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**Health and Safety in the Rubber Industry:  
A Guide to Training**

**RAS/03/13**

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## **EXECUTIVE SUMMARY**

This report presents a training guide developed by the Health and Safety Laboratory on behalf of the Health and Safety Executive (HSE) and the Rubber Industry Advisory Committee (RUBIAC) for use within the rubber industry. The guide is designed as an aid for employers in the rubber industry that they can adopt or adapt to meet their training needs. The guide can also be used as a benchmark for existing health and safety training systems to help identify gaps in existing arrangements and so plan and implement any improvements.

### **Objectives**

The objectives of the project were to develop a training guide for the rubber industry consisting of:

- An exemplar of a health and safety training system suitable for the rubber industry.
- A matrix setting out key health and safety training elements for employees at all levels.

### **Main Findings**

The training guide includes information on:

- How to set up a training system.
- Training plans for senior executives, managers, supervisors and shopfloor employees.
- Induction training
- External training
- Job specific training
- Training matrices for senior executives, managers, supervisors and shopfloor employees.

# 1 INTRODUCTION

This report presents a training guide developed by the Health and Safety Laboratory on behalf of the Health and Safety Executive (HSE) and the Rubber Industry Advisory Committee (RUBIAC) for use in the rubber industry. Managers in the rubber industry had expressed concern that health and safety training in the industry is often inconsistent. Thus, this guide is designed to be an aid for employers in the industry to adopt or adapt to meet their training needs. The guide can also be used as a benchmark for existing health and safety training systems to help identify gaps in existing arrangements and so plan and implement improvements.

Visits were made to six companies across the four sectors within the rubber industry. One visit was made to a company in the new tyre sector, one to a company in the retread sector, two to companies in the general rubber goods sector (small and medium sized) and two to companies in the flexible foam sector. The aim was to gain greater familiarity with the rubber industry and to see companies who already have training programmes in place to help identify the main elements that are useful for the rubber industry. A literature search was also carried out to identify the key elements that should be incorporated into a health and safety training system.

The industry was consulted in the preparation of the training guide to ensure that it was relevant, comprehensible and acceptable. Draft versions were considered by employer and trades union representatives at an open meeting arranged by RUBIAC. Comments and suggestions received were then incorporated into the training guide.

The training guide is presented in annexe 1.

## **2 ANNEXES**

## **ANNEX 1**

# **Health and safety in the rubber industry: A guide to training**

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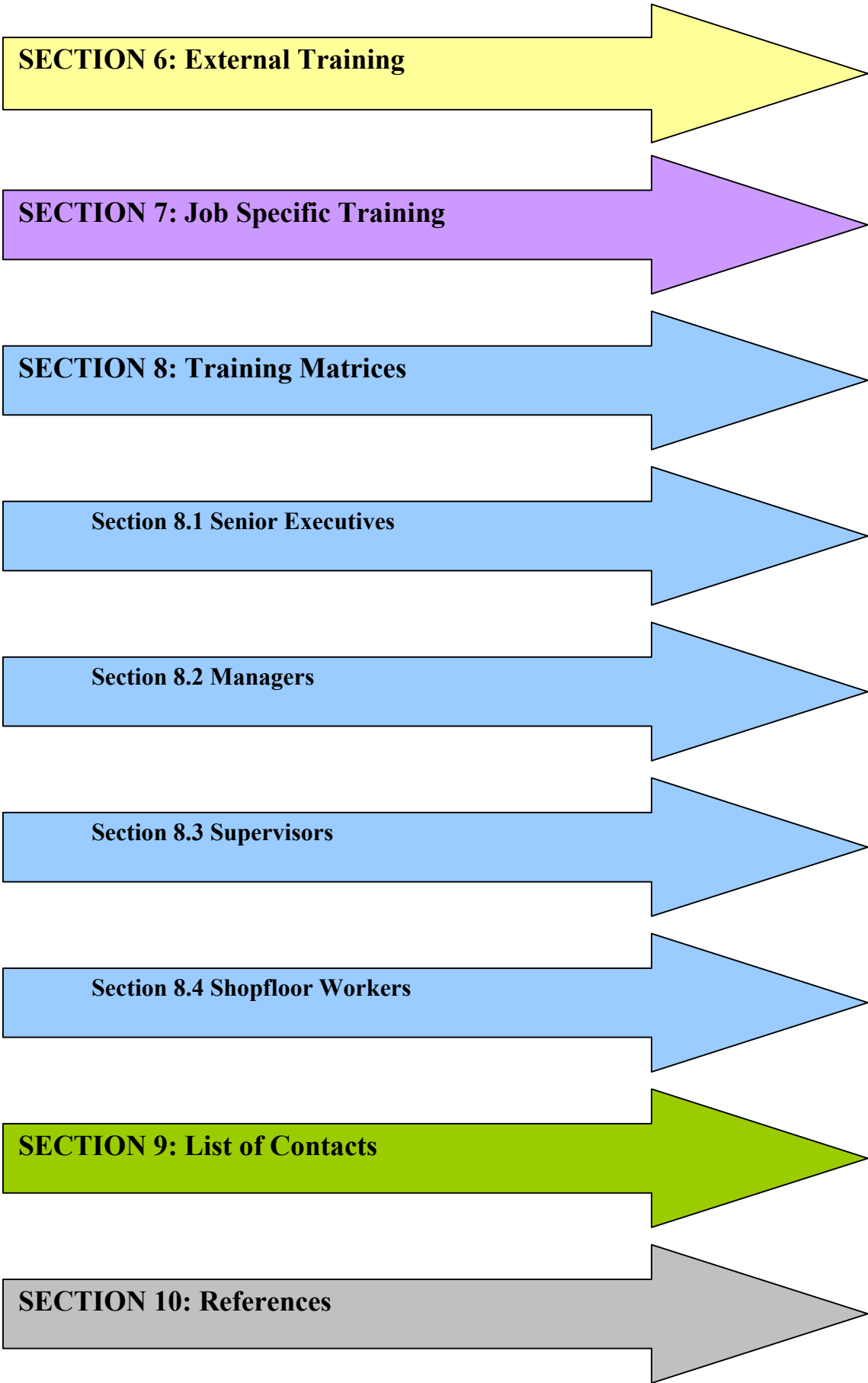
**Section 4.1 What training do Senior Executives need?**

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# 1 INTRODUCTION

For employees to make an effective contribution to health and safety at work there must be suitable arrangements in place to ensure that they are properly trained to carry out their role. Senior executives need to know how to provide the necessary leadership in health and safety and how to influence the relevant behaviours of their managers, supervisors and other staff. Managers need to know how to manage and control the risks to health and safety in the operations and activities for which they are responsible and how to obtain proficient advice and assistance. Supervisors need to know how to supervise safe work activities and all employees need to know how to work safely.

