THE PLASTICS INDUSTRY
SAFETY IN MANUFACTURING PLASTICS
‘SIMPL’

HEALTH & SAFETY ACTION PLAN
(2011 – 2014)
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PAFA HEALTH & SAFETY ACTION PLAN

1. Statement from PAFA

The Plastics industry has recognised the need for good health and safety performance and together the trade associations, the Health & Safety Executive (HSE) and other representatives from the plastics industry have formed a strategy board that will develop the themes and objectives appropriate to the needs and challenges of the industry and provide leadership to participating organisations.

The HSE is promoting the concept of ‘Be part of the solution’ and this Action Plan seek to apply the same importance and priorities to health and safety as set out in the HSE’s strategy as well as the Plastics Industries initiative for health and safety ‘Safety in Manufacturing Plastics’ (SIMPL). It is important that organisations attach the same priority to achievement of high standards of health and safety management as they would do to any other key aspects of business activities, and that health and safety is integrated into management systems.

PAFA has recognised the need for good health and safety performance and has an active Health & Safety Committee comprising of representatives from member companies. A number of PAFA members already have well established performance records and 25 sites submit statistics each year on health and safety performance but this participation level needs to improve.

Those companies participating in the trade association Health and Safety Meetings and submitting data have demonstrated collectively a reduction in accidents of 20% in 2009 and lost time per employee has dropped to its lowest level in the nine years that PAFA has been collecting the data and now stands at a third of the level recorded nine years ago.

We believe that the industry can achieve even better standards of health and safety with SMART (Specific, Measurable, Attainable, Realistic, Time Bound) objectives from the Health and Safety Group that will take in to account the needs and issues in the relevant sub sectors and members. We will provide a frame work for direction to support and help to:

- promote the business case for good health and safety management, highlighting the moral, economic and legal arguments.
- promote effective safety management systems and cultures within which there is visible leadership demonstrated by actions from the top, so that all managers and employees know that health and safety is being taken seriously.
- promote the sharing of good ideas -- both across the plastics industries and beyond, adopting best practice from other sectors of industry.
- promote partnership working -- working with and through others to improve the collective impact.
- promote employee involvement, ensuring the full engagement of employees and their representative organisations and drawing on the knowledge, skills and enthusiasm of those closest to the risks.

Barry Turner
Chief Executive

2. Introduction
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This programme is a real opportunity for the Plastics Industry to establish actual performance targets, which will contribute to overall improvement and improve the overall image of the sector and see the risk premium for the sector downgraded.

Health and safety has changed over the years from one of prescriptive content to more proscriptive content in laws which continues to gather momentum and recognises the need for safety measures to be risk based rather than rote based on broad legislative requirements. This all adds to need for recognition and commitment by employers to the acceptability of risk assessments as the basis for safety measures.

To this end it is felt that maintaining continuous improvement in health and safety standards in the industry gives us a tremendous platform from which to make a significant impact. The SIMPL Strategy ‘Safety in Manufacturing Plastics’ recognises the need to build on past achievements, to consolidate these, and embed health and safety and safety culture within individual business in the industry. We can do this through a mechanism of defined targets against which all PARTIES drive change and improvement as well as measure performance. It is envisaged that these targets will be progressive from 2011 – 2014 with foundation setting targets that seek to embed safety in to the culture of the industry. These over time will reduce accidents, ill health, lost time as well as improve the industry’s safety performance.

The strategy and the targets depend on each of the individual sector associations developing Health and Safety Action Plans and their individual member companies preparing their own action plans which reflect these and delivering these within the prescribed timescales. The purpose of the strategy is not to reinvent or replace current good practice but merely to consolidate and build on it so that it becomes the norm throughout the industry.

Inspectors who visit companies in the plastics industry will enquire about their awareness of the SIMPL Strategy ‘Safety in Manufacturing Plastics’ and in the case of companies who are members of PAFA, the BPF, PMMDA, etc they will establish if they are aware of the trade associations Health and Safety Action Plan and whether there is a company action plan designed to contribute to achievement of the aims for their sector.

The trade unions are committed to raising awareness of the SIMPL Strategy ‘Safety in Manufacturing Plastics’ and engaging with their safety representatives in the plastics industry to gain their involvement and collate feedback from them where trade union recognition applies. Inspectors are asked to enquire of these safety representatives as to their awareness of the SIMPL Strategy and any company action plan.

