Footwear and Leather Industries
Health & Safety
Committee

SAFE SYSTEMS OF WORK

A guidance note for the footwear and leather industries

INTRODUCTION

A safe system of work is a procedure that results from a systematic examination of a working process, that identifies hazards and specifies work methods designed either to eliminate the hazards or controls and minimise the relevant risks.

The legal background to this is the requirement, within the Health and Safety at Work Etc Act (1974), that:

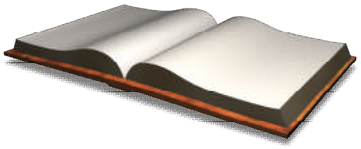
- It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees and to provide and maintain systems of work that are, so far as is reasonably practicable, safe and without risks to health.

The phrase "reasonably practicable" mean a balance between the level of risk and the resources necessary to control it.

Further regulations make specific requirements in respect of safe systems of work, for example those relevant to manual handling, use of hazardous substances and use of display screen equipment. Safe systems of work will frequently be addressed in the arrangements section of an organisation's health and safety policy and within risk assessment processes.

Safe systems of work should be developed by a competent person ie a person with sufficient training and experience or knowledge and other qualities to assist with key aspects of safety management and compliance.

Staff who are actively involved with carrying out the work also have a valuable role to play in the development of the system to ensure it is of practical benefit and that it will consequently be applied diligently.



All relevant staff must clearly understand the system of work and it is equally important that it is effectively communicated to others such as contractors who may become involved periodically.

Safe systems must be documented to provide unequivocal reference points for all concerned including the employer. They may also prove essential if there is an inspection by the enforcement agencies or if any proceedings arise from an accident.

The safe system of work should be comprised of three types of controls:

Technical – as in engineering controls such as guards.

Behavioural - how individuals or groups should act in relation to the hazard.

Procedural - specifying the exact nature of the task, including the sequence, checks and key safety actions.

A safe system of work results from systematic examination of a task in order to identify all hazards. The aim is to produce a safe work method that will eliminate or reduce the risks associated with the identified hazards.

All safe systems of work need to be monitored regularly to ensure that they are fully observed and effective. Appropriate supervision is also as ever a strict requirement.

WHAT THE LAW SAYS

Under section 2 (2) (a) of the Health and Safety at Work Etc Act (1974) employers are legally obliged to provide and maintain plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health.

Components of a safe system.

The system will be developed by an analysis and assessment of the risks inherent within the task and the requisite controls. Sources of information that may need to be consulted include reference to legislation, guidance notes, manufacturers' information, company policy and relevant staff.

Where risks of an extreme nature are involved, the safe system of work may be in the form of a "permit-to-work" which is an extremely robust and detailed procedure including permissions and signatures.

A safe system of work:

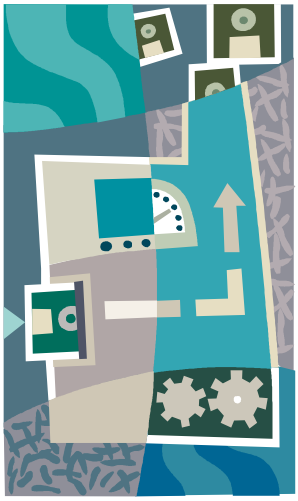
- Combines materials, people, plant, equipment, task and environment.
- Must have a well thought out, logical approach.
- Should fully identify and document all the hazards, safety precautions and safe working practices associated with all activities performed by employees.

Definition

A formal procedure which results from systematic examination of a task in order to identify all the hazards. It defines safe methods to ensure that hazards are eliminated or risks minimised.

When is a safe system required?

Many hazards are clearly recognisable and can be overcome by physically separating people from them eg by using guarding on machinery.



A safe system of work is needed when hazards cannot be physically eliminated and some element of risk remains.

This applies to non-routine work as well as normal operations.

