

Tracking research for HSE's workplace transport programme 'struck by' initiative

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People being hit or run over by workplace vehicles ('struck by' incidents) resulted in 41% of all workplace transport (WPT) incidents in 2004/05. The Health and Safety Executive 'struck by' initiative was part of a 2-year workplace transport project running from April 2006 - March 2008 aimed at reducing the number of incidents.

The 'struck by' initiative consisted of a targeted audit, that involved reviewing transport activities undertaken in the manufacturing sector and parts of the service industries (eg waste disposal). Several large companies were targeted to take part in an audit where their policies and procedures for controlling all workplace transport risks were reviewed against the precautions that were actually observed on site by a HSE inspector. A structured questionnaire was produced to apply this audit technique.

Following on from the 'struck-by' initiative audits, HSL carried out tracking research with ten of those companies that had been visited as part of the initiative, to provide an assessment of the effectiveness of the audits; specifically, companies experiences of the audits and the actions they had taken since, or as a result of, this intervention. This work is described in this report.

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EXECUTIVE SUMMARY

The Health and Safety Executive (HSE) 'struck by' initiative was part of a wider 2-year workplace transport project running from April 2006 - March 2008. The aim of this initiative was to reduce the number of incidents where individuals are hit or run over by workplace vehicles. Several large employers were targeted to take part in an audit where their policies and procedures for controlling workplace transport risks were assessed against the precautions observed on site.

Objectives

The objective of this work was to carry out interview surveys with 10 of the 17 companies that were originally audited by HSE inspectors, to provide follow-up information on the inspection process by assessing:

- What the companies recall about the audit;
- How the inspection differed from a normal inspection;
- What, if anything, the companies have done since the inspection.

Main Findings

The majority of companies were generally positive about the 'struck by' audit, although the majority referred to the time with the inspector as a workplace transport (WPT) visit. Conversely, some companies had some negative and neutral comments about the visit.

Nearly all of the companies recalled being contacted via a letter prior to the visit and over half reported receiving a pre-visit checklist. The companies' experiences of the visit varied from site to site, as did the format of the visit. However, the majority of visits were conducted on one day by either one or two HSE Inspectors.

There were a number of changes reported across the sites as either a direct or indirect result of the visit. Examples of the changes made include:

- *Redesign of layout* (both internally and externally). Examples of changes made include barriers, new signage and new road markings.
- *Changes to vehicles*. This included changing the vehicles used, speed limiters being fitted to existing internal vehicles and all weather cabs to external vehicles.
- *Consideration of environmental conditions*. This included looking at factors such as lighting and road surfaces.
- *Management/System changes*. This included reviews and/or changes to transport policies, procedures, training, and in one case the introduction of an improvement/consultation scheme with staff.

Several of the companies also reported other changes that were planned or being investigated for the future as an indirect result of the raised awareness around issues covered in the audit.

The interviews also identified a theme of information sharing that highlighted the dissemination of information from the 'struck by' audits across multiple company sites.

Many of the companies reported common issues relating to WPT including difficulties relating to international drivers.

Most of the companies thought that they had not learnt anything new from the audit, however they still reported finding it useful. Many thought the audit was a perfect opportunity to gain management engagement in WPT issues and H&S teams at sites could use the visit as leverage to gain management support for WPT. For many, the audit reinforced what they were already doing and others stated that the visit was beneficial because it was like having a fresh set of eyes looking at the site.

Conclusions

In summary, although the majority of companies did not think that they learned anything new from the 'struck by' audits, on the whole the audits were seen as positive and a good use of time. The 'struck by' audits were seen by companies as a chance to spend time with an inspector in a supportive environment rather than an enforcement led visit, and often formalised what they already knew. The audit offered an opportunity to highlight WPT issues and gain or reaffirm management commitment to them.

1 INTRODUCTION

1.1 BACKGROUND

People being hit or run over by workplace vehicles ('struck by' incidents) resulted in 41% of all workplace transport (WPT) incidents in 2004/05. The Health and Safety Executive (HSE) 'struck by' initiative was part of a 2-year workplace transport project running from April 2006 - March 2008 aimed at reducing the number of incidents.

The 'struck by' initiative consisted of a targeted audit, that involved reviewing transport activities undertaken in the manufacturing sector and parts of the service industries (e.g. waste disposal). Several large companies were targeted to take part in an audit where their policies and procedures for controlling all workplace transport risks were reviewed against the precautions that were actually observed on site by a HSE inspector. A structured questionnaire was produced to apply this audit technique.

1.2 AIMS AND OBJECTIVES

The aim of the work completed by the Health and Safety Laboratory (HSL) was to undertake tracking research with the large companies that were identified and audited by HSE inspectors as part of the 'struck by' initiative in order to assess the effectiveness of these audits. Specifically, the research was to investigate companies' experiences of these audits, and actions they have taken since, or as a result of, this intervention.

The objective of the work was to carry out a survey of a number of the companies originally audited by HSE inspectors to provide follow-up information on the audit process by assessing:

- What the companies recall about the audit;
- How the targeted audit differed from a normal inspection;
- What changes (if any), companies have implemented since the audit.

2 METHOD

2.1 IDENTIFICATION OF PARTICIPANTS

HSL researchers were provided with a list of the 17 companies that had been audited during the 'struck by' initiative. Several visits were carried out at various sites of the same companies. HSL researchers then contacted all the inspectors to check whether any of 17 sites should be excluded from this work, before contacting the companies to request their assistance with the project.

