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Target audience:
All FOD staff, Bands 0- 5

EVALUATION OF SLIPS AND TRIPS PROJECT 2005 – SELECTED INVESTIGATIONS OF SLIPS AND TRIPS MAJOR INJURY ACCIDENTS

This OM reports the results of a project designed to increase the involvement of nominated FOD inspectors in the inspection and enforcement of slips and trips. Inspectors investigated selected major injury accidents which were outside those selected using the normal criteria. The project has been evaluated and recommendations are given for future projects of this type.

SUMMARY OF FINDINGS

1 Nominated FOD inspectors carried out 93 investigations of major slips and trips accidents. These investigations were outside those which were carried out using the revised RIDDOR incident selection criteria. Inspectors applied the 'Preventing slips on the level' training which they had received during 2004. Verbal advice was given at about half of the visits. Letters or instant visit reports were issued in a further 29 cases. Eleven notices were issued, with prosecutions being considered in five of these cases. Following project evaluation, recommendations are given for future projects.

INTRODUCTION

2 This project was run between April and September 2005 and involved inspectors who had attended the 'Preventing slips on the level training' in investigating slip and trip accidents. A minimum of three inspectors per division were nominated to work on the project. Each inspector was to investigate six incidents, giving a total of 18 per division and 126 in total.

3 Band 5 staff viewed the slip and trips RIDDOR major injury notifications. These were then screened using part 1 of a two-part proforma. Part 1 aimed to start identifying the underlying accident causes and those incidents which justified further investigation. Additional information was meant to be obtained by telephoning the duty holder and looking at the accident history for the premises.

4 The proforma was then passed to an inspector/ Band 2 who assessed part 1 in relation to the EMM. The incident was either curtailed at this stage, or

where there appeared to be a substantial risk gap an investigation was undertaken. The inspector would then complete part 2 of the proforma once they had completed the investigation.

5 Full details of the project are given in OM 2005/01.

PROJECT AIMS AND OBJECTIVES

6 The aim of this project was to increase enforcement in relation to slips and trips by the investigation of selected slip and trip accidents by inspectors. The objectives were:

- (1) To reduce slip and trip accident rates in the premises visited by ensuring duty holders complied with the relevant statutory requirements.
- (2) To use accident investigation as a means of enabling inspectors to implement and build on the knowledge acquired at the 'Preventing slips and falls on the level' training events.
- (3) To involve Band 5s in the selection of accidents for investigation.
- (4) To increase the use of appropriate enforcement action in relation to slips and trips.
- (5) To increase the use of the Slips Assessment Tool (SAT).
- (6) To obtain better intelligence on the underlying causes of slip and trip accidents, by the analysis of the completed proformas.

RESULTS

Number of incidents investigated

7 The aim was for each division to investigate 18 slip and trip accidents, giving a total of 126 investigations. The table below illustrates the actual number of investigations undertaken.

| Division | Investigations undertaken | % of total required |
|----------|---------------------------|---------------------|
| ESE | 18 | 100 |
| Y & NE | 17 | 94 |
| W & W | 16 | 88 |
| Midlands | 19 | 105 |
| Scotland | 6 | 33 |

| | | |
|--------------|-----------|-----------|
| NW | 14* | 77 |
| London | 3 | 16 |
| Total | 93 | 74 |

Curtailed incidents

8 The table below shows the number of incidents that were curtailed, with just part 1 of the proforma being completed.

| Division | No. of completed part 1 proformas | Ratio of part 1 to part 2 proformas |
|--------------|-----------------------------------|-------------------------------------|
| ESE | 34 | 2 |
| Y & NE | 29 | 1.5 |
| W & W | 34 | 2 |
| Midlands | 34 | 2 |
| Scotland | 95 | 16 |
| NW | 109 | 8 |
| London | 6 | 2 |
| Total | 341 | 3.3 |

Action taken by Inspectors

9 The table below shows the type of action taken by inspectors when they investigated the incident.

| Division | Advice | Letter | Instant Visit Report | Notice | Prosecution Considered |
|----------|--------|--------|----------------------|--------|------------------------|
| ESE | 8 | 5 | 3 | 2 | 0 |
| Y & NE | 9 | 4 | 0 | 2 | 0 |
| W & W | 10 | 2 | 0 | 3 | 1 |
| Midlands | 8 | 2 | 5 | 3 | 3 |

| | | | | | |
|--------------|-----------|-----------|-----------|-----------|----------|
| Scotland | 4 | 2 | 0 | 0 | 0 |
| NW | 7 | 2 | 3 | 1 | 1 |
| London | 2 | 1 | 0 | 0 | 0 |
| Total | 48 | 18 | 11 | 11 | 5 |

Analysis of immediate and underlying causes

10 Investigating inspectors were asked to record the immediate cause of the accident and to derive the underlying causes. Of the 86 immediate causes recorded, 44 concerned slips on contaminated floors; 26 were due to deficiencies in the work environment or work equipment and in 16 cases no immediate cause was found or the accident was due to human error.