3. Guiding principles by which PAFA members will work under the SIMPL Strategy.

1. By signing the SIMPL Pledge the member company will commit to working towards or exceeding the targets set out in the PAFA Health & Safety Action Plan appended to this document.

2. Individual companies will design their annual Health and Safety objectives and improvement plans to support implementation of the PAFA Action Plan.

3. As far as possible, the companies will express the objectives in terms of SMART (Specific, Measurable, Achievable, Realistic and Time bound) deliverable outcomes.
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4. Outcomes are defined as measurable reductions in the incidence of accidents and/or measurable improvements in the management and control of Health & Safety risks.

5. The way in which achievement of outcomes is to be measured, and the criteria for success, are considered when annual health & Safety objectives are prepared. The performance measures to be used in gauging success are agreed at that stage.

6. PAFA and its constituent members actively encourage employers, including those who are not members of trade associations, to prepare and implement their own H&S improvement plans to support implementation of SIMPL strategy.

7. All activities, events and projects planned by PAFA have clear objectives. These are described in terms of SMART deliverables, achievement of which make a positive contribution towards SIMPL strategy aims and, in particular, to the delivery of target outcomes.

8. When planning activities, events and projects, PAFA and its partners will consider how achievement of the deliverables will be in line with SIMPL.

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4. Partner’s Input

Packaging And Films Association

☐ Setting out the Health & Safety Action Plan in line with SIMPL
☐ Collection of statistics and data
☐ Communication with members
☐ Resources for PAFA members
☐ Organising conferences, seminars and workshops

Trade Union

☐ Collection of health & safety experience from safety representatives and members
☐ Communication with members
☐ Resources for project teams
PAFA HEALTH & SAFETY ACTION PLAN

- Contribution to presentations at conferences, seminars and workshops
- Facilitating at conferences, seminars and workshops
- Contributing to the organisation of SIMPL events

Health & safety Executive

- Providing relevant data and experience from national data collection
- Facilitating sharing of information and experience with other manufacturing industries
- Resources for project teams including specialist resource
- Chairing SIMPL meetings and providing the secretariat
- Contributing to the organisation of SIMPL events
- Contributing presentations and facilitating at conferences, seminars and workshops.

5. SIMPL Strategy

Application

The Action Plan applies to the whole of PAFA members. We at PAFA will actively encourage our members to sign up to the SIMPL Strategy ‘An initiative to reduce the incidence of accident and ill-health in the plastics industries’. All who formally sign the industry pledge will receive a certificate for display within their own organisations.

Targets

Our goal is to achieve the defined levels of health, safety and welfare improvement in each workplace throughout the Plastics industry. This will be achieved by each company committing to drawing up their own Action Plan which is based on the actions noted in this document; by commitment to targets for improvement change will be measured.
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Action

All who have signed the industry pledge will need to continually demonstrate their commitment to the SIMPL strategy by meeting or exceeding the targets set in the PAFA Action Plan.

This strategy must not be viewed as a one off, a one stop shop to fix it all. The initial commitment is only the start of the improvement process, continually reviewing and updating your company action plan will be essential in meeting the needs of your business and that of the strategy. It will be expected that PAFA will gather and feedback their progress annually.

Review process

The information gathered will be used to determine what is and what is not effective in the PAFA Action Plan; it will enable focus on areas where PAFA can offer help and support to enable continued progress in meeting the targets set by the SIMPL Strategy.

To ensure that strategy targets are being met, PAFA will undertake milestone reviews co-ordinated by the PAFA H&S Committee. This will be through performance indicators and benchmarks.

6. Reporting

There is a need to routinely monitor and report the performance of SIMPL and the inclusion of all participants is essential. Clearly if we are to contribute towards the objectives identified at the outset, each individual Company needs to have a means by which it can measure its own performance against the Industry and the Industry will need a means by which it can measure its own performance against other industries, and of course therefore, determine its level of contribution to the overall National priorities.

This will be done in a number of ways,

1. Through the clear commitment via the sign up of the pledge; PAFA will continually monitor the number of its members that have signed up to the pledge.

2. By the examination of accident and ill health data supplied to PAFA. A request for accident and ill health data will be circulated by PAFA to individual companies in January each year so that accident and ill health data can be compiled for the previous year;

3. By the examination of annual progress reports from each company signed up to the SIMPL Strategy. In October each year PAFA will circulate a form for each company to complete.