Training helps senior executives, managers, supervisors and shopfloor employees acquire the skills, knowledge and attitudes they need to enable them to meet their responsibilities for health and safety. Training can be delivered through formal training, individual or group instruction and on-the-job coaching and mentoring. Health and safety training should be an integral part of the employee's basic training to help reinforce the fact that health and safety and production should not be managed separately.

This training guide illustrates the key elements of an effective health and safety training system. The guide is an aid that employers in the rubber industry can adopt or adapt to meet their own needs. It can be used as a benchmark for an employer's health and safety training system to help identify gaps in existing arrangements and so plan and implement improvements.

The guide is intended to help employers identify any essential improvements to their health and safety training systems as well as the training that those systems should deliver. Any improvements to training systems identified by using the guide, and the provision of additional training identified by using the matrix set out at annex 1, will need to be planned, prioritised and implemented to appropriate timetables.

This guide is described in terms of the key elements of a training system as outlined in HSG65 "Successful Health and Safety Management"<sup>1</sup>, namely *policy, organising, planning and implementing, monitoring performance and reviewing performance*.

## 2 THE BENEFITS OF TRAINING

Managers and supervisors play a vital role in achieving work place safety<sup>2</sup>. To be effective training needs to be part of an integrated management approach. Such an approach to training should include<sup>3</sup>:

- Commitment from management that is top-down;
- Emphasis on the prevention of accidents and occupational ill health;
- Programmes tailored specifically for the workplace;
- Compliance with legislation;
- Accountability at all levels;
- Employee involvement;
- Systematic training and retraining;
- Defined short and long term goals;
- Training evaluation, feedback and revision.

Training can be seen as a proactive approach to a company operating safely. Training should include both the teaching of new skills and the maintenance of skills already learnt e.g. through refresher training. By adopting an integrated training approach a company can<sup>3</sup>:

- Reduce injuries;
- Increase productivity;
- Improve the morale of employees;
- Improve public relations;
- Increase the recognition of hazards;
- Increase reporting of unsafe acts and conditions;
- Prevent unsafe acts and conditions;
- Enhance the company's standing in the eyes of its customers.

Such improvements can result in reduced costs and increased profit for the company<sup>2</sup> and help to boost the company's corporate reputation.

### Case Study – Reducing accidents through training<sup>4</sup>

When a large company in the plastics industry recorded an accident free year in 2002 at one of its sites, the environmental health and safety manager partly attributed the record to its focus on training. He explained that the company had set up a series of “small safety groups covering areas such as risk assessment and manual handling.....We have a group that looks at manual handling tasks on site and developing alternative ways of reducing those risks. This involves training every individual in the plant, and when you talk about 240 people, that's quite an exercise”.

## 3 SETTING UP A TRAINING SYSTEM

### 3.1 POLICY

To develop effective health and safety training a company needs a training policy that sets out the organisation's training aims.

There is no requirement for a separate health and safety training policy document. The employer's aims and commitments in relation to health and safety training may be included in other policy documents or they may be set out in the employer's general health and safety policy statement.

The size and nature of the company will determine the extent to which the training policy is documented. For a very small company the aims may be expressed in one or two paragraphs within the general health and safety policy document required under the Health and Safety at Work etc. Act (1974).

It is important that those in control of the company recognise the importance of health and safety training for people at all levels and are committed to providing it.

#### *Checklist*

- Does the company have a training policy?
- Does it set out the purpose of the training system and explain what the training arrangements aim to achieve?
- Does it include a commitment to providing employees at all levels in the organisation with appropriate training in the health and safety aspects of their job?
- Does the company health and safety policy place appropriate emphasis on training for:
  - ❖ Senior executives - in how to provide the necessary leadership in health and safety at work?
  - ❖ Managers - in how to manage and control the risks to health and safety arising from the production, maintenance and other operation for which they are responsible?
  - ❖ Supervisors - in how to effectively supervise safe work activity?
  - ❖ All employees - in how to work safely?
- Has the policy been communicated effectively to all employees?
- Do they understand it?

### 3.2 ORGANISING

To make the health and safety training policy effective the company needs to be properly organised. The four pillars for effective organisation are *control, co-operation, communication* and *competence*.

### **3.2.1 Control**

#### *Checklist*

- Are responsibilities for resourcing, organising, delivering, validating and evaluating health and safety training clearly defined and allocated?
- Do all employees, especially managers with responsibilities for resourcing, organising, delivering, validating and evaluating health and safety training, understand and accept their responsibilities?
- Do they know how to discharge their responsibilities?
- Is their performance in meeting their responsibilities monitored and assessed?
- Are they held accountable for their performance in meeting their responsibilities, for example, through an annual performance appraisal system?
- Is good performance rewarded and is appropriate action taken if performance is judged to be inadequate?

### **3.2.2 Co-operation**

#### *Checklist*

- Are safety representatives and employee representatives consulted on the nature and content of training programmes?
- Are managers, supervisors and shop floor staff actively involved in contributing to training programmes?
- Are their views and ideas for improving health and safety training sought?
- Are employees actively encouraged to identify their own training needs?

### **3.2.3 Communication**

#### *Checklist*

- Do senior executives and line managers demonstrate their commitment to health and safety training by being consistent in what they say and do?
- Are the arrangements for health and safety training clearly documented and communicated to all people who need to know about them?
- Are the health and safety training requirements for all posts (executives, managers, supervisors and shopfloor employees) identified and recorded?
- Are the identified health and safety training requirements for all employees communicated to those responsible for organising and providing the training?
- Are training records kept for all employees and do they include records of health and safety related training?

### **3.2.4 Competence**

#### *Checklist*

- Do senior executives and managers know how to demonstrate their commitment to health and safety and health and safety training?

- Do the individuals who are responsible for organising, providing, validating and evaluating training have the required knowledge and skills for these roles?
- Are those employees who train others technically proficient to do so?
- Have those employees who train others been trained as trainers?
- Do individuals responsible for identifying the training needs of others have the knowledge and skills to do so?
- Do individuals responsible for procuring external training have the knowledge and skills to identify and assess suitable external training providers and courses?

### **3.3 PLANNING AND IMPLEMENTATION**

Planning is essential for implementing the training policy. To successfully implement an effective health and safety training policy it is important that the organisation plans and establishes rules and standards for training.