11 In several cases more than one underlying cause was found. In 18 cases the slip/trip risk had not been recognised and in 31 cases suitable precautions had not been implemented or enforced. Poor maintenance was at the root of 22 cases and poor housekeeping accounted for another 14. Workplace design was implicated in 12 cases and in 18 cases no reasonably practicable precautions could be identified. A complete breakdown of the results is given in the annex.

Value of screening process

12 Inspectors were asked to indicate how useful they found the screening process.

| | | | | | |
|--------------|--------------------|-----------|-----------|-----------|---------------------|
| | 1 (not beneficial) | 2 | 3 | 4 | 5 (very beneficial) |
| Total | 6 | 22 | 19 | 33 | 6 |

Note: 5 proformas were returned without this section completed.

EVALUATION

Introduction

13 The aims of the evaluation were to:

- (1) Assess what went well
- (2) Identify areas where inspectors/ Band 5s had difficulties
- (3) Assess whether the project aim and objectives were met
- (4) Provide recommendations for future projects
- (5) Provide conclusions

Evaluation methodology

14 The project was discussed with a sample of staff (3 Band 5s and 9 inspectors) using a structured question set. The key findings are discussed below.

What went well

15 Overall the project was seen by inspectors as a “good and valid way of working”, with a 74% return rate. Inspectors approved of the use of data and intelligence, and of the idea of an initial screening process to orientate their investigations, although some had reservations about the procedures used. They also appeared to welcome the opportunity to get involved with and take some action on slip and trip issues, and most were able to cite at least one clearly positive outcome from the project (enforcement notices or sites where positive steps are now being taken to reduce risks).

16 Moreover there was evidence of a positive attitude towards slips and trips amongst the inspectors involved (perhaps reinforced by preparation for the Watch Your Step campaign) and an encouraging acknowledgement that slips and trips is an issue that can and should be tackled. However, it is too early to determine the long-term effects of the interventions.

17 A number of inspectors commented that even in circumstances where they felt they could take no enforcement action they were still able to take positive steps with the duty holder by providing general advice on slips and trips. This was seen as successful because the duty holder, having already experienced a slip or trip accident, was prone to be more amenable to general messages about how to prevent them in future.

Identify areas where Inspectors/ Band 5s had difficulties

18 The key issue affecting the project appears to have been variations in the appropriate action to take when accidents indicate no obvious failing on the part of the employer. Inspectors appear to primarily hold the view that a fair proportion of slips and trips are things that could not have been reasonably prevented (freak occurrences, human error etc.). For the project the consequences of this were that:

- The initial sifting exercise often became problematic as staff applied the criteria in different ways. Therefore staff in some offices struggled to find accidents that appeared to warrant investigation by applying the selection criteria that were given. This was compounded in a number of cases by staff not checking information with the operator or injured person by phone. This resulted in a large number of part 1 proformas being completed in relation to the number of investigations undertaken, which was very resource intensive;
- In a high number of actual investigations, inspectors identified no failings on the part of the duty holder, and therefore only felt able to provide advice, rather than take enforcement.

Initial screening process

19 The least positive feedback about the project was around the initial screening process. It seems that each inspector/office involved approached this differently and consequently met with different levels of success.

20 The sifting process was not particularly effective in either:

- Generating sufficient numbers of accidents that inspectors felt they could investigate; or
- Promoting the investigation of accidents that through closer scrutiny revealed failings on the part of the employer.

21 Investigations were also frequently curtailed where telephone enquiries or the F2508 indicated that remedial measures had already been implemented.

22 Despite these difficulties, successful inspectors were able to use their own initiative in different ways (more rigorous sifting, going over curtailed proformas etc.), and by this they made a success of the project.