2.2 INTERVIEW SCHEDULE

In consultation with the HSE customer and HSE project officer, a semi structured interview schedule was compiled. This was used as a prompt for the face-to-face discussions that lasted approximately 90 minutes. A copy of the interview schedule can be found in Appendix A (Section 5.1).

The interviews were carried out by two HSL researchers, one acted as a facilitator to the discussions and the other made notes to accurately record the discussions.

2.3 DATA COLLECTION

A series of face-to-face interviews were conducted at companies previously audited by HSE. Of the 17 companies that had originally been audited, several were excluded upon recommendation/request from inspectors and ten were identified to be interviewed.

The interviewees at companies were individuals who had been present at the original visit from HSE; usually this was a health and safety manager. On several occasions there were multiple interviewees present as they all had a significant contribution to make to the discussions, for example, this included trade union representatives.

2.4 ANALYSIS OF TRANSCRIPTS

The interview notes were summarised and recorded electronically. Interview summaries are included in appendix B (section 5.2). The information was then analysed to identify themes and the key issues raised in response to the questions asked. These issues are summarised in the key findings of this report (see Section 3.)

3 SUMMARY OF FINDINGS

3.1 RECOLLECTION OF THE AUDIT

The majority of companies referred to the audit in question as a workplace transport visit to their respective sites (i.e. covering a broader topic area than the targeted focus on ‘struck by’) rather than a ‘struck by’ audit; the terms audit and visit will be used interchangeably throughout the findings. In addition, when WPT is referred to this will incorporate ‘struck by’ as a number of the companies stated that ‘struck by’ issues could not be looked at in isolation without considering wider WPT issues. Most noted the difference between the audit/workplace transport visit as compared to a normal inspection. However, one company stated they were not even aware of the visit/ audit related to workplace transport.

The following section summarises the findings from the interviews and is presented in four parts:

- Recollection of the audit;
- Summary of changes;
- Overall summary of the audit for each of the companies;
- Appraisal of the targeted audit approach.

3.1.1 Initial contact and preparation for audit

During the discussions, companies were asked if they could recall how they were originally approached to take part in the audits, and what if any preparation they undertook prior to the visit commencing.

The majority of companies (n=8) reported that they were initially contacted regarding the visit via a campaign letter from the HSE inspector. This letter informed them of the intended visit to the site, and all but one of these companies reported also receiving a pre-visit checklist to go through. A number of companies recalled they were originally approached by an inspector over the telephone and then received a letter (n=3). One company reported they were only contacted about the visit by telephone.

Some of the companies (n=3) reported utilising the statements on the pre-visit checklist to carry out checks across the site prior to the visit happening. One company explained that they had access to the workplace transport inspection pack prior to the visit and used this when preparing. Another of the companies reported that, as they had been involved in previous audits they used their own knowledge of what had happened before to prepare.

One company interviewed reported receiving no prior warning of the visit, and therefore did not carry out any preparation before the audit.

3.1.2 Details of the audit

The companies experiences of the audit varied between sites as different inspectors took different approaches to the visit. One common theme, as previously mentioned, was that the majority of companies referred to the audit as a workplace transport visit. Of those that did describe the visit as being a ‘struck-by’ audit, one reported that the visit did in fact cover everything and included consideration of wider workplace transport issues not just ‘struck-by’.

More than one HSE Inspector attended some of the visits. Companies sometimes described the visit as more of a ‘catch-up’ whilst others stated that the visit contained nothing surprising.

The majority of visits were completed within a day and only one company commented on the length of the visit in terms of hours spent. However, two companies reported that the visit to their site was split over two days due to the inspector being called away.

Some companies reported that the pre-visit checklist was used in the audit itself (n=3) and of these, two reported that it was used as a starting point for discussions.

Overall, the companies reported a variety of areas being covered within the HSE visits. These included:

- Looking at the site layout or a site map and using this to identify areas of priority concern to be visited as part of the audit;
- Movement around the site of vehicles and goods;
- Reviewing risk assessment (RA) procedures and elements of completed RAs;
- Review of other procedures and/or policies;
- Inspectors going on a walk around of the site, and being reportedly shown the ‘worst’ areas for WPT by the site representative;
- Training;
- Competence;
- Parking, refuelling, and the maintenance/ checking of vehicles.

Three of the companies also reported that during the visits the inspector met union officials, managers, and in one case the external logistics company.

3.2 CHANGES MADE SINCE THE AUDIT

During the interviews the changes that were made as both a direct result and as an indirect outcome of the audit were discussed.

3.2.1 Changes made as a direct result of the audit

The following section summarises the changes that were reported by respondents as being a direct result (e.g. a recommendation) of the HSE audit. This is broken down into physical and management system changes.

3.2.1.1 Physical changes

In total 27 physical changes were reported as a direct result of the audit by 8 of the companies interviewed. These were broken down into:

- **Redesign of layout**
One of the main changes to the layout of both the inside of buildings and externally on site at the companies interviewed related to improving the separation of vehicles and pedestrians. Three of the companies reported using several methods to do this including barriers along walkways (both internally and externally), new walk routes, new traffic

routes, one-way systems and bridges. A number of the companies reported making changes to signage both internally and externally. Another company reported re-painting some markings on internal floors to make them consistent with the rest of the site. One company reported making changes to road markings to ensure consistency with the Highway Code, including zebra crossings and double yellow lines.

