pass to the agent by a formal signed document, but the client must be satisfied as to the competence of the agent)
- ✓ Appoint a CDM Co-ordinator~~planning supervisor~~ (when the project is notifiable) as soon as possible – to enable this person to give competent advice and assess the competence of contractors and designers early in the process. The competence of this appointment must be carefully assessed~~.~~

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- Appoint a Principal Contractor as soon as sufficient information is available about the project for a decision to be made – in particular with regard to competence and resource allocation. This should be done in with agreement from the CDM Co-ordinatorPlanning Supervisor.

The positions of both CDM Co-ordinatorplanning supervisor and principal contractor must remain filled throughout the project. Specific persons and companies can be changed part way through the construction phase, but the roles must still be filled.

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It is possible for the Client to act as CDM Co-ordinator~~ Planning Supervisor~~ and/or Principal ~~Contractor or for the Planning Supervisor to also act as the Principal Contractor~~ Contractor providing competence for each role can be proven. Further duties of the client are:

- ✓ Ensure the competencies of Designers~~.~~
- ✓ Ensure that the health and safety plan has been prepared **BEFORE** the construction phase commences and keep available any health and safety files relating to existing structures. This should be prepared by the client or on behalf of the client by an independent advisor or the ~~planning supervisor~~CDM Co-ordinator~~.~~
- ✓ Provide the ~~planning supervisor~~CDM Co-ordinator with such information relating to health and safety on the state or condition of the premises involved and other matters in his control~~.~~
- ✓ Once the project has finished, ensure that the safety file (see below) is kept available for inspection and passed onto any subsequent owner of the premises~~.~~

In most of the above the client has a responsibility to be reasonably satisfied regarding the competence of the ~~planning supervisor~~CDM Co-ordinator and, by inference, principal contractor. The client must also be reasonably satisfied as to the adequacy of resource allocation to allow the appointees to carry out their duties adequately.

The ~~Planning Supervisor~~CDM Co-ordinator

For notifiable projects, the client must appoint a competent, adequately resourced CDM Co-ordinator as soon as practicable after initial design work or other preparation for construction work have begun.

The ~~planning supervisor~~CDM Co-ordinator must be competent and appointed sufficiently early in the project to allow him or her to carry out ~~his~~ their duties. The ~~planning supervisor~~CDM Co-ordinator does not need to be a single person and can be a company or group of people, although one person must co-ordinate. Indeed, there is a weight of opinion that no one person can fulfil all the duties of the ~~planning supervisor~~CDM Co-ordinator – that is no one person is an expert on all the issues which need to be covered throughout a project.

The ~~planning supervisor~~CDM Co-ordinator's duties are:

- ✓ Notify the HSE of the CDM project if the project is notifiable. Usually by way of an F10 form.
- ✓ Ensure the health and safety plan for the project is completed and agreed before construction commences for use in the tender stage~~.~~
- ✓ Give suitable and sufficient advice and assistance to clients in order to help them comply with their duties to appoint competent designers and contractors and ensure that adequate arrangements are in place for managing the project~~.~~
- ✓ Co-ordinate design work, planning and other preparation for construction where relevant to health and safety~~.~~

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Advice note on CDM Regulations May 2008

- ✓ Identify and collect the pre-construction information and advise the client if surveys need to be commissioned to fill significant gaps.
- ✓ Manage the flow of health and safety information between clients, designers and contractors.
- ✓ Advise the client on the the suitability of the the initial construction phase plan and the arrangements made made to ensure that that welfare facilities are on site from the start.
- ✓ Produce or update a relevant, user friendly, health and safety file suitable for future use at the end of the construction phase.

The Designer/s

The designer prepares drawings, designs details, produces specifications and formulates the bill of quantities for the work. There may be more than one designer and, in such cases, the ~~planning supervisor~~CDM Co-ordinator must ensure that they co-operate with each other to ensure that the final design is safe and fit for use. The ~~planning supervisor~~CDM Co-ordinator will also feed information to the designer, such as the risk and hazard information provided by the client, and assist the designer in ensuring that risks are reduced through good design.

The ~~planning supervisor~~CDM Co-ordinator will also need to gain information from the designer on topics and issues to be covered in the safety plan. Designers have a duty to ensure that they provide such information. Designers also have a duty to inform the client of any legal and good practice issues which come to light while they are translating the client's wishes into a final design. The designer's duties are:

- ✓ Avoid foreseeable risks to health and safety of anyone during construction or during cleaning work either in or on the structure
- ✓ Combat risk at source if avoidance is not reasonably practicable through good design
- ✓ Use controls in their design which protect all persons, not just those involved in construction of cleaning
- ✓ Provide adequate information about the project, structure and/or materials used in design documents so that those involved in the project can take the appropriate decisions regarding health and safety
- ✓ To co-operate with the ~~Planning Supervisor~~CDM Co-ordinator on and other Designers working on the project~~.~~

When considering design, at least the following issues need to be considered:

- ✓ Is the design based on current or well established practice?
- ✓ Does the design conform to legislation, good principles and practice, current British or EU standards etc?
- ✓ Do design drawings point out any specific or unusual hazards, particularly those which may be encountered during construction?
- ✓ Is the design 'construction friendly'?
- ✓ Has adequate consideration been given to the subsequent maintenance, cleaning etc of the structure?

The Principal Contractor

With advice from the ~~planning supervisor~~CDM Co-ordinator, the client, or his agent, will appoint a competent principal contractor (there may only be one contractor, but more normally others will also be involved). It is the principal contractor's main duty to manage the construction

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work safely for the client.

Before construction commences the principal contractor should ensure that the safety plan contains arrangements and controls which will, so far as is reasonably practicable, protect all those involved or who may potentially be affected by the project.

- Bring the safety rules, including site rules, to the attention of any person involved in construction and ensure they are complied with.
- Take reasonable steps to control access to the site.

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- Provide the ~~planning supervisor~~CDM Co-ordinator with information promptly on issues which may need including in the safety file being written for the structure~~.~~
- Provide consultation arrangements to ensure that those involved in the construction can raise safety issues and provide co-ordination forums to allow adequate co-operation between contractors to occur and so allow safe working between parties~~.~~
- Provide a system to allow the reporting of accidents and incidents, in particular those which would fall under RIDDOR.
- Display the notification to the HSE (F10)~~.~~

Contractors

Of course for smaller projects the only contractor may be the principal contractor. However, in most cases several contractors will be involved, such as electricians, civil engineers, plumbers etc. These other contractors are more commonly called sub-contractors.

All contractors working on any job have a series of health and safety duties, such as that to compile risk assessments for all tasks imposed by the Management of Health and Safety at Work Regulations. Such documentation should be provided to the principal contractor as proof of competence.

The additional duties imposed on contractors by the CDM Regulations are:

- Obey the site safety rules communicated to them by the principal contractor
- Report any RIDDOR incidents or accidents to the principal contractor
- Report any factor or issue which may affect the safety of the project to the principal contractor

In addition to ~~the~~ normal site induction requirements, such as emergency procedures, which areas can be entered and which not, who will be in charge etc, all those working on site must have been inducted in:

- The name of the CDM Co-ordinator
- The name of the principal contractor
- The relevant parts of the safety plan

As with all safety law requirements, the above inductions must be recorded and be available on site.

The key requirement throughout the regulations it to ensure that the all appointments are based on competence and that the competence of all parties can be proven. The Approved Code of Practice that accompanies the CDM Regulations sets out criteria which should be

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used when considering the competencies of each party.

If you are unsure as to whether the regulations apply then advice can be sought from ~~the Safety~~ SHE Department. If you are sure CDM applies but you have not worked on CDM projects before you should inform ~~the~~ SHE Department of the work and assistance will be provided on complying with these regulations.

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Safety, health and environment advice for Shanks UK operations – issued by SHE Department

SHE advice

SHE advice for all of Shanks UK operations

First aid – there when you need it?

First aid is defined as being any treatment with the aim of preserving life or minimising the consequences of an injury until medical assistance can be rendered, or the treatment of minor injuries which do no need professional medical assistance. Please note first aid does not include tablets or medicines (these are not defined as first aid). This is a fairly wide definition and includes everything from eye wash bottles and plasters to cleaning a wound.

The law requires that companies provide suitable equipment, such as first aid kits, eye wash equipment etc, and appropriately trained employees (first aiders) to carry out such first aid. But, how many first aid kits do you need, of what size and type, how many trained first aiders to you need on site etc? The basis for answering this type of question is risk assessment – a first aid risk assessment. Plus, of course, once you have adequate first aid provision in place, based on risk assessment, you need to ensure that it is maintained, that everyone knows about it etc.

The below advice note looks at first aid risk assessments and other aspects of first aid. For ease of use it is split into sections:

1. First aid risk assessments
2. The responsible person
3. First aid equipment checks
4. Communications
5. First aiders – numbers, training and availability
6. Shared sites
7. Mobile employees
8. Recording first aid treatment

Note – this advice note needs to be read in conjunction with Shanks company standard on first aid (SHE113STN), which is on the intranet.

1. First aid risk assessment

Managers need to make an assessment of their site's first aid needs to make sure that they are appropriate and adequate. This is a more flexible approach than has been the case in the past when strict guidelines as to the number of first aid kits etc, contents of first aid kits etc were laid down. It is a sensible approach - obviously the first aid requirements for a large recycling plant will be very different from those for a small administration office.

Advice note on First aid risk assessments March 2010

But, it does mean that you need to get your first aid risk assessment right, or you may find yourself without adequate first aid equipment or first aiders. Plus, of course, you need to assess whether your first aid kits, first aiders etc are in the right places and how they can be accessed easily etc.

The first step in a first aid risk assessment is to decide what types of injuries could occur which may require first aid treatment, what might cause these injuries and where on site they may happen. The two main sources of information here are accident records (to tell you what injuries have already happened – and may happen again) and site risk assessments (to tell you what type of injuries you have not suffered as yet, but which might occur). These two sources should provide you with a good idea of the types of injury you might expect and that you may need to provide first aid for.

List the types of injury which might occur in the risks column on a standard Shanks risk assessment form and the things which may cause the injuries in the hazards column. Plus consider what issues may exacerbate an injury, such as how quickly can a first aider be summoned to help, how quickly can a first aid kit be accessed etc. For example, do your site first aiders have site radios to allow them to be summoned quickly in the event of an injury or how easy is it to get at a first aid kit quickly?

The next step is who may be injured and where they may be (the location) when injured - these should be listed in the 'persons potentially affected' column. Where a person may be when injured is obviously important: A first aid kit in an office will be of little use to a landfill operative on a tipping face a mile away, or to a LGV driver 30 miles down the road. The 'current controls' column on the risk assessment form will consist of your existing first aid kits and their contents, eye washes etc and trained first aiders etc which are already available on site. Plus, of course, your existing communication methods such as the use of site radios, first aid boards showing where first aiders are located, signs showing where first aid kits are kept etc.