#### **3.3.1 Planning and implementing a health and safety training policy**

##### *Checklist*

- Do job and recruitment specifications include health and safety requirements?
- Is the knowledge required by managers to carry out their roles effectively identified, for example,
  - The relevant legislation?
  - The associated underlying health and safety principles?
  - The employer's relevant health and safety arrangements e.g. risk assessment?
- Are the knowledge and skills required by shop floor employees to carry out their role effectively identified, for example,
  - Health and safety principles relevant to the job?
  - Knowledge of the relevant standards, rules and procedures needed to control the risks of the job?

#### **3.3.2 Planning the delivery of health and safety training**

##### *Checklist*

- Do the planning arrangements identify individual training needs for employees at all levels from the managing director to the shopfloor. Training needs can be identified in a number of ways<sup>5</sup>:
  - In the case of senior managers, by assessing the training they need to meet their legal responsibilities;
  - Reviewing the organisation's injuries, near misses or cases of ill-health;
  - Ascertaining each employee's skill and knowledge gaps by identifying the skills and knowledge needed to do their job safely and comparing these with actual abilities;
  - Consulting employees or their representatives for their views;

- Using risk assessments to identify where training is a factor in controlling risk;
  - Identifying the training that staff with health and safety responsibilities require to carry out their roles.
- How are training methods selected? Training can either be in-house or through external trainers. Training methods can include:
  - On-the-job training;
  - Classroom training;
  - Giving information or instruction;
  - Individual or group training;
  - Computer based CD-Rom or interactive learning.
- Are common language and terms used – and jargon avoided? Adapt the training to be suitable for each employee level.
- Is all training documented? Training files should be established for the entire workforce as well as a personnel file. The training file should be kept up to date and regularly compared against a training matrix.
- Are refresher training requirements identified for all employees? Refresher training needs to be planned in advance. Legal requirements for regular training should be taken into account e.g. first aid training, fork lift truck driver training. If it is vital that certain procedures or actions are carried out correctly then more frequent refresher training will need to be incorporated into the training plan to ensure that routines remain familiar to those required to carry them out<sup>6</sup>.

### **3.4 MONITORING PERFORMANCE**

To manage health and safety training successfully companies should measure their performance against pre-determined criteria. A company should have suitable arrangements in place to assess, maintain and improve the effectiveness of training.

#### ***Checklist***

- Is the delivery of the training monitored?
- Are the knowledge and skill deficiencies of all employees identified?
- Is the assessment and evaluation of training carried out systematically?

#### **3.4.1 Validation and evaluation of training**

Training should be validated and evaluated to establish whether or not it has been successful.

##### **3.4.1.1 Validation**

#### ***Checklist***

- On completion of training do employees understand what is required of them? Is understanding confirmed, for example, through the use of multiple-choice questions? Are skills checked by observing tasks being performed?
- Do employees now have the knowledge and skills required to work safely?

- Are they working as they have been trained? If an organisation uses safe working procedures to train staff, they should periodically assess employees against the procedures. This will highlight any needs for refresher training or requirements for safe working procedures to be changed.

<p><b>Case Study – Monitoring performance</b></p> <p>Monitoring performance can be used to establish deficiencies in training:  <i>“It came to light after a near-miss involving a forklift truck that the driver training course was lacking in certain respects....when the issue was raised with the training provider they quickly addressed it and free of charge”.</i> Company Safety officer<sup>7</sup></p>
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### **3.4.1.2 Evaluation**

#### **Checklist**

- What is the feedback from the trainees about the relevance, content and quality of the training received? Assess the training through use of post-course evaluation sheets etc.
- What is the feedback from line managers?

### **3.5 REVIEW**

An organisation’s health and safety training policy and system need to be reviewed to ensure that any lessons learned are put into practice. Reviewing performance helps to improve the process of training and the development of skills and knowledge for all employees.

#### **Checklist**

- Does your training policy identify suitable performance indicators?
- Are these performance indicators used to judge how well the training system is working?
- Are senior managers involved in the review process?
- Do the arrangements for review consider:
  - If refresher training is required?
  - Whether there has been a change in behaviour and practice following training?
  - What improvements can be made?
  - Whether health and safety performance has improved?

## 4 TRAINING PLAN

### 4.1 COMPANY DIRECTORS

Some directors have suggested that they do not need training in how to manage health and safety as they employ others to take care of health and safety within the company. However, research has highlighted senior management as being the key influence of an organisation's safety culture<sup>8</sup>. Therefore, it is essential that directors and senior managers understand the importance of strategic health and safety management and appreciate the consequences of failing to manage health and safety effectively. It is also the responsibility of the appropriate director to ensure that a company health and safety policy is in place and implemented. Relevant training in how to provide leadership and manage health and safety will allow the director to assess whether the policy is adequate and equip them to make informed cost-benefit decisions on health and safety budgets. Directors need to understand their health and safety responsibilities as their decisions can directly affect the health, safety and welfare of their employees.

#### Case Study – Overcoming resistance

In a medium sized company, 4 managers failed to attend a training course that had been set up by the health and safety officer. The Managing Director made it clear that he did not approve of their behaviour and made them account for their absence in writing. The support from the Managing Director has helped to overcome any resistance to training from employees and made it easier for the health and safety officer to arrange further training.

Directors have many demands on their time and may find it difficult to allocate several days or even a whole day to training<sup>9</sup>. Thus, half day training courses spread over time may be more appropriate for them. The training matrix for senior executives is outlined at section 8.1.

#### Case study – Influencing the safety culture 2

Lack of commitment to health and safety objectives by senior executives can have a negative impact on the organisation's safety culture.

*“The CEO puts production needs over our personal needs and sometimes that includes safety”* Maintenance Engineer.

Senior executives can enhance their company's safety culture by showing genuine, visible commitment to health and safety<sup>8</sup>. Ways of showing commitment include:

- Safety tours - Tours are not detailed inspections but are a way of demonstrating leadership and commitment to safety. Research suggests that management tours are most effective when they focus on just the most significant hazards and time is spent talking with employees and asking for their views on hazards and solutions<sup>10</sup>;
- Taking part in incident and accident investigations – managerial involvement helps to underline its importance;
- Playing an active role in health and safety committee meetings – to increase the standing and credibility of the committee amongst staff;
- Actively participating in health and safety audits;

- Intervening when they witness violations of health and safety rules;
- Discussing health and safety issues and production issues;
- Spending equal time discussing production and health and safety issues;

## 4.2 SITE MANAGERS

The role of the site or middle manager is to ensure that the health and safety policy is implemented consistently<sup>11</sup>.

Some managers may be reluctant to undertake health and safety training because of time constraints or they may not see health and safety training as being relevant to them. However, managers are responsible for managing the operations that create health and safety risks. It is essential that they are made responsible, and held accountable, for controlling those risks. Therefore, they need to be trained in how to control the risks.