- **Vehicles**

One company reported making changes to their internal vehicles as a direct result of the HSE visit. These changes included the installation of speed limiters on internal vehicles and the introduction of personal key codes for vehicles to enable the company to know who was driving if and when an incident occurred. Another company reported making changes to the vehicles that were used externally on the site. This included the purchase of all weather cabs for the forklifts (FLT)s used outside.

- **Installation of CCTV**

One company reported installing CCTV to monitor drivers' behaviour, to ensure they were adhering to the site rules.

- **Storage**

Another area that was addressed by two companies, as a direct result of the audit, was external storage. In both cases this related to the appropriate stacking and storage of items in yard areas so that they did not pose a threat to pedestrians by reducing visibility. Another company made changes to the storage of goods inside buildings to ensure that they were not being stored on the designated walkways.

- **Condition of environment**

One area identified by two companies was to improve the lighting conditions as a direct result of the HSE visit. One company looked at this inside buildings and another company was concerned with improving lighting conditions in external areas of the site.

3.2.1.2 Management systems

In total, 20 changes to management systems were reported as a direct result of the audit by 9 of the companies interviewed. These were broken down into:

- **Transport policy**

Two of the companies reported making changes to rules on Personal Protective Equipment (PPE); one made it compulsory for all staff to wear hi-visibility clothing while on site, and another site enforced their policy of wearing high visibility clothing with foreign drivers coming onto site. The issue of problems relating to the presence of international drivers was one that was highlighted across the visits to the companies. In addition, several sites mentioned the creation of instruction cards for foreign drivers coming onto site; these cards consist of general instructions in multiple languages, and hand signals used by banksmen.

One of the companies visited had made it a compulsory requirement for all staff in forklift trucks to wear seatbelts. This was as a result of discussions during the audit. The same company had updated their policy to enable them to identify who drivers are.

One site was slightly more complex than any of the sites visited in this research as the roads through the site were shared. In this instance the company was drafting and seeking

approval from the other companies on the site for a transport policy applicable to all those using the site roads. This would include a sticker system for vehicles that were allowed on site to park e.g. for staff, and it was hoped this would help to control visitors/non-employees on site.

- **Procedure reviews**

Two of the companies reviewed their risk assessment process/procedures as a direct result of the visit and made changes accordingly.

Another two companies looked at the checking and maintenance of their vehicles and the current procedures in place. Subsequently one of the companies modified and improved their reporting system for the recording of maintenance on vehicles. The other company increased their checks on forklift trucks to 6 monthly in line with the HSE requirement to do so when used in conjunction with safety cages.

Several of the other companies made alterations to their procedures relating to contractors. One company made changes to the recording and control of contractors on site, whilst another made changes to the procedure for checking the competence of contractors to clarify which jobs they could undertake.

A further procedural change at one company related to the planning of arrival times of heavy goods vehicles on site. This was to ensure no more than seven heavy goods vehicles were on site at any one time. A centralised database was created, accessible to both the gatehouse and the warehouse, detailing expected deliveries and their allotted times. These time slots were also designed to spread the deliveries across a 24-hour period, thus reducing the number of heavy goods vehicles on site at any one time and also reducing the number of heavy goods vehicles entering and leaving the site at shift change.

The last procedural change reported by one company related to the banksman authority. The procedure on site changed so that, whilst helping to manoeuvre a vehicle, the banksman had the authority to stop pedestrians crossing.

- **Training**

Three companies reported making changes to their training as a direct result of the HSE audit. This included refresher training and the subsequent reproduction of documented training records or permits to drive.

- **Improvement/ consultation scheme**

One company had developed a consultation scheme to involve employees in identifying potential problem areas/hazards relating to workplace transport; this had been widened to cover other issues. Staff can make suggestions as to what could be done to improve the situation, with suggestions immediately passed to senior management for a decision. This process takes one day. As a result of this process an amount of unnecessary street furniture (e.g. bollards and signs) had been removed, moved or changed. Also, an exit route from a rest area had been redirected.

3.2.2 Changes made as an indirect result of the audit

The following section summarises the other changes that were reported as having occurred since the HSE audit; this is as a result of the issues being raised during the visit. Again, this is broken down into physical changes and management system changes.

3.2.2.1 Physical changes

In total, 4 physical changes were reported as an indirect result of the audit by 3 of the companies interviewed. These were all internal and were broken down into:

- **Redesign of layout**
One company went on to a further review of the internal design/ layout of the buildings and the associated costs for barriers/walkways were investigated.
- **Vehicles**
One company made a subsequent change to the type of vehicles they used; this was completed at the cost of the fleet supplier. In addition, the same company had sensors fitted to vehicles, which, in the event of an accident or collision, prevented the movement of the vehicle until the systems had been reset. This was something that had been considered before the visit by company 7 and the visit presented an opportunity to discuss with the inspector. Prior to this change individuals did not necessarily report incidents but now they have to, as they are unable to move a vehicle after a collision.
- **Condition of environment**
After the audit, one of the companies decided to do a complete review of the condition of internal environments looking at aspects such as surfaces and lighting. They have identified appropriate repairs and included them in a prioritised risk assessment plan.