The 'severity', likelihood' and 'low/medium/high' risk rating columns will be as for other any other risk assessment.

The 'additional controls required' column should then list what you are going to do about any shortfalls you have identified by the risk assessment process. This may be additional equipment (such as eye wash equipment if dust etc may be a problem, more first aid kits or specialist first aid kits if required), the location of equipment (for example, in vehicle cabs, carried with first aiders such as 'bum bags', eye washes close to where an injury may occur etc), additional first aiders to take account of shifts etc, better communication (for example, a first aid notice board in the operatives' mess room rather than reception where operatives rarely go) etc.

Whether an existing control, or an additional control, you need to list in detail the outcomes of your risk assessment. These details will at the least include:

- ✓ How many first aiders you have, or need, and where they are normally located or can be contacted

- ✓ How many first aid kits you have and where they are located – that is a list of where first aid kits are kept. For vehicle first aid kits a simple '*kept in all lorries'* or similar note will do, but for static first aid kits you need to state where they are such as, '*large first aid kit in office'*, '*large first aid kit in main picking cabin*', '*eye wash bottles in main picking cabin'*, '*eye wash bottle in secondary picking cabin'* etc
- ✓ Where your first aid notice board is located

The best place to record this type of detail is in the comments box at the bottom of the risk assessment form as a list.

Note – if anything significant changes at your site you will need to revise your first aid risk assessment. For example, if you move from day working only to multiple working shifts you will probably need more first aiders to ensure your site is covered at all times.

A good practice example first aid risk assessment is available on Shanks intranet to guide you. Or, if you have any queries or want some advice contact SHE Department. Either way, make sure your first aid risk assessment covers all the injury types it needs to and that you have identified an adequate provision for first aid. First aid is not often seen as an exciting part of health and safety – but when you really need first aid, you really need it.

2. The responsible person

Each site must have a responsible person (usually a trained first aider, but not always) who is responsible for ensuring that the first aid provisions identified by the risk assessment are really in place and maintained. The responsible person is also responsible for ensuring that the location of first aid equipment and first aiders is communicated to other employees (see notice boards below). Taking these two areas of duty in turn:

3. First aid equipment checks

All first aid equipment etc needs checking regularly to ensure that it is complete and functional. These checks are one of the duties of the responsible person. This would include checking that:

- ✓ The contents of first aid kits to ensure that they are complete
- ✓ First aid kits are where they should be
- ✓ The contents of first aid kits are in date
- ✓ Eye wash bottles etc, are likewise in place, unused and in date
- ✓ Any other first aid equipment, such as emergency showers etc, are working, clear from obstruction etc
- ✓ All signs, such as signs showing where first aid kits etc are kept, are in place, clean and visible
- ✓ The first aid notice board is up to date and clear

Such checks should be carried out and recorded in the first aid section of your on-site inspection form – managers should check periodically to ensure that this is being done.

As regards how often checks should be made, checks on first aid equipment should be carried out:

- ✓ For fixed first aid kits, eye wash bottles etc, once a month

- ✓ For mobile first aid kits, eye wash bottles etc, such as in HGV and light van cabs, once every two months
- ✓ For other first aid equipment as appropriate - typically monthly although more frequent checks may be required

Record first aid checks in the first aid section of your on-site inspection form

First aid	✓/X/NA	Issue and action to be taken
All first aid boxes in place and accessible? First aid boxes checked – contents OK, anything missing? Eye wash bottles in place (none missing) and full? First aid boxes/eye washes in date? First aiders noticeboard in place and up to date? First aid box locations signed? First aid kits in vehicles (LGVs etc)? Eye wash bottles/tubes in vehicles?		
The above checks are a strict legal requirement. The below **MUST** be signed by the person who conducted the checks to confirm that they have been completed. This person does not need to be the employee who does the general inspection and may be a site first aider etc. However, whoever conducts the checks **MUST** still sign below: I confirm that the above first aid checks have been completed as listed (signed): Date:		

4. Communication

All Shanks sites must have a notice board identifying:

- ✓ Who are the first aiders for the site and where they can normally be found (locations) – photographs can be useful here and should be used where practical
- ✓ Who is the responsible person for the site
- ✓ Where fixed first aid kits and other equipment is located – a list
- ✓ A general note for mobile first aid kits, such as in mobile plant etc
- ✓ The address and telephone number of the nearest hospital emergency department plus basic directions on how to get there (a brief and simple map may help)

It is the duty of the responsible person to ensure that the information on the first aid notice is kept up to date. Thought should also be given to where this notice is (that is where most people will see it), whether more than one is required if the site is large etc.

5. First aiders - number, training and availability

The first aid risk assessment for a site will identify how many first aiders are required. There are two main types:

- ✓ ***Qualified first aiders*** - those who have attended a full three day First Aid at Work (FAW 3 day) course
- ✓ ***Appointed persons*** - those who have been on a one day emergency first aid at work (EFAW) course

For very low risk sites it may be appropriate for only an appointed person/s to be in place. However, this is not the case for the vast majority of Shanks' sites because of the risk posed and a qualified first aider will virtually always be required – if in doubt contact SHE Department for advice.

As stated above the responsible person has duties relating to checking and communication. It is normal for the responsible person to also be a qualified first aider, but this is not always the case. For example, a site may have two trained first aiders, but a separate responsible person to carry out checks and communication. However, because of the knowledge etc involved it is often simpler to make one qualified first aider the responsible person.

When determining the number of first aiders required in a risk assessment factors such as holiday cover, job nature, shift and weekend working etc, must be considered. A minimum requirement for qualified first aiders has been laid down by Shanks of one first aider to every 25 employees and at least one first aider on site at all times. In essence if a site has two qualified first aiders it is no good them both being on holiday at the same time, neither is it any good if the qualified first aider is always off site because of the nature of his/her job.

For some sites the basic three day training may not be sufficient. For example, the assessment may identify a risk, which is not covered by normal first aid training. In such cases specialist training should be undertaken by first aiders in addition to their normal three day course. Again, if in doubt contact SHE Department for advice.

6. Shared sites

Some of Shanks' sites are shared. For example a recycling plant with a vehicles operation also on site. In such cases the various facilities must co-operate on first aid provision. In particular the availability of qualified first aiders - it may be appropriate in the above case for a recycling plant first aider to also cover the office staff of a vehicles operation it they share the same building. However, this may not be appropriate if the facilities are separated by distance.

7. Mobile employees

A proportion of Shanks' employees are mobile, such as LGV drivers, mobile fitters etc. In these cases small personal first aid kits (and eye wash bottles/tubes as appropriate etc) will need to be provided:

- ✓ All company LGVs and light vans used by mobile fitters etc must have a small first aid kit in them
- ✓ If there is an identified risk, such as dust, other equipment such as eye wash bottles, must also be carried
- ✓ If a significant risk has been identified via the risk assessment consideration should be given to the training in first aid (a one day emergency first aid course) of mobile employees

It is accepted that first aid equipment held by mobile employees is difficult to check. For this reason the checks on first aid equipment carried by HGV and light van drivers are bi-monthly rather than monthly. However, it must be stressed to the employee that they must report any loss or use of their first aid kit, eye wash bottle etc.

8. Recording first aid treatments

It is a legal requirement for all first aid treatments to be recorded. For this reason there is a box on Shanks incident reporting form specifically covering treatment administered. This must always be completed if any treatment is given. When such treatment is given the first aider concerned should inform the responsible person to allow for the speedy replacement of any first aid equipment used.

First aid is about preserving life and minimising injuries – when you need first aid, you really need first aid
First aid can save lives - make sure your operation is covered
If you have any queries on first aid, contact SHE Department

Advice note on First aid risk assessments March 2010

Safety, health and environment advice for Shanks UK operations – issued by SHE Department

SHE advice

SHE advice for all of Shanks UK operations

Occupational health and hygiene systems – what does it all mean?

This advice note gives an overview of Shanks occupational health and hygiene systems, the forms used, where they go etc. The note concentrates on occupational health issues as experience shows that this is the area which causes most confusion. However, occupational health and hygiene, while different, are often linked.

For more information see Shanks occupational health policy, hazardous substances company standard and various advice notes on occupational health or contact HR or SHE Department for advice.

What is health and hygiene and which laws require them?

Several items of law require companies such as Shanks to have occupational health and hygiene systems in place. For example:

- ✓ The COSHH Regulations require monitoring for dusts and chemical and biological hazards and, when appropriate, medical surveillance of employees who may be exposed to such hazards
- ✓ The Management of Health and Safety at Work Regulations require occupational health surveillance in appropriate cases and that employers ensure they are not placing employees into jobs which may affect health
- ✓ The Working Time Regulations require occupational health surveillance for night workers
- ✓ The Noise at Work Act requires noise assessments and hearing tests where appropriate

Plus specific law, such as the Control of Asbestos at Work Regulations, also requires occupational health/hygiene measures. In addition, occupational health systems can assist a company manage its sickness absence. A good place to start with occupational health and hygiene is to define what each is:

Occupational hygiene looks for 'agents' in the environment which may cause health effects, such as:

- ✓ **Noise** – noise monitoring
- ✓ **Dusts** – dust monitoring
- ✓ **Chemical agents** – various environmental monitoring techniques
- ✓ **General chemical and biological agents** – COSHH assessments

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Occupational health looks at the signs of health effects from agents including the above, such as:

- ✓ **Hearing tests** to support noise monitoring
- ✓ **Lung function tests** to support dust and chemical monitoring
- ✓ **Looking for the symptoms of vibration white finger** to support vibration monitoring

Occupational hygiene is all about agents in the environment, while occupational health is mainly about looking for the signs of health effects from such agents in the body. Occupational hygiene rarely causes any confusion. However, occupational health is another matter.

Occupational health – Shanks systems

Occupational health checks benefit both employees and employers. However, this is an area where misunderstandings over how the system works can result in not all employees having the level of cover or protection required. There are two general types of occupational health check carried out by Shanks:

- ✓ **Pre-employment medical assessment** - carried out on **ALL** new employees joining the company by completing a pre-employment medical questionnaire (the OH30 form)
- ✓ **Routine medical surveillance** - **ONLY** carried out on operational employees, or others as determined by risk assessment, during visits to sites by Shanks occupational health consultant Serco (formerly called Grosvenor)

Either of the above may lead to a 'medical referral'. Or a medical referral may be carried out for another reason, such as sickness or an accident etc. This gives three main areas for occupational health:

- ✓ **Pre-employment medical assessments**
- ✓ **Routine medical surveillance**
- ✓ **Medical referrals**

Three other areas also covered in this note are: Shanks standard employee categories, a single point of contact for occupational health and dust, noise etc monitoring on individuals. All of these are covered in separate sections below.