Management actions and behaviour establish the safety pre-conditions of the site. Management commitment to safety must be demonstrated, as employees will take the lead from management. Ultimately the behaviour of managers will reflect the importance that management as a whole gives to safety. Managers should also be aware that they too could be injured<sup>6</sup>. For example, eye injuries can happen to anyone - not just to shop floor workers. Managers who always wear safety glasses in an eye protection zone not only show their commitment to safety but also protect themselves.

### Case study – Influencing the safety culture 2

“Quite often he (the works director) will come down here and walk around without his safety specs on....so why should I wear mine?”  
This statement illustrates the importance of setting a good example and leading from the front. All managers should recognise that even a simple gesture such as the wearing safety glasses can have a positive influence on the attitudes of their employees and the overall safety culture<sup>7</sup>.

A number of investigations into disasters, health and safety incidents and accidents have highlighted the role of management failures including: a limited awareness of the organisation’s safety systems or their own health and safety requirements; neglecting to enforce organisational health and safety rules; failing to inspect work conditions or rectify unsafe conditions; failing to properly inform or train employees<sup>6</sup>.

The training matrix for managers is outlined in section 8.2.

## 4.3 SUPERVISORS

Supervisors play an important role in the health and safety management of a company. Part of this role is to be able to manage the people under them, including addressing any lack of compliance with procedures and training. In most companies there is scope for supervisors to play a more proactive role with regard to health and safety, for example, carrying out health and safety inspections.

In many companies supervisors have been promoted from the shop floor because they were good at their job. This does not mean that they are especially safety conscious or that they are natural team leaders or trainers. Research shows that supervisors tend to

view safety as being separate from production and product quality and sometimes find it difficult to see how time spent on safety can help to attain production goals<sup>12</sup>.

Although supervisors may be aware of the company's safety rules they may not have the skills necessary to communicate those rules or know what their health and safety duties are towards those they supervise. These skills need to be developed through training. However, traditional safety training has been criticised as being too theoretical, with workers and supervisors often finding the models and systems of health and safety presented by trainers as too complicated. Another criticism has been that their training involved the "mere delivery of facts" while the actual ways of handling problems were not sufficiently addressed<sup>12</sup>.

It is not enough to tell supervisors that they are responsible and accountable for health and safety. The extent of their responsibilities, and the ways in which they are to discharge them, must be made clear. The organisation should<sup>13</sup>:

- Assign relevant health and safety responsibilities to supervisors;
- Ensure supervisors are aware of the extent of their responsibilities and what level of authority they have to carry out their role, for example, under what circumstances do they have complete authority, under what circumstances do they first need to check with their line manager;
- Hold supervisors accountable for discharging their health and safety responsibilities.

Supervisors should also receive the support of their line managers and the managing director. A supervisor at one company reported that he was "not popular" with his work colleagues for reporting employees who were working dangerously and were put on a final warning. He felt that "people can be told constantly what not to do – but they don't take any notice". It is important that both managers and supervisors know how to reinforce desirable behaviours and discourage undesirable ones. They also need to be trained to understand how their own behaviours can influence the behaviour of the workforce.

Case Study – Influencing behaviour
A safety representative at a company stated that he told people off for health and safety infringements but felt he was undermined by managers who would walk by someone working unsafely several times and not say anything. The same manager would later notice the behaviour and give the person a warning. The inconsistent actions of the managers' caused resentment amongst shopfloor employees and served to undermine employees' confidence in management's commitment to safety.

Supervisors require training to enable them to carry out effective supervisory tasks such as promoting workplace discipline, training and mentoring employees and monitoring their behaviour. The training matrix for supervisors is outlined at section 8.3.

#### **4.4 SHOPFLOOR**

Many companies use in-house training, especially for shopfloor staff. In-house training can be of the “sitting with nelly” variety with the trainee being supervised by experienced staff until proficient to perform the work themselves. The drawback of such training is that the “trainer” often lacks training skills. Just because a person is experienced in a method of work does not mean that they will be good at instructing others. To ensure effective training shopfloor instructors should also be taught how to train.

Employees need only to be trained in areas that are relevant to their work. The training matrix for shop floor employees is outlined at section 8.4.

## 5 INDUCTION TRAINING

Induction training is an important element in any training programme and should be given to **all** new staff, regardless of their position within the company. It gives the company an opportunity to tell new and temporary employees, visitors, and contractors what is expected of them in terms of behaviour and performance, and lets new recruits know what they can expect from the company. The company should record the key elements of an induction programme to ensure each new employee receives the information that they need.

Of major importance to an induction programme are the health and safety aspects. New employees can be overwhelmed with too much information at the start of their employment and so it is essential for companies to prioritise. Vital information should be covered immediately, while other information should be given as appropriate over the first few weeks. Companies that have large amounts of information to convey to new staff may wish to consider dividing the information into “chunks” and deliver 2, 3 or perhaps 4 stages of induction.

Induction training may include the following:

- The company’s health and safety policy, organisation and arrangements, including the responsibilities of individuals within the company;
- Introduction to key staff e.g. departmental manager, direct supervisor;
- Tour of the department including fire exits, evacuation assembly points, sanitary and hygiene facilities and smoking areas;
- Safe working methods and company health and safety rules;
- Occupational health issues;
- First aid arrangements;
- Provision and use of personal protective clothing and equipment and other forms of protection such as barrier creams;
- Safe use of machinery and equipment including use of machine guards and emergency stop buttons;
- Location and identification of first aiders;
- Reporting and investigation procedures for accidents, incidents or cases of ill-health;
- Manual handling;
- Arrangements for joint consultation with workers and their representatives;
- Significant hazards and risks identified through risk assessments, and the procedures to report hazards;
- Procedures for reporting hazards;
- Hazardous substances in the workplace including handling chemicals (COSHH);
- Permit to work systems.

## **6 EXTERNAL TRAINING**

Where organisations use external training they will need to look closely at the content of training courses to ensure that the main elements they require have been included.

There are many companies offering generic training in health and safety for executives, managers and supervisors. Available courses include:

### **6.1 SENIOR EXECUTIVES**

Institution of Occupational Safety and Health (IOSH) - 'Safety for Senior Executives'.  
IOSH - Directing Safely for Small and Medium Size Enterprises.

### **6.2 MANAGERS**

British Safety Council – Certificate in Safety Management.  
British Safety Council – Fundamentals of Health and Safety for Managers.  
British Safety Council – Diploma in Safety Management.  
Institute of Leadership and Management – Level 3 S/NVQ Certificate in First Line Management.  
Institute of Leadership and Management – Level 4 Diploma in Management.  
Institute of Leadership and Management – Level 5 Executive Diploma in Management.  
IOSH - Managing Safely.  
IOSH - Supervising Safely.  
NEBOSH National Diploma in Occupational Safety and Health, Parts 1 and 2.  
NEBOSH National General Certificate in Occupational Safety and Health.