3.2.2.2 Management systems

In total 7 changes to management systems were reported by respondents in four companies as having occurred since the HSE audit; this is as a result of the issues being raised. These were broken down into:

- **Transport policy**
One of the companies created their own safe driving policy for their site; a variety of sources were utilised to put this together. As part of this policy, speeding fines were introduced and enforced on site. The same company also produced an information DVD on the subject of defensive walking, aimed at raising awareness of the potential risks to staff.

Another company introduced a new identification policy for forklift truck drivers on site and driver cards were created, whilst another company changed their policy for those arriving at site on a motorbike, requiring them to wear high visibility clothing.
- **Procedure reviews**
One company chose to review all their procedures after the HSE audit and made changes accordingly. Another company reported they had subsequently reviewed their procedures for the selection of staff, as after the visit they had identified language barriers and now insisted that all staff had a good understanding of English.

3.2.3 Future areas to be targeted

The following section summarises the areas that companies identified to be investigated and targeted in the foreseeable future. This is broken down into physical and management system changes.

3.2.3.1 Physical changes

In total, 4 physical changes were identified externally as areas that would be looked at in the future by 3 of the companies interviewed. These were broken down into:

- **Redesign of layout**

One company discussed how they were hoping to achieve some quick results in the near future by making two changes to the external environment: installing speed humps on external roads; and purchasing additional signage.

- **Vehicles**

In addition to changes one company had made to external vehicles as a direct result of the HSE visit, the company reported they planned to make a further change of installing a Perspex roof on the forklift trucks to improve driver visibility of his surroundings.

- **Condition of environment**

As a result of the visit, one of the companies reported looking at the age and condition of the site; they planned to look at the site as a whole and identify problems with road surfaces, potholes and where the site would benefit from brightening up.

3.2.3.2 Management systems

Only one of the company representatives discussed future areas of development in relation to management systems. This related to the possible introduction of a behavioural change scheme at the site; this was to be explored by the company as a way of further improving safety.

3.2.4 Change in attitudes

Half of the companies (n = 5) reported that there have been positive changes in attitude during the last 12 months. One company reported that the changes that have been made have encouraged greater personal responsibility in staff. Another reported that the changes had made the employees more confident to challenge others not adhering to safe practices e.g. delivery drivers not following designated walkways within a warehouse. Two of the companies also reported a management change in attitude and commented that WPT is now better received and more at the forefront for management. Another company also reported that management are aware of what needs to be done in terms of reducing the hazards and risks associated with WPT.

3.2.5 Impact of changes on business

Companies were asked if the changes had impacted on the business in any way. Two companies stated there had not been any impact on the business, whilst four companies reported that changes had had an impact. In three cases a positive impact was reported including improved efficiency and keeping the employees 'on their toes' regarding WPT. Only one company reported a

negative impact because they had to reduce stocking levels as a result of the physical changes made at the site.

3.2.6 Barriers to implementing changes

Companies reported that the main barrier to making changes is the financial constraints they are working under; this was reported by many of those interviewed (n = 6). One company reported being unable to take action and make changes without senior management commitment; this was perceived as a barrier to change. Other barriers described by companies were more cultural such as:

- Balance the focus between production and health and safety;
- Need to raise awareness in employees;
- Need to change attitude of employees on the ‘shop floor’;
- Need to ensure positive employee behaviours, e.g. using walkways.

In addition to this, one company described more site-specific barriers that could not be changed. Another expressed the view that in addition to the identification of problem areas there needs to be suggestions for practical solutions from the inspectors.

3.2.7 Changes made at the other sites of the company

The interviews identified a theme of information sharing across sites within their respective companies. Some health and safety professionals often have shared responsibility for other sites or are part of health and safety forums to share relevant information within the company. This included for example the sharing of the ‘struck by’ checklist, banksmen instruction cards, instruction cards for foreign drivers, and the production of common company policies, risk assessments and procedures across sites. Several of the respondents reported that it was not always appropriate to implement changes at other sites or could sometimes be difficult to do so.

3.2.8 Additional advice

After the visit, four of the companies reported seeking further information on the issues from relevant guidance and the HSE website. Another three of the companies reported additional contact with the HSE inspector including a letter to confirm the areas to be addressed, another visit, and direct advice from the inspector themselves on certain issues. One company reported seeking additional advice from an external consultant on WPT issues. They then combined this with risk assessments and a previous report from the Royal Society for the Prevention of Accidents (ROSPA) for informed planning.

3.2.9 Is there more to be done?

The majority of the companies accept that there is always more that can be done, e.g. behavioural safety, but this hinges on having more money. Others had more specific ideas of where they hoped any further work would focus, e.g. segregation of pedestrians and vehicles, and internal one-way systems. One company interviewed reported that by gaining senior management commitment they had secured funding to complete additional work.

3.3 OVERALL SUMMARY

Table 1 below summarises the main findings from the series of 10 interviews.