Pre-employment medical assessment

Pre-employment medical assessment is carried out on all new Shanks employees. It is aimed at ensuring that new employees are not put into jobs which may affect their health and to inform Shanks of any relevant medical conditions which it may need to take into account. **ALL** new employees must undergo pre-employment medical assessment. The process for pre-employment medical assessment is:

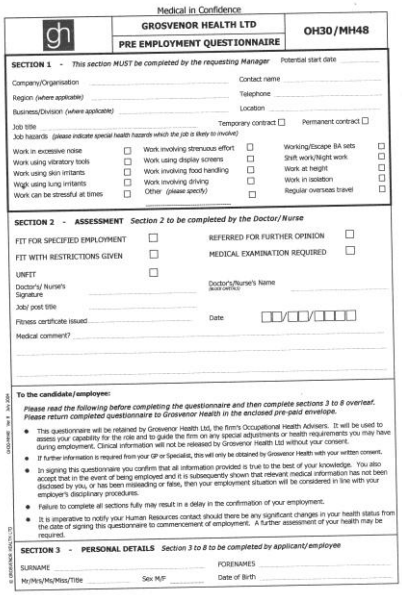
1. The OH30 questionnaire

The potential new employee must complete a medical questionnaire (form OH30 - available from HR Department in hardcopy and electronic format as a PDF file). There are two main parts to this form – section 1 which deals with general information such as name, job title etc and further sections which cover the new employee's medical history etc.

Most of section 1 will be completed by HR Department before being sent to the new employee (either direct or via the local manager – see below). In particular the following details will be completed by HR:

- ✓ Job title – this will be one of Shanks standard employee categories (see section below and appendix 4 for details)
- ✓ Ticks in some of the hazard boxes – these will be linked to job title, for example the vibrating tools hazard box will be ticked for fitters
- ✓ HR Department contact and other general details

Managers may need to add to these general details, but must not change any already on the form. Because these details are specific to an employee managers **MUST NOT** keep a photocopy of an old form and use this – ask HR for a new form each time or you will be using a form tailored to one employee for another. HR Department keep OH30 forms in electronic format and can e-mail these to managers.



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PRE EMPLOYMENT QUESTIONNAIRE

OH30/MH48

SECTION 1 - *This section MUST be completed by the requesting Manager* Potential start date

Company/Organisation ..... Contact name .....

Region *(where applicable)* ..... Telephone .....

Business/Division *(where applicable)* ..... Location .....

Job title ..... Temporary contract ☐ Permanent contract ☐

Job hazards *(please indicate special health hazards which the job is likely to involve)*

Work in excessive noise	☐	Work involving strenuous effort	☐	Working/Escape BA sets	☐
Work using vibratory tools	☐	Work using display screens	☐	Shift work/Night work	☐
Work using skin irritants	☐	Work involving food handling	☐	Work at height	☐
Work using lung irritants	☐	Work involving driving	☐	Work in isolation	☐
Work can be stressful at times	☐	Other *(please specify)*	☐	Regular overseas travel	☐

SECTION 2 - **ASSESSMENT** *Section 2 to be completed by the Doctor/Nurse*

FIT FOR SPECIFIED EMPLOYMENT	☐	REFERRED FOR FURTHER OPINION	☐
FIT WITH RESTRICTIONS GIVEN	☐	MEDICAL EXAMINATION REQUIRED	☐
UNFIT	☐		

Doctor's/ Nurse's Signature ..... Doctor's/Nurse's Name *(block capitals)* .....

Job/ post title .....

Fitness certificate issued ..... Date ☐☐/☐☐/☐☐☐☐

Medical comment? .....

To the candidate/employee:

Please read the following before completing the questionnaire and then complete sections 3 to 8 overleaf. Please return completed questionnaire to Grosvenor Health in the enclosed pre-paid envelope.

- This questionnaire will be retained by Grosvenor Health Ltd, the firm's Occupational Health Advisers. It will be used to assess your capability for the role and to guide the firm on any special adjustments or health requirements you may have during employment. Clinical information will not be released by Grosvenor Health Ltd without your consent.
- If further information is required from your GP or Specialist, this will only be obtained by Grosvenor Health with your written consent.
- In signing this questionnaire you confirm that all information provided is true to the best of your knowledge. You also accept that in the event of being employed and it is subsequently shown that relevant medical information has not been disclosed by you, or has been misleading or false, then your employment situation will be considered in line with your employer's disciplinary procedures.
- Failure to complete all sections fully may result in a delay in the confirmation of your employment.
- It is imperative to notify your Human Resources contact should there be any significant changes in your health status from the date of signing this questionnaire to commencement of employment. A further assessment of your health may be required.

SECTION 3 - **PERSONAL DETAILS** *Section 3 to 8 to be completed by applicant/employee*

SURNAME ..... FORENAMES .....

Mr/Mrs/Ms/Miss/Title ..... Sex M/F ..... Date of Birth .....

The OH30 pre-employment questionnaire form – this is partially completed by HR Department (section 1 on general details, hazards faced etc). Please **DO NOT** copy this form and use for another employee. There are 20 different OH30 forms – one for each employee category (see below) so **DO NOT** assume that you have given the right form out to the right employee

2. Who recruits

How the new employee receives the questionnaire will depend on how they are recruited: Either by HR Department or by local management.

- ✓ If the new employee is recruited by HR (typically salaried employees) then the OH30 form with general details in section 1 completed will be sent by HR to the potential new employee along with their job offer letter, contract of employment etc.

- ✓ If the new employee is being recruited by local management (most hourly paid employees) the same process should be followed, **BUT** the manager must send the OH30 form to the new employee rather than HR. Note – a start date for employment must not be given until HR has confirmed that Serco has received a completed OH30 from the prospective new employee (see flow diagram). In both cases the manager must ask for an OH30 form from HR Department

To accompany the questionnaire is a covering letter which explains how to complete the form and common mistakes. This letter must be given to the new employee with the questionnaire. Please note as above HR will complete most of section 1 of the form (general details) to avoid confusion regarding employee category – do not alter these details.

For new employees who have limited understanding of English, or limited literacy, help may be needed to complete the questionnaire. This can be obtained from HR or SHE Department. Managers **MUST NOT** complete OH30 questionnaires for employees – they are confidential. Alternatively the employee can have a relative or friend assist them.

Whichever route the new employee receives the OH30 questionnaire by they must complete it promptly and send the completed form to Shanks occupational health consultants (Serco). If the form has been sent out by HR Department then a self-addressed free-post envelope will be included. However, if a local manager has printed the form from an e-mail sent to them by HR then a stamped envelope addressed to Serco must be given to the employee. Serco's address is: Serco, Grosvenor House, Prospect Hill, Redditch, Worcestershire, B97 4DL.

NOTE – HR Department tracks when Serco receives OH30 forms and start dates for new employees **WILL NOT** be confirmed until Serco has received the completed form from the new employee.

3. Serco assess the completed questionnaire

When Serco receives a completed OH30 questionnaire one of its occupational health specialists will look at the form and assess the information on it. There are three possible outcomes:

1. The form has been completed correctly and the new employee appears to be fit for work. In this case an 'OH4' result of assessment form will be sent to HR Department (see below), OR

2. The form has not been filled in correctly or some detail is missing. In this case Serco will contact the employee direct to obtain missing information etc. Once completed, provided the information is adequate and the employee appears to be fit for work, an OH4 form will be raised as above and sent to HR Department (see below), OR

3. The form has been completed correctly, but there is an issue which requires more detail and/or assessment. In this case the new employee will need to be referred (see below under referrals)

Often Serco needs to contact employees simply because they have not filled the form in correctly. This is why the new employee must receive the cover letter explaining the OH30 questionnaire and how to fill it in and, importantly, include a contact telephone number.

4. Checking that OH30 forms are completed and sent off

HR Department keeps a log of new employees and checks with Serco each month to ensure completed OH30 questionnaires have been received. For example, each month HR will send Serco a list of new starters/leavers and discuss any missing forms. In addition each quarter HR will check against its personnel database to ensure new employees have completed and returned their OH30 questionnaire to Serco.

HR Department will contact managers based on the above to ensure the process is completed. If the process looks to be stretching out a new employee's probationary period will need to be extended – managers **MUST NOT** confirm employment before the pre-employment medical assessment process has been completed.

5. The results of the pre-employment questionnaire

Whether a referral or further information is required or not, the end point of the pre-employment process is a decision on the new employee's fitness for the work they are to carry out. This comes as an OH4 results form which is sent by Serco to Shanks HR Department. This OH4 form does not give medical details etc (these are confidential), but does give an outline of the results. There are three options:

1. **The OH4 form states that the employee is fit for the work they will do**. If HR Department holds the employee's personnel file (typically salaried employees) HR Department will inform the manager that the pre-employment process is complete by sending him/her a note (e-mail usually) and then place a copy of the OH4 form in the employee's personnel file. If the manager keeps the employee's personnel file (typically hourly paid employees) HR will send the manager the OH4 form with a covering note instructing him/her to place it in the employee's personnel file. Whichever the route – the OH4 form **MUST** always end-up in the employee's personnel file

2. **The OH4 form states that the employee is not fit for the work they are to do (rare).** In this case HR and/or SHE Department and the manager will need to meet and discuss the case as there are likely to be employment law and H&S law issues

3. **The OH4 form states that the employee is fit for restricted work**. This means that the employee is fit for work, but there are some restrictions to be noted. These will be given on the OH4 form. For example, 'no work involving heavy lifting' may be noted on the OH4 form for an employee with a history of back problems. In these cases HR Department and/or SHE Department will contact the manager to discuss the case and what needs to be done. Typically the process will need to be:

- ✓ Manager discusses restrictions given with the employee (if required with a HR or Safety Advisor present)
- ✓ Employee instructed not to do tasks which they know will aggravate their condition
- ✓ Employee is instructed to stop work and contact their manager should symptoms start during work
- ✓ A letter to the effect of the above given to the employee and a copy placed in their personnel file, along with the OH4 form

For more common restrictions standard letters are available from HR. Whether HR or local management recruits or whether the employee's personnel file is kept by local management or HR at the end of the process the following documents, as applicable, **MUST** end up in the employee's personnel file:

- ✓ OH4 form giving results of medical assessment marked as either fit for work or fit with restrictions
- ✓ If restrictions apply file note/letter confirming that these have been discussed with the employee and that he/she accepts such restrictions
- ✓ Any correspondence relating to the assessment

Appendix 1 gives the above process as a flow diagram.

Routine medical surveillance

All of Shanks operational employees must undergo routine medical surveillance – this is a requirement of law such as COSHH. Non-operational employees do not need medical surveillance because they are not exposed to significant agents such as hazardous substances. However, it is accepted that if Serco has a spare 'slot' while they are on site then administration etc employees may 'join-in'.

It should be noted that where employees may be exposed to hazardous substances (under COSHH) and there is a suitable occupational health surveillance technique available then Shanks must provide health surveillance. At the least Shanks operational employees may be exposed to dust. Managers should note that employees have a legal duty to take part in occupational health surveillance – it is not optional.

