

Complying with H&S Directives When Installing a Resin Floor in the Food Industry



The Issues

When it comes to the important decisions surrounding the installation of a new resin floor in the food industry or even the updating of an existing one, health and safety considerations are not always at the forefront. The issues of quality, cost and project completion time (the triangle of forces) are quite understandably paramount in the minds of the client's project managers.

However, advances in the understanding of issues such as hand arm vibration (HAV), noise, health surveillance and the potentially harmful effects of substances previously thought of as harmless, have resulted in the necessity for ever more stringent health and safety regimes.

Furthermore, the increasing amount and complexity of health and safety legislation and guidance from the UK and Europe can represent a real threat to companies in the food industry involved in any form of installation work.

It is the role of the Health and Safety Executive (HSE) to ensure that health and safety legislation is adhered to in the UK and that as far as possible workers in the UK are protected. The HSE has discovered that the simplest way of achieving this is to carry out industrial inspections especially in the "higher risk" industries. For many years the construction and installation industries have had the highest accident and fatality statistics so it is surely no surprise that the HSE target such activities for their inspections.

There are many cases of such inspections resulting in companies receiving heavy fines for breaches of legislation which they either did not know existed or did not fully understand. In many cases the inevitable HSE enforcement / prohibition / improvement notice which accompanies the fine can be an even bigger threat to the company.

The Solution

Wouldn't it be great if the project manager could just break the contract down into sub-projects and rely on the sub-contractors to manage all of the health and safety issues within the sub-project and at the interfaces with other sub-projects? This would allow the project manager to give his/her full attention to the key issues of quality cost and completion time (the programme). Unfortunately this is not normally the case. If the project manager does not actively enforce health and safety legislation it is quite often the case that sub-contractors will breach the legislation simply because no one forced them to comply. This is even the case when sub-contractors know that their actions could lead to accident or injury..

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At John L Lord we aim to understand and comply with all relevant health and safety legislation and guidance from the UK and Europe. We believe that if we can offer clients a service which they can rely on to be safe and compliant while still achieving the overall aims of good quality, competitive cost and timely completion, the clients will want to choose us for their projects.

Our approach is simple and consists of the following:

1. Commitment

The board of directors of John L Lord is showing through words and actions the belief that strong health and safety management is absolutely essential for a company in our industry to be successful.

As the country as a whole struggles to climb out of a financial recession and we as a company have been forced to make cuts in certain areas, we continue to spend on the essential elements of the health and safety management system. It would be understandable for companies such as ours to sub-contract the management of our health and safety systems to part time consultants thus saving a considerable amount. Instead, we have decided that Health and Safety management is a full time activity and we require it to be led by professionals dedicated purely to the business of the John Lord Group.

We are currently investing heavily in health surveillance and specialized PPE and RPE in response to the recent re-classification of substances brought about by The CLP Regulation (EC) No 1272/2008. We correspond regularly with the HSE to determine the exact requirements of the legislation and are at the forefront amongst specialist flooring companies to fully adopt new requirements.

2. Research

Everyone knows that planning is key to achieving goals within budgets and required timescales. This is also the case with health and safety management. Health and safety is purely legislation driven. There are models for health and safety management such as OHSAS 18001 and the HSE's HSG65 but all of them require companies to be fully aware of new and modified legislation from the UK and Europe. The sources of law affecting all of us include:

- UK Acts of parliament
- UK statutory instruments
- EC Treaties
- EC Directives
- EC Regulations
- Approved Codes of Practice (ACOP's)
- Health and Safety Guidance Documents [HSG series] (HSE)

- Health and Safety Leaflets [INDG series] (HSE)
- Health and Safety Research Reports [RR series] (HSE)
- Specific Industry Information Sheets [e.g. EIS Engineering Information Sheet] (HSE)
- News Letters (HSE)
- Health and Safety Factsheets (European Agency for Safety and Health at Work)
- Forum Documents (European Agency for Safety and Health at Work)
- E-Facts (European Agency for Safety and Health at Work)
- TE Research Papers (European Agency for Safety and Health at Work)

In order to successfully plan an effective health and safety management system and protect employees and clients we have to be constantly aware of sources of information such as those above. Not only do we need to be aware of the documents, we also must have the ability to understand the requirements and put them into effect in a cost effective manner.

On our management team we have individuals with specific qualifications and experience in research and the law. We already have systems in place to ensure continual research into the key issues affecting our business and those of our customers.

With this we are able to assure our customers that if there is a legal requirement or best practice advice on any topic relating to the business, we will know about it and will be acting upon it.

3. Development

Product development is important in staying ahead of the competition and as such we have an experienced technical team as part of our senior management.

The developments will not just be related to product quality but will also involve health and safety. Work is ongoing to replace certain substances used with safer and more eco-friendly ones.

4. Communications

No matter how much we research and no matter how much we know or think we know, everyone will at times learn something from communicating.

We regularly communicate with other companies in the industry through our membership of FeRFA the Resin Flooring Association. Indeed one of our senior managers is a FeRFA council member. We see no problem in discussing industry wide issues and are not afraid to explain our intended solutions.

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Benchmarking is seen as a useful tool and can only improve the industry as a whole including John L Lord. Of course information on what others in the industry are doing is only valuable if it is acted upon with commitment and professionalism.

One communication area often overlooked is the communication that takes place on the project during installation. Effective and timely communications between our employees, our managers, our customer's site personnel and other site users helps to remove health and safety problems at an early stage before they become critical.

Over the years we have found that communicating with the HSE has been quite beneficial. We have found that if we are unsure of anything health and safety related, communicating with the HSE generally sorts out the problem.

We encourage our customers to contact us if they have any concerns over health and safety issues. We will always try and assist as it is in our interest as well as the customers to ensure projects run safely and without unnecessary delays.

5. Cooperation & Flexibility

At times customers may require specific actions to tackle an actual or perceived health and safety risk. We will always cooperate with the customers' requests even if we question the assessment of risk.

6. Long Term Relationships

Repeat business is essential to the success of companies such as ours. To that end we aim to build lasting relationships with our customers.

We want our customers to know that their projects can:

- Be carried out in a manner which protects the safety of all on site
- Have the appropriate health and safety response for the specific risks
- Continue without the fear of HSE notices and work delays
- Have a ready supply of accurate health and safety advice