All the information* received will be presented in a comprehensive report by PAFA for circulation to all companies and will be used to determine the contribution made to the National targets and by individual companies to assess their own performance against that of the Industry.
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*This anonymised information will also be used at the SIMPL Board Level to enable them to monitor progress in the Plastics Industry.

Any other information required will be reported upon as necessary during the course of this strategy.

7.0 Strategic Targets for 2011-2014

These targets are designed to help deliver achievement to the SIMPL Strategy. Each company signing up to the strategy will need to incorporate the targets into their own action plans. PAFA has taken these statistic targets and entered them into its own Action Plan. This makes up its commitment to Safety in Manufacturing Plastics and the support it will provide to its members.

7.1 Industry Action Plans

It is expected that companies signing up to the SIMPL Pledge will have in place an Action Plan within two months. These plans will be set underneath the PAFA SIMPL Health and Safety Action Plan.

For those companies signing up to SIMPL there will be a requirement to confirm commitment to the scheme. Each company will be required to submit confirmation that they have put together and are working to an Action Plan as required under SIMPL.

7.2 Leadership

It is a requirement that companies are led from the top and that health and safety is given the same priority as any other business activity. It will be necessary to encourage strong leadership in championing the importance of, and a common sense approach to, health and safety in the workplace.

The drive for change in health and safety culture must be led by the most senior member of the business who will need to direct the change. The role must not be restrictive and where necessary arrangements can be devolved but it must be seen that the setting of health and safety objectives have a clear goal as part of the business objective.

7.3 Management systems

Managing health and safety is key to its success; whilst Leadership is key to motivating changes, the setting out of health and safety management systems that fit the size and complexity of the company is essential. To achieve a good foundation each company must make appropriate arrangements to have a health and safety policy which commits the company to meeting health and safety standards, a system for capturing areas where improvement can be made and mechanisms to plan for the needed changes. Monitoring and
PAFA HEALTH & SAFETY ACTION PLAN

review is essential to ensure targets are met; making a commitment to change often is not enough, following the change through to completion is necessary to make certain that it has happened and continues.

7.4 Workforce Involvement
The workforce is an important mechanism to change and therefore must not be discounted by the management team. The workforce can be instrumental at all levels in implementing health and safety as part of a cultural change to existing working practices. It is evident that the management are key in motivating and committing to improvement through investment in time, supplying information and instruction and providing forums for feedback and improvement. Commitment at this level is essential in introducing health, safety and welfare changes in to the workplace.

Safety Communication
All employers in the industry sector must actively involve employees in all area of health and safety. They should provide appropriate arrangements via a structure for communication, provide competent worker representation on health and safety matters.

Training
All companies to analyse their own their own training needs based on the risk reduction objectives. Companies will need to put in to place mechanisms to train their employees to drive improvement.

7.5 Risk reduction objectives
Identifying the risks is essential to improving health and safety. By signing the SIMPL Pledge you are committing to reducing risk (the potential to cause harm) in your workplace. To do this you will need to identify that key health and safety issues that are in your workplace and come up with measures to eliminate or control them.

PAFA has already collated years of data from accident information submissions from its members; the resulting data has been used to target those risks that that it believes require improvement. These may be the same as the targets that you set or they may be different dependant on the accidents reported; the aim must be to actively reduce work related accidents.
PAFA will work with companies signing up to the SIMPL Strategy to help reduce accidents under these headings.

PAFA has identified injuries that require targeting in order to demonstrate an improvement:
- Manual Handling
- Slips trips and falls
- Contact with moving machinery
- Knife Cuts

PAFA is committed to reducing the risks in these areas and each company must plan their own risk reduction mechanisms to meet the requirements of the targets set. The results of the tackling these risks will be seen from the collated accident data therefore targeted accident reduction figures are seen as the driver to tackling these health and safety issues.

7.6 Accident Reduction
Accidents in the workplace no matter how minor should not be tolerated. Apart from the impact on the employee and the workforce as a whole it is well documented that every accident carries a cost to the business. Proactive accident reduction has whole cycle benefits to business operations and investment in identifying and managing accidents is seen as the first base for improving health and safety.