The vast majority of Shanks operational employees receive bi-annual medical surveillance (the exception being if risk assessment determines more frequent surveillance is required). Surveillance consists of a series of tests, such as lung function and hearing tests and is carried out by a qualified occupational health specialist. The process is:

1. Schedule of site visits

Each year Shanks provides Serco with a list of sites, number of employees on each etc. From this Serco compiles their own list of when they need to visit each site, how much time will be required etc. All of this information is put together in a 'master list' held by Shanks and Serco. This list includes when the last surveillance visit was and when the next one is due. This list is available SHE Department. Serco refer to this list and plan site visits for the year.

2. Contact with site and arranging the visit

Four weeks before a visit Serco will contact HR Department and ask for a list of employees at the site to be visited. Serco will then contact site to arrange the visit. Managers must spend sufficient time liaising with Serco to allow all employees to be seen. This will include discussing the list of employees, who are operational (must be seen) and who are non-operational, any recent new starters, leavers etc.

Serco will send the manager an appointment table to complete. The manager must complete this for at least all operational employees. Site Managers must ensure that all employees to be seen are clear about the time of their appointment. Site Managers should note that occupational health surveillance is not cheap and that any "no-shows' as a result of poor planning on the behalf of a site may result in a back-charge for any time wasted.

Shanks manager will then e-mail the completed appointment back to Serco and copy it to HR Department. **NOTE** – this will be checked against employee lists to ensure **ALL** operational employees are seen.

It is accepted that sometimes employees will be on holiday etc. However, managers should be aware of employees who 'always book holidays during visits', or repeatedly do not attend – remember it is a legal duty for employees to co-operate with health surveillance. Serco will send Shanks HR Department a list of any 'no shows' and this may be taken-up with managers.

3. The site visit and surveillance results

Serco will arrive on site, set-up and start the surveillance appointments. During the site visit site staff will provide all reasonable assistance. There are two typical outcomes to routine medical surveillance:

- ✓ The employee is fit for work (the vast majority)
- ✓ The employee needs to be referred for a further opinion

As for pre-employment assessment if the employee is fit for work an OH4 form will be produced by Serco (note – the routine assessment OH4 is different from the pre-employment version being a copy-through form for use on site). Serco will also send a letter to each employee at their home address giving a synopsis of their results and any issues which arose. Following the visit Serco will send a report to Shanks HR Department containing:

- ✓ A list of employees seen and any no-shows (from appointment list)
- ✓ Completed OH4 forms for those employees who are fit for work
- ✓ Completed OH4 forms for those employees who have been referred

Shanks HR Department will then:

- ✓ For employees whose personnel files are held on site send the OH4 forms to the site manager with a covering letter instructing the manager to place these in personnel files
- ✓ For employees whose personnel files are held by HR ensure that the OH4 forms are placed personnel files

For OH4 forms for employees who have been referred discussions may be held between HR, SHE Department and the manager. If the employee requires medical referral the medical referral process as below will be followed. Whether the employee's personnel file is held by HR or at site and whether a referral following a routine surveillance visit is required or not the following documents **MUST** end up in the employee's personnel file:

- ✓ OH4 form giving results of the routine surveillance marked as either fit for work or that a referral is required
- ✓ If a referral is required and some work restrictions apply OH4 form confirming this and any medical report etc
- ✓ If a restriction will apply following referral, a letter confirming these have been discussed with the employee and that he/she accepts such restrictions (as for pre-employment assessments above)
- ✓ Any correspondence relating to any referral etc

Appendix 2 gives the above process as a flow diagram.

Medical referrals

Medical referrals are required because sometimes Shanks occupational health consultants need more information to advise whether an employee is fit for work or whether any restrictions apply. Sometimes such a referral simply means Serco talking to the employee's doctor while at other times Serco may need to make an appointment for the employee to be seen by a specialist. Medical referrals can be initiated in various ways:

Serco can initiate a referral because:

- ✓ A pre-employment medical questionnaire indicates referral required
- ✓ Routine medical surveillance shows that a medical referral required

Shanks can initiate a referral because:

- ✓ An employee suffers an accident which requires a medical referral
- ✓ An employee develops a condition, or suffers an accident at home, which could affect their work
- ✓ A period of long-term sickness means that referral would be wise
- ✓ An employee refers themselves – either through their manager, HR or SHE Department (or in some case directly to Serco)

1. Release of medical confidentiality

A referral can take several paths: For some all that is required is for Serco to talk to the employee, for others contact with the employee's GP (General Practitioner – family doctor) or other 'care provider' may be required or actual examination by one of Serco's specialists.

If Serco arranges for the employee to be examined by a specialist then the employee consents to this when the examination takes place. For other referrals the employee may need to sign a release of medical confidentiality form (OH17 form). This is required when Serco needs a report from an employee's GP etc.

This is carried out by the employee signing a 'release of medical confidentiality form' (OH17). Signing an OH17 does not mean that Shanks can see any GP's report etc, it simply means that Serco can. And Serco cannot pass any confidential information onto Shanks – only sufficient information to allow Shanks to fulfil its legal duties. The OH17 form is **ONLY** required when a GP's etc report is required.

In the past Shanks issued the OH17 form, but this led to confusion. Serco now holds these and will send one to the employee direct.

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GROSVENOR HEALTH LTD

AUTHORISATION FOR THE RELEASE OF MEDICAL INFORMATION

OH17/MH79

SURNAME

FORENAMES IN FULL

Company

Home address

Post Code

Telephone No

Name of Medical Practitioner

Practice address

Post Code

Telephone No

Name of Hospital Specialist (If appropriate)

Address

Post Code

Telephone No

SIGNATURE OF AUTHORISATION

- I hereby consent to a medical report from my doctor being supplied, in confidence, to the company medical examiner.
- I have read the summary of my rights under the Access to Medical Reports Act 1988, set out on the reverse of this form.
- * I **do / do not** wish to have access to my doctor's report before it is sent.
  - * *Please delete as appropriate and please read reverse for details*
- I hereby agree to see the company medical personnel if requested and agree to a report being sent to my employer.

Employee's signature

Date

The OH17 release of medical confidentiality form. Please note this is only required when a report is to be requested from an employee's GP or other care provider. Serco manages the issue etc of this form and Shanks managers should not need to use one

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Linked to the above is the Data Protection Act. Shanks is allowed to keep such records as it needs to fulfil its health and safety responsibilities, such as OH4 forms. Serco is allowed to keep more detailed records so it can advise Shanks on its legal responsibilities. These medical files can be seen by the employee if they wish. However, parts of these files can be withheld if they refer to a third party or if information may aggravate an employee's condition.

2. Background information if Shanks initiates a referral

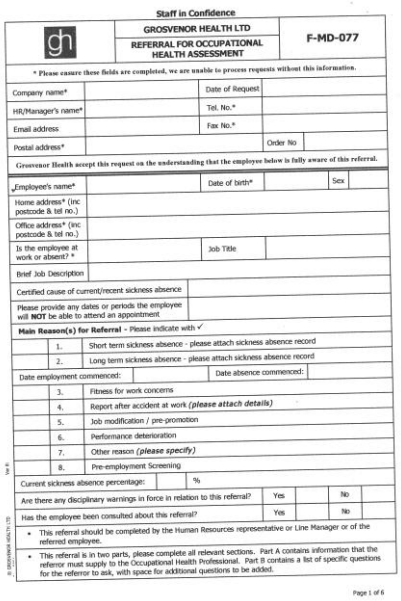
Serco requires as much background information as possible to allow it to perform as complete a referral as practical. If Serco initiates the referral (such as following pre-employment assessment) then Serco will have sufficient information. However, if Shanks initiates a referral Serco may not have all of the background information it requires. In these cases a FMD077 'information' form will need to be completed.

This FMD077 form asks for background information relating to the referral and helps Serco make accurate assessments. The FMD077 form is held by HR Department and must be completed whenever Shanks makes a referral. Typically this will require HR and/or SHE Department and the manager discussing the issue and completing the FMD077 form between them. The completed form is then sent to Serco.

3. The medical referral

Medical referrals may be relatively simple, such as telephone call to the employee's doctor or other care provider, or they may be in-depth requiring a specialist's opinion and specific medical assessments. However, all referrals are aimed at the same end as pre-employment medical assessments and routine medical surveillance – is the employee fit for the work they do without it causing them harm.

Some referrals take time and if the result of a pre-employment medical the employee's probationary period may need extending.



Staff in Confidence

GROSVENOR HEALTH LTD

REFERRAL FOR OCCUPATIONAL HEALTH ASSESSMENT

F-MD-077

* Please ensure these fields are completed, we are unable to process requests without this information.

Company name*		Date of Request	
HR/Manager's name*		Tel. No.*	
Email address		Fax No.*	
Postal address*		Order No	

Grosvenor Health accept this request on the understanding that the employee below is fully aware of this referral.

Employee's name*		Date of birth*		Sex	
Home address* (inc postcode & tel no.)					
Office address* (inc postcode & tel no.)					
Is the employee at work or absent? *		Job Title			
Brief Job Description					
Certified cause of current/recent sickness absence					
Please provide any dates or periods the employee will **NOT** be able to attend an appointment					

Main Reason(s) for Referral - Please indicate with ✓

	1.	Short term sickness absence - please attach sickness absence record
	2.	Long term sickness absence - please attach sickness absence record
Date employment commenced:		Date absence commenced:
	3.	Fitness for work concerns
	4.	Report after accident at work *(please attach details)*
	5.	Job modification / pre-promotion
	6.	Performance deterioration
	7.	Other reason *(please specify)*
	8.	Pre-employment Screening

Current sickness absence percentage:		%		
Are there any disciplinary warnings in force in relation to this referral?	Yes		No	
Has the employee been consulted about this referral?	Yes		No	

- This referral should be completed by the Human Resources representative or Line Manager or of the referred employee.
- This referral is in two parts, please complete all relevant sections. Part A contains information that the referror must supply to the Occupational Health Professional. Part B contains a list of specific questions for the referror to ask, with space for additional questions to be added.

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The FMD077 referral information form. This is required when Shanks initiates a medical referral – the form gives Serco the information they need to make a valid judgement from the referral. In some cases a covering letter asking for specific questions to be answered may also be useful

4. Results of medical referrals

Generally the results of a medical referral will be one of three outcomes:

- ✓ The employee is fit for the work they do
- ✓ The employee is fit for work they do, but with restrictions
- ✓ The employee is not fit for the work they do

As for pre-employment/routine assessments an OH4 results form will be produced and also often a letter giving a medical opinion. Both of these will be sent to Shanks HR Department. Dependent on the outcome of the referral, what actions etc are required etc, HR, SHE Department and the manager will discuss the case and take appropriate steps.

