Health and Safety Executive

A review drawn from the work and experience of the Accident Prevention Advisory Unit of HM Factory Inspectorate

Effective policies for health and safety

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Foreword

The Accident Prevention Advisory Unit (APAU) and its sub unit the Construction Central Operations Unit (CCOU) are concerned with developing the concept of the influence that organisation has on health and safety and with the contribution that effective management can make to minimising injury and ill health experience at work.

Present work includes detailed studies of the organisation for safety of both individual factories and of large manufacturing and construction groups. The Unit also looks at the distribution and causation of fatal and serious accidents, the contribution of workers and their representatives and the development of more realistic measurement of safety performance.

Contents

1. The influence of organisation on health safety
2. The contribution that effective management can make.

Introduction by the Director-General Health and Safety Executive

1 We have now had some five years' experience of the operation of the requirement in the Health and Safety at Work etc. Act 1974 for all undertakings employing five or more persons to have a written policy for health and safety. I thought it would be helpful to ask the Accident Prevention Advisory Unit of the Health and Safety Executive to review what they had learned about such safety policies in the course of their work.

2 They have, over the past five years, examined the policies, organisation and arrangements for health and safety in a wide range of undertakings throughout Great Britain. The studies of the Unit have encompassed a broad spectrum of technology and included foundries, steel, food manufacture, electronics, scrap disposal, printing equipment, chemicals, rubber, building and civil engineering and public sector establishments. The size of the undertakings examined has varied from factories employing thousands owned by huge multi-national corporations to modest premises employing a few dozen. This examination of undertakings has involved discussions at all levels from the boardroom to the shop floor, and with functional managers to discuss their role and contribution.

3 In this review the Accident Prevention Advisory Unit have set out the reflections and conclusions which they have reached on this subject. Although it is a legal requirement to have a written policy for safety and health, the policy is not a legal straitjacket; the wide range of approaches adopted to policies demonstrate their flexibility. Accordingly this review offers no off the peg solutions. Its intention is to stimulate the development of practical policies which are, I am sure, essential to success in health and safety.

4 The views expressed are those of the Accident Prevention Advisory Unit and are not intended as formal advice from the Executive. But I believe that it provides information which will be of real value to directors and managers, and particularly to those with specific responsibilities for health and safety in their organisations. I am sure it will also be of value to safety representatives, to health and safety professionals and, indeed, to all who have a concern in developing more effective arrangements for health and safety at work.

5 The writers acknowledge with gratitude the debt that they owe to all the directors, managers, foremen, shop floor workers and safety professionals who in the course of many projects and conversations have helped to develop and test the ideas expressed in this publication.

6 In order to avoid undue repetition, the term 'safety policy' should be interpreted in its widest sense to mean the policy for safety and health as expressed in the written document produced to comply with Section 2(3) of the HSW Act and implemented via such organisation and arrangements as may be referred to in the document.

Part 1 The need for a safety policy

The legal requirements

7 The legal framework and the specific requirements relating to policies are contained in Section 2(3) of the HSW Act which states that "it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of all his employees". This requirement applies to all employers, the only exceptions being those employing less than five persons.

8 The Health and Safety at Work etc Act 1974, which came into effect in 1975, is radically different from its predecessors, the Factories Acts, the Alkali Act and the Offices, Shops and Railway Premises Act which were almost entirely concerned with the provision of physical safeguards for specified hazards and nuisances which occurred in designated and clearly defined locations. The HSW Act is still concerned with the provision of physical safeguards for specified hazards and indeed most of the old legislation remains in force, but a major difference lies in the explicit requirements in Section 2 of the Act for all employers to organise their health and safety activities and to commit their organisation and arrangements for health and safety to paper, in a document open to the scrutiny of employees and inspectors.

9 Section 2 of the HSW Act has its origins in the views expressed in the Robens Report that the primary responsibility for doing something about the present levels of occupational

accidents and disease lies with those who create the risks and those who work with them*. The accepted shorthand phrase for this approach is 'self regulation'. Self regulation is however not self enforcement of standards imposed from outside the organisation but involves the purposeful creation and maintenance of standards of health and safety and the according of priorities commensurate with the risks generated by the activities of the organisation. The policy for health and safety together with the organisation (people and their duties) and arrangements (systems and procedures) is the practical expression of self regulation within an undertaking. The discretionary element in self regulation must, however, be exercised within the overall framework of the legislation and accordingly does not admit adherence to standards less than those required by specific legislation and in general terms requires the acceptance of health and safety objectives as high as is reasonably practicable. It assumes therefore that the management of health and safety objectives will have equal importance with the other primary objectives of the organisation.

10　The legal requirements which deal with management duties in health and safety are wide ranging and impose exacting standards. Appendix 1 reproduces Section 2 of the HSW Act and specifies the general duties of employers to their employees. In considering the words 'maintenance of plant', 'systems of work', 'information', the inspecting authority, either during inspection or accident investigation will seek to assess not only compliance with specific statutory requirements but, more demanding to the undertaking, the extent to which the general duties contained in Section 2 of the HSW Act have been complied with. The widening of the range of requirements under the HSW Act is even more graphically illustrated by Section 6 which lays extensive duties on designers, manufacturers, importers and suppliers of articles and substances for use at work.

11　In most cases answers to questions relating to how far such requirements are being met within a given undertaking are likely to be qualified because although most organisations apply considerable effort and resource to health and safety in order to stay in business, such effort is often unstructured and unco-ordinated and is not used to best effect. The production of a policy framework for health and safety can rationalise the problems, indicate gaps in present effort and admit the efficient allocation of resources to the areas of greatest need.

Management accountability

12　It is important for managers to ensure the proper allocation of resources to health and safety because they can now be more easily held accountable in law for deficiencies within their area of control. Failures cannot be readily ascribed to circumstances beyond control. The director's or manager's job is to be in control. That is why he is there. Most accidents involve an element of failure in control — in other words failure in managerial skill.

13　In terms of Section 37 of the HSW Act, if an offence (including failure to comply with the safety policy requirements laid down in Section 2) is found to have been committed with the consent or connivance of, or to have been attributable to any neglect on the part of any director, manager, secretary or similar officer of a corporate body then he, as an individual is also liable to prosecution for that offence. This applies not only to managers in manufacturing industry: already a senior manager with a local authority has been convicted and fined for failing to ensure that his department had a written policy for health and safety.

The effects of new technology

14　The HSW Act affords protection not only to those at work but also to those who may be affected by work activity, and management planning must take this into account. In certain operations such as the manufacture, storage, distribution and use of flammable and toxic substances, or major construction projects, the scale of risks and the precautions needed to prevent accidents have changed. There is potential for large scale destruction and loss of life. In addition some activities involving the use of radioactive materials may hazard the health not only of present but also future generations. Such changes have resulted increasingly in demands from workpeople and the public for reassurance that no possibility exists for accidents to occur. The need to provide such reassurance as a condition of continued operation presents the most stringent and exacting test that can be applied to management and its organisation for safety and health. In such areas safety and health become more a question of constantly maintaining high standards of control rather than of

* Safety and Health at Work Cmnd 5034, 1972, para 28

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providing devices which immediately solve a problem. Senior management has therefore, a special responsibility to keep the perception of health and safety by their staff in its proper perspective and to ensure consistency of approach.

15 There is no longer sufficient time in the life cycle of a product or work of construction to assess its safety or hazard to health on a trial and error basis. To avoid a catastrophe or an unacceptable level of multiple incidents, standards for health and safety must be built into all products and activities at each phase of their design, fabrication, test, operation and disposal. In order to ensure that this is done technology needs specialists to exercise particular skills. Those who exercise such skills — and they should be sufficient in both number and qualifications — have to be managed and their work dovetailed into the organisation's overall objectives. A clear statement of objectives and the means by which they will be achieved is a pre-requisite for successful application.

The scale of undertakings

16 The size and complexity of processes and product which characterises many modern undertakings present similar organisational and managerial problems in health and safety as in production, marketing, quality and profitability. An important feature of a workable policy should therefore be its flexibility. It should not become a straitjacket to deny change or inhibit local initiative, adaptability or ingenuity by or within the organisation.

17 The need to have an efficient organisation for health and safety is not a new idea and early attempts to introduce legislation to require organisation for safety came in 1929. A draft Safety in Factories Order which would have required a safety organisation in specified high risk industries such as steel, foundries and shipbuilding, was prepared, but withdrawn after the view was expressed that the most effective organisations would be those that were set up voluntarily, and assurances were given by the employers' organisations in the industries involved that they would encourage their members to set up organisations for safety on a voluntary basis. Successive reports of HM Chief Inspector of Factories in the 1950s and early 1960s referred to the improvements in standards of health and safety achieved by firms who organised for safety. It emerged that the specification of an organisation, arrangements and objectives could benefit all types and size of company.

The practical value

18 The CBI and TUC have expressed their views on the usefulness of safety policies, and in 1972 produced a joint statement recording their view that "a clear written statement of a company's safety policy is the essential foundation stone for any effective safety organisation". Those organisations which have demonstrated their success in controlling and eliminating hazards and accidents have not done so by chance. Their success stems from applying policies laid down by the board and progressed through the successive levels of their management. What these progressive managements have seen is that a policy properly drawn up, implemented and monitored can break down the belief that safety is either too general to defy definition and in consequence impractical to set down in objective terms, or so specific and obvious as to make planned action unnecessary. Their policies have aimed to demonstrate to managers and workers alike that the incidence of injury and ill health throughout their organisations can be substantially reduced and in some cases eliminated by the application of good management practice to work activities. Some examples of this effect are given in Part 5.

Allocation of resources

19 When it comes to questions of cost an efficient safety policy is essential. High standards of health and safety can be costly and organisations need to allocate their resources properly and ensure that they are getting value for money.

20 Any organisation operating in an industrial society under any economic system has to incur some costs to deal with health and safety. Some undertakings have attempted to allocate their expenditure on the basis of cost benefit analysis. Unfortunately the techniques of cost benefit analysis are not yet adequate to provide answers to questions of policy save in limited applications where the input and derivations can be identified in isolation, and

therefore have marginal application in the total company context. It is recognised by most employers that however great are the costs of prevention the costs of failure in health and safety are also substantial and that it is therefore unwise to seek a close accounting relationship between costs and immediately quantifiable benefits as a basis for managerial decision making. Investments in safety and health do not always yield an immediate dividend but may take several years to mature. Expenditure on health and safety can produce other benefits to the organisation in, for example, production, labour relations and customer confidence. The Accident Prevention Advisory Unit has noted that those firms which have organised themselves to be prosperous and efficient are usually the ones who have organised themselves for the promotion of health and safety.

21   For the majority of employers the health and safety problem is not one requiring a high level of expenditure to control advanced technology. The majority of accidents and industrial diseases arise from failures to do simple things well — eg good housekeeping, maintaining guards on machinery, repairing building fabric, maintaining existing environmental controls and supervising the work in progress. These are the areas where the greatest advances can be made often at modest cost but with substantial if not always immediately quantifiable benefits.

22   Evidence arising from studies carried out by the Accident Prevention Advisory Unit indicates that although managers may question the level of overall expenditure on safety, few have adopted effective methods of controlling the safety budget or ensuring that expenditure is funded in accordance with demonstrable priorities. Inspectors sometimes find cases of generous but ill advised expenditure on safety such as the provision of safety helmets throughout a department where no relevant risk exists. Managers when questioned about this type of expenditure tend to justify it using the welfare argument "No money spent on safety is ever wasted. It makes our employees feel that we care!" This may well be the case but it is hardly the way to allocate scarce resources.