Designing a safe system of work

5 Steps:

1. Assess the task
2. Identify the hazards
3. Define safe methods
4. Implement the system
5. Monitor the system

1. Assessing the task

Assess all aspects of the tasks and its risks.
Consider health hazards as well as safety.
Take account of:

- What is used
- Who does what
- Where the task is carried out
- How the task is done

2. Identify the hazards

Spot the hazards and evaluate the risks.
Where possible, eliminate hazards and reduce the risks before you rely upon a safe system of work.

3. Define safe methods

Define orally, by simple written procedures or by permits to work.

Involve the people who will be doing the work – their practical knowledge of problems can help avoid unusual risks and prevent false assumptions being made.

4. Implement the system

Safe systems of work must be communicated properly, understood by employees and applied correctly.

Ensure supervisors know they should implement and maintain the system of work.

Ensure adequate training is carried out for employees and supervisors.

Stress the need to avoid short cuts – part of the system should be to stop work when faced with an unexpected problem until a safe solution can be found.

5. Monitoring the system

Periodically checking that:

- Employees continue to find system workable.
- Procedures laid down are being carried out and are effective.
- Any changes in circumstances which require alterations to the system of work are taken into account.

Job safety analysis (JSA) or task analysis

A method for formulating a safe system of work. Follow the **SREDIM** principle:

Select the job to be analysed
Record the steps in the process
Examine the component parts of the job
Develop control measures
Install the safe system
Maintain and monitor the safe system

Job safety reviews

Framework for an effective review can be provided by the existing job safety analysis.

Review is more effective if employees are included in the review. Involving team-safety reps is ideal for this purpose.

If all new employees can be taught safe methods of work at the outset, it is less likely they will develop bad habits with the passage of time.

Job safety instructions

It is pointless to devise safe methods unless they are made known to employees.

Clear and unambiguous job instructions are essential.

Job safety instructions should:

- Give an unambiguous description of the way each step of the job is to be done.
- Stress the do's and don'ts at each step - ie key points and, in particular, the key safety points.

Instructions are useless unless they are complied with. Preparing them is not difficult - the real problem is enforcing them.

One way to ensure that rules and instructions are obeyed is to invite those who have to comply with them to participate in their preparation.
If instructions are ignored in practice and there is no ready means of enforcing them, they should be changed or withdrawn.

A rule which is not observed will tend to foster the attitude that it is unnecessary to obey any rules and their value is impaired.

The issue of rules and instructions does not dispense with the need for supervision, which is the only effective method of seeing they are obeyed.
It is not enough to merely issue instructions, steps must be taken to ensure they are understood.

Permits-to-work

In certain cases ensuring that systems of work are safe may be achieved with the help of permits-to-work. Such written permits formalise the progression through a particular operation. Most often the operations are those with a high risk. They require clearances at specific stages throughout the operation and a signed go-ahead that it is safe to continue from a named, specifically appointed person. Only when this is done is the next stage allowed to go ahead.

Summary

The principal of establishing and, equally important, maintaining safe systems of work is keenly regarded by enforcing authorities, who see it as a direct reflection of managerial competence and commitment.

Safe systems of work are required by law. Some risks are clear and can be overcome. Look at every job – think about what is used, who does what, where and how it is done.

Tell employees how the job must be done.
When a job is complex or risks are high, put instructions in writing.

Make sure the system is supervised.

INFORMATION, INSTRUCTION, SUPERVISION AND TRAINING

Employees and Safety Reps

Consulting with trade union appointed safety representatives *(see Safety Reps and Safety Committee Regulations 1977)* or other employee representatives *(see Health & Safety Consultation [with employees] Regulations 1996)* is a legal requirement. Working with safety representatives and employees' representatives is a very useful means of communicating on health and safety matters in the workplace.

Remember: involving employees in decisions can help to foster closer working relationships and make employees more receptive to new ideas.

USEFUL SOURCES OF INFORMATION

HSE publications are available by mail order from HSE Books, PO Box 1999, Sudbury, Suffolk CO10 2WA. Tel 01787 881165. www.hsebooks.co.uk

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This document will be available on the following websites:

British Footwear Association – www.britfoot.com

UK Leather Federation – www.ukleather.org

Community – www.community-tu.org