If the outcome is that the employee is fit for work all that needs to happen is that the OH4 is placed in the employee's personnel file. However, if the employee is fit for work, but with restrictions then the same process as above for other assessments needs to take place:

- ✓ Manager discusses restrictions given with the employee
- ✓ Employee instructed not to do tasks which aggravate a condition
- ✓ Employee is instructed to stop work and contact their manager should symptoms start during work
- ✓ Letter to the effect of the above given to the employee and a copy placed in their personnel file, along with the OH4 form

Whatever the outcome medical referrals allow Shanks to make reasoned decisions. If an employee refuses to co-operate in a referral Shanks is placed in a difficult position. Because a referral has been requested Shanks is aware there is a potential problem. But, if the employee refuses to co-operate then Shanks cannot obtain the information it needs to make a reasoned decision. In these cases Shanks may be forced into making a 'cautious' decision to protect itself. Ultimately medical referrals protect employees as much as Shanks.

As for pre-employment and routine surveillance at the end of the referral the following documents **MUST** end up in the employee's personnel file:

- ✓ OH4 form giving results of the referral marked as either fit for work or fit with restrictions
- ✓ Any report from the referral
- ✓ If restrictions apply letter confirming that these have been discussed with the employee and that he/she accepts such restrictions
- ✓ Any correspondence relating to the referral

Appendix 3 gives the above process as a flow diagram.

Employee categories

In addition to occupational health surveillance (which looks at the possible effects of 'agents' on the body), Shanks also conducts environmental monitoring/occupational hygiene. For example:

- ✓ Noise monitoring looks for an agent (noise) – occupational hygiene
- ✓ Hearing tests look for the effects of excessive noise on the body – occupational health
- ✓ Dust monitoring looks for an agent (dust) – occupational hygiene
- ✓ Lung function testing looks for the effects of excessive dust exposure on the body – occupational health

Shanks must be able to compare the results of environmental monitoring/occupational hygiene with the results of occupational health surveillance. For example, comparing noise monitoring results with hearing test results for those employees who may be exposed to noise.

For individual employees this is not a real problem. For example, if an employee shows an unusual lung function result then it can be assessed as to whether he/she works in a dusty environment (or whether they are simply a smoker). However, Shanks also needs to compare results across the company to assess for any wider problems.

To do this Shanks needs to compare occupational health results for types of employee with environmental monitoring results for the type of task they are involved with. A tool in this is having common employee categories. Appendix 4 shows Shanks common employee categories for occupational health and hygiene. Please note that these are just for occupational health hygiene and not for other areas and issues (the categories are those which have common type potential exposures). These common employee categories must be used:

- ✓ On pre-employment medical assessment forms for new employees. Shanks HR Department holds a series of OH30 pre-employment medical assessment questionnaires with details completed in section 1 of the form (one for each employee category). On these the generic hazards faced etc are noted – make sure you have the right form for the employee
- ✓ During routine occupational health surveillance at sites (the Serco occupational health specialists will ask employees during their medical which category most closely fits them)

Appendix 4 shows the common employee categories

One common contact point for occupational health issues

Some occupational health issues are virtually all HR related, such as an employee with a long-term illness which is not work related. Others are virtually all safety related, such as work restrictions on an employee which require controls in the workplace. Most are a combination. However, one central co-ordination point in Shanks for all occupational health issues is required to allow adequate tracking of issues.

Within Shanks this is provided by HR Department in Milton Keynes. Master copies of the forms used are kept here, the results of referrals, pre-employment medical assessments and routine surveillance are all sent to HR Department in Milton Keynes. From here any medical reports etc will be sent out to the appropriate person/s, such as an HR Advisor or Safety Advisor, OH4 forms will be sent to whoever holds the employee's personnel file etc.

Where the term 'HR Department' is used above in reference to where a form is sent to etc this means HR Department in Milton Keynes. Having one central co-ordinating point for occupational health assists Shanks in getting the most out of the system.

Personal dose monitoring

All of Shanks sites and operations will receive some form of dust, noise, hazardous substances etc monitoring as required by risk assessment. For some sites and operations this may be generic, such as noise monitoring for different types of waste collection lorry which can be applied to several sites. At other sites, such as MRFs etc, monitoring will always be specific. In general there are two types of monitoring:

Static monitoring – dust pumps, noise monitors etc placed in the workplace, but not on an individual. For example, a noise meter left to record in a MRF picking cabin or a static dust monitor left on a landfill site tipping face.

Individual monitoring – dose monitors placed on an individual such as a personal noise monitor pinned to an operative's jacket or a personal dust monitor pinned to a transfer station operative's hi-vis jacket.

Following a batch of monitoring at a site the occupational hygienist (or Safety Advisor) who conducted the monitoring will produce a report. This will include all relevant results and recommendations for additional controls etc. Such general reports will be sent to the Safety Advisor for the site involved (in electronic format). The Safety Advisor will then visit the site and discuss the results in the report with the manager.

The manager (and when required assisted by the Safety Advisor) will publicise the report at team briefs, drivers meetings etc. Employees will be aware that monitoring has taken place and need to be informed about the results. In the vast majority of cases the outcome will be that no significant exposures are taking place – even in this case employees must be communicated with at least as reassurance.

However, if individual monitoring took place it is a requirement of the law that the individual employee/s involved is/are informed personally of their results. In these cases the occupational hygienist will send a letter/s with individual results on them and in indication of risk level to the Safety Advisor for the site (in electronic format and signed hard copy). The Safety Advisor will then visit the site and discuss the results with the manager.

Dependant on the results the manager (or if risk levels are significant in partnership with the Safety Advisor) will discuss individual results with the individual employee/s concerned. At the end of such discussions a copy of individual monitoring results letters **MUST** be placed in the relevant employee/s personnel file/s.

Appendix 5 shows the process for dose and similar monitoring

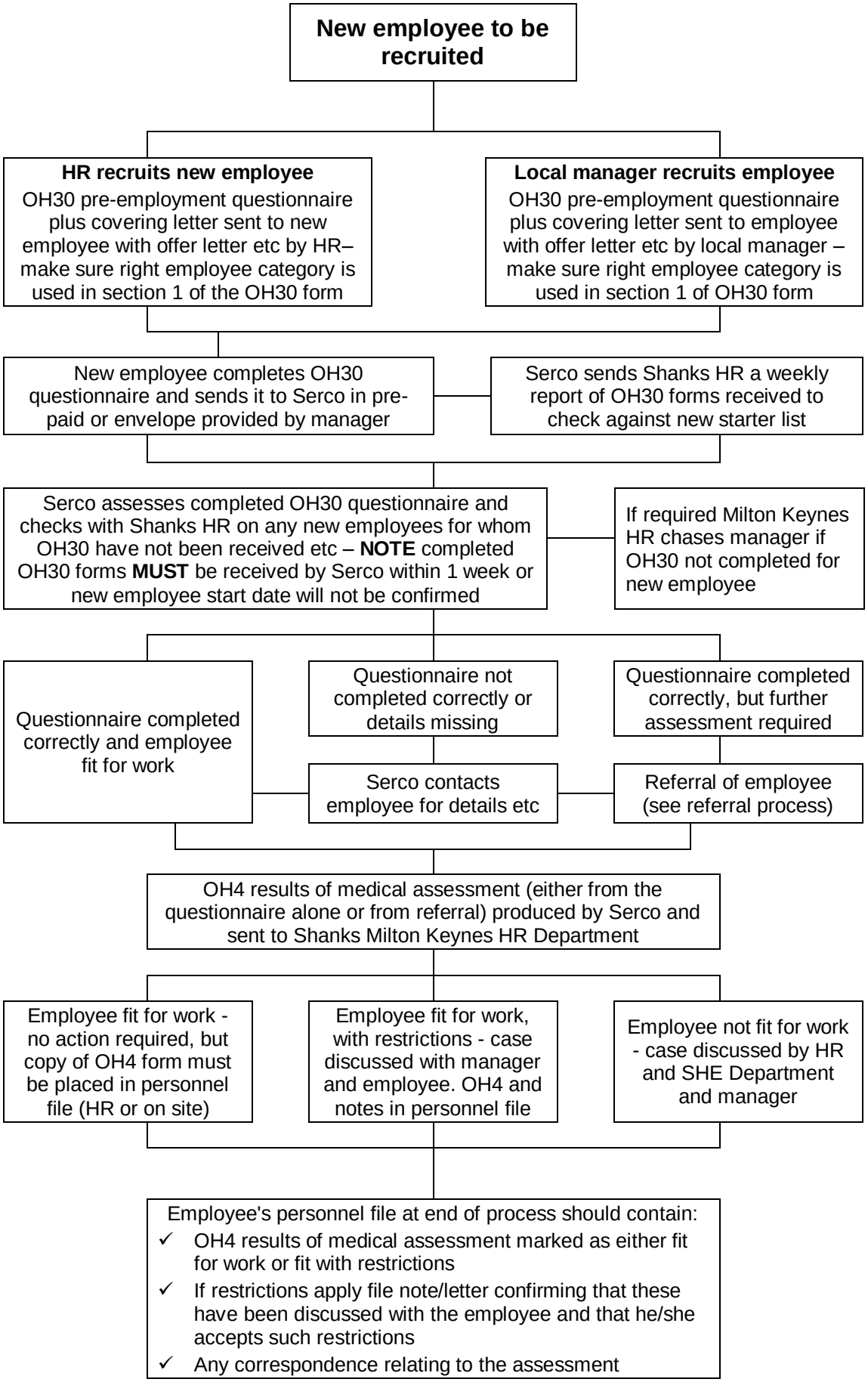
Appendices:

1. **Flow diagram for pre-employment medical assessment**
2. **Flow diagram for routine occupational health surveillance**
3. **Flow diagram for medical referrals**
4. **Shanks common employee categories for occupational health and hygiene**
5. **Dose and similar monitoring for noise, dust etc**