The social background

23   Health and safety are now prominent features of the social climate in which industry operates. There is increasing pressure from employees, trade unions and some sections of the public for improved working conditions. Expectations relating to health and safety are rising and frequently feature as industrial relations problems. Variations in standards of safety or health precautions in the parts of an organisation's operations may become just as much a source of dispute as variations in pay. Allied to this, some sectors of society now consider the whole range of accidents, ill-health, pollution or loss of amenity to be preventable and are unwilling to accept technical difficulties or financial constraints as reasons for lack of control. Poor publicity or criticism of an organisation's performance in these areas diminish its image not only in the eyes of its neighbours but also in the eyes of potential customers faced with similar obligations. Alternatively there are indications that those who respond to social pressures by featuring health, safety and protection of the environment as a priority reap considerable benefits from their reputations as ethical organisations.

24   Arguments about the financing of health and safety are invariably complex but however one looks at the matter it is clear that there is no honour, no profit, nothing to be gained, from having accidents in any organisation; there is suffering, wide ranging legal, production and human consequences and continuing problems.

Meeting the challenge

25   These then are some of the challenges of health and safety facing the modern organisations. They are complex problems which can be solved by efficient managements if they:

(a)   specify their objectives;
(b)   organise to meet those objectives;
(c)   make effective arrangements to deal with risks;
(d)   monitor the effectiveness of the organisation and arrangements.

26   The first three of these steps are outlined in Section 2(3) of the HSW Act which requires a written statement of general policy with respect to health and safety at work (specifying objectives) and the organisation (people and their duties) and arrangements (systems and procedures) for carrying out the policy and for the policy to be reviewed as often as

necessary. Monitoring is required to ensure that the organisation remains effective and that the arrangements continue to deal with the risks. The following parts of this booklet suggest ways in which these requirements can be met.

Part 2 Writing a safety policy

27 The following sections deal with the writing of a safety policy and with some of the requirements which should be met in drawing up the organisation and the arrangements by which it is to be implemented. The policy itself is a statement of intent; however worthy its intentions and however well it is written, it will have limited value unless it is backed up by a rational organisation and by relevant and up to date arrangements. It may be that all three, policy, organisation and arrangements, can, in a small, homogeneous company be dealt with together. For the sake of clarity they are here dealt with separately, but ultimately they form a quite inseparable whole.

28 In large multi-tier organisations the overall policy objectives and top level functional organisations are specified by the most senior management. Subsequently each section of the organisation having its own operational identity, viz a product division or an operating department, will further amplify its organisation and arrangements to meet the specified overall objectives, and, within divisions or departments, separate operating units or sections will similarly indicate how the divisional or departmental objectives are to be achieved. In this way each operating level needs to concern itself only with those features of health and safety relevant to its own operations. Whilst a large degree of flexibility of approach is to be expected, particularly where control is devolved throughout an organisation, it is none the less anticipated that there will be adequate co-ordination to ensure consistency of approach to problems common throughout the undertaking and to prevent the need for repeated solving of similar problems, technical or organisational, which occur at different parts of the organisation. The manner is which the policy is presented, including its format, style and content, is a matter for each organisation to decide for itself.

Policy

29 The writing of a safety policy, and reviewing and updating it in the light of experience, gives the employer a vehicle to promote and maintain the impetus of the health and safety programe within each place of work. The safety policy should demonstrate that a company accepts that concern for health and safety is an integral part of its organisation at all levels and that the highest management within the company mean to ensure that this concern will be translated into effective action. A practical test of the safety policy is that a manager or supervisor can recognise that he will be supported by the company if he reasonably chooses the safety of his subordinates before the demands of production. This test is particularly important in a devolved organisation where the factories are a long way from head office, or in the construction industry, where the agent or manager on a remote site must frequently make decisions which are crucial to safety.

Each policy is unique

30 It is important that the policy reflects the uniqueness and the special needs of the company for whom it is written. The document cannot be bought or borrowed, nor can it be written by outside consultants or inspectors. It is the decisions and actions taken by those within a workplace that ultimately determine the success or failure of attempts to influence the level of its safety performance. Consultants and inspectors may have a wide comparative knowledge of the hazards of an industry but they do not have, nor can they ever have, as detailed, or as intimate a knowledge of a particular working place or of a particular process as those who manage it or as those who work in it. Only they have the deep and continuous insight into the complex relationship between the job being done, and the men who do it, which will enable them to write the policy with the conviction which is needed. Valuable advice can be obtained from outside bodies, such as trade associations and HSE inspectors, but the essential tone of the policy must be established by the company which writes it. Anyone who reads the policy must be able to recognise that it carries the full authority of the boardroom: that the organisation and arrangements which are produced to put its intentions into effect are the product of a full commitment to health and safety. The policy is a formal and unique declaration that the company intends to devote sufficient effort and resource, to the organisation of health and safety.

31   It is important that the policy is so written that the undertaking's full commitment to health and safety can be understood, not only by management, but by the workers and their representatives, and by the general public whose well-being may be affected by the activities within the place of work. Health and safety in the workplace is not restricted to a dialogue between management and enforcing authorities. Industry is increasingly accountable for its activities to public and parliamentary opinion. The Health and Safety Executive sees that one of its functions is to satisfy itself that management is competent and has the organisation and procedures effectively to contain risk, whether it be to the workforce or the larger public. Increasingly the Inspectorates will be looking for evidence that an organisation has an effective safety organisation: the first piece of evidence will be the written safety policy.

32   Industry in Great Britain is increasingly dominated by large national and international companies and these companies should look with special care at their safety policies. Their size alone ensures that they are concerned with the health and safety at work of the majority of employees. The variety of their interests and activities also ensures that they will control industries where there are widely different chances of serious injury. APAU has found that the senior managements of large companies are often unaware that there are great differences in the incidence of serious accidents between groups of workers within their organisations. Moreover they are often unaware of large regional variations in the incidence of serious accidents in identical factories situated in different parts of the United Kingdom. It is vital that such companies undertake, in their safety policies, to ensure that all those who work for them, will be equally protected by the safety organisation. The policy must therefore be supported by an organisation which is capable of analysing the accident and hazard experience and of providing the systems of work which will ensure equal protection.

Why some policies have lacked success

33   Some years have now passed since the HSW Act first required the production of a safety policy. It is now possible to summarise the main reasons why some policies have had less than the effect which was hoped for, even though they are admirable in their apparent intention and polished in both form and style. The APAU have identified that many policies have not been successfully implemented because:

(a)   The most senior management have only been minimally involved in the preparation of policies. Middle and junior management have been very quick to react unfavourably and often cynically to what they see as a failure in essential commitment at the highest level since they have lacked basic encouragement even though they are expected to bear the greatest responsibility for what is done by the organisation.

(b)   The aims and intentions of the policy have not been thoroughly understood at and below the most senior levels. It is essential that the intentions of the safety policy are seen by the whole workforce to be compatible with, and consistent with, the undertaking's main objectives of operating in an efficient and profitable manner.

(c)   The policies have not adequately identified priorities and problems, and were not relevant to the organisation's real needs. This was the main defect where policies were adopted wholesale from other organisations.

(d)   They were flawed by a reluctance to accept that the document was of equal importance to the undertaking's other policy objectives: this was often demonstrated by a failure to state that the undertaking will monitor its own organisation for safety and the performance of those on whom duties were placed.

(e)   Some were inhibited by the mistaken belief that a formal policy must commit the undertaking to such expense as will make it uncompetitive.

(f)   They placed too much emphasis on the responsibilities and duties of the workforce and failed to see that the policy is essentially a plan for management action.

The hallmarks of successful policies

34   Those policies which have been demonstrably successful in terms of improving the standards of health and safety within their organisations have generally displayed the following characteristics. These characteristics are not in rank order of importance and the extent to which each is an ingredient of a particular policy must inevitably depend on the nature of the organisation for which it is written.

35   The policy should state its main objectives and

(a)   specify that safety and health are management responsibilities ranking equally with responsibilities for production, sales, cost and similar matters.

(b)   indicate that it is the duty of management to see that everything reasonably practicable should be done to prevent personal injury in the processes of production and in the design, construction and operation of all plant, machinery and equipment and to maintain a safe and healthy place of work.

(c)   indicate that it is the duty of all employees to act responsibly and to do everything they can to prevent injury to themselves and fellow-workers. Although the policy is a management responsibility, it will rely heavily on the co-operation of those who actually produce the goods and take the risk.

(d)   should identify the main board or managing board director/directors with prime responsibility for health and safety in order to make the commitment of the board precise and provide points of reference for any manager who is faced with a conflict between the demands of safety and the demands of production.

(e)   should be dated as a means of ensuring that it is periodically revised in the light of current conditions and be signed by the Chairman, Managing Director, or whoever speaks for the organisation at the highest level and with the most authority on all matters of general concern.

(f)   should state how and by whom its operation will be monitored.

Organisation

36   We turn now from the policy, the statement of intent, to the organisation which gives effect to the policy. The law requires that the ultimate responsibility for health and safety in each workplace lies with the highest management, but in practice duties have to be delegated and it is this delegation which forms the link between 'policy' and 'organisation'. The organisation should be drawn up in such a way that this is clear. The shape of the organisation for health and safety depends on the managerial system adopted in each organisation. To see relationships clearly it may be useful to represent them diagrammatically. Most organisations will require to demonstrate the following features:

(a)   The unbroken and logical delegation of duties through line management to the supervisors who operate where the hazards arise and most accidents happen.

(b)   The identification of the key personnel who are accountable to top management for ensuring that detailed arrangements for safe working are drawn up, implemented and maintained.

(c)   The definition of the roles of line and functional management. Job descriptions should be drawn up to identify specific roles and to avoid expensive and potentially dangerous overlapping. A concern for safety and health should be seen as an essential part of good management: it follows that job descriptions for safety should be part of a manager's general job description, and should be agreed with the holder of a particular job, to ensure that he understands what he has to do. It is equally important that a job description also shows the limits of a prticular role. For example, the responsibility for taking direct action will normally lie with line management rather than with the safety officer or adviser. The safety officer's role will probably include the monitoring of the effectiveness of safety procedures and the provision of information for senior management. Further elaboration of the contribution to be made by job descriptions is included in Appendix 3.

(d)   Arranging for adequate support by all relevant functional management, not only by the safety officer, but also, according to need, by the works doctor, the works engineers, designers and chemists and so on.

(e)   The nomination of persons with the authority and competence to monitor safety performance both individually and collectively, by unit, by site or by department.

(f)   The provision of the means to deal with failures to meet the requirements of the job as it has been described and agreed. Once a manager, whether a line manager or functional, knows what he has to do, and the means have been established for measuring what he has done, then he must be held accountable for his management of safety and health in the same way as he would be for any other function of management. The organisation must unambiguously indicate to the individual exactly what he must do to fulfil his role: thereafter a failure is a failure to manage effectively.

(g) Making it known in terms both of time and money what resources are available for safety and health. The individual must be certain of the extent to which he is realistically supported by the policy and by the organisation needed to fulfil it.

37 The organisation for safety and health should take into account the size and complexity of the undertaking's general organisation. It is unlikely that an effective safety organisation will radically differ from the organisation established to meet the undertaking's other objectives. If, for example, the main board's function is to assign money to separate products divisions, with a great deal of authority assigned to each Divisional Manager as to how he puts this money to profitable use, then it will be proper that the organisation of divisional safety is also delegated in the same way. But, in such a case as this, the Divisional Managers must still be held accountable to the main board for the comparative success or failure of their safety organisation, as they would be for other uses of the main board's money. Additionally, in large groupings it will be necessary for someone to be answerable to the main board to ensure that relevant safety systems which have been developed in one product division are known in the others and to ensure that failures of method, or physical dangers which have been identified in one division are publicised before someone is unnecessarily maimed in another.