### **6.3 SUPERVISORS**

British Safety Council – Safety for Supervisors.  
BRMA – Workshop on Supervisors' Role in Effective Management of Health and Safety.  
IOSH - Managing Safely.  
IOSH - Supervising Safely.  
IOSH - Working Safely.  
Institute of Leadership and Management – Level 2 S/NVQ in Team Leading.  
Institute of Leadership and Management – Level 3 S/NVQ Certificate in First Line Management.  
Institute of Leadership and Management – Level 4 Diploma in Management.  
Trade Union – Safety Representative training.

### **6.4 TRAINING PROVIDERS**

Companies often use external training providers to ensure quality training for their staff and avoid the costs associated with hiring or diverting employees to meet training needs. There are many training providers within the UK including: firms in the private sector that specialise in developing as well as delivering training; firms that provide packaged courses and seminars on a variety of topics; professional associations that offer training in areas specific to their speciality; safety associations; and local colleges. Choosing the right training provider can be difficult. However using the following

checklist will help to decide which provider is the most suitable for the company's needs:

- Do they have a good general knowledge and experience of training?
- Do they have experience in occupational health and safety?
- Can they provide good references? – these should be checked.
- Can they provide training at a convenient time for you?
- Are they willing and able to customise training material for your company?
- Do they provide relative value for money? <sup>17</sup>
- Do they carry out pre-course assessments including carrying out an analysis of the training needs of the company?
- Do they carry out post-course assessments of the training they have provided?
- Is the training provider accredited e.g. ISO 9000?
- Have they achieved the Investors in People standard?
- Has the training provider experience of the rubber industry?
- Is the training linked to national standards, for example, NVQ's?
- What is the ratio of students to trainers? A ratio of three to five students to one trainer is the ideal if the training is "hands on", although consideration should be made as to content of the course, the facilities available and presentation methods. If the ratio reaches say, 10 students to one trainer it is highly likely that at some point during the training session students will be working unsupervised.

## 7 JOB SPECIFIC TRAINING

The majority of organisations will have certain tasks for which it may be difficult or costly to find external training. In-house health and safety training for specific jobs can be effective if it is organised properly and systematically. Three of the companies interviewed in the course of this project used the documentation of a safe system of work for each job to train employees. The process included the following:

- Producing work procedures by breaking down each job into sub-elements and detailing how the task is performed by the operator. Asking operators and supervisors for their input promotes ownership of the procedures and increases the likelihood of the procedures being adhered to;
- The work procedures should be agreed by management to ensure that quality and health and safety issues, including risk assessment information, are incorporated into the procedures;
- Draft work procedures being circulated and proof read by department/line managers and supervisors;
- Alterations being agreed and authorised;
- The work procedures being adopted as the safe system of work and used as the basis for training. Operators who already perform the tasks can be trained in the procedures using lecture style training. One-to-one training should be given to new employees;
- The work instructions being kept in the relevant job area to act as an aide memoire for employees that have been trained in the task.

The benefits of this method of training are that:

- The work procedures reflect the actual procedures;
- The risk and COSHH assessment results are brought to the attention of employees, thus fulfilling the legal requirements of the organisation;
- The procedures are a consistent training tool and training is not dependent on individual interpretations;
- By including quality issues in the procedures quality and health and safety are not seen as separate issues;
- Training can be monitored against the work procedures.

The trainee, the instructor and shift manager sign off each procedure when the required standard is attained. Depending upon the nature of the business a company may have over 100 work instructions. Therefore, it is essential that an accurate record of training be kept. One way of doing this is by developing a training matrix for all work instructions and having a training file for each employee; the training file can then be compared against the training matrix. The safe system of work procedures may include the following:

- Required documentation for example, permit-to-work documents, COSHH assessments and safety data sheets;
- Emergency and evacuation procedures where applicable;
- Explanations of all the applicable safety regulations;

- Personal Protective Equipment including demonstration of correct fit, method and circumstances of use and cleaning procedures e.g. ear defenders, face shield, dust mask etc;
- The training that should have been completed before carrying out the task, e.g. COSHH awareness training or manual handling training;
- Identification of mechanical hazards e.g. entanglement, shear and nip hazards;
- Identification of health hazards e.g. exposure to solvents, isocyanates, rubber fume etc;
- General health and safety rules to be observed;
- The parts/materials/equipment that are required in order to carry out the task;
- Tasks to be completed at the start and end of the job, e.g. ensuring the work area is clean and free from any hazards and obstructions, ensuring fire exits are clear, ensuring completion of a forklift truck safety check sheet if the use of a fork lift is required;
- The procedures or job method that need to be followed;
- Where possible the use of diagrams or digital photographs to clarify an issue. For example, photographs of the correct way to handle objects can be included.

The training for each job can be recorded on a matrix. Colour coding can be used to identify the level of training for each worker, for example in figure 1, red could indicate an employee is totally untrained, yellow could indicate that they have received training but it is ongoing and they still need supervision, while green could indicate fully trained status. Colour coding can also be used to indicate subjects that require refresher training by law e.g. first aid, fork lift truck driving.

	Task A e.g. Operator prestart checks & Maintenance	Task B e.g. Initial Start up, Test and Shut down	Task C e.g. Normal operations	Task D	Task E	Task F
Brown	Red	Red	Yellow	Red	Yellow	Yellow
Jones	Green	Green	Yellow	Yellow	Green	Red
Smith	Green	Green	Green	Green	Green	Yellow

**Figure 1 Job 'A' Training Matrix**

Companies who plan to carry out training in-house may find the publications “Health and safety training package for the rubber industry”<sup>15</sup> and “Health and safety training resource pack for the rubber industry”<sup>16</sup> produced by the Rubber Industry Advisory Committee (RUBIAC) useful.

## 7.1 TRAINING THE TRAINERS

Training and instructional skills are vital for every one who trains and instructs staff, including training officers, managers and supervisors. To be effective, trainers must be trained to train. There are many courses currently available that instruct people in the skills needed. Normally, the duration of such courses are between three to four days. Courses should include the following training elements:

- The barriers to learning;

- Motivational techniques;
- Factors which affect the learning process;
- How to train people with differing levels of ability;
- Instructional techniques;
- How to set learning objectives;
- The importance of job analysis and how to breakdown skills and tasks into smaller components;
- Communication skills.