Advice note on Occupational health systems March 2009

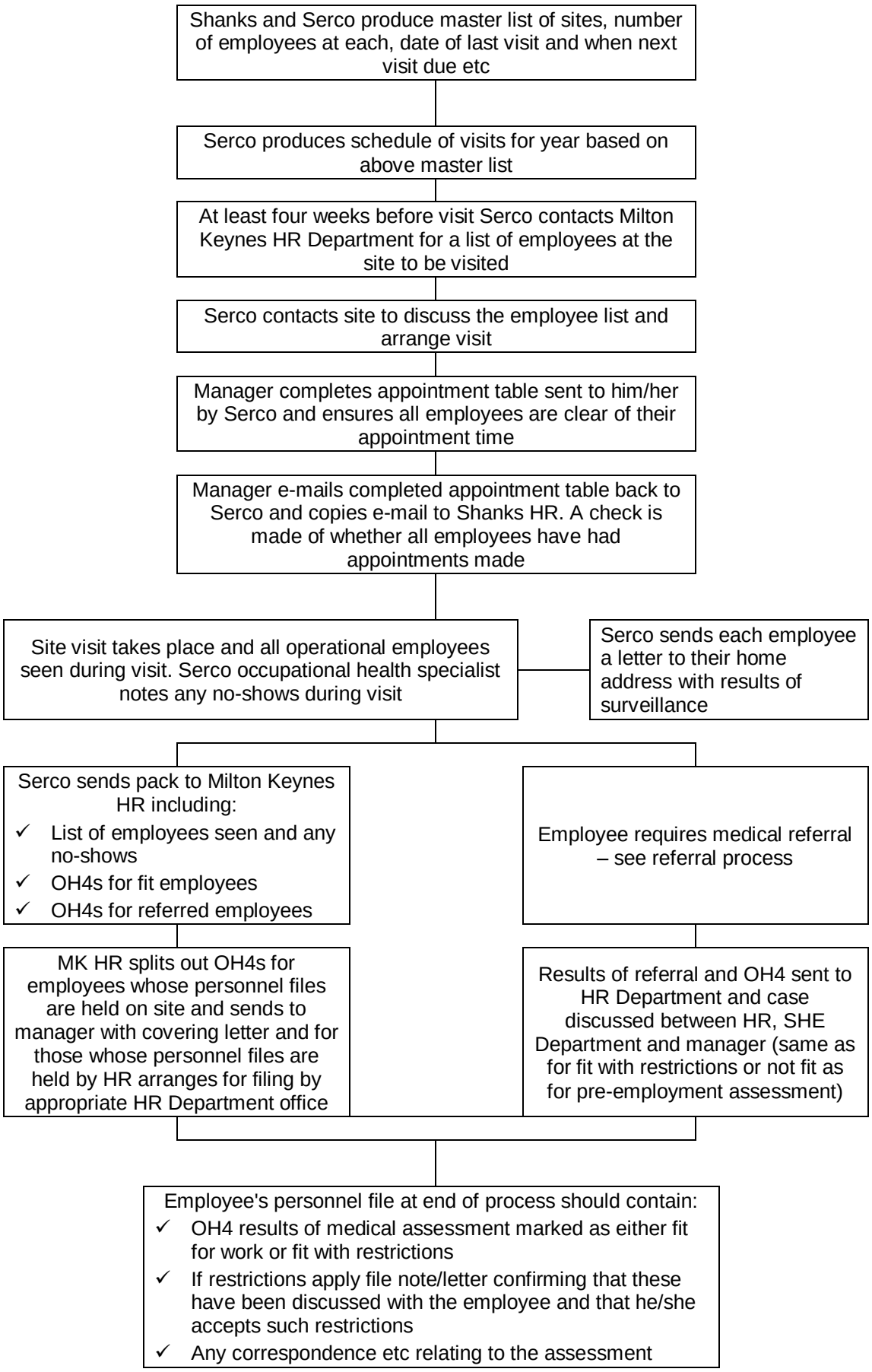
Keep this advice note and refer to it whenever you take on a new employee, or are due a routine visit from the occupational health consultants or when you are involved in a medical referral

Appendix 1. Pre-employment medical assessment



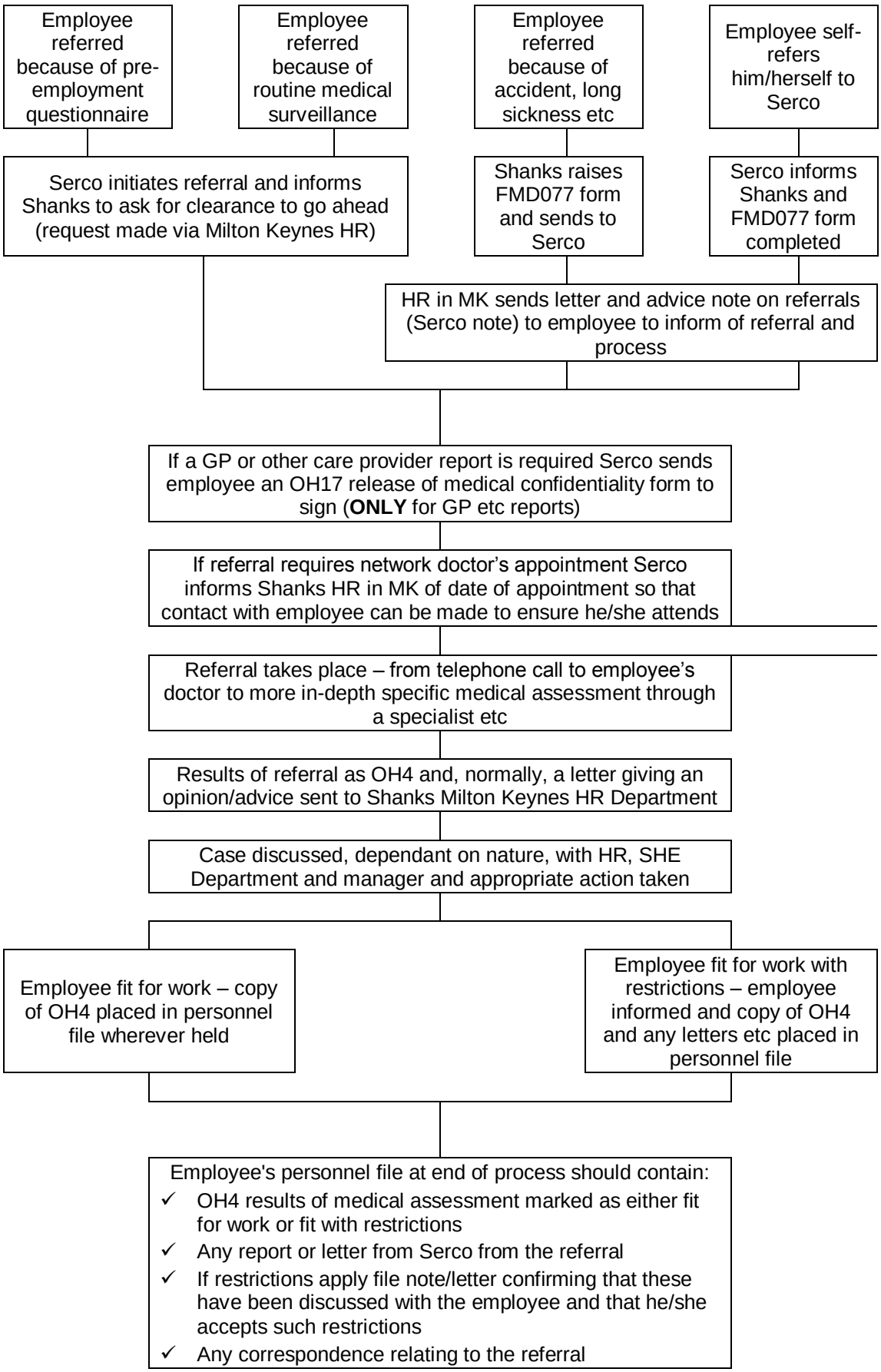
Appendix 1.

Appendix 2. Routine medical surveillance



Appendix 2

Appendix 3. Medical referrals



Appendix 3.

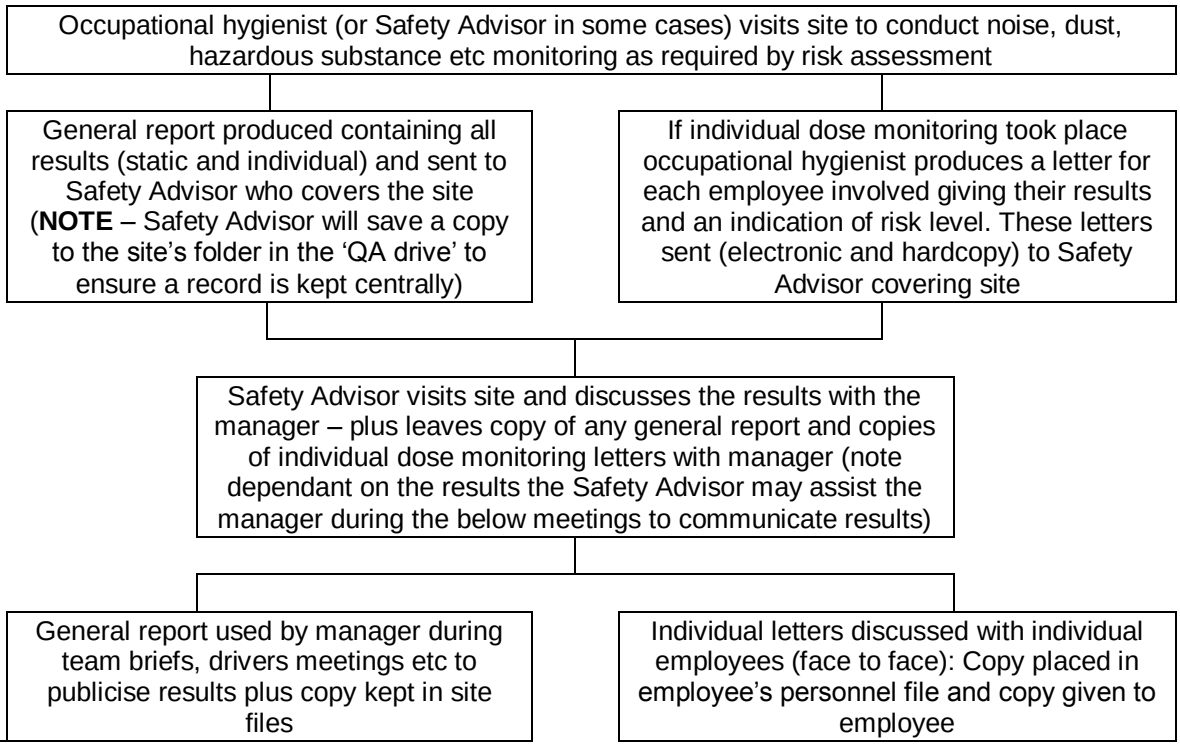
Appendix 4.

Appendix 4. Employee categories

Operational type	Ref.	Employee category
Landfill	L1	Mobile plant operator
	L2	Banksman/labourer
Landfill gas/power	L3	Gas technician/operative
	L4	Power station operative/engineer
Dry waste transfer and recycling	R1	Mobile plant operative
	R2	Recycling picker
	R3	Composting/bio-MRF etc operative
	R4	General operative
Civic amenity (CA) sites	C1	CA site operative (no separate categories other than general CA)
Dry waste collections	V1	Driver – compaction vehicles
	V2	Driver non-compaction vehicles
	V3	Driver's mate and others
Tankers, flatbeds and bio-solids	T1	Special waste driver (tankers, flatbeds)
	T2	Bio-solids driver
	T3	Other bio-solids operative
Workshops and fitters	W1	All fitters and workshop operatives (only dedicated fitters etc)
Support and admin	A1	All managerial, support and admin staff including weighbridge etc

Appendix 5.