38 Repeatedly, the APAU has found that safety is a function of efficient management. It is an aspect of this efficiency to ensure that a major undertaking is so organised in terms of safety and health that there is no unnecessary duplication of effort. For example, in manufacturing industry, the problem of guarding of machinery lies not in what is made, but how it is made: not whether it is rubber or toffee or butter, according to product division, but whether the raw material is being ground, extruded, rolled, pulverised or mixed, according to the needs of the process, and whether there is a need to prevent the operator from being ground, extruded, rolled, pulverised or mixed. Common health problems may arise in several factories within a group: the group should have a consistent attitude to health and precautions in the use of ionising radiations, the handling of toxic materials and for noise control, should be standardised.

39 In large construction companies separate divisions may be concerned with Housing, Major Building, Civil Engineering and Plant. It is vital that the central organisation ensures that each division shares, for example, the Civil Engineering's special knowledge of earthworks or the Plant Division's special knowledge of the behaviour of large mobile cranes. It is an essential duty of the organisation for safety of a large complex organisation to ensure an equal and rational balance of safety effort and resource throughout the organisation

40 Nowhere is this last point, on the need to ensure a rational balance of safety effort throughout a complex organisation, more relevant than in the world of the local authority. APAU have found examples where straightforward relationships in line management, and action on functional safety advice, have been affected by the desire of Chief Officers to maintain departmental independence, together with additional complications of corporate management teams and lay committee interests. The particular input of each part of the organisation has to be carefully considered and clarified to prevent misunderstanding; unless the whole achieves the rational balance, the results are likely to be disappointing.

Arrangements

41 Section 2 of the HSW Act provides a useful check list of the arrangements which must be implemented if the general policy and the organisation are to be given effect on the shop floor. These are the provision and maintenance of a safe place of work, and safe access thereto; arrangements for the use, handling and storage of substances; the provision of information, instruction, training and supervision; consultation with the workforce and most important of all, because it takes into account all these other factors the provision and maintenance of safe systems of work.

Identification of risk areas

42 The experience of APAU has suggested that, when an undertaking is examining its existing organisation and arrangements, it is useful to start by identifying the nature and ex-

tent of current hazards and the current means for controlling them. This may help the organisation to identify any shortcomings in the existing arrangements. A vital part of the arrangements section is the establishment of safe and healthy systems of work so that every activity which can reasonably be expected by the exercise of foresight and professional skill to be a source of hazard, is identified, and the relevant precautions provided, listed, kept up to date and monitored. Safe systems of work, established and maintained to contain the risks within a particular place of work are at the heart of a firm's individual organisation for health and safety. If an undertaking faithfully complies with all the regulations imposed on it by government agencies it will accomplish a great deal but it will not ensure that every activity which can be foreseen as a source of danger will be fully covered. A specific system of work must be established for every activity which professional knowledge within the company, and within the trade, identifies as having special dangers. Such a system will include compliance with relevant regulations, but usually it will be greater than the sum of the regulations because it will take into account local conditions and circumstances and the attitudes, behaviour and trade practices of the men who work for the company. In establishing safe systems of work it is useful to divide hazards into two groups:

(a) Precautions necessary to deal with major hazards in the broadest sense. What could happen in a particular place of work which could cause the deaths of many people, whether the cause is chemical, structural, or mechanical? How could this factory or construction site affect the lives, not only of the workforce, but of the general public? What are the safe systems of work for these potential disasters?

(b) The establishment of safe systems of work for the mundane, for the ordinary, for the commonplace, for people going about their daily business. Most industrial fatalities occur to men going about their normal workaday tasks. It is vital to check and to monitor work which is technically challenging and technically difficult: it is equally vital in safety terms to supervise and control ordinary repetitive production work.

Identification of the expertise

43　In establishing safety arrangements and safe systems of work two points should be borne in mind. Firstly that those most closely involved in a particular type of work at whatever level will have a valuable contribution to make as to how the job can be done. This is an area for meaningful consultation. In a complex organisation there will be small groups of people who have a unique knowledge of their own departmental process: probably the most fruitful way for an individual workman to be involved in safety is by thinking of it first in relationship to his own machine or his own process.

44　Secondly in working out safe systems of work it is essential to consider not only the hazards of normal production during the daylight hours of a normal working day, but also:
(a) the special hazards of maintenance and routine shift working;
(b) outside contractors and the installation of plant;
(c) the safety of visitors;
(d) shut-down periods and of weekend working.

A large number of preventable accidents happen outside ordinary working hours and outside normal day to day procedures.

45　Arrangements to ensure safe working should be written with regard to an honest recognition of how people work as opposed to how one would like to think they work. Within all work groups special privileges and informal rules and customs exist, which if the policy and its arrangements are to be realistic must be taken into account in formulating good working practices. Many such informal rules and customs will not affect the safety and health aspects of day to day activities but some will. Where it is clear that they will, particular effort — mainly in time and persuasion — will be needed to convince those who work in that way that change is necessary to safeguard them and their fellow workers. Such an approach requires participation in its truest sense, taking account of the real needs of those most likely to be affected by events.

Systems and procedures

46   It is possible to list some of the matters which may be used as a guide when preparing arrangements for safety and health.

(a)   The involvement of the safety department and of relevant line management at the planning stage and the analysis of health and safety factors in new projects. Too often in the past safety has involved a confrontation between the site agent, factory manager or safety officer and the enforcing authority at a time when many of the fundamental decisions have already been made. Designers, planners and consultants must all be involved in safety, in the design of machinery and plant and in environmental control. Pre-planning should also take into account the provision of access for those who have to maintain the new plant and premises in years to come.

(b)   The health and safety performance criteria required of plant, machinery and equipment being purchased by the undertaking, with particular reference to mechanical safety and health hazards. In addition the toxic properties of substances and the precautions required in their use should be subject to evaluation at the purchasing stage.

(c)   Specific instructions for using machines, for maintaining safety systems and for the control of health hazards.

(d)   Specific training for operatives and particularly for those, like tool-setters in power press shops and timbermen in civil engineering whose activities affect the safety of their fellow workers.

(e)   Arrangements for medical examinations and biological monitoring.

(f)   The provision of safety clothing and protective equipment. This can be a fruitful subject for consultation with the people who have to wear the equipment.

(g)   Permit to work systems, particularly where more than one workforce is involved as in shipbuilding or construction.

(h)   Emergency and First Aid procedures.

(j)   Procedures for visitors and contractors.

(k)   Relevant instructions at each level of involvement, for manager, foreman, supervisor and workmen.

47   Systems and procedures should be properly codified and indexed. Some firms ensure that the pages of a safety manual are coloured by subject and that the manuals are loose-leaf for the purpose of revision and for the making up of relevant sets of instructions for sub-contractors and plant installers. It is important that each man receives only the systems and arrangements whih are relevant to his own particular activity and place of work. The accumulation of irrelevant written material quickly begets contempt. Systems of work stand or fall by the accuracy and care with which they are regularly examined and controlled. In listing those matters which require special attention, and the procedures which should be followed there will be a role for the safety officer or adviser in the objective monitoring of these procedures. In the course of time, formal arrangements for safety, or for anything else, become subtly degraded and tacitly ignored, both by line management and by operatives: corners are cut and risks are taken. The safety officer must systematically and regularly look for signs of this and ensure that it is drawn to the attention of all relevant management.

Training

48   Finally, it is not a part of this booklet to deal at length with the problem of training, but APAU has observed that those organisations which take their safety arrangements seriously quickly realise that training must be provided in two important areas. Firstly, if managers are to see safety as an integral part of their job in the same way as they see production and profit, then training courses must be provided whih integrate safety training with training in general management skills. Secondly, operator training must particulalry take into account those men whose activities can be especially dangerous to their fellow workers, for example tool-setters on power presses, crane drivers, fork-lift operators and, in construction work, timbermen, scaffolders and hoist operators.

49   In this part we have purposely avoided giving detailed advice as to the contents of a model safety policy because of our firm belief in the uniqueness of each document and consequent reluctance to endorse one approach to compliance with the legal requirement rather

than another. Appendix 2 however provides a guide against which it is possible to assess the likely effectiveness of such documents prior to their implementation at the workplace.

Part 3
Introducing and managing a safety policy

50   This part outlines the main steps in the introduction of a policy for health and safety within an organisation. Firstly decisions affecting the policy and its promotion must be taken at the highest level within the undertaking, ie at main or managing board level. Although subsidiaries may have a great deal of operational autonomy, key decisions of strategy affecting finance, production and employment are often made by the parent grouping, and there is a great deal to be said for this also being the case with health and safety. If a main board of a group of companies, or the managing board of an undertaking, produces a statement of its general policy and then requires and authorises subsidiary organisation and arrangements to implement it on the basis of local needs, that policy will have greater authority than anything which is the product of local initiative only. It is important however, whatever the structure of the undertaking or its grouping, that the policy should be seen to emanate from the Directors and to have their unequivocal backing.

The importance of proper authorisation

51   The following example indicates what can happen when a policy document is not properly authorised:

An engineering works had a one-page safety policy cribbed from Federation advice. It appeared on company notepaper but was unsigned and undated. The management at the works believed that this, like all 'policy', was for Head Office and had filed it away for two years pending intervention from Head Office. When Head Office was approached their view was that health and safety in the company was decentralised and each local management had complete operational autonomy. Although the policy statement was short none of the statements of intent outlined in it were being met. The works accident record was substantially in excess of the national average for the industry.

52   Active top management involvement in pursuit of the policy objective is a pre-requisite for achieving the stated goals. This does not imply that a rigid corporate policy must be adopted by all the disparate work locations in an undertaking. Organisation and arrangements in particular are best devised and promoted locally with central intervention's function to challenge and monitor local management to meet the overall and general objectives in the best way they can. Effective managers appreciate the value of organisation in meeting their production targets and it is similarly essential to organise for safety if safety targets are to be met. An effective organisation must first create lines of authority before going on to specify the means by which the organisation's objectives are to be achieved. Once defined, responsibilities must be actively invoked at an early stage not simply enshrined in a policy booklet. The dangers of writing a policy but not actively pursuing its implementation are shown in the following case:

The need to implement the policy

A food factory had a detailed policy in booklet form widely distributed. The document was prefaced by a senior member of the Group board. Examination of the works indicated that few of the stated intentions in the document were being met. The Group did not monitor the operation of the policy believing that health and safety were best dealt with locally. Although the safety officer of the factory produced some local statistics and an annual return of accidents, there was no attempt to check that the policy requirements were being met. "That's just the policy for the group — we have always operated our own system here — provided nothing disastrous happens we can do our own thing." The factory's own system was not documented. Accidents kept happening at twice the national incidence rate but nothing 'disastrous' happened!

Resistance to change

53   One of the main reasons why the policies of some companies have not been as successful as they were originally intended to be is the under-estimation by the most senior management of the resistance, or at best lack of commitment, at levels below them to their own views and written policies. Many of these policies are attractive at board level and seem

reasonable in terms of giving more information, more delegation and in wishing to stimulate a more direct dialogue and a more open criticism by workers of the standards provided. Yet to many middle and junior managers such features may be seen as a threat and an added burden. The concern expressed by the higher level in its policy is not always understood and actions are often taken below that level which run counter to these wishes in the belief of managers that they are observing the company's main aim — the maximisation of profit. It is in the application of its policy that senior managements need not only to be convincing but consistent so that their views are not easily qualified by immediate local difficulties.