Accident Reporting
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To achieve a consistent accident reporting format and to establish baseline statistics that gathers reliable data from all industry sectors each participating organisation must report their accident data so that reduction targets can be defined.

Accident Performance
RIDDOR - The current data from the HSE statistics 2008/09 for reportable injuries confirmed that reportable injuries occurred in the Plastics packaging Manufacturing Sector, equating to an injury rate of 873 per 100,000 workers.

PAFA accident data collated from its members shows that all RIDDOR reported in 2009 is at a rate of 779 per 100,000.

PAFA has set a target that by December 31st 2014 its overall RIDDOR reported non fatal injury rate for employees will be better than the reportable injuries rate for the Plastics packaging Manufacturing Sector average. This will be reviewed annually as collection of accident data from PAFA members improves.

Accidents
To achieve the target reduction requirements assumes an improvement in the overall sector performance and PAFA has set strict accident reduction targets for those categories that are showing the highest number of accidents. We feel that by targeting specific accidents we can improve the accident severity, the number occurring and also have an impact on the accidents reported as RIDDOR. Each company will review the following risks and then plan and develop mechanisms for improvement to meet the targets

PAFA has set clear annual reduction rates for each category which is believes will enable the overall RIDDOR reduction target to be met. It is evident that meeting general accident reduction targets will influence the number of injuries reported as a RIDDOR. Each company is to review their own accident data and apply accident reduction targets

An overall improvement of 10% and with particular focus in the following areas

- manual handling injuries.
- slips. trips and falls injuries.
- contact with moving machinery injuries.
- knife related injuries.
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8. Supporting Guidance

Clearly much of the success of the SIMPL programme will depend on the commitment and dedication of the Companies and all people employed within them. However, PAFA and its Partners are equally committed to making their contribution in supporting the work and to that end will be addressing the following measures.

8.1 Industry Action Plans

Putting together a plan based on the targets set under the SIMPL strategy may seem a daunting prospect. PAFA are aware that some guidance will be required therefore it will be providing various support mechanisms that will enable committed companies to set out an Action Plan with targets that not only meets their business needs but also fits the PLEDGE to the SIMPL Strategy.

8.2 Leadership

Companies are to have nominated a Director with overall responsibility. This appointment is of vital importance to the success of the programme. The primary role of the responsible Director is of driving through improvement and is therefore managerial in nature. The following points need to be borne in mind when making the selection:-

a) The responsible director will require the necessary authority, commitment and drive to make things happen.
b) He/she need not be an expert in Health and Safety.
c) He/she will be responsible for compiling annual Health and Safety Performance reports, and should be held accountable.
d) By appointing a Main Board Director everybody in the organisation should recognise the real change in Health and Safety culture, which gives the programme real impetus and impact.
e) Each Board of Directors to draw up an action plan and monitor progress at Board meetings.

8.3 Management Systems

Managing health and safety is no different from managing any other aspect of your business.

You need to:

- Set a clear policy for health and safety
- Organise your staff for managing health and safety
- Plan for health and safety by setting targets and objectives, identifying hazards, assessing risks and establishing standards against which you can measure your performance
- Measure your health and safety performance in just the same way that you already measure production or sales
- Periodically audit and review how well you are doing so that you can decide how to improve

8.4 Workforce Involvement

Communication should be seen as a powerful mechanism to drive change; developing a communication structure that flows in both directions (Management to Workforce / Workforce to Management) is key to making a real difference to Health and Safety Performance. Effective communication needs :-

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- Strong and focused Management.
- A formal Committee* to include all relevant parties (Workforce & Management)
- Suitably trained and aware members with a sharp eye for knowing what really matters and what makes a difference
- A positive set of terms of reference.
- A definite programme of work which has been delegated and actively monitored.

*The term Committee is used here to show that a structure needs to be implemented as this is the best method for improving health and safety in the workplace. The company will need to set up a communication forum which suit the size and needs of their own business.

**Training Plan**

Training must play a vital part in increasing the skill and knowledge levels amongst Management and Supervisors, Trade Union Health and Safety representatives and Safety Committee members to ensure that they are continuously aware of their responsibilities and have an eye for health and safety and a willingness to continually improve.