Table 1 Summary of findings

No.	Recollection of the visit	Changes made since the visit	Comparison to normal inspection	Overall feedback*	Comments
1.	<ul style="list-style-type: none"> • Pre-visit letter (inc. checklist) received prior to visit; • Described as Workplace Transport (WPT) visit; • Treated as a 'Catch up' visit with HSE Inspector. 	<p>The company reported a number of changes that had been made:</p> <ul style="list-style-type: none"> • CCTV's installed to monitor employee behaviour. • Chained pedestrian barriers around walkways; • Colouring or road markings made consistent with Highway code; • Attempts to put common transport policy in place for whole site; • Risk Assessment (RA) process reviewed/ updated. <p>No changes currently implemented at other sites.</p>	<p>The company felt there was no difference to a standard inspection due to:</p> <ul style="list-style-type: none"> • Nature of the site; • The ongoing relationship with HSE. <p>The visit was described by the company as a WPT visit and therefore treated as a normal visit for the site.</p>	Neutral	Although nothing new was learnt, this visit helped to formalise what was already known.
2.	<ul style="list-style-type: none"> • Pre-visit letter received prior to visit; • Also HSE Inspector provided a checklist – this was passed on to the company safe working groups. 	<p>The company reported a number of changes that had been made:</p> <ul style="list-style-type: none"> • New traffic route in part of factory; • Changed route to rest areas – moved a door so that workers don't walk out into Forklift truck (FLT) path; • Barriers and signs reviewed. <p>Some changes had also been taken on board at other site.</p>	<p>The company felt it was a good use of the inspector's time.</p> <p>In addition, the company commented that they like having a local regular inspector and that they would like to see more of the inspector.</p> <p>Both generic (holistic) and targeted visits have their place.</p>	Positive	
3.	<ul style="list-style-type: none"> • Pre-visit letter received prior to visit; • The struck by check list and tick box sheet was utilised during the visit. 	<p>The company reported the introduction of a staff consultation scheme to help identify areas where pedestrians and vehicles come into contact.</p> <p>The company reported several additional/ indirect changes. These included:</p> <ul style="list-style-type: none"> • A review of their policy regarding safe driving for the plant, and amendments were made; • A 5-minute DVD was created looking at WPT issues such as defensive walking, and shown to staff on site; • The introduction of a speed/fine system on site to monitor employees' speed whilst driving on site. 	<p>The company reported that normally one area of the site is the focus of an inspection and this changes on each visit.</p> <p>This visit was different because one topic was covered over several areas of the site.</p>	Positive	<p>The company felt the visit was useful for reinforcing WPT issues with senior management and staff.</p> <p>The company was reassured about what they were already doing, and used the visit as an opportunity to discuss their existing plans.</p>

* This overall feedback rating was assigned by the HSL researchers based on the information provided by each company. It reflects interviewee feedback on the visit rather than the 'struck by' initiative.

No.	Recollection of the visit	Changes made since the visit	Comparison to normal inspection	Overall feedback*	Comments
4.	<ul style="list-style-type: none"> • There was no prior warning given of the visit; • The HSE Inspector completed the visit in two halves. 	<p>The company reported a number of changes that had been made as a direct result of the visit from HSE:</p> <ul style="list-style-type: none"> • Segregation of pedestrians and vehicles; using barriers. • The company representatives also reported making all the staff wear hi-vis. • New lighting; • Speed limiters were introduced on certain vehicles. In addition to this, personal key codes were also installed to vehicles to ensure individuals were identifiable in the result of a collision occurring. <p>There were also a number of additional/ indirect changes:</p> <ul style="list-style-type: none"> • Driving cards for FLT drivers so individuals identity and driving qualifications can be quickly checked; • Speed humps installed; • The company identified problems with international staff and language barriers, and have implemented a new recruitment policy to ensure all new members of staff can speak good English. 	<p>The company thought it was unfair not to have known what the visit was about, prior to the inspector coming.</p> <p>Overall, they thought it was not a good use of the inspector's time.</p> <p>However the company accepted that perhaps the visit helped them focus on the issue.</p>	Neutral	<p>The company felt they were already on top of WPT issues and were driving them forward.</p> <p>The company commented that one of the main barriers to change is behavioural change, and this is an area they are moving into dealing with.</p>
5.	<ul style="list-style-type: none"> • Pre-visit check list was provided prior to the visit; • The company described it as a detailed visit, which 'covered everything'. 	<p>The company reported having made a number of changes:</p> <ul style="list-style-type: none"> • Signage/ road markings improved; • FLT (used outside) fitted with all-weather cab; • Introduction of laminated guides to banksmen's hand signals (for use by drivers coming on site); • Revised programme for training/ refresher training of drivers (including provision of certificates/permits on completion). <p>The companies also reported a number of additional/ indirect changes:</p> <ul style="list-style-type: none"> • Staff arriving for work on a motorcycle now have to wear hi-vis • Provision of site rules/ guide to banksmen's hand signals implemented at other sites. 	<p>The focused audit was useful as it encouraged the health and safety manager (and the site) to focus on one area.</p> <p>The visit also provided an opportunity to review the Risk Assessments, ensuring they were up to date.</p>	Positive	<p>Considered the audit to contain 'nothing surprising'.</p> <p>The company was reassured by the inspector failing to find any 'safety critical' issues on site, and would like ongoing visits/ contact with HSE.</p>