Key staff must be trained

54   Having decided the objectives of the policy, the staff, both line and functional who are to have special responsibilities for carrying the policy into effect, must be identified, informed, trained and motivated. This is a key step. It is not sufficient to pass a note to individuals informing them that the range of their duties has been extended to cover health and safety. There should be informed consultation which allows for the identification of training needs and subsequent motivation of staff in the new role. Staff must be told what, how, and why and enabled to test and, where necessary modify, their relationships with others similarly involved, both line and functional. The training load should be realistically assessed. Even those persons chosen to fill roles because they have a particular skill may need further training in the safety aspects. Inspectors note that there is invariably a direct relationship between the level of success in policies for health and safety and the calibre of the persons charged with implementing them. The need for the right person with the right background is illustrated in the following example:

The safety policy written at head office of a group of companies provided for a safety organisation including a group safety officer and safety officers at each manufacturing location. Before the policy was written there had been part-time safety officers at some locations. The most senior of these was designated group safety officer but given no training or additional authority. Other existing safety officers retained their titles, whilst at those plants where no post-holder existed a 'volunteer' was nominated to fill the role. Some of these nominees took their new duties seriously and requested training but without success. The group policy document which had limited circulation placed upon its safety officers extensive advisory functions, including responsibilities for technical assessment of new machinery and plant requiring a degree of knowledge which most did not possess and could not acquire. Needless to say this policy was ineffective.

Employees must feel involved

55   It is not sufficient to assume that health and safety is an objective to which all employees are naturally motivated. Fortunately serious accidents are a relatively infrequent event for most groups of workers and in the absence of evidence to the contrary most employees prefer to think that accidents happen only to other people in other departments and that they themselves are not directly concerned. Accordingly the implementation of safety policy objectives, which usually involve a change in existing attitudes and procedures, requires motivation, consultation and the promotion of a conviction on the part of those who are to work them, of their value and purposes.

56   The following case indicates that improvements can be made with goodwill from all sides if consultation and motivation are employed.

A chemical works in a high absenteeism area had a policy statement authorised by the Group Board with endorsement from the Managing Director of the works and with organisation and arrangements sections drawn up locally after consultation with trades union representatives. The policy was monitored by the MD who received reports on a regular basis from line management and functional advisers. Performance data was open to inspection by workers or their representatives. Safety and health requirements were progressively integrated within operating manuals. The company was operating some old plant in an unsatisfactory total environment but made substantial and measurable progress towards its long term objectives including reducing the accident rate and eliminating many health risks. Employees now have confidence that health and safety is being looked after and the overall performance is improving.

Consistency of style

57   It is important that the management ethic behind the safety policy is consistent with that operated in other areas of management activity. It is futile, for example, to attempt to graft authoritarian style management for safety into a production unit which is clearly consultative in its management style. People will not simply accept management out of style even for the sake of their own good.

The demands on line management

58   In most cases the major burden of responsibility for carrying the policy into effect at the workplace will fall upon line management. Because the effects of failures in health and safety — ill health and accidents — require an input directed to the welfare of employees, it should not be assumed that health and safety are extensions of welfare to be treated as such in management terms. These companies which have demonstrated the greatest success are those which have adopted the view that the prevention of ill health and disease is a line management function requiring the same techniques of control as any other area of business activity. For this reason it should be clearly understood when introducing the safety policy that the control of the decisions affecting health and safety is firmly within the province of line management with functional managers acting as supporters and advisers. Line management can introduce changes with greater efficacy than functional advisers and those changes are more likely to be of a permanent nature. The studies of accident causation carried out by the APAU indicate clearly that the majority of accidents are caused by a failure to take elementary tried and tested precautions and not by causes which could be described as technological. There is therefore little value in allocating responsibility for safety to technical experts alone when the remedy is more likely to be in the hands of the line manager and the way he carries out his production duties. When according duties in health and safety to line managers, it is important to be specific in allocation and to ensure that the recipient understands the nature of the duties, how they are to be carried out, the levels of performance expected, and where necessary, the nature of any penalties that he may incur for failing to discharge his duties. Too often APAU investigations have discovered that managers are happy to accept generalised commitments to health and safety but are unable or unwilling to be specific about who is responsible for unsafe conditions and practice within their sphere of responsibility.

Systems and procedures

59   An early duty for the key staff will be to draw up the systems and procedures for ensuring health and safety in each department. How this is done will depend on the normal system of information exchange used in the undertaking. A danger to be resisted is the production of elaborate safety manuals which can be ignored for long periods. Some firms have had considerable success in writing their systems and procedures for health and safety into their ordinary operating manuals, and reserving the safety manuals for the safety professionals. The inclusion of superfluous advice in instructions to line staff can detract from the value of advice presented in similar form which is of direct relevance.

The need for regular revision

60   Safety policy guidelines should be subject to change as conditions change. They should not, like so many other corporate philosophies, be cast in concrete and then ignored. An over formal safety organisation which is not active can be positively harmful if it allows people to think that things are being done when they are not.

Personal protection — the last resort

61   A guiding principle when drawing up arrangements for securing health and safety should be that so far as possible work should be adapted to people and not vice versa. A common mistake in writing instructions for health and safety is demonstrated in the attempts to obviate unquantified risks by resorting to various forms of personal protective equipment and protective clothing. Such equipment and clothing insofar as it is an attempt to adapt people to their work is unsatisfactory as a long term solution to health and safety

problems and the need for it is to some degree an admission that the actual risks are not being eliminated.

Consultation

62   Although the arrangements section of the document should refer to the main systems and procedures for achieving health and safety, it is not suggested that all operating instructions and detailed guidance needs to be included in the policy document and clearly in large organisations it would be impractical to attempt this. Information and instruction provided in terms of Section 2(2)(c) of the HSW Act can be disseminated in the manner most appropriate to the circumstances. The policy document should however refer to how this is to be done, how it is to be evaluated and how the system can be modified in the light of experience. At this stage the policy implementation moves crucially on to the shop floor where the established procedures of joint consultation can be of great assistance in securing acceptance of the new systems and procedures by the workforce. Instruction, information and supervision are vital at this stage. The resistance to change can be broken down if the reasons for it are explained in a positive manner which motivates employees towards acceptance. Some companies have had considerable success in obtaining the acceptance and agreement of their workforces to health and safety systems by forming joint consultative safety committees to deal with particular problems. The contribution made by the workforce will vary between undertakings, but since the 1 October 1978 employees in recognised trade unions have had the right to be consulted on matters of health and safety. If properly informed and invited to participate in the setting of standards and maintaining those already agreed, workers can make a specific contribution to the safety of their own immediate place of work, which is available from no other source.

Publicising the policy

63   The law requires that the policy statement should be drawn to the notice of all employees and companies have found many varied methods of complying with this requirement. It should be understood however that compliance with the legal requirement is not the same as effectively promoting the policy throughout the organisation. The law requires the employer to show that the policy statement was 'drawn to the notice' of all employees and this can generally be achieved through the expedient of posting copies on notice boards, wage packet inserts or distribution of the policy in booklet form to all existing employees and new starters.

64   The method of communicating the policy through an organisation will vary from organisation to organisation, depending on numbers involved, geographical location, management style and the technology of the industry. So far as possible normal everyday channels of communication should be used. For many people a copy of the general policy statement plus an abstract of the organisation and arrangements applicable to their particular workplace will be all that is required. Those who wish to have a company-wide view can be satisfied by a footnote referring them to locations where the documentation as a whole may be consulted. The method of communication should adopt a style or styles directed to ease of understanding of the policy. It should therefore avoid legalistic prose, or technicalities which large sectors of the workforce may not understand. Translations may be necessary for cultural or ethnic groups. All communications systems have their *weaknesses so it may be worthwhile using several systems appropriate to the nature of the organization.*

65   Although the policy, organisation and arrangements will be contained in written documents the promotion of the ideas, objectives and methods of the policy can be conveyed in numerous ways. These may include the use of posters, films, training sessions and group briefings. The joint consultative and/or safety committee system can also be used to good effect. The use of informal 'grapevine' types of communication should be discouraged as one of the deficiencies of informal systems is the lack of control over the quality of the information imparted. Whichever system is adopted it should have a feedback facility to admit the need for queries, clarification and a check on understanding.

Monitoring the policy

66   Monitoring will be required to assess firstly whether the policy as stated is being effectively pursued within the organisation, and secondly to ascertain the extent to which it is having the desired effect. Senior management will wish to review progress and make any modifications which become necessary in the light of experience. Section 2(3) of the HSW Act requires that the policy statement shall be revised as often as may be appropriate. The 'appropriateness' of revision should be determined using the same sort of criteria as is applied to other policies. It is clear from the investigations of the APAU that the manner in which a policy is introduced and promoted throughout an organisation ranks at least equally in importance with its content if success is to be achieved. We emphasise that this is not a paper exercise but the means whereby management can introduce changes into an organisation to improve health and safety and almost invariably to attract further improvements and benefits to the organisation as a result.

67   An outline of the steps involved in promoting a health and safety policy is shown for ease of reference in the following diagram.
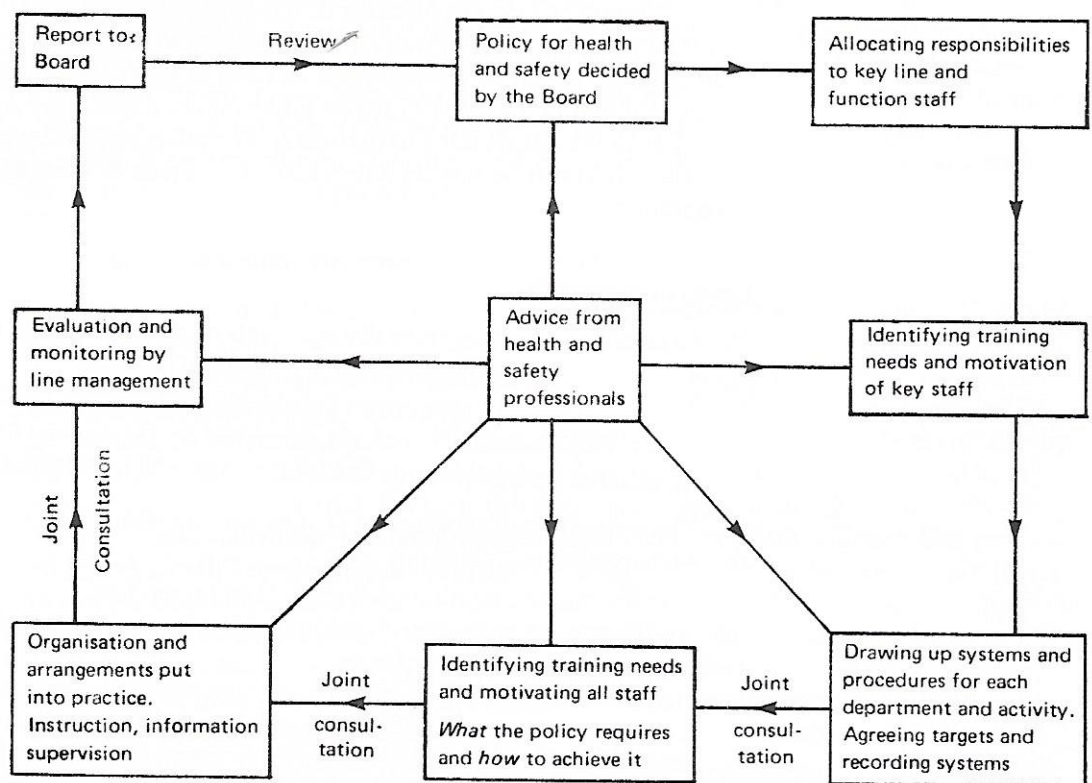

Fig 1   Diagrammatic representation of a safety policy in a self regulating organisation

Part 4 Progress in health and safety and how to monitor it

68   Having drawn up a policy, organisation and arrangements for health and safety it is essential to monitor its implementation and assess its overall effects upon the organisation. Unless a policy is monitored it is unlikely to be seen as a genuine commitment. Other areas of management activity are monitored and it is accepted that they should be if the organisation is to stay in business. If health and safety are seen as a part of management responsibility to be effectively managed then the undertaking's organisation and the arrangements for health and safety need to be monitored with equal care.