There are numerous courses and opportunities for the improvement of skill levels amongst Manager and Supervisors to the field of Health and Safety and a Company must have regard to the following points :-

- Not everybody will need to be trained to the same level.
- Companies should establish what is available and decide what is required of each individual and what they will need to fulfil their responsibilities. Suggested courses could include Institution for Occupational Safety & Health; National Examination Board for Occupational Safety & Health.
- Trade Union courses are available for Health and Safety representatives and members of Health and Safety Committees, i.e. Stages 1 and 2.

Accident reduction targets may identify areas where specific training may be required to control the work process. Examples of this are Manual Handling. Further training could include risk assessment. As part of its commitment, PAFA will be working with its partners to offer appropriate guidance / courses / workshops.

8.5 Risk Reduction Objectives

It is clear that in order to achieve the targets set that support will be necessary for the companies who have signed up to the ‘Pledge’. PAFA and its Partners will be working to provide support through training programs and guidance e.g. Slips, trips and falls, Safety in the Use of Machinery, Manual Handling risk assessment, accident investigation etc.

8.6 Accident Reporting

Work has already been carried out to establish the most appropriate means of gathering and sharing information on accidents and ill health. PAFA will continue to request accident statistics* from its members, this will form part of the early work within PAFA who will monitor** and produce a report on the level of accidents with the plastics industry.

Those Members of the SIMPL pledge will be required to provide data on their accidents to the Packaging and Films Association.
**PAFA HEALTH & SAFETY ACTION PLAN**

**Accident Performance**

PAFA has set what is believes are achievable targets in overall accident reduction. It is evident that the Plastics Industry accident record is at an unacceptable level and well above the Manufacturing Sector data. These accident figures have prompted a focus on improvement through accident reduction targets set by PAFA as part of its commitment under the SIMPL Pledge.

PAFA is aware that these targeted accident reduction figures may seem daunting; it is clear that without a commitment the number of injuries will not fall quickly to a level that is acceptable, this we feel is intolerable. PAFA will be working with its partners to offer appropriate guidance / courses / workshops.

* **Specific Site Help**

Reporting progress is an important part of the programme but reporting in a way which is not intrusive and does not commit too much resource is also important. In the event of companies struggling with their targets, help will be at hand and we will be establishing a means by which companies can access assistance where they need it.

** The Next 3 Years**

Throughout the programme PAFA will monitor the progress carefully through its H&S Committee, and will be using information received and knowledge gained to begin to draw up a programme of work for the next 3 years and beyond 2014.
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**LEADERSHIP:**
It is a requirement that companies are led from the top and that health and safety is given the same priority as any other business activity. It will be necessary to encourage strong leadership in championing the importance of, and a common sense approach to, health and safety in the workplace.

<table>
<thead>
<tr>
<th>ACTION BY</th>
<th>COMPANY ACTIONS</th>
<th>PAFA ACTIONS</th>
<th>WORKFORCE</th>
<th>MEASURE</th>
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<tbody>
<tr>
<td>END OF YR1</td>
<td>CEO of company to sign up to strategy</td>
<td>To identify and provide information on health &amp; safety training for directors and managers</td>
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<td></td>
<td>Companies to set health and safety objectives for managers to generate risk improvement through strong leadership and the championing of health and safety.</td>
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<td></td>
<td>Nominate a Responsible Director for Health &amp; Safety.</td>
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<tr>
<td>END OF YR2</td>
<td>Directors to Attend Health and Safety Training Course</td>
<td>Hold 1st Annual H&amp;S Conference Run Directors H&amp;S Training Seminar Develop Directors Audit Tool</td>
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<td></td>
<td>Companies to put in to place a communication arrangements i.e. health and safety committees.</td>
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<tr>
<td>END OF YR3</td>
<td>Member Companies to Complete Directors Audit</td>
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To achieve a good foundation each company must make appropriate arrangements to have a health and safety policy which commits the company to meeting health and safety standards, a system for capturing areas where improvement can be made and mechanisms to plan for the needed changes.

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<tr>
<td>END OF YR1</td>
<td>Put together a Health &amp; Safety Policy</td>
<td>Develop Basic H&amp;S Management System</td>
<td>To have pro-active involvement is putting together the health &amp; safety policy</td>
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<td>END OF YR2</td>
<td>Implement H&amp;S Management System</td>
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## PAFA Health & Safety Action Plan

### Workforce Involvement

All employers must actively involve employees in all area of health and safety. They will provide appropriate arrangements via a structure for communication, and provide competent worker representation on health and safety matters.