Appendix 5. Dust, noise etc monitoring



And if in doubt contact SHE or HR Department for advice

Safety, health and environment advice for Shanks UK operations – issued by SHE Department

SHE advice

SHE advice for all of Shanks UK operations

Temporary workers

Increasingly companies are making use of temporary workers to carry out tasks which may have been undertaken by themselves in the past, or for which they do not wish to hold resources for in-house. Shanks is no exception. However, temporary workers present significant difficulties in terms of health and safety and other issues - what do you really know about the competence of your temps?

This advice note is a back-up to Shanks standard on temporary workers. It is an overview of Shanks temporary worker control system outlined in the standard, gives tips on problems and, in its appendix, gives a brief synopsis of health and safety law and temporary workers.

What is a temporary worker?

There is no simple answer to this. Some cases are obvious, such as a temporary secretary employed during a full-time worker's absence or an agency LGV driver. It is less obvious in other cases. Generally, if a 'contracted in' worker is paid by the hour, rather than for a particular job, and is using Shanks' equipment they are likely to be a temporary worker. If unsure contact Human Resources or SHE Department - the law treats temporary workers and contractors quite differently and it must be established which is which to allow correct controls to be used.

Shanks system for temporary worker control

Step 1. Risk assessment

All tasks carried out by temps must be risk assessed. In practice the vast majority of tasks carried out by temporary workers will have already been assessed – this is because Shanks only uses temporary workers to do tasks our own employees also do. For example a landfill site will already have an assessment for litter picking, no matter who does it. There may be additions you might want to make, and at the least you will need to note that if the task is being carried out by a temp that Shanks system for temporary workers will be followed. Note any additions in the comments box at the bottom of the assessment form.

Where operating procedures are being used (based on risk assessment) these become part of the assessment. In these cases the operating procedure can 'stand-in' for the assessment in terms of informing the agency involved and for induction of temps etc.

Any risk assessments (or operating procedures) for tasks carried out by a temporary worker must be lodged with the agency concerned (see below on job specification). They must also form the basis for inducting the temporary worker (see below on induction).

Advice note on Temporary worker control
June 2008

Step 2. Compile a job specification
Managers must, before employing a temporary worker, draw up details of the requirements for the job on Shanks temporary worker job specification form. These details may include:

- ✓ Any special qualifications required to do the task safely. For example, CITB card, or equivalent, LGV licence etc.
- ✓ Any occupational health issues which are relevant
- ✓ Any physical attributes required to do the job safely. For example, if the task involves lifting any recent injury, history of back problems etc may result in a temporary worker being unsuitable for the job. Likewise taking on an asthmatic temporary worker to do work in a dusty environment, even if RPE is provided, may be unwise
- ✓ Any equipment, such as PPE, which the agency or self-employed temporary worker should bring with them or supply

All of the above are included on the temporary worker job spec form, available on the intranet. SHE Department has produced a series of baseline job specification forms for commonly employed temps, such as recycling picker, driver's mate etc. These are on the intranet and can be used by managers – **BUT** check that any baseline form really fits with your operation and remember to fill in the highlighted sections.

Completed job spec forms (baseline or site specific) and copies of risk assessments and/or operating procedures relevant to the job a temporary worker is to do must be sent to the agency concerned. This tells the agency what type of person you want, what qualifications etc they must have, what hazards and risks they may face etc. If the agency then sends you someone who is unsuitable, you will have a straight forward case to solve - ie, 'I told you what I wanted and you have not supplied such'.

TIP: Producing risk assessments, or modifying current ones, and compiling a job specification may seem like a lot of work. However, in general, the vast majority of the tasks carried out by temporary workers for Shanks are standard - for example, litter picking, labouring, recycling picker, LGV driving, secretarial etc. In these cases all that needs to be sent to the agency are the risk assessments or operating procedures for these tasks attached to the spec form.

For example: A recycling site regularly uses temporary workers for recycling line picking:

- ✓ A baseline job spec for recycling line pickers is on the intranet
- ✓ Download this and add in the site specific details required
- ✓ Attach relevant risk assessments and/or operating procedures
- ✓ Send the 'pack' to the agency and require the agency to confirm they have received and understood it

Once the above has been done it is not necessary to keep sending out a job spec every time a picker is taken on – simply tell the agency to refer to the original.

3. On arrival at work
On their first day at work, and **BEFORE** commencing work, temporary workers must be inducted using Shanks' temporary worker induction checklist (available on the intranet). This should include:

- ✓ Checking to see that the temporary worker conforms to the job specification. For example, a heavily pregnant woman turning up to do a strenuous manual task, or a driver not having his/her LGV licence with them. If the temporary worker does not conform to the job specification they must **NOT** start work
- ✓ Arrangements for emergencies should be explained to the temporary worker. For example, what the fire alarm sounds like and where the emergency exits are. For drivers this would include fire extinguishers and first aid kits in cabs. For all temps this should include fire warden and first aider names and locations
- ✓ The nature of and system for the work to be carried out should be explained to the temporary worker. For example, how to operate any machinery required, who to go to for information, any areas they are not to enter or go near, who will be in charge of them etc. For drivers this will include details of routes and customers
- ✓ The risk assessment/s and/or operating procedures for the task to be carried out should be explained to the temporary worker including what the hazards and risks are and what control measures are in place to prevent/reduce these risks.
- ✓ Any site rules, such as standard PPE etc, should be explained.

The temporary worker induction form includes all of the above and is a record that the induction has been carried out. A copy of a temporary worker's induction form must be kept in site records.

TIP: For some types of temporary workers, such as LV drivers, carrying out an induction every time may be a problem, such as if a temp is needed urgently. Over time managers can build-up a list of temps they know to be competent are 'comfortable' with using, who have been through induction and training and for whom an induction form has already been completed and is in site/operation files - obviously a full induction is not required when they next work for Shanks.

For example, a regular agency LGV driver (Joe Bloggs) may have been used as a temp in the past and has already been trained by Shanks on the vehicle to be used and has already been through induction etc. If a temp is required urgently call the agency and say you want 'Joe Bloggs' rather than any temporary worker who has not been through induction etc. Be careful, however, some qualifications need checking periodically to make sure they are not out of date and it may be wise to repeat induction periodically as a reinforcement.

4. Reviewing performance

Periodically the performance of temps should be reviewed. For example, have there been any accidents involving temporary workers which require the job specification to be changed, is the performance of temporary workers 'up to spec' or does the agency need to consider any factors. If job specifications are changed a copy of the revised version must be given to the agency and any differences pointed out.

Long-term temporary workers

When the law states 'temporary worker' it means just that - they are temporary. Temps who have worked solely for a company for more than around a year may be considered to be full-time employees under the law with all the rights of such. For this type of temp the only advice is to treat them the same as a normal full-time employee and include them in most of the systems aimed at full time employees such as:

- ✓ Invite them to team briefings
- ✓ Include them on training courses and seminars
- ✓ Distribute to them information, such as newsletters etc, as you would a full-time employee
- ✓ Include them in health checks (although inform the nurse that the person is a long-term temporary worker)

Although the pressure to keep fixed costs low is always there, if a temporary worker has been part of your operation for more than a year, should they not be a full-time employee? It may be cheaper.

Conclusions

In effect host employers such as Shanks have duties relating to temporary workers on the conditions and equipment at the host employer's premises, to ensure temporary workers have the skills, attributes, competence and qualifications to do the job safely and to inform/instruct the temporary worker and agency of any risks linked to the task to be carried out and the control measures in place.

Agencies, likewise, have duties to do with protecting their employees. However, in the vast majority of cases accidents involving temporary workers are 'blamed' on the host employer. The classic case is a host employer who takes on a temp to replace an ill employee without clearly communicating to the agency what is required, does not check that the person is suitable and then sends them out unsupervised – not surprisingly accidents happen.

Using temporary workers gives more flexibility, however, temporary workers have their problems. Undoubtedly the factors which have caused more accidents with temporary workers than any others are:

- ✓ Lack of sufficient thought before temps are appointed
- ✓ Poor communication between host employer and temp/agency
- ✓ Lack of co-ordination between host employer and temp/agency
- ✓ Not training temps adequately and not ensuring they are competent
- ✓ Lack of supervision and/or checking of performance

All of the above can be avoided through good systems and adherence to them. On occasion managers complain about poor performance from temporary workers and then in the next breath complain that they do not have the time to follow an adequate system of control. It is likely that the two are linked.

There are several regulations which may affect temporary workers and host employer duties, but the above are the main considerations. For advice on any aspect of health and safety law and temporary workers contact SHE Department

Below appendix 1 – legal requirements for temporary workers

Appendix One.

Law and regulation covering temporary workers

The law covering temporary workers is complex. There is a specific EU directive on temps and, because of this, the UK Government has included mentions of temps in a whole range of legislation. It would be simpler if there was a 'Temporary Workers Health and Safety Regulations' law, but there is not. The below is a synopsis of main legislation where temps are mentioned.

General legislation applying to non-employees, including temps

The following general pieces of legislation apply to all 'non-employees', such as temporary workers. They also apply to members of the public, contractors etc.

Health and Safety at Work Act 1974 requires employers to conduct their undertakings in such a way to ensure, so far as is reasonably practicable, that any non-employees (contractors, temporary workers, visitors or indeed members of the public) are not exposed to risks to their health and safety - most prosecutions are brought under this piece of legislation.

Management of Health and Safety at Work Regulations requires employers to make risk assessments. This applies to non-employees, such as temps. The Management Regs also require all employers to provide (including temps) information on: Risks to their health identified by assessment, control measures to prevent or reduce risks, what action should be taken in an emergency and who will co-ordinate. Plus requirements on employers to provide information to employees of other companies (and self-employed) who are on their premises. Ie, temporary workers and contractors must be given adequate safety information such as site rules and induction (these must be recorded). In general, employers have duties to non-employees, such as contractors and temporary workers, described as revolving around provision of information, monitoring performance, provision of safe environment and checking of competence.

Specific items of legislation applying to temporary workers

In addition to the above general pieces of legislation, temporary workers are specifically mentioned in several other items of law and regulation.

Management of Health and Safety at Work Regulations requires employers to provide temps, and workers on a fixed term contract, with information on any particular occupational qualifications or skills needed to carry out the intended work safely (for example, a HGV licence, ADR licence, CITB or equivalent plant qualification). Under the Regulation temporary workers must also be provided with information about any health surveillance identified for the type of work to be done (for example under the COSHH Regulations) and also supply this information to the agency concerned, if there is one - please note the host employer does not have a duty to carry out this surveillance.

Fire Safety Order requires that all employees are informed regarding fire alarms, exits, where fire extinguishers are and how to use them, evacuation procedures etc. This applies to temporary workers as well as full-time employees.