Why monitoring?

69   The studies of the Accident Prevention Advisory Unit have indicated unequivocally that a monitoring element is an essential ingredient of the policy if it is to achieve credibility

with the workforce and thereby be implemented and achieve its desired effects. Those undertakings which made clear at the outset that the implementation of the organisation and arrangements, along with their effect in terms of safety performance, would be regularly observed and measured with the results being assessed at the most senior levels in the organisation have had the greatest success in the use of their policies. Employees at all levels differentiate very quickly between those instructions from senior management which are to be taken seriously and those which fall into the realm of a public relations exercise. Monitoring is therefore essential in operational terms if the policy is to be a success — if the investment in manpower and resources in drawing it up is to pay dividends.

70   Some monitoring of the effects of the policy will be done anyway, if not by authorised channels within the undertaking then by outsiders of one sort or another. The trade union appointed safety representatives may pursue their own monitoring of safety standards and make representations on their findings via the consultative machinery set up under the Safety Representatives and Safety Committees Regulations. The enforcing authorities whose primary interest will be in the standard of compliance with statute law will also exercise a monitoring function. Similarly the Courts when called upon to interpret the common law after an accident will be making judgements which will be announced in public. There is also a growing interest in monitoring the social performance of industry by special interest groups, including professional bodies, trade associations and environmental protection groups. Monitoring cannot however be left to outsiders because they can never have as detailed a picture of overall standards within an undertaking as those who run it. Their interest must invariably be sectional and directed towards a specific set of objectives. It must also be said that in the case of interest groups those objectives may be hostile to industry in general or to the undertaking in particular. Outsiders can in any case give their opinion but their diagnosis must be suspect unless account is taken of the subject's own appreciation of its condition.

Levels of monitoring

71   In large undertakings three distinct levels of monitoring will be required, viz:
(a)   Main or managing board level;
(b)   Division or overall production unit level;
(c)   Workplaces level.
     In small organisations only levels (a) and (c) will be relevant.

72   The techniques of monitoring at such varying levels in an organisation will vary but should demonstrate:
(a)   that the policy commitment is more than lip service;
(b)   that it emerges from considered judgement by senior management of what the organisation wishes to achieve;
(c)   that it is designed to distinguish areas which require a greater effort and what additional support may be necessary to achieve the stated objectives; and
(d)   whether or not the agreed standards of control have in fact been provided and maintained to the levels required.

Four key areas of monitoring

73   There is no single index of performance in health and safety. Whatever monitoring system is adopted the APAU has found that the following four areas of interest are essential to all successful monitoring schemes. Reports on these areas of interest should be made through successive levels in the organisation.
(a)   The accident and ill health record of the undertaking;
(b)   The standards of compliance with legal requirements and codes of practice relating to health and safety;
(c)   The extent to which undertakings specify and achieve within a given timescale certain long term objectives; and
(d)   The extent of compliance with the organisation and arrangements sections of the undertaking's own policy statement including in particular the systems of work developed by the company to meet its own needs.

74   These areas of evaluation are not exhaustive and organisations may wish to modify or enlarge specific parts to suit their particular needs, depending on the relative importance of

plant and equipment, power sources, materials, people, environmental control, protective systems, information and data, or protection against large scale disruption to their organisation. The collection of information in these areas should be positive. In addition to identifying what has been achieved it should aim to identify why things are wrong rather than who is wrong with a consequent preoccupation with apportioning blame. It should identify deviations from agreed standards and, in the event of failure, analyse the events which led to that failure in order that their causes might be better understood. It is not constructive to concentrate on fault finding with its temptations to lay responsibility at the lowest management level.

75   Although certain duties may be delegated downwards in the management chain the responsibility for the efficient discharge of such duties is not similarly delegated and remains with those in overall control. Although statistical presentation of performance is a necessary and indeed invaluable tool, the reporting framework should admit narrative comment to allow qualitative as well as quantitative appreciation of performance and the way in which targets have or have not been met. Constructive monitoring will identify what has been achieved as well as areas of failure.

76   Monitoring should assess the contribution of all levels of management against the evidence that is available, be it of accidents or of conditions at the workplace. As a result of this positive type of monitoring managers should be able to assess and set their performance in health and safety against others operating in similar activities, either inside or outside their own organisation. The information needs to be presented so as to assist decision-making by indicating priorities for resource allocation thus preventing inappropriate or inefficient expenditure which may be the subject of special pleading for one reason or another. Where monitoring identifies areas of success, then success publicised is a positive incentive to improvement elsewhere.

Accident and ill health experience

77   The accident and ill health experience of the organisation is an important indicator of performance although care is required to ensure that numerical assessments of this part of the performance equation are not over influenced by social and other factors outside the control of the workplace. For this reason the use of several indicators of accident and ill health analysis are recommended. These may include accidents at various levels of severity, e.g. fatal, Group 1 (Severe), Reportable (i.e. 3 day absence), lost time, or first aid injury and assessments of industrial disease which give some indication of the extent of disablement. It is also valuable to have information about incidents which although they produce no injury, clearly represent manifest danger. The information must however be put to use. In some organisations managements believe that the majority of accidents are inevitable due to carelessness or workers' apparent refusal to make the workplace safe. In almost all the works that have been studied by the APAU this belief has been found to be unsubstantiated. Indeed most of the evidence has indicated that careful analysis of accidents demonstrates substantial scope for prevention using existing established techniques. The amount of internal communication about accident experience and prevention within companies is often limited so that serious 'carbon copy' accidents occur in different parts of the company and because of lack of communication each separate part attempts to resolve the problem in its own way without reference to what should be already learned experiences. The circulation of internal digests of information about accident experience within a group can provide useful preventive information.

Legal compliance and conditions at the workplace

78   The legal requirements on health and safety in Great Britain have evolved over the last 140 years as a means of dealing with hazards which are demonstrably a cause of injuries. Accordingly the extent to which compliance with the legislation is achieved is an indication of the extent to which many hazards have been controlled or eliminated. The method assessing the extent of legal compliance should include regular and systematic checks — systematic being the important word here — to ensure that the requirements of the Health and Safety at Work etc Act, the Factories Act, Codes of Regulations, codes of practice, which represent best practical advice, etc are being met in the works. The method of checking may be by formal inspection, sample or audit, and should be carried out by trained staff. The results should be properly recorded and evaluated so that progress or deterioration in standards can be assessed. It is important to include in this area of assessment not only

the physical safety items but also items of organisational safety including systems of work and training. This aspect of monitoring will allow systematic collection of information about the nature and scale of the hazards which can be identified within an undertaking or given part of it. The extent to which the number of hazards remains, or is progressively eliminated, is one important aspect of safety performance. The majority of accidents occur as a result of a hazardous condition or situation not being controlled. The identification and elimination of hazards should be a primary objective of the safety policy. The data arising from systematic inspection to identify hazards has further uses once the individual or groups of hazards have been eliminated. In consolidated form it can yield useful information about the standards of training, supervision and information available in a given department, thus providing the basis for improvement in the human value aspects of accident prevention, and preventing future potential hazards from arising. It is important that the recording systems used should not consist of negative catalogues of failure only but should incorporate a positive assessment section where credit can be given for progress in the elimination of hazards and the maintenance of high standards of legal compliance.

Achievement of objectives

79   Progress should be monitored by reference to how far the agreed objectives of the undertaking at main or managing board and subsidiary levels are being progressed within the timescales set for them. Within a self regulating system companies will in the nature of things wish to specify certain targets and objectives in health and safety. Such targets will for example include agreed dates for the elimination of certain types of hazard the provision of protective equipment, training or retraining of groups of staff, or the achievement of certain environmental control standards. The extent to which such self imposed targets are met is a measure of progress in health and safety. It is an area of monitoring where the publication of success to the whole or part of the workforce can have a significant effect on morale and help maintain an impetus to and pride in good health and safety standards.

Monitoring the policy itself

80   The company safety policy document should itself be monitored at regular intervals to ensure that it is being effectively implemented in letter and spirit at successive levels in the management chain. The extent of its application at successive levels by management is one of the clearest indicators of its acceptance by them. Any serious mishaps which occur should be assessed against the specified organisation and arrangements with a view to the identification of weaknesses and their subsequent elimination. The extent to which organisations carry out in practice the aims and objectives specified in their safety policy documents, is in the experience of the APAU one of the best measures of that firm's commitment to health and safety.

Monitoring is continuous

81   Monitoring is not a once and for all effort or a quarterly, half yearly or annual event. It should be a continuous process recognised as one of the normal functions of management in the same way as any efficient organisation would treat facts about production and costs. The monitoring techniques used within an organisation should follow the established corporate ethic and management style of the organisation and will depend, for example, on the extent to which functional management is exercised at group level. One satisfactory method of monitoring is for the most senior management to require at specific intervals an account of performance in health and safety with particular reference to predetermined targets from each part of the undertaking. This is perhaps most worthwhile if it forms part of the regular appraisal and objective setting routine for managers in line with agreed job descriptions. The knowledge that this information is required tends to make managers conscious of the need to ensure an acceptable performance. Analysis of the returns can identify the less successful and further monitoring of a diagnostic nature may eliminate the cause of unsatisfactory performance.

82   There is a strong case for almost all monitoring, except perhaps that for which a special degree of training is required, being carried out by the line managers who bear the responsibility for implementing the health and safety requirements in their own areas. Some training will be necessary to ensure that they have the basic monitoring skills, and advice from

functional managers can be used to promote uniformity of standards. Where line managers have the responsibility for the maintenance of standards which for technical reasons they do not monitor personally, they should of course be appraised of the results and be held accountable for any subsequent action which may be required. The safety adviser will usually be the person best equipped to analyse and assess the risks identified by workplace monitoring and to give best advice to middle managers on accident and ill health prevention and to senior management on the identification of training needs and resource allocation.

83   The results of monitoring will over time indicate areas of weakness or deficiencies in the organisation or arrangements sections of the policy and point the need for revision of the document. In certain cases the identification may require that a specific new objective be incorporated into the policy statement to emphasise its importance to the undertaking.

Part 5 Policies in practice: some case studies

84   The advice given in earlier pages is founded on the first part of the Health and Safety at Work Act: it is also fortified by the experience which the Accident Prevention Advisory Unit has gained in several years of visiting companies and public undertakings to examine their organisation and arrangements for safety. The approach is therefore essentially practical and has been validated under test. The case studies in this part give some idea as to what has been done by some leading organisations to develop a safety policy and to implement it via efficient organisation and arrangements. These are different undertakings, of different sizes, making different products. What they now have in common is that they see that a concern for safety and health is an essential component of effective management.

Case study 1: The safety policy as a catalyst for change

85   The first example concerns a large modern technology factory with excellent compliance with the Factories Act and associated regulations. It had high standards in the provision and maintenance of physical safeguards in terms of plant and machinery and apparently excellent working facilities. The factory is part of a major multi-national company whose other operating plants in the UK provide equally high standards in terms of working conditions and yet by contrast have much higher levels of safety performance as expressed in accident incidence rate terms. This plant was not engaged in similar activities to others within the Group. From its start the plant had technical problems and was relatively unprofitable. These considerations dominated management thinking although there was no deliberate neglect of health and safety or any conscious effort on the part of management to minimise the safety of their employees. Nevertheless in the first year of the APAU survey the plant which at that time employed 2150 people, reported 239 accidents of which 33 were Group 1 (Severe) and 7048 injury accidents were treated at surgeries. Neither management nor trade unions were aware of this nor of the comparative position of this factory in relation to other factories in the Group or to other factories in this industry.