## **7.2 NVQ'S**

Opinion on NVQs was divided amongst the companies visited during this project. One medium sized company had moved away from NVQs after a number of years because they did not feel the training was relevant, as the training did not cover the specific methods used on site. Another company, who employed around 70 staff, had ten employees undertaking NVQ training including managers and supervisors. The entire workforce was given the opportunity to do NVQs. The company saw them as “better than nothing” with the main benefit being trainees gaining confidence from doing the training. In contrast, a third company had set up a successful NVQ training programme and had “reaped the benefits”. Employees were trained on site by supervisors with the relevant training qualifications. Thus, an organisation should assess for themselves whether NVQs are suitable for training their employees. One option may be to use external training providers to give NVQ training and assessment for employees on site using the organisations’ own plant and equipment.

## **8 TRAINING MATRIX**

This matrix outlines the main training elements that should be incorporated in a company's health and safety training system. The matrix is divided into four sections covering senior management, managers, supervisors and the shopfloor.

It is not envisaged that all employees undertake all the training outlined within each section. The content of the matrix is generic and individual companies will need to tailor it to meet their own requirements.

## 8.1 SENIOR EXECUTIVE TRAINING MATRIX

This training is intended for the most senior manager on site.

Training Area	Specific Training
<p>Managing Health and Safety</p> <p><i>Policy</i></p> <p><i>Leadership</i></p>	<ul style="list-style-type: none"> <li>• How to set health and safety policy.</li> <li>• How to write an effective health and safety policy.</li> <li>• Ensuring a system is established which reviews the effectiveness of the policy and how it is being implemented.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Recognising the moral, legal and business case for establishing an effective health and safety system.</li> <li>• Defining and allocating health and safety roles and responsibilities amongst line managers.</li> <li>• Understanding the role of safety culture and how it can be positively and negatively influenced.</li> <li>• Determining and allocating sufficient resources to the health and safety policy.</li> <li>• How to communicate the policy commitments and corporate health and safety goals to the workforce.</li> <li>• Ensuring the management team is competent in relation to health and safety.</li> <li>• Ensuring either in-house or external specialist health and safety support is available.</li> <li>• Establishing a system which ensures the involvement of all employees in the health and safety effort, through:               <ul style="list-style-type: none"> <li>➤ Consultation with employees or their representatives;</li> <li>➤ Encouraging and acknowledging contributions from employees;</li> <li>➤ Providing feedback on ideas or concerns raised.</li> </ul> </li> <li>• Ensuring systems are in place that make managers accountable for health and safety in a proactive way.</li> </ul>
<p>Risk Assessment</p>	<ul style="list-style-type: none"> <li>• Understanding the role of risk assessment in health and safety management, for example:               <ul style="list-style-type: none"> <li>➤ Determining and assessing control measures;</li> <li>➤ Setting and prioritising action plans;</li> <li>➤ Determining corporate health and safety goals;</li> <li>➤ Setting safety-related performance standards.</li> </ul> </li> </ul>
<p>The Law</p>	<ul style="list-style-type: none"> <li>• Awareness of the Health and Safety at Work Act (1974) and other relevant legislation, including civil law and corporate manslaughter.</li> </ul>

<p>The Learning Organisation</p>	<ul style="list-style-type: none"> <li>• The legal requirements and importance of accident and near miss investigation including: <ul style="list-style-type: none"> <li>➤ The importance of identifying underlying causes of accidents and ill-health;</li> <li>➤ Ensuring a system is established for reviewing underlying causes of all incidents to inform future strategy;</li> <li>➤ The importance of ensuring that investigation outcomes are acted upon.</li> </ul> </li> <li>• Establishing a system for ensuring that the results from audits and performance monitoring are acted upon.</li> <li>• Understanding the importance of safety management systems and how they are integrated with other business management systems, for example: <ul style="list-style-type: none"> <li>➤ Informing the setting of corporate health and safety goals;</li> <li>➤ Implementing a health and safety plan to achieve those goals;</li> <li>➤ Deciding performance indicators.</li> </ul> </li> <li>• Establishing a system to measure the overall health and safety performance of the company.</li> <li>• Establishing an independent health and safety audit system.</li> </ul>
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## 8.2 MANAGERS TRAINING MATRIX

Training Area	Specific Training
Core Skills and Knowledge	<ul style="list-style-type: none"> <li>• Managing people training including, as appropriate:               <ul style="list-style-type: none"> <li>➢ Team leadership;</li> <li>➢ Effective communications;</li> <li>➢ Motivation skills;</li> <li>➢ Assertiveness training;</li> <li>➢ Interviewing skills.</li> </ul> </li> <li>• An understanding of the main causes of injuries and ill health in the rubber industry.</li> <li>• An appreciation of the role of H&amp;S legislation and how it is enforced.</li> <li>• An appreciation of the government's "Revitalising H&amp;S programme" and the reasons for it.</li> <li>• An appreciation of HSE's priority topics.</li> <li>• An appreciation of the role of RUBIAC.</li> <li>• Familiarity with RUBIAC action plans for the rubber industry.</li> </ul>
Managing Health and Safety  <i>Policy</i>  <i>Leadership</i>	<ul style="list-style-type: none"> <li>• Importance and purpose of the company H&amp;S policy.</li> <li>• How to communicate the policy commitments to the workforce.</li> <li>• Defining and allocating responsibilities for health and safety to line managers &amp; supervisors.</li> <li>• Resolving the conflict of production versus health and safety.</li> <li>• Holding people accountable for fulfilling their health and safety responsibilities (e.g. through personal performance appraisal systems).</li> <li>• Providing effective health and safety leadership.</li> <li>• Communicating effectively on health and safety at all times (verbally, in writing, by visible behaviours and setting a good example).</li> <li>• Understanding the manager's role in developing a positive health and safety culture, for example, how appropriate management behaviours can help build a positive culture and how inappropriate ones will undermine the health and safety effort.</li> <li>• Understanding health and safety competence requirements for line managers, supervisors and shop floor staff.</li> <li>• Understanding how to obtain specialist health and safety assistance and advice when needed and understanding the role of the health and safety professional.</li> <li>• How to consult the workforce and its representatives on health and safety (role of safety committees etc.).</li> <li>• How to secure the active involvement of employees at all levels in the health and safety effort.</li> </ul>