No.	Recollection of the visit	Changes made since the visit	Comparison to normal inspection	Overall feedback*	Comments
6.	<ul style="list-style-type: none"> • Pre-visit check list provided prior to the visit; • Given access to inspection pack to prepare for the visit and this was useful; • The focus of the visit was on HGV (external transport) rather than internal transport. 	<p>The company reported having made a number of changes:</p> <ul style="list-style-type: none"> • Planning logistic vehicle arrival times; • Foreign drivers – given PPE and instruction cards. 	<p>The company felt that focused inspection is far more useful than a general inspection.</p> <p>The overall tone of the visit was 'to help' rather than enforce.</p>	Positive	Visits are good for all the staff in a variety of ways.
7.	<ul style="list-style-type: none"> • There was prior warning of the visit. • A campaign letter and checklist pre-visit information were provided and found to be useful; • During the visit the HSE Inspector went through the activities on site, then focused on specific areas and finally went for a walk around. 	<p>A number of changes were made as a direct result of the visit:</p> <ul style="list-style-type: none"> • Improvements were made to RAs; • There were also a number of changes made to road layout, signage and floor markings. <p>A number of additional/indirect changes were also reported by the company:</p> <ul style="list-style-type: none"> • Changes were made to the type of trailer used; • Sensors were fitted to FLT's. 	<p>The company thought that visits are usually targeted to some extent, and suggested that this may be due to the size of the site.</p> <p>Overall, the company reported that the targeted visit was beneficial to company, but suggested that HSE would need to prioritise and use their judgement about who to target with these sorts of visits in the future.</p>	Positive	The pre-audit information from HSE was appreciated as it enabled the company to prepare for the visit, and encouraged a self-regulatory approach.
8.	<ul style="list-style-type: none"> • There was a lot of prior warning • The company received information prior to the visit via telephone calls, letters, and additionally had previous experience taking part in audits; • Very similar to the 'backs' visit (a previous HSE targeted approach). 	<p>The company reported having made a number of changes:</p> <ul style="list-style-type: none"> • In the basket storage area, railings put in place to separate storage; • Changes were made to signage; • Changes were made to the control of contractors on site. 	The company reported that it was good to have a fresh set of eyes looking at the site.	Positive	The audit identified things that were already being looked at, as a result of work previously done on WPT.
9.	<ul style="list-style-type: none"> • Prior notification of the visit was received through a telephone call and a letter; • The visit involved explaining WPT policies and procedures, followed by visits to specific site areas to assess compliance; • The visit covered all aspects from transport of goods to waste disposal. 	<p>The company reported having made a number of changes</p> <ul style="list-style-type: none"> • Comprehensive refresher training of all FLT operators (to generate correct documentation); • Clarification of roles (mechanics, maintenance and drivers); • Signage to prevent goods being stored on walkways; • Improved reporting/ monitoring system (for vehicles undergoing maintenance). <p>Changes made at other sites were as a result of similar visits at those sites.</p>	<p>Themed inspections are more beneficial than the traditional 'scattergun' approach. This targeted visit provides a focus for staff to work towards.</p> <p>The company also reported that in their opinion the 'struck-by' initiative impact would be enhanced by an unplanned follow-up inspection.</p>	Positive	The company reported it was useful for the inspector to review their existing policy and practices, and to help raise the profile of Health and Safety within the company.
10.	<ul style="list-style-type: none"> • Prior warning including checklist received by the company; • Sought advice from the inspectors on receiving decks and FLT governance. 	<p>The company reported one change:</p> <ul style="list-style-type: none"> • Pedestrian safety near to main entry and exit point for staff on site – rolled into part of a larger project. 	<p>The company felt the visit did not greatly differ from a normal inspection.</p> <p>Although the company were not sure they learnt anything, the visit gave support to what they were already doing.</p>	Neutral	Having the checklist prior to the visit was very useful.

3.4 APPRAISAL OF TARGETED AUDIT APPROACH

3.4.1 Overall view of the experience of the targeted audit

Overall it was found that the majority of companies viewed the visit as a positive experience (n=7). Three of the companies had a mixed view of the visit and were therefore classified as neutral in the summary table. None of those interviewed were completely negative in regard to the targeted audit, although some did have unenthusiastic comments such as it was *not* a good use of the inspector's time.

The majority of the companies reported that the audit was a positive/useful experience (n=7); two reported that the audit was beneficial and one other described the visit as thought provoking. Some respondents reported that they liked the focused element of a targeted visit (n=3). Three of the companies reported that they felt the visits were a good use of inspectors' time and that the visit had more of a feel of helping rather than enforcing. Further to this, some of the companies felt that more contact with HSE would be useful. Those who had a regular inspector felt this was beneficial as it gave the inspector and the company the opportunity to build a relationship.

Conversely several companies made comments that the visit was no different to a normal visit. One company stated that the visit only differed in the sense that they knew what was going to be covered, whereas another company reported that visits are usually targeted to a certain extent and, therefore, did not differ greatly.

3.4.2 Information learnt and usefulness of the audit

On the whole, the companies did not report learning anything new from the audit. However, two companies reported that the inspectors gave them more ideas and identified areas for improvement and a third reported that the visit had changed their view to be more holistic of the design, environment and the people.

Whilst the majority of companies did not report learning anything directly from the audit, the majority found it useful; one company stated that these visits were always useful. Some of the companies remarked that the visit formalised what was already known or being looked at (n=3).

A number of companies described the arrival of 'a fresh set of eyes' as an opportunity to do several things including:

- Review risk assessments;
- Apply knowledge;
- Focus on one thing;
- Provide a good forum to seek advice on issues.

The visits were also associated with raising the profile of health and safety with both management and employees; this was partly attributable to the walk rounds with inspectors. The visits provided the health and safety teams with backing and were described as a tool for senior management engagement by one company. One company went on further to discuss how they personally did not learn anything new from the visit although the senior management did; this was due to the foreign management gaining a better understanding of British law.