86   Faced with this knowledge management from the Plant Director downwards express their determination to improve. In three years the total of reported accidents fell by 38%, the injury rate by 68% and Group 1 injuries were eliminated. Present indications show continuing progress particularly in minor injury occurrence.

87   The management was unanimous that these results had been achieved by a deliberate and continuing policy aimed at securing the commitment to and accountability for the level of safety performance within the areas of control of individual managers. Functional management support was improved and extended and better information made available to identify the sources and the causes of accidents. Accident information is now supplemented by detailed inspections and auditing of the processes. Considerable time and attention has been given to the training needs of all managers and particularly supervisors. The basic change has been to set standards and objectives for which individuals at whatever level are to be accountable. These standards are detailed and all are monitored. All management levels now believe that they have motivated the staff to believe that they are not only accountable for performance but that they can improve on present performance be it accident incidence or safe working. A similar approach is applied to workpeople and their representatives. All inspections and investigations are the responsibility of line managers who have accepted that efficient managements can produce high levels of safety performance. The factory is better supplied by the Group in terms of technical standards and advice on common problems.

88   The declared policy of senior management was a crucial factor in setting the scene for this initiative and obtaining the understanding and commitment of all line managers towards realising the objectives and encouraging the workforce to participate in its implementation. The policy was the catalyst for change.

Case study 2: A more effective policy

89   The second example is of a factory with an accident incidence rate which was three times the national rate for its industry. It is part of a very much larger group which has a wide range of manufacturing activities and products. It employs 1500, many of whom work shifts, and is large by the standards of its industry. In one year the factory reported 175 accidents, 9 of which were Group 1 (i.e. Severe) and 4811 cases were treated in the First Aid section. Senior management had expressed, for some time, a desire to improve its safety performance but had not applied themselves systematically to establishing a framework within which such improvement might be achieved. They had relied on a belief that their general wish was known to all managers and staff, but had done little to identify accident causation, whether real or potential, as a basis for deciding on the initiatives which would improve the existing situation. A safety policy was in existence but was written in very general terms. It committed line management to having overall responsibility for health and safety and it indicated the duties of functional managers to support the line managers. It attached importance to joint consultation, to training and to reporting of accidents. It approved the practices of individual departmental managers in discharging their duties.

90   What it did not do was give line managers positive indications as to the extent and limitations of their commitment to achieving standards which would satisfy the overall objective of providing and maintaining a safe working environment. Management had neither a sense of purpose nor a sufficient knowledge to improve on the present situation. Recommendations were therefore made by APAU that the organisation should be more clearly defined from the most senior to the most junior levels of line management and that, through the development of detailed arrangements and procedures relevant to their particular needs, line managers should be made aware of the standards expected and the ways by which these standards might be achieved. A manual of safe practices and procedures was needed, the policy was to be monitored and sufficient training given to all managers to see that they had a full understanding of the duties placed on them to give the policy best effect.

91   These recommendations were made on the assumptions that:
(a)   a large number of current accidents and injuries could be prevented;
(b)   it was line management's job to achieve this objective;
(c)   it was reasonably practicable to safeguard operators from exposure to risk and that the means by which this was to be achieved ought to be developed by the company;
(d)   it was necessary that all employees be better trained to work safely.

92   The safety policy was identified as the crucial factor in providing a framework for initiatives to be taken to improve on the present level of performance. Managers had already shown their ability to control the more direct and readily identifiable causes of accidents -those due to machinery were, for this type of activity, relatively few. Given the high standards of machine guarding and the ability to maintain those standards, accidents attributable to the human factor were to be their greatest concern and priority. A new safety policy has been written which is more specific as to the duties of managers and incorporates detailed operating rules and procedures for main production areas as well as allowing for the provision of local rules for particular processes. This policy and its contents have been agreed both by managers and the trade unions. It is monitored for effectiveness and provision is made for audit and inspection of all work activities. A main board director has been named as having overall responsibility for the implementation of the policy. Considerable emphasis has been placed on training in the introductory stage of this new policy. The purpose of training has been set out, and the contribution that individual managers and workpeople can make to its success has been indicated. It is for the Safety Department to collect and analyse the information now available from audit and from accident investigation. This information is fed into training. It is also used to highlight areas of success, and areas which will need greater attention in the future. It already indicates more clearly the location and causation of accidents which have occurred, as well as areas of work practice which contain potential risk. The policy has established the need for a full-time occupa-

tional/medical function for injury treatments and rehabilitation as a demonstration of management's concern for its employees well-being.

93   It is already the experience of this company that, although considerable time has been spent on the writing of a policy which is relevant to their needs, considerably more time and attention has had to be given to convincing intermediate and junior managers and workers that the company is serious in its intention to improve on present levels and that compliance with this policy is a primary way through which the highest levels in the company see success being attained. One way in which the commitment of management is encouraged is that they are responsible for the investigation of all accidents within their areas of responsibility. Each accident report form now contains a section in which supervisory management must attribute the causes of the accident. The reports are then passed upwards to middle management for their information. Workplace audits are being developed which are to be formalised into an audit jointly carried out periodically by a supervisor and a safety representative. The Safety Officer is responsible for accident and audit analysis and for the presentation of findings to both management and to employees.

Case study 3: Improving on existing high standards

94   The third example is of a company with a well established safety policy who recognise the need for the policy to be periodically reviewed. They are aware of the need for careful planning and for the need to explain changes to managers and workers if they are to be accepted. The company also illustrates the cumulative benefit obtained from setting realistic standards and seeing that they are achieved, not least in the effect such an approach has on attitudes and behaviour both of managers and workers. This example illustrates how changes can be introduced into an already well established policy.

95   The company is the second largest unit of its type in a large multi-activity organisation. Considerable sums of money have been spent recently on modernisation and on introducing new processes. It has the second lowest accident incidence rate within its division and has shown progressive improvement over the years since the safety policy was first introduced. The existing policy sets objectives and establishes monitoring for the individual parts of the Group through the Safety Adviser who has direct access to senior levels within the Group. The safety activities of individual units are set within a framework of Group advice and units are encouraged to develop safe operating practices and procedure within the framework of the safety policy. The Group issues advisory notes aimed at producing practical interpretations of and offering solutions to common problems likely to be encountered throughout its works. This is an initiative which saves both time and resources and contributes to more uniform standards within the Group. The Group safety organisation consider problems which all units have in common, in order to ensure a uniform and high standard of safety and health. These problems include the establishment of rules for dealing, for example, with sub-contractors, with noise and with entry into confined spaces.

96   The Group has now identified a need to amend its safety policy document in the light of experience. This has involved:
(a)   a re-emphasis of the role of the main board director with responsibility for health and safety;
(b)   a clear statement of the role of specific functional managers;
(c)   an emphasis on written safe working methods which are extended in consultation with the workforce where the need is identified. Once agreed they become part of the policy document;
(d)   the establishment of responsibility on line management to enforce agreed standards;
(e)   stating the need for a more formal monitoring of performance which will be applied to all management levels,
(f)   a greater accountability for good and bad conditions at work;
(g)   a more systematic audit at different levels of management;
(h)   The improvement of the information system as a key area for establishing a balanced accident prevention effort.

97   In order that line managements understand the reasons for such improvements and the part that they will play in their implementation, a hundred and thirty managers have been trained in the auditing techniques which they apply to see that these standards are maintained. Personal presentations have been given to all managers on advisory notes, safety sampling, safe systems of work and codes of practice. Formal monitoring and accident

analysis are to be assessed at 6 monthly intervals. Hazards identified at safety audits will be plotted on graphs to show their extent and the speed with which they are rectified. Amendments to the policy document are circulated to all employees.

Case study 4: Problems of a small independent factory

98   The fourth example concerns a relatively small factory with some 270 employees which was engaged in poultry killing and preparation. Its accident incidence rate per 1000 persons employed over a 3-year period was successively 350, 700 and 500 (UK average for manufacturing industry, 35). These were some of the highest figures recorded in the United Kingdom. Over 6000 injury surgery treatments were given in any one year. Working conditions ranged from good to very bad with some areas hot, noisy and badly decorated and with inadequately guarded machinery. Low standards of compliance with statute law were readily observable and in the case of machinery guarding, most breaches were for obvious defects on dangerous parts of machinery. Management experience of production operations was limited as nearly all managers had been engaged in agricultural as opposed to industrial activities for most of their working lives. As well as experiencing large numbers of reported accidents and injuries the factory had problems with high labour turnover and absenteeism.

99   There was no safety policy, nor any observable management commitment to improve working conditions or to lower the present accident incidence. No safety training was given nor was there a safety committee or any formal consultation with workpeople. Confronted with a resumé of these points management agreed to specific courses of action aimed at improving the very low levels of safety performance. A formal safety policy was seen as an integral part of this approach. The immediate steps taken were:

(a)   to publish a safety policy under the signature of the Managing Director;
(b)   to create a formal organisational structure for management which defined duties/responsibilities of the senior management who would have job descriptions within the organisational structure;
(c)   to provide a similar organisation at supervisory level, with particular reference to definition of the safety, health and welfare responsibilities;
(d)   to form a safety committee which involved management, works engineering supervision and representatives of employees;
(e)   to appoint a personnel manager with responsibilities for organising safety training with particular reference to TWI job safety training;
(f)   to train all production management, supervision and shop stewards in job safety;
(g)   to ensure that all members of the safety committee attended one-day courses on the work of a safety committee;
(h)   to arrange an appreciation session on human relationships and on its interaction with safety for senior managers;
(j)   to regulate the hours of work to comply with the Factories Act;
(k)   to introduce systematic induction courses for all new starters;
(l)   to enlarge and modernise the surgery;
(m)   to have eight operator/instructors trained by the Training Development Service;
(n)   to introduce a personal record system for all staff.

100   Within this framework the first basic aim was to improve standards to reach a satisfactory level of compliance with legal obligations. The guarding of machinery was improved and steps taken to ensure the proper training of persons for machine operation and, especially for the cleaning of machinery. Attention was paid to the effective isolation of machinery and to the identification of areas in which safe systems of work and safe working procedures would be required. These were to be incorporated in the safety policy. Protective clothing and protective footwear were to be given particular attention as contributors to individual safety. Responsibility for their use rested with line management and this again was a major part of the safety policy to be agreed in conjunction with the workforce.

Case study 5: The effects of main board involvement

101   The fifth example concerns a very large multi-activity group, organised into product divisions, which had no central safety policy and believed that its management style necessitated the devolution of all major functions to divisional managing directors. Safety and health was seen as a function to be dealt with in the same manner. APAU identified a

very wide range of safety performance within the Group, and, more importantly, between divisions undertaking similar work. When these disparities were pointed out to the Board they took the chance to reconsider their policy in the context of the changes which followed the introduction of the HSW Act. The main board accepted the challenge to operate a self-regulatory system with the objective of getting more uniformly high standards of health and safety across the whole range of its activities.

102   The main board decision to write a policy declaration setting out its objectives, naming a main board director with overall responsibility for reaching those objectives together with the monitoring of performance by divisions and by the Group was approached in the following ways:

(a)   Once the policy had been written it was presented to a meeting of managing directors, other senior managers and senior safety officers at a specifically convened meeting.

(b)   Acceptance was sought for the policy and their responsibilities and for its implementation at divisional level.

(c)   It would be the responsibility of the divisional managing directors to supplement the main board's policy with such detail as related to their own organisation and the arrangements and procedures necessary on their part to contain risk.

(d)   It was equally their job to secure acceptance of their own policy and that of the main board at levels below them.

(e)   Each division would monitor its own performance and accept a comparison with like activities.

(f)   Divisions would interchange more information to aid common problem solving.

(g)   It would be for the Group to monitor the performance of the parts - through yearly submissions by divisions of agreed data on which the division would be assessed. Group's purpose would be to understand the causes of successes and failures and consider the significance of resource allocation where necessary.