RIDDOR Regulations impose requirements regarding reporting of accidents on employers and occupiers. A temporary worker's employer (ie, the agency or themselves if self-employed) is responsible for reporting accidents suffered by temporary workers. However, the occupier (in this case Shanks) must inform the agency that an accident has occurred - in some cases, particularly with serious accidents, it may be prudent to contact the HSE by telephone as well as the agency. The exception to this is in the case of a dangerous occurrence where the occupier must report.

First Aid Regulations require employers to provide first aid facilities and competent persons to administer first aid. This requirement does not extend to temporary workers who need not be considered in risk assessments to determine first aid requirements. However, the practicalities of the situation are that most occupiers make arrangements with agencies to provide first aid - this is supported by legal requirements for employers to co-operate on health and safety issues.

Provision and Use of Work Equipment Regulations (PUWER) places a series of duties on employers regarding risk assessment, training, competent persons etc in regard to plant and equipment. Because with temporary workers the equipment being used belongs to the host employer (in the vast majority of cases), it is the host employer who is responsible for instruction, safety measures etc.

This has significant implications for Shanks - for example, it cannot be assumed that agency drivers etc know how to operate specific items of plant and equipment (such as RELs, TRVs, rolonoffs etc) and Shanks has a duty to ensure temporary workers' competence, training and instruction (including temporary workers employed to operate heavy mobile plant). NB. If training of temporary workers to use any equipment is required a record must be kept of this training.

Personal Protective Equipment (PPE) Regulations place a duty on employers to provide employees with PPE. As with first aid this does not apply to temporary workers where the agency, or self-employed person, has the duty. The host employer (Shanks) is, however, responsible for informing the agency of what is required. The agency or self-employed person is also responsible for training, maintenance and replacement. However, it is often the practice for the host employer to provide PPE. In which case the host employer is responsible for training etc. Whichever way the issue is handled it should be noted down and any arrangements agreed and signed-up to by both parties (hence the PPE section on Shanks job specification form).

Health and Safety (Display Screen Equipment) Regulations require an assessment to be carried out on employees using DSE equipment. As with PUWER this extends to temporary workers. Shanks uses a self-assessment form as a preliminary system for fulfilling its duties under the Display Screen Equipment Regulations and this should be extended to any temporary workers, such as secretarial temps.

Manual Handling Operations Regulations require employers to carry out risk assessments, reduce risks associated with manual handling, carry out suitable training of those involved and ensure a safe system of work is in place. This also applies to temporary workers. In practice this requirement should be considered before taking on a temporary worker by specifying standards at the selection stage - if a task to be carried out by a temporary worker involves significant manual handling the agency should be informed of any physical limitations (for example, no temporary workers should have a history of back problems, be heavily pregnant, have a recent injury, be of age incompatible with the task etc). For specific tasks manual handling training should be included in the induction of temporary workers on to the site/operation.

Control of Substances Hazardous to Health Regulations (COSHH) require employers to asses the risks to their employees from substances (except lead and asbestos which have their own regulations) and take measures to prevent or control them. This duty extends to temporary workers. The only difference is that COSHH assessments may identify occupational health surveillance as a requirement - this duty does not extend to temporary workers. However, the host employer must inform temporary workers and their agency of any such requirement. The host employer is responsible for any environmental monitoring identified under the COSHH Regulations.

Asbestos and lead have their own regulations. Shanks has little or no involvement with lead, but does handle asbestos. The Control of Asbestos at Work Regulations 1987 require employers to assess the risks from exposure and put in place controls - this also applies to temporary workers. However, the duties under the regulations to train, educate and carry out health surveillance do not apply to temporary workers, although the host employer must inform the temporary worker and agency of the risks and any training and/or surveillance requirements.

Noise at Work Regulations require employers to assess noise levels and put in place suitable controls if they exceed set levels (80 dBa twa - advisory, 85 dBa twa - compulsory). This duty to protect applies to temporary workers. However, the agency must consider whether its employees will be subjected to excessive noise in the jobs they are carrying out and take appropriate steps. In practice host employer and agency should co-operate.

Working Time Regulations - cover temporary workers. While the agency has the primary duty to ensure that the Regs are not broken, Shanks managers would be wise to query any potential problems, such as a temporary worker having two jobs and therefore working excessive hours. This may be a breach of the Regs, but could also be a serious safety problem.

Advice note on Temporary worker control
June 2008

The law and temporary workers is complex – if you have any queries contact SHE Department for advice

RIDDOR reporting rules

shanks. waste solutions.

Use the below to make sure you have done everything you need to when you have a RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrence regulations) incident. Remember failure to report a RIDDOR to the HSE (Health and Safety Executive) is a criminal offence. When you have completed each action below tick the last column with a chinagraph or similar pen to keep track of actions completed. The Shanks forms referred to below are:

FHS337 – Shanks incident reporting form. This **MUST** be sent to SHE (white copy) and Insurance (pink copy) Departments within 72 hours of an incident occurring

FHS349 – Shanks incident investigation form. This **MUST** be completed by the manager and sent to SHE (white copy) and Insurance (pink copy) Departments with 7 days

YES

Has there been a:
Death?
Major injury?
More than three day injury?
Disease?
Dangerous occurrence?

NO
Form FHS337 to SHE/Insurance Departments within 72 hours
Form FHS349 to SHE/Insurance Departments within 7 days

RIDDOR type	Actions required	Tick to confirm done
DEATH	▪ **Report IMMEDIATELY** to SHE Department by telephone	
	▪ **Report IMMEDIATELY** to Line Manager and Operations Director	
	▪ **Report IMMEDIATELY** to HSE using reporting instructions	
	▪ **FORM FHS337** to SHE/Insurance Departments within **72 hours**	
	▪ **FORM FHS349** to SHE/Insurance Departments within 7 days	
	▪ Copy of HSE RIDDOR report to the SHE/Insurance Departments	
MAJOR INJURY	▪ **Report IMMEDIATELY** to SHE Department by telephone	
	▪ Report to line manager and Operations Director within 24hrs	
	▪ Report to HSE using the reporting instructions overpage	
	▪ **FORM FHS337** to SHE/Insurance Departments within 72 hours	
	▪ **FORM FHS349** to SHE/Insurance Departments within 7 days.	
	▪ Copy of HSE RIDDOR report to SHE/Insurance Departments	
MORE THAN 3 DAY INJURY	▪ **REPORT** to Shanks SHE Department by telephone	
	▪ Report to line manager and Operations Director within 24hrs	
	▪ Report to HSE using the reporting instructions overpage	
	▪ **FORM FHS337** to SHE/Insurance Departments with 72 hours	
	▪ **FORM FHS349** to SHE/Insurance Departments within 7 days	
	▪ Copy of HSE RIDDOR report to SHE/Insurance Departments	
DANGEROUS OCCURRENCE	▪ **Report IMMEDIATELY** to SHE Department by telephone	
	▪ Report to Line Manager within 24hrs	
	▪ Report to HSE using the reporting instructions overpage	
	▪ **FORM FHS337** to SHE/Insurance Departments within 72 hours	
	▪ **FORM FHS349** to SHE/Insurance Departments within 7 days	
	▪ Copy of HSE RIDDOR report to SHE/Insurance Departments	
DISEASE	▪ Employee notifies manager they may have a reportable disease	
	▪ Manager contacts SHE Department by telephone immediately	
	▪ SHE department contacts occupational health consultants	
	▪ Medical referral arranged for employee	
	▪ If confirmed, **FORM FHS337** to SHE/Insurance Departments	
	▪ Report to HSE using the reporting instructions overpage	

Remember ALWAYS

Contact SHE Department for advice - RIDDOR can be complicated so do not assume anything
Make sure the incident report form is sent to SHE and Insurance Departments within 72 hours
Make sure you have informed your line manager and Operations Director – they WILL want to know

How to report a RIDDOR

RIDDORs can be reported to the HSE (Health and Safety Executive) in several ways:

BY PHONE	**0845 300 9923 (08.30 – 17.00 Monday to Friday)**
BY INTERNET	**www.hse.gov.uk/riddor/online.htm (24 HOUR)**
BY EMAIL	**riddor@connaught.plc.uk**
BY POST	**Incident Contact Centre, Caerphilly Business Park Caerphilly, CF83 3GG**

What to report – ALWAYS seek advice from SHE Department

The following are examples of various types of RIDDOR reportable incidents. However, RIDDOR can be complex and you should **ALWAYS** seek advice from SHE Department if you think you have a RIDDOR.

More than three-day injuries	**Not a major injury (as given below) but results in the injured person being away from work or unable to do their normal work for more than three days. This includes any day/s they would not normally be expected to work such as weekends, rest days or holidays, but does not include the day of the injury**
Major injuries	▪ Fractures other than to fingers, thumbs or toes ▪ Amputations ▪ Dislocations of the shoulder, hip, knee or spine ▪ Loss of sight (temporary or permanent) ▪ Chemical or hot metal burn to the eye or any penetrating injury to the eye ▪ Electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours ▪ Any other injury leading to unconsciousness; or requiring resuscitation or requiring admittance to hospital for more than 24 hours ▪ Unconsciousness from asphyxia or exposure to harmful substance or biological agent ▪ Acute illness requiring medical treatment or loss of consciousness arising from absorption of any substance by inhalation, ingestion or through the skin ▪ Acute illness requiring medical treatment where there is reason to believe this resulted from exposure to a biological agent or its toxins or infected material
Dangerous Occurrences:	▪ Collapse, overturning or failure of load-bearing parts of lifts and lifting equipment ▪ Explosion, collapse or bursting of any pressured vessel or associated pipe work ▪ Failure of any freight container in any of its load-bearing parts ▪ Plant or equipment coming into contact with overhead power lines with >200 volts ▪ Electrical short-circuit or overload causing fire or explosion ▪ Any unintentional explosion, misfire, failure of demolition to cause the intended collapse, projection of material beyond a site boundary, injury caused by an explosion ▪ Accidental release of a biological agent likely to cause severe human illness ▪ Malfunction of breathing apparatus while in use or during testing immediately before use ▪ Collapse or partial collapse of a scaffold over five meters high, or erected near water where there could be a risk of drowning after a fall ▪ A vehicle carrying a dangerous substance overturns, suffers serious damage, catches fire or the substance is released ▪ Unintended collapse of: any building or structure under construction, alteration or demolition: a wall or floor in a place of work; any false-work ▪ Explosion or fire causing suspension of normal work for over 24 hours ▪ Sudden, uncontrolled release in a building of 100kg or more of a flammable liquid; 10kg or more of a flammable liquid above its boiling point; or 10kg or more of a flammable gas; or 500kg of these substances if released into the open air ▪ Accidental release of any substance which may damage health

Investigate ALL RIDDORs

All accidents require investigation. For RIDDORs it is more than likely that the standard investigation form (FHS349) will not be enough and that a further investigation report will be required. As applicable, take witness statements, take photographs, measure any critical distances, take samples if hazardous substances are involved. Make sure your investigation is thorough and complete. **AND ALWAYS** contact SHE Department for advice.