Several of the companies discussed advantages to the visit specifically relating to WPT. These companies reported that the visit:

- Reinforced WPT in management and staff;

- Provided better communication of WPT;
- Resulted in WPT being built on.

3.4.3 Other comments on struck by audit

Several comments were made in relation to the checklist. On one occasion a company suggested that the checklist should be completed prior to the visit and then forwarded to the relevant inspector for closer investigation. Another suggested that, as many of the statements in the checklist were not relevant to their company, a not applicable (n/a) option should be added.

4 CONCLUSIONS

The majority of companies referred to the audit in question as a workplace transport visit. It was thought to be appropriate by the companies, as ‘struck by’ issues could not be looked at in isolation without considering wider WPT issues.

There were a number of commonalities across the companies in terms of both the contact prior to the audit and the changes made as a both a direct and indirect result of the ‘struck by’ audits. The format of the visits varied across inspectors but the content of the visit remained similar. Whilst the changes made were in some cases reported to have made an impact on the business, this was, in most cases, in a positive way. The interviews identified a theme of information sharing that highlighted the dissemination of information from the ‘struck by’ audits across multiple company sites. Most companies acknowledged that there is always more that can be done in terms of reducing WPT risks but highlighted that there are barriers to doing so, e.g. financial constraints and lack of management ‘buy in’. In addition, many of the companies also highlighted cultural barriers to making WPT changes such as awareness, attitudes and behaviour of employees.

A number of other interesting elements came out from the interviews. Many companies highlighted a common problem around having international drivers on site and the difficulties this causes with language barriers and differences in expectations of safe behaviours; international drivers on occasions did not have appropriate PPE. Further to this, many of the companies reported the introduction or prior use of multi-lingual instruction cards on their sites as a way of addressing this issue.

In summary, although the majority of companies did not feel that they learned anything new from the ‘struck by’ audits, on the whole the audits were seen as positive and it was generally felt they were a good use of time. The ‘struck by’ audits were thought of as a chance to spend time with an inspector in a helping environment rather than enforcement led visit and often formalised what they already knew. The audit offered an opportunity to highlight WPT issues and gain/ reaffirm management commitment to them.

5 APPENDIX

5.1 APPENDIX A - INTERVIEW SCHEDULE

Warm up questions

1. What is your job role and how long have you worked for this company?
2. How many employees are on site?
3. How many sites in the UK does the company have?
4. Who is responsible for WPT safety management at your business?
5. What sort of Workplace Transport activities take place on site?
 - Vehicles (probe) (what types/tasks are they used for)
 - Number of Staff (probe)
 - Contractors (Probe)

Company recollection

1. What can you remember about the 'struck by'/WPT audit?
 - What areas did the audit cover?
2. What did you learn (if anything) from the 'struck by'/WPT audit?
 - About Workplace Transport risks
3. Was the 'struck by'/WPT audit useful? How?
4. Did you receive prior notification of the audit? If so, how did you prepare for it?

Company changes/actions since audit

1. Have you made any changes or do you plan to make changes as a result of the 'struck by'/WPT audit in any of the following areas? If yes, please provide details
 - Policy/Rules/Procedures/working practices including for contractors
 - Physical layout
 - Recording and reporting
 - Accident
 - Maintenance
 - Training records
 - Communication
 - Vehicles
 - Barriers
 - Costs

If no changes have been made- why?

Do they feel they are being fully compliant?

2. How easy/difficult were they to implement?
3. Were these changes a result of a recommendation arising from the audit or were they changes which were already planned?
4. Do you feel the changes you have made have impacted on your business in any way?
5. Have any of these changes been made at the companies' other sites?
6. Have you sourced more advice regarding WPT since the audit/inspection?
7. Do you still have outstanding actions from the audit/inspection?
 - If so, what?
8. How much more do you think your business could do to reduce the risk of accidents involving vehicles in the workplace?
9. How satisfied are you that senior management have taken all the necessary precautions regarding WPT safety?
10. Do you/senior managers consider there to be any significant barriers to achieving good standards of WPT safety?
11. Have attitudes changed towards WPT in the last twelve months?
 - Staff
 - Management

Difference from a standard inspection

1. Have you had experience of previous inspections by HSE? If so, how do you feel this audit process compares to a standard inspection?
 - Probe for positive and negative views
 - Was this inspection more comprehensive/ rigorous? Why?
2. What did you get out of the audit/inspection in comparison?
 - Was it more useful to focus on a single issue in detail rather than a wide range of health & safety issues? Why?
 - Did it help identify any issues?
 - Overall was it a positive or negative experience? How?
3. Do you think the audit approach is a good use of HSE inspector time?

5.2 APPENDIX B – INTERVIEW SUMMARIES

5.2.1 Interview 1

5.2.1.1 Background

Company 1 is a manufacturing company with 16 sites across the UK (most of which have an administration function) and, approximately 90% of the manufacturing by company 1 in the UK as a whole, happens at the site visited. The site visited employs 600+ people in manufacturing and 40 in logistics (approximately 640 individuals in total).

The logistics transport is contracted out and, therefore, the drivers who come on site are from a variety of nationalities (site instructions are provided in a variety of languages). The HS&E Manager and Logistics supervisor take a joint approach to managing workplace transport (WPT).