(h)   The Group would itself prepare an annual statement through the nominated director to the main board. In both divisional and main board presentations the factual report would be supplemented by a narrative account of progress made during the year.

(j)   Workers and their representatives were to be consulted on and kept informed of changes that might be made at Group, divisional or individual factory levels to policies which had already been agreed by the workforce.

103   One of the most telling points that the main board accepted was that prior to the writing of a safety policy and the establishment of these procedures, they were unaware of the safety performance of individual companies for which they had overall responsibility.

Case study 6: Special problems of construction firms

104   The next example concerns a firm in the construction industry. This industry has special problems when it is organising safety and health, one of which is control, owing to the complex and shifting relationships of contractors and sub-contractors on large sites. Further problems are created by the changing nature of the place of work. Once completed, a factory is usually a fairly stable place, and the processes and the labour force vary little. But in the months in which work is going on, a construction site will be successively a hole in the ground, a concrete slab, a steel frame and a completed structure. In a short time the labour force may change completely; the job may be affected by ground conditions and the weather; the speed at which the job has to be done may be dictated by the nature of the contract and the methods of payment of the labour force: darkness, weekend working and distance from head office make supervision more difficult than in a factory. The Construction Central Operations Unit has undertaken several studies of the organisation for safety and health of construction firms. In general, it has found that major construction firms which have organised themselves to be efficient and prosperous have also tried to organise themselves to do their work in as safe and as healthy a manner as is practicable and have seen that the special organisational problems of construction work must be overcome. The relationship between safety and efficiency has usually been seen at the most senior levels, but it is not always a view shared by managers throughout the organisation, particularly at the most junior levels of trades foreman and gangers.

105   The particular example concerns a large construction group which controls civil engineering, construction, housing and renovation companies. The group set out their

objectives in a written safety policy: they produced an organisation and arrangements for safety which were intended to translate the policy into effective action. They had considered the separate elements of an organisation, such as supervision, information, training, safe systems of work and joint consultation. They had examined their organisation in terms of the Health and Safety at Work Act. A great deal of systematic and conscientious work had been done, but it was still possible to suggest certain improvements. These improvements were an expression of the common theme that middle and junior management should be clearly aware that safety and health are essential parts of their management functions.

106   Firstly, in order that the comprehensive safety policy should not be overlooked by employees, it has been re-issued and sent out with a covering letter from the Managing Director to all managers above Section Foreman, and all operatives and gangers will eventually receive pocket-book versions of the policy. Secondly, a standard system for assessing safety and health performance is now being tried out on the sites, in order to measure the extent of management effort in safety and health. If the achievement of a safe site is to be seen as an essential management objective than the means must be provided of showing how far this objective has been realised. Individual site safety reports should not therefore simply be concerned with reporting the hazards observed, but should be clearly related to long term improvements of the safety organisation, and should be brought together to form the basis of discussion by senior management. Thirdly, job descriptions for safety have been revised so that three simple but essential points are made to every manager, from ganger to director, so that:

(a)   He has authority to deal with health and safety in the areas of activity which make up his span of control.
(b)   He makes those immediately below him in the management structure accountable for their success and failure in using their authority in matters of health and safety.
(c)   He understands that he is equally accountable to those above him for his success or failure in using his authority in matters of safety and health.

107   Fourthly, there has been a review of the consistency with which safety training is given, so that managers who have not received the company's training are identified. Company training courses for senior managers have been increased in number. The training of gangers and trades foremen is being revised, since it is important that junior management receive some training in actual management, and do not have simply to rely on the general operative training.

Case study 7: The organisational difficulties of a local authority

108   This example illustrates the kind of organisational problems faced by a local authority. The authority examined had extremely variable results in terms of accident statistics. One department, direct building and housing maintenance, had a reported accident incidence rate approximately three times the national average for the construction industry, while in other departments accident rates were negligible.

109   Analysis of the data indicated that although reported accident rates were high, Group 1 (Severe) injury rates were only average for the construction industry, so that the poor performance tended in the main to relate to minor injury. When analysed by occupation it was found that one group, painters, had few reportable accidents. The reason for their relatively good performance lay in the degree of determination on the part of their management to promote safe working, including a vigorous follow-up of incidents which led to minor injury. The authority was able to utilise this success to motivate managers in other areas, who had felt uncertain that their efforts could reduce minor injury, to re-examine their attitudes and apply themselves more purposefully to health and safety.

110   The position of the Central Safety Officer in the organisation brought its problems, particularly in the first two years of his appointment. He was a member of the Town Clerk's Department answering to the Chief Personnel Officer. As a member of one department, below Chief Officer status, he found it difficult to apply the wide-ranging role of his terms of appointment in other departments. Much of his advice for change based on evaluation of standards as part of his data collection role evoked resentment on the part of Chief Officers who disliked active critical inspection of their operations from someone whom they saw as a junior member of another department. The Central Safety Officer received support from the Chief Executive, but below that level the mistrust as to the way in which he was re-

quired to do his work reflected itself in a lack of confidence, not usually justified, in the technical nature of his advice.

111   This experience indicates that the implications arising from an appointment of a Central Safety Officer must be carefully thought out. A Chief Executive has to consider both the kind of information he requires and the intervals at which he wants it. Others have to acknowledge that this is a legitimate need of the organisation if it is to come to terms with 'self-regulation', one of the objectives of the HSW Act.

112   It is inevitable that safety and health effort in a local authority will fall unequally between departments. In this case, two departments which employed a preponderance of manual workers each had their own departmental safety adviser; other departments, where mainly office workers were involved, relied on the Central Safety Officer for advice. Thus the Central Safety Officer had in effect departmental duties in some departments in addition to the role established by his brief. One department, however which had a number of varied problems of health and safety but no departmental safety adviser, tended to monopolise the time of the Central Safety Officer. Individual departments must make realistic provision for solving their domestic problems in health and safety. The Central Safety Officer can then relate his work to:

(a)   the organisational needs of the authority as a whole;
(b)   the overall assessments of safety performance within the authority;
(c)   deciding on an acceptable measure of performance;
(d)   assisting departmental advisers with technical problems, and
(e)   looking after the departments in which the risk is insufficient to justify a separate appointment.

Whilst departmental safety officers should answer to their departmental head, there should be a link to enable the Central Safety Officer to monitor the quality of their advice.

113   The unequal load in terms of scale of operations, numbers at risk and varying hazards in health and safety as between departments requires that any measure of performance should take these factors into account when determining the resources to be allocated. Equally insight should be gained into areas where more effective effort is required from managers. For some managers, eg in a works department, decisions which involve health and safety are made daily; in other departments much less frequently. This means that different criteria will be necessary in deciding whether a manager has satisfactorily promoted safety and health objectives. Any assessment of performance should include an acccount of positive practices to contain hazards, training, instruction and supervision. Accident statistics should be presented in such a way that departments are compared against agreed norms, eg their own past records, rather than with other departments where demands may be quite different.

114   In housing maintenance departments supervisors, foremen and workmen from local depots often work throughout the area, on a number of short-run jobs which because of their nature receive only perfunctory supervision. Instructions when the job is given out have therefore to be thorough enough to include detail not only of what has to be done, but how the work has to be done particularly in terms of equipment which the men should take and set up. In this case, it was acknowledged that there was a tendency for supervision to ignore instruction on safe methods when allocating work, making assumptions that simple precautions did not need to be stated. If work is not to be checked, such assumptions are dangerous.

115   The way forward to the resolution of these problems faced by a complex local authority organisation lies in the acceptance by all concerned of an overall policy for health and safety supplemented by a cohesive organisation and arrangements which are monitored at successive levels within the undertaking.

Appendix 1
Health and
Safety at Work
etc. Act 1974

General duties of employers to their employees

2   (1)   It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees.

(2)   Without prejudice to the generality of an employer's duty under the preceding subsection, the matters to which that duty extends include in particular-

(a)   the provision and maintenance of plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health;

(b) arrangements for ensuring, so far as is reasonably practicable, safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances;

(c) the provision of such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of his employees;

(d) so far as is reasonably practicable as regards any plant of work under the employer's control, the maintenance of it in a condition that is safe and without risks to health and the provision and maintenance of means of access to and egress from it that are safe and without such risks;

(e) the provision and maintenance of a working environment for his employees that is, so far as is reasonably practicable, safe, without risks to health, and adequate as regards facilities and arrangements for their welfare at work.

(3) Except in such cases as may be prescribed, it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of all of his employees.

(4) Regulations made by the Secretary of State may provide for the appointment in prescribed cases by recognised trade unions (within the meaning of the regulations) of safety representatives from amongst the employees, and those representatives shall represent the employees in consultations with the employers under subsection (6) below and shall have such other functions as may be prescribed.

(5) (Repealed)

(6) It shall be the duty of every employer to consult any such representatives with a view to the making and maintenance of arrangements which will enable him and his employees to co-operate effectively in promoting and developing measures to ensure the health and safety at work of the employees, and in checking the effectiveness of such measures.

(7) In such cases as may be prescribed it shall be the duty of every employer, if requested to do so by the safety representatives mentioned in subsection (4) above, to establish, in accordance with regulations made by the Secretary of State, a safety committee having the function of keeping under review the measures taken to ensure the health and safety at work of his employees and such other functions as may be prescribed.

Appendix 2
Testing the safety policy: A guide

We do not believe that there is an ideal standard safety policy as there is no ideal standard organisation. The safety policy must develop out of the identified needs of each particular organisation. Accordingly we refrain from providing examples of 'model' policies and instead provide in this Appendix a suggested checklist guide of questions to probe the applicability, strengths and weakness of existing policy documents. The extent of applicability of each section will depend upon the type of organisation and the risks with which it has to cope. Advice on particular aspects, eg fire or emergency procedures is available in published handbooks.

The policy statement

1.1 Does it give a clear unequivocal commitment to safety?
1.2 Is it authoritative? Is it signed and dated by a director? Has it been agreed by the board?
1.3 Is the policy to be regularly reviewed? If so by whom and how often?
1.4 Has it been agreed with the trades union representatives?
1.5 Are there effective arrangements to draw it to the attention of employees?
1.6 Does it state that its operation will be monitored at workplace, divisional and group level?

The organisation for health & safety

2.1 Is the delegation of duties logical and succesive throughout the organisation?
2.2 Is final responsibility placed on the relevant director?

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2.3 Are the responsibilities of senior managers written into the policy or specified in job descriptions?

2.4 Is the safety performance of managers an ingredient of their annual review?

2.5 Are the qualifications of managers where relevant to health and safety considered when making appointments?

2.6 Do line managers understand the nature of their health and safety duties? Have they accepted them?

2.7 Are key functional managers identified? viz:

(a) Safety Manager
(b) Hygiene Manager
(c) Radiation Officer   Are their duties clearly understood?
(d) Engineering Manager
(e) Electrical Manager
(f) Training Manager

2.8 Do managers understand the extent of their discretion to vary from systems and procedures?

2.9 Do they understand the consequences of failure to implement the policy in their area of responsibility?

2.10 Are there adequate arrangements for liaison with contractors managers and others who come onto the site?

2.11 Are there adequate arrangements for consultation with the workforce?

Arrangements for health and safety

Training

3.1 Is there a system for the identification of training needs?
3.2 Is the responsibility for training properly allocated?
3.3 Does training cover all levels from senior manager to new entrant?
3.4 Are special risk situations analysed for training requirements?
3.5 Are refresher courses arranged?

Safe systems of work

4.1 Are those tasks for which a system of work is required identified?
4.2 Are identified systems properly catalogued?
4.3 Are the systems monitored?
4.4 Are there systems to deal with temporary changes in the work?
4.5 Are there proper systems of work for maintenance staff?