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| END OF YR1 | Introduce a Health and Safety Committee  
Plan and put in place mechanisms for meeting with the workforce to discuss health and safety.  
Identify needs of the company and request representatives from the workforce. | Produce guidance on how to run an effective Health and Safety Committee | | |
| END OF YR2 | Actively encourage worker involvement in:  
- Risk assessments  
- Workplace inspections | | | |
| END OF YR3 | Put in place mechanisms to train their employees to drive improvement | | | |
Identifying the risks is essential to improving health and safety. By signing the SIMPL Pledge you are committing to reducing risk (the potential to cause harm) in your workplace. To do this you will need to identify that key health and safety issues that are in your workplace and come up with measures to eliminate or control them.

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<th>RISK REDUCTION OBJECTIVE</th>
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<tr>
<td>END OF YR1</td>
<td>Companies to develop specific site action plans based on minimum standard</td>
<td>Identify General Risk Areas</td>
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<td>Produce Industry Guidance Toolkit</td>
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<td>Locate Guidance and Information on Website</td>
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<td>END OF YR2</td>
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<td>Provide Training Toolkits</td>
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Accidents in the workplace no matter how minor should not be tolerated. Apart from the impact on the employee and the workforce as a whole it is well documented that every accident carries a cost to the business. Proactive accident reduction has whole cycle benefits to business operations and investment in identifying and managing accidents is seen as the first base for improving health and safety.

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<td>END OF YR1</td>
<td>Agree an accident recording format</td>
<td>PAFA will carry out annual collection and analysis of accident statistics from member companies.</td>
<td>Report all work related accidents</td>
<td>Collation of annual data</td>
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<td>Identify accident categories and set targets for reductions</td>
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<td>Monitor accident figures</td>
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<td>Identify mechanisms for accident reduction</td>
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<tr>
<td>END OF YR2</td>
<td>Review accident categories and set targets for reduction</td>
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10 QUESTIONS AND ANSWERS

Q1. **What does this mean for my Company?**
   – By signing up, you agree to demonstrate leadership, to draw up an action plan to reduce accidents and improve health and safety, [if one does not exist] and to submit data requested by PAFA annually.

Q2. **What support will my Company receive?**
   - A basic framework, guidance, access to results of initiative and exchanges of best practice, networking and specific training modules developed for the industry.

Q3. **What are the main health and safety concerns in the Plastics Industry?**
   – Risk of fire/ explosion, slips and falls, machinery, handling and cuts.

Q4. **What are the benefits for my Company?**
   - Access to a network of health and safety professionals, exchange of best practice, basic health and safety system if one does not exist, specific training developed by the industry for the industry, as accidents reduce less lost time, and as accidents reduce industry wide lower insurance premiums and less health and safety interventions. In fact all members of the SIMPL initiative will be entered on a Health and Safety inspectorate database to indicate the company’s commitment to the pledge.

Q5. **Where do we go for help?**
   - PAFA and health and safety committee.

Q6. **What are the first steps I would need to take in the first year? (See notes for Guidance, page 8)**
   - CEO to sign the pledge, Company to set smart health and safety objectives and an action plan if not already done so, company to appoint a competent person if not already done so, design/ update health and safety policy if not already done so recently.

Q7. **What targets will we be measured against?**
   - Against manufacturing average and peer group.

Q8. **The SIMPL Strategy appears to apply to Accidents only, what about ill-health?**
PAFA HEALTH & SAFETY ACTION PLAN

–Although initially targeted against accidents we would expect systems to evolve to include near misses and occupational issues and occupational health programs as appropriate.

Q9. **How do I know which is the most appropriate course to send my Managers on, and where do I go to get them?**

- Pafa will develop signposting to competent companies and will look to develop courses where member’s needs cannot be met by existing provision.

Q10. **What happens if my Company does not sign up to the SIMPL Strategy?**

- You could be seen by the health and safety executive as a company not committed to improving its health and safety.

Q11. **What is the timetable from now on?**

- The launch is scheduled for October 14th. The detailed action required is shown on the attached gant chart.

Q12. **How will this improve my bottom line?**

- If the industry and individual companies can through adopting best practice and exchanging information improve its health and safety record then the following benefits should arise
  - Less lost time
  - less opportunity for employee claims
  - lower insurance premiums
  - less risk of successful prosecutions by the health and safety executive.