	<ul style="list-style-type: none"> <li>• To lead accident investigations and how to identify immediate and underlying (systemic) causes and how to act on the results.</li> <li>• Understanding of systems for reporting health and safety performance to senior executives in the appropriate form.</li> </ul>
<i>Risk Assessment</i>	<ul style="list-style-type: none"> <li>• Understanding the role of risk assessment in health and safety management.</li> <li>• Understanding risk assessment methods, how to identify hazards and assess risks.</li> <li>• How to organise and deliver risk assessments.</li> <li>• How to set objectives and prepare health and safety action plans for implementing corporate health and safety goals at the site.</li> <li>• How to draw up action plans to implement site health and safety objectives in the department.</li> <li>• How to use results of risk assessment to prioritise implementation of action plans.</li> </ul>
The Learning Organisation	<ul style="list-style-type: none"> <li>• Securing resources and scheduling work for implementing action plans.</li> <li>• Understanding how to establish and apply appropriate health and safety standards.</li> <li>• Understanding how to decide and allocate resources for health and safety performance monitoring and measurement.</li> <li>• Understanding how to use the results of risk assessment to decide depth and frequency of health and safety performance monitoring activity.</li> <li>• Understanding methods for active performance measurement (hardware-checking systems, workplace health and safety inspections, checks on safety-critical working procedures and practices, behaviour observation etc) and arrangements for reporting and recording.</li> <li>• Understanding reactive performance measurement (systems for reporting, investigating and recording accidents, incidents, near misses and cases of ill health).</li> <li>• Understanding the role of independent health and safety audits.</li> <li>• Understanding how to use the results of independent audits.</li> <li>• Understanding how the cumulative results of active performance monitoring should be used to review site and departmental health and performance.</li> <li>• How the cumulative results of accident, incident, near miss and ill health investigations are used to review site and departmental health and safety performance and to revise risk assessments.</li> <li>• How to provide senior executives with the data and information they need for reviewing, and revising as necessary, the health and safety policy and the safety management system.</li> </ul>
The Law	<ul style="list-style-type: none"> <li>• An understanding and appreciation of the main requirements of the Health and Safety at Work etc Act 1974 including the manager's own legal duties.</li> </ul>

Fire Awareness Training	<ul style="list-style-type: none"> <li>• Fire Risk Assessments.</li> <li>• The evacuation plan for the factory/department.</li> <li>• How to raise the alarm.</li> <li>• Special fire hazards specific to the workplace.</li> <li>• The fire triangle: ignition; fuel, oxygen.</li> <li>• Housekeeping practices that may allow fires to start e.g. waste disposal.</li> <li>• The possibility of exothermic reactions, hotwork etc., causing fires.</li> </ul>
Control of Legionella	<ul style="list-style-type: none"> <li>• Ensure a system is in place to prevent or control the risk.</li> <li>• Ensure records are kept.</li> <li>• Knowledge of legislation.</li> <li>• Identify and assess sources of risk.</li> <li>• Identifying relevant control methods and precautions.</li> <li>• Ensuring records are kept.</li> </ul>
Occupational Health and Hygiene (other than noise and manual handling)	<ul style="list-style-type: none"> <li>• Occupational exposure limits.</li> <li>• Routes of entry into the body.</li> <li>• Identifying employees at risk and assessing the risk.</li> <li>• Strategies for preventing and controlling exposure (the hierarchy of controls).</li> <li>• Implementation of a health surveillance system as identified through risk assessments.</li> <li>• Ensure records are kept.</li> <li>• Confidentiality issues.</li> </ul>
Manual Handling	<ul style="list-style-type: none"> <li>• Manual handling assessments including: <ul style="list-style-type: none"> <li>➢ Eliminating the need for manual handling if possible;</li> <li>➢ Evaluation of each lifting task including consideration of the task, the load, the working environment and individual capability;</li> <li>➢ Identifying control measures which can be used to remove or reduce the risk e.g. mechanisation and/or training;</li> </ul> </li> <li>• Manual handling training should include: <ul style="list-style-type: none"> <li>➢ Overview of muscular-skeletal system;</li> <li>➢ Safe manual handling techniques specific to the job;</li> <li>➢ Causes of muscular-skeletal injuries;</li> <li>➢ Identification of employees who may be affected and for how long.</li> </ul> </li> </ul>
Noise	<ul style="list-style-type: none"> <li>• Acute and chronic effects of noise and prevention strategies.</li> </ul>
Permit to Work and Isolation Systems	<ul style="list-style-type: none"> <li>• Awareness of circumstances of issue e.g. hotwork, working in confined spaces.</li> <li>• The role of authorised signatories.</li> <li>• Use of locking devices.</li> </ul>

### 8.3 SUPERVISOR TRAINING MATRIX

Training Area	Specific Training
Core Skills and Knowledge	<ul style="list-style-type: none"> <li>• Supervisory skills training including, as appropriate:               <ul style="list-style-type: none"> <li>➤ Communication skills;</li> <li>➤ Team Leadership skills;</li> <li>➤ Managing people training;</li> <li>➤ Interviewing skills;</li> <li>➤ Motivation skills;</li> <li>➤ Assertiveness training;</li> <li>➤ Interviewing skills;</li> <li>➤ Discipline and grievance handling training;</li> <li>➤ How to instruct others – train the trainer.</li> </ul> </li> </ul>
Health and Safety Legislation	<ul style="list-style-type: none"> <li>• Awareness of Health and Safety Legislation, including:               <ul style="list-style-type: none"> <li>➤ Health and Safety at Work Act (1974);</li> <li>➤ Management of Health and Safety at Work Regulations (1999);</li> <li>➤ The Workplace (Health, Safety and Welfare) Regulations (1992).</li> </ul> </li> </ul>
Accident/Near Miss Investigation	<ul style="list-style-type: none"> <li>• Legal requirements.</li> <li>• Accident /near miss reporting.</li> <li>• The process of investigation.</li> <li>• Why identifying underlying causes of accidents is important.</li> <li>• Accident/near miss Analysis.</li> </ul>
Occupational Health  <i>Control of Substances Hazardous to Health (COSHH)</i>	<ul style="list-style-type: none"> <li>• The legal requirement - The Control of Substances Hazardous to Health Regulations 1999.</li> <li>• Awareness of Substances used on site which are covered by COSHH including:               <ul style="list-style-type: none"> <li>➤ The type of chemical risk e.g. toxic/irritant etc.</li> <li>➤ Assessment of the risks including:                   <ul style="list-style-type: none"> <li>❖ The form and quantity of the substance;</li> <li>❖ Potential harmful effects;</li> <li>❖ Handling, storage, use and transportation of substance, including how to handle spillages;</li> <li>❖ Identification of employees who may be affected and for how long.</li> </ul> </li> </ul> </li> <li>• Ensuring appropriate control of substance.</li> <li>• Provision of suitable and sufficient information, instruction and training to employees regarding the health risks created by the exposure and necessary precautions. Emergency action in the event of spillage or personal contamination.</li> <li>• The use of extraction, RPE, PPE.</li> <li>• Personal Hygiene.</li> </ul>