Environmental control

5.1 Is the working environment made as comfortable as is reasonably practicable? Does it meet statutory requirements?
5.2 Is sufficient expertise available to identify the problems and reach solutions?
5.3 Is sufficient instrumentation available?
5.4 Are there arrangements to monitor the ventilation systems?
5.5 Are temperature/humidity levels controlled?
5.6 Is there adequate lighting provided? Are there satisfactory arrangements for replacement and maintenance?

Safe place of work

6.1 Are there arrangements to keep workplaces in a clean, orderly and safe condition?
6.2 Are walkways, gangways, paths and roadways clearly marked?
6.3 Are there arrangements for clearing hazards, eg substances likely to cause slipping from the floors?
6.4 Is safe means of access provided to all working areas?
6.5 Are staircases, landings, teagles and openings in the floor protected?
6.6 Is storage orderly, safe and provided with easy access?
6.7 Are flammable, toxic and corrosive substances used safely and without hazard to health?
6.8 Are permit to work systems operated and monitored?

Machinery and plant

7.1 Is new machinery and plant vetted for health and safety prior to being brought onto site?

7.2 Is there a system of inspection to identify and safeguard dangerous machinery?

7.3 Is there a system for vetting plant and machinery after modifications?

7.4 Is there a routine check on interlocking devices?

7.5 Is pressurised plant subject to inspection and test?

7.6 Are monitoring systems and alarms tested at regular intervals?

7.7 Are lifting machines and tackle subject to regular inspection and test?

Noise

8.1 Are noise risks assessed and danger areas notified?

8.2 Is there a programme of noise reduction/control?

8.3 Is personal protection provided and worn?

8.4 Are the requirements of the Code of Practice for Reducing the Exposure of Employed Persons to Noise being met? Is there a risk from vibration?

Radiation

9.1 Is a competent person nominated to oversee the use of equipment and materials which may pose a radiation hazard?

9.2 Is adequate monitoring equipment available?

9.3 Are records kept in accordance with statutory regulations?

Dust

10 Do the arrangements for the control of dust meet statutory requirements?

Toxic materials

11.1 Are there adequate arrangements in the purchasing, stores, safety, medical and production departments for the identification of toxic chemicals and specifying necessary precautions?

11.2 Are storage areas adequately protected?

11.3 Are emergency procedures for handling spillage/escape laid down, known and tested?

11.4 Are there proper instructions for labelling?

11.5 Are there adequate arrangements for the issue, maintenance and use of respiratory protection where it is found to be necessary?

Internal communication

12.1 Is the role of safety representatives agreed?

12.2 Is there a properly constituted safety committee?

12.3 Is the level of management participation appropriate?

12.4 Is there a system for stimulating and maintaining interest in health and safety?

12.5 What arrangements are there to advise workers about the standard of the organisation's performance in health and safety?

12.6 Are there adequate means of communication from shop floor to management on safety and health matters?

12.7 Is there scope for joint management/shop floor inspections?

12.8 Are there efficient arrangements to process action on communication from the enforcing authorities?

Fire

13.1 Who is nominated to co-ordinate fire prevention activities? Does he have sufficient authority?

13.2 What arrangements are there for fire fighting?

13.3 Is there an adequate fire warning system? Is it regularly checked?

13.4 Are fire drills held and checked for effectiveness?

13.5 What arrangements are there to check compliance with the statutory fire certificate?

13.6 Are means of escape regularly checked and properly maintained? Are they clearly marked?

13.7 Is there a proper system to account for staff and visitors in the event of an evacuation of the buildings being required?

13.8 Are flammable and explosive materials stored and used in compliance with statutory requirements?

Medical facilities and welfare

14.1 Are there adequate facilities for first aid treatment?
14.2 Are sufficient persons trained in first aid?
14.3 What arrangements are there for medical advice?
14.4 Are there adequate facilities to admit proper medical supervision particularly where this is a statutory requirement?
14.5 What medical records are needed and are they properly kept?
14.6 Are the washing and sanitary facilities adequate?
14.7 Are cloakrooms and messrooms adequate?

Records

15.1 Are there adequate arrangements for the keeping of statutory records?
15.2 Are the records vetted for efficiency and accuracy?
15.3 Is sufficient use made of the information in the records to identify areas of strength and weakness? eg accident and ill health experience or training needs?
15.4 Is there sufficient access to records of performance by those with a legitimate interest?
15.5 Are copies of all the relevant statutory requirements and codes of practice available on site?

Emergency procedures

16.1 Are the areas of major hazard identified and assessed by qualified staff?
16.2 Are there procedures for dealing with the worst foreseeable contingency?
16.3 Have these procedures been promulgated and tested?
16.4 Are there adequate arrangements for liaison with other parties who may be affected or whose help may be required?
16.5 Are there arrangements to protect sensitive installations from malicious damage or hoax threats?
16.6 Do the above arrangements cover weekend/holiday periods?

Monitoring at the workplace

17.1 Is it understood that monitoring will be carried out?
17.2 Are there sufficient staff with adequate facilities to carry out the monitoring?
17.3 Are the standards expected known and understood?
17.4 Is there a system for remedying identified deficiencies within a given timescale?
17.5 Is the monitoring scheme sufficiently flexible to meet changes in conditions?
17.6 Are all serious mishaps investigated?
17.7 In the event of mishap is the performance of individuals or groups measured against the extent of their compliance with the safety policy objectives?
17.8 Is monitoring carried out within the spirit as well as the letter of the written policy document?

Appendix 3
Job descriptions : their value in a safety policy

1 In two large organisations recently studied by APAU, a written commitment to safety and health at the most senior levels was backed up by an organisation chart, job descriptions, a better than average specialist safety service and comprehensive written manuals of procedures. Optimism about the effect of this commitment evaporated however when studying the organisation as it worked in practice. The written framework was largely ignored by middle and junior managers, and progress in working towards the objective was slow. Training courses brought out the belief of managers that the paperwork was there simply to catch them out if anything went wrong, and in practice they worked principally to other, more pressing, objectives set by their companies, namely to progress the work as fast as possible.

2 Such examples indicate that it is not sufficient simply to print a policy organisation and arrangements to meet the legal requirements and then to expect it all to work. Almost all the enthusiasm came from the specialist safety advisers with the backing of senior management, and in both firms studied, the Chief Safety Officer had been able to influence main boards to endorse the paperwork which he had produced, almost without comment or alteration.

3 The people who had to make the proposals work, however, had been ignored.

Middle and junior management were presented with bright new manuals, organisation booklets, and carefully written safety policies with the managing director's signature in fac-simile, but no one talked to them to explain what was being required of them. It will come as no surprise to many, that people do not change their attitudes and their way of going about things solely on receipt of written advice from head office, unless such advice indicates tasks specifically addressed to themselves. If the documents are general in nature and diffuse in their apparent relevance, they are often ignored.

4   In both companies Chief Safety Officers mounted training courses where middle managers were told of the new arrangements but here again advice was general, stressing how important are the health and safety objectives but with little personal relevence in terms of day-to-day decision making, or the difficulties faced by middle and junior management staff, of reconciling them to other objectives.

5   Both training courses and a clear explanation on paper of management organisation for safety and health are important, and should form part of the company effort in health and safety. But objectives need to be personalised because:

(a)   a manager will only follow a company objective with enthusiasm if he sees it as a personal objective as well;

(b)   a manager receives the best notion about his company objectives from his superior for whom he works;

(c)   if a manager does not receive an accurate indication of the importance of the company objectives from his superior officer, he is unlikely to alter his priorities because written advice from head office says something different;

(d)   self-esteem for a manager is related to the satisfaction gained from the knowledge that he is achieving what a superior wants. He builds up a belief that certain courses of action will lead to a particular reaction from a superior in terms of blame or praise. The longer he works for a particular superior, the more accurate will be his understanding of the likely reaction. Above all else, this belief will influence the direction and nature of the decisions which he takes, his priorities, and his attitude as to what the company want from him.

6   The safety and health message therefore can only come properly from a superior, who takes the time both to dicuss it and to describe how he sees it affecting future decisions, in the area which he has delegated. After such a discussion, the superior officer should subsequently indicate satisfaction where he sees change occurring, or dissatisfaction if no change has taken place. Sensitivity to a change in direction, and flexibility of approach as a result, are two of the most important qualities of the talented manager. Important changes are almost always invariably passed on by discussion; changes in approach through reading written material do not follow so easily.

7   Unfortunately this kind of discussion, followed by a supervision input which reinforces the conclusions reached by discussion, was found to be lacking where health and safety was concerned amongst line managers. As a result little change in priorities had been noticed in examining the decisions taken by middle managers, because regrettably little thought had been given to how this change in emphasis was to be promoted. Since the response of junior managers (supervisors, foremen and gangers) required changes in priorities among middle managers as a pre-requisite to their own changes, even less progress had been made at these levels.

8   One of the most common methods of personalising the health and safety objective is its inclusion in job decriptions issued to each manager. Job descriptions should be an agreed list of duties, reflecting current priorities after discussion between a manager and his superior to a point where both parties see priorities and objectives in the same way. Regrettably, in the two firms studied, job descriptions for safety were sent out by the Chief Safety Officer, and were neither agreed, nor personal. They were simply a stab at what the Chief Safety Officer thought a man at certain level in the organisation should promote in terms of safety and health. Since the job descriptions were not even issued to an individual through his senior officer, but simply posted; since the receiver of the job description had no chance to comment, and did not even know who sent it out; since the man's senior officer, who was supposed to have the job of oversight of the man's work had no say in the matter and sometimes did not even himself receive a copy, the project was doomed to failure, and was wasted paper.

9   Indeed there is a sense in which this sort of exercise is positively harmful. People are quick

to spot failures to take their views into account on matters in which they are directly related. The days of imposing duties in the belief that this is sufficient to achieve results, are past. People are educated to believe that their views matter as individuals and that they have to be persuaded personally of the value of any change; otherwise they will continue to hold fast to what they thought about their job before the exercise began.

10   We have seen too many examples of a sound idea badly applied and urge firms therefore to take considerable care about the issue of any job descriptions for safety, and in particular to bear in mind the following points.

(a)   The construction of a job description, a defined list of tasks for each level of manager, is a valuable exercise, so long as it is personally relevant to each person.

(b)   Since the person who will monitor the degree of success in meeting the tasks listed in the job description is the man's superior officer, it is that officer who should first of all offer the suggested list of duties. He should then have an interview to discuss the job holder's views on his own work.

(c)   At the interview any uncertainties about the duties, on the part of the person for whom the job description is written should be discussed and resolved.

(d)   Agreement between the two men involved should then be followed by the issue of a final personal job description.

(e)   Monitoring by the senior man should be against the job description, and reference should be made to it in assessing performance against the allotted and agreed tasks.

(f)   Whenever either person changes, the exercise should be repeated, in order to establish the clearest possible common attitude to safety and health between the new parties.

(g)   The procedures listed in (a) to (g) should be carried out progressively through the company, starting at senior management and finishing with the most junior manager in the organisation.

11   APAU believe that the suggested procedures outlined above should make the job description exercise worthwhile, and help a firm considerably in achieving its safety objectives.

Appendix 4
Bibliography

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Success and Failure in Accident Prevention: HMSO 1976

Health & Safety: Industry & Services Report 1977: HMSO

The Safety Representatives and Safety Committees Regulations 1977 (SI 500/1977)

One Hundred Fatal Accidents in Construction: HMSO 1978

Health & Safety Commission Report 1977-78: HMSO 1978

Health & Safety Statistics 1976: HMSO 1979

Fatal Accidents in Construction 1977: HMSO 1979

HSE Publications Catalogue 1979: HMSO 1979

There are, in addition, many publications by Employers and Trade Federations, management specialists and safety practitioners giving advice on particular aspects of policies for safety and health.