Including over-three-day injuries

23 The criteria most frequently cited as getting in the way of some useful investigations was the need to focus on major injuries alone. A number of inspectors commented that potentially promising investigations, which only appeared to have resulted in three-day injuries, were thrown out in favour of major injuries where there was no reasonable action that could be taken. The majority of the inspectors consulted took the view that the key criteria should be indications of a lack of management control of slips/ trips, not the nature of the injury, which was regarded as something of a “red herring”.

Lack of guidance/ information

24 There was felt to be a lack of practical guidance on how to control slips, resulting in a lack of understanding of what can be done to control them. For example:

- Footwear – a lot of companies trial footwear on comfort rather than slip-resistance. They will invite a major supplier into their workplace and ask the supplier to decide what is suitable.
- Flooring – lack of standards and information on what people should do – usually ask large companies to implement a floor purchasing strategy.
- Cleaning – lack of knowledge on what products are available within the marketplace, e.g. 60 second mops.
- Matting – lack of understanding on type that is required, location and fitting, cleaning

Assessment of whether the project aims and objectives were met

25 The project has increased enforcement in slips and trips, in relation to incidents that would not normally have been selected for investigation.

26 However, the majority of investigations (48) resulted in advice being given during the visit. Considering the aim of the project was to increase

enforcement action, there are still issues to address with enforcing on slips and trips including the provision of further guidance on control measures.

27 The project appears to have gone some way towards achieving its objectives:

- (1) It is too early to assess whether slip and trip accident rates have been reduced in the premises visited.
- (2) The project has resulted in inspectors building on the knowledge acquired from the 'Preventing slips and falls on the level' training courses.
- (3) Band 5s were involved in the selection process. However, increasing their knowledge of the subject would have made the project more meaningful to them.
- (4) There has been an increase in appropriate enforcement action.
- (5) Inspectors used the SAT at the majority of their visits.
- (6) The part 2 proformas have been analysed for information on the underlying causes of accidents.

The main recommendations for future projects

28 The main recommendations were:

- Revisit the process and criteria for the sifting stage so that it is undertaken by a smaller number of more experienced staff who are encouraged to creatively use data from other sources to find likely accidents for investigation;
- Run the project for longer than six months;
- Limit expectations about the amount of 'strong enforcement' that will arise from the project, and whilst continuing to maintain that notices and prosecutions are desirable, recognise that advice is an appropriate outcome in many cases and encourage inspectors to use the opportunities the project gives to provide advice.
- Hold a briefing day and provide training to Band 5s if they are to be involved in the project.

29 The Slips and Trips Programme should also look at:

- Relaxing the criteria on just selecting major injury accidents in favour of including over-3-day accidents;
- Using an accident as a means of identifying companies, then looking at their overall management of slips and trips at a visit, rather than focussing on that accident.
- finding some way of conducting analysis at company level to spot the potential for frequent failings.

Proposal to investigate cleaning accidents

30 A number of inspectors seemed keen on the proposal to focus any future project on cleaning issues. This was because cleaning was identified as a 'live' issue on which many employers were currently failing, and which therefore something might be done about. It is also an area where guidance is available and there is the potential to focus on a large population of peripatetic workers involved in contract cleaning.

Conclusions

31 There is merit in continuing with this type of project because it is supported by those involved, provides inspectors with opportunities to get involved in slips and trips in more depth and is leading to some positive actions with duty holders (either enforcement action or advice).

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ANNEX

SLIPS AND TRIPS ACCIDENT INVESTIGATION PROJECT 2005/06 ANALYSIS OF IMMEDIATE AND UNDERLYING CAUSES

Immediate causes

| | |
|---|----|
| Floor contamination – not water | 19 |
| Wet floor – from cleaning | 12 |
| Wet floor – not from cleaning | 13 |
| Housekeeping | 6 |
| Uneven floors | 7 |
| Work equipment / work piece | 13 |
| Error by injured person/ no specific hazard | 16 |

Underlying causes

| | |
|---|----|
| Management – (processes and procedures) | 31 |
| Management – (risk assessment) | 18 |
| Housekeeping | 14 |
| Maintenance - (building) | 13 |
| Maintenance - (machinery) | 9 |
| Poor design (workplace) | 12 |
| No reasonably practicable precautions | 18 |

Notes

1 Management (processes and procedures) refers to incidents where a risk has been identified but suitable procedures were not implemented. Management (risk assessment) concerns cases where a risk has not been identified prior to the accident.

2 Poor Design (Workplace) relates to where a piece of work equipment /building is designed in such a way that performing certain tasks will always present a hazard (eg inaccessible controls or maintenance hatch).

3 Some accidents have more than one underlying cause.