<i>Health Surveillance</i>	<ul style="list-style-type: none"> <li>• Awareness of health surveillance programme.</li> <li>• Awareness of their roles and responsibilities under the health surveillance programme.</li> <li>• Personal surveillance and self-checks.</li> </ul>
<i>Control of Legionella</i>	<ul style="list-style-type: none"> <li>• Knowledge of legislation.</li> <li>• Aware of sources of risk.</li> <li>• Aware of relevant control methods and precautions.</li> </ul>
<i>Occupational Health and Hygiene</i>	<ul style="list-style-type: none"> <li>• Awareness of occupational exposure limits.</li> <li>• Routes of entry.</li> </ul>
Manual Handling	<ul style="list-style-type: none"> <li>• Manual Handling Operations Regulations (1992) -Awareness of the legal requirement as appropriate.</li> <li>• Manual handling assessments including: <ul style="list-style-type: none"> <li>➢ Eliminating the need for manual handling if possible;</li> <li>➢ Evaluation of each lifting task including consideration of the task, the load, the working environment and individual capability;</li> </ul> </li> <li>• Manual handling training should include: <ul style="list-style-type: none"> <li>➢ Overview of muscular-skeletal system;</li> <li>➢ Safe manual handling techniques specific to the job;</li> <li>➢ Causes of muscular-skeletal injuries;</li> <li>➢ Identification of employees who may be affected and for how long.</li> </ul> </li> </ul>
Noise	<ul style="list-style-type: none"> <li>• Awareness of legal requirements – Noise at Work Regulations.</li> <li>• Acute and Chronic Affects of noise.</li> </ul>
Permit to Work	<ul style="list-style-type: none"> <li>• Awareness of circumstances of issue e.g. hotwork, working in confined spaces.</li> <li>• The role of authorised signatories.</li> <li>• Use of locking devices.</li> </ul>
Risk Assessment	<ul style="list-style-type: none"> <li>• Awareness of the legal requirement – Management of Health and Safety at Work Regulations (1999).</li> <li>• The process of risk assessment.</li> <li>• Job specific hazard awareness and risk evaluation.</li> </ul>
Fire Awareness Training	<ul style="list-style-type: none"> <li>• Awareness of fire risk assessments.</li> <li>• The evacuation plan for the building.</li> <li>• How to raise the alarm.</li> <li>• Special fire hazards specific to the workplace.</li> <li>• The fire triangle: ignition, fuel, and oxygen.</li> <li>• Housekeeping practices which may allow fires to start e.g. waste disposal.</li> <li>• The possibility of exothermic reactions, hotwork etc., causing fires.</li> </ul>

#### 8.4 SHOPFLOOR TRAINING MATRIX

Training Area	Specific Training
Health and safety legislation	<ul style="list-style-type: none"> <li>• Awareness of main provision of the Health and Safety at Work Act (1974).</li> <li>• Understanding and awareness of the risks associated with their position and knowledge of the control measures.</li> </ul>
Accident/near miss investigation	<ul style="list-style-type: none"> <li>• Awareness of legal requirements.</li> <li>• The process of investigation:               <ul style="list-style-type: none"> <li>➢ Why identifying underlying causes of accidents is important</li> <li>➢ Accident /near miss reporting.</li> </ul> </li> </ul>
Control of Substances Hazardous to Health (COSHH)	<ul style="list-style-type: none"> <li>• Awareness of the legal requirement - The Control of Substances Hazardous to Health Regulations 1999.</li> <li>• Awareness of Substances used on site which are covered by COSHH including:               <ul style="list-style-type: none"> <li>➢ The type of chemical risk e.g. toxic/irritant etc;</li> <li>➢ Assessment of the risks including:                   <ul style="list-style-type: none"> <li>❖ The form and quantity of the substance;</li> <li>❖ Potential harmful effects;</li> <li>❖ Handling, storage, use and transportation of substance, including how to handle spillages.</li> </ul> </li> </ul> </li> <li>• The use of extraction, RPE, PPE.</li> <li>• Personal Hygiene.</li> </ul>
Fire Awareness Training	<ul style="list-style-type: none"> <li>• Awareness of fire risk assessments.</li> <li>• The evacuation plan for the building.</li> <li>• How to raise the alarm.</li> <li>• Special fire hazards specific to the workplace.</li> <li>• The fire triangle: ignition, fuel, and oxygen.</li> <li>• Housekeeping practices which may allow fires to start e.g. waste disposal.</li> <li>• The possibility of exothermic reactions, hotwork etc., causing fires.</li> </ul>
Fork Lift Training	<ul style="list-style-type: none"> <li>• Fork lift training as appropriate.</li> <li>• Refresher training as required by law.</li> </ul>
Control of Legionella	<ul style="list-style-type: none"> <li>• Aware of sources of risk.</li> <li>• Aware of relevant control methods and precautions.</li> </ul>
Health Surveillance	<ul style="list-style-type: none"> <li>• Awareness of health surveillance programme.</li> <li>• Awareness of their roles and responsibilities under the health surveillance programme.</li> <li>• Personal surveillance and self-checks.</li> </ul>

Manual Handling	<ul style="list-style-type: none"> <li>• Awareness of manual handling assessments including: <ul style="list-style-type: none"> <li>➤ Evaluation of each lifting task including consideration of the task, the load, the working environment and individual capability;</li> <li>➤ Manual handling training should include: <ul style="list-style-type: none"> <li>❖ Overview of muscular-skeletal system;</li> <li>❖ Safe manual handling techniques specific to the job;</li> <li>❖ Causes of muscular-skeletal injuries;</li> <li>❖ Identification of employees who may be affected and for how long.</li> </ul> </li> </ul> </li> </ul>
Noise	<ul style="list-style-type: none"> <li>• Awareness of legal requirements – Noise at Work Regulations.</li> <li>• Acute and Chronic Affects of noise.</li> </ul>
Occupational Health and Hygiene	<ul style="list-style-type: none"> <li>• Awareness of occupational exposure limits.</li> <li>• Routes of entry.</li> </ul>
Permit to Work	<ul style="list-style-type: none"> <li>• As appropriate - awareness of circumstances of issue e.g. hotwork, working in confined spaces.</li> <li>• The role of authorised signatories.</li> <li>• Use of locking devices.</li> </ul>
Risk Assessment	<ul style="list-style-type: none"> <li>• Awareness of the legal requirement – Management of Health and Safety at Work Regulations (1999).</li> <li>• The process of risk assessment.</li> <li>• Job specific hazard awareness and risk evaluation.</li> </ul>
Safety Representatives	<ul style="list-style-type: none"> <li>• Training in the functions of a Safety Representative.</li> </ul>

## 9 LIST OF CONTACTS

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