There are approximately 100 'internal' drivers at the site who all have training and a medical. All these staff must display their badge with details of vehicles they are authorised to drive, e.g. counterbalance, dilly etc, and all vehicles are given daily checks. If any of these drivers are involved in an incident they are given a medical, as standard, to check there are no medical problems. If there are no medical problems then retraining is provided and there are two instructors on site who are able to do this.

The site visited is quite complex as a third of the site visited had previously been sold off (freehold) and, therefore, a number of site facilities are shared (e.g. gatehouse). There are consequently a number of other companies on the site, who are tenants of the holding company, who currently own the other third of the site. It is estimated that approximately 70% of the external traffic on the site is not related to company 1. This joint ownership of the site as a whole poses a number of difficulties to company 1 when making external site-wide changes relating to workplace transport. However, this is currently being addressed and transport is an agenda item on the site wide meetings.

5.2.1.2 Company recollection

What can you remember about the 'struck-by'/ WPT audit

The HS&E Manager was not present at the specific 'struck by' visit but the Logistics supervisor was and fed back the details of the visit. The company have been involved in a number of workplace transport visits over the last couple of years and the visit in question was not described to the company as a 'struck by' visit but rather as another workplace transport visit. This particular visit was more of a catch up visit.

What did you learn if anything from the audit?

Was it useful? How?

The interviewees reported that there were no surprises during the visit but it was useful as it formalises what is already known and it is useful to have a new set of eyes look at things. It also gave an opportunity to review the Risk Assessment process and make changes.

All the HSE visits on WPT have helped change the emphasis to a more holistic view of people, workplace and equipment and designing good systems, rather than a reliance on human compliance.

The logistics manager also felt it was a good opportunity to apply and develop knowledge/ theory.

Did you receive prior notification of the audit?

The interviewees recall a pre visit letter with a question sheet proforma being sent. The HS&E Manager reported previously seeing the proforma used in HSG165 before the visit.

5.2.1.3 Changes/ Alterations

Any changes made:

The majority of changes have been made as a result of an issue being highlighted:

- Internally:
 - Work done to reduce congestion in gangways with people/ fork lift trucks;
 - The problem was that previously they were constricted to design layout. However now the site is downsizing and this has generated floor space and an opportunity to redesign that previously would have been impossible, e.g. new gangways etc;
 - Also the site installed CCTV's to monitor people's behaviour and this has helped to change people's behaviour.
- Externally:
 - Installation of chained pedestrian barriers around walkways;
 - New zebra crossings installed to match Highway Code – previously there were yellow box crossings. Also double yellow lines put on certain parts of the site roads to stop vehicles parking;
 - Trying to get a common transport policy in place for the entire site as a whole, although this is currently at a draft/discussion stage. This would include a sticker system for authorised people to be on site and also a system whereby people are warned for inappropriate driving onsite and would possibly lead to individuals being banned from the site if their driving practices do not improve.
- RA process was identified as being outdated and was subsequently reviewed.

Many of these changes were in place before the specific 'struck by' audit.

These changes are communicated in the H&S meeting minutes that are posted on the board.

How difficult/ easy to implement?

The interviewees reported there are a couple of barriers to implementing changes:

- Money:
 - These visits from HSE offer formalised intervention, which in turn offers more leverage to obtain funding;
 - In the current climate there are financial restrictions. In an ideal world there would be a total redesign of the entire site including one-way systems in place on all the roads – but the money is not available for that to be done. Therefore in reality, all that can be done is what is “reasonably practicable” however this is a possible point of contention.
- 3rd party ownership of 1/3 of the site:
 - It has proved difficult to identify who the owners of the rest of the site are (currently) and obtain contacts/links to discuss the issues with the site. The current contact is not based at the site and therefore the remote nature of the management is a further barrier;
 - This is not likely to change soon and is potentially a long-term barrier;
 - The responsibility for maintenance is split 60/40 (company 1/ 3rd party company) and therefore there needs to be discussions about some of the changes that need to be completed.

Have the changes impacted on the business?

The interviewees did not feel the changes made had impacted on the business in anyway. The number of WPT accidents previous to any changes was minimal anyway, although the accident rate overall had reduced.

Have any of the changes been implemented at the companies other sites?

None of the changes made had been implemented at the other sites as yet. The logistics manager reported that they were to visit another of the company sites, that were not HSE enforced, to look at what systems they have in place and there are plans to apply some of the controls at this site across others within the company.

Have you sourced more advice since the visit?

The interviewees reported that prior to this specific visit they had a report from the royal society for the prevention of accidents (ROSPA). Since the visit, the site had also asked a consultant to provide fresh view and provide a brief report in July to highlight a number of recommendations or rather priorities, and this was not significantly different to the ROSPA report. These reports together with the RA's are the preparatory documents for plans to be made.

How much more do you think your company could do?

The interviewees reported that the majority of WPT accidents are internal. In the future there will be further pedestrian segregation and this will be tied in with the downsizing of the site. There is also the possibility of a one-way system being implemented internally.

The interviewees reported that they could do more if there was more money. Having said this if something 'has to be done' then the senior management will find the money.

Management commitment

For the first time two of the company wide Key Performance Indicator's (KPI's) relate to H&S. Senior management at the company work in a way that everything is out in the open and the union support this. They know they need to develop a plan appropriate to the business/ costs and are currently in a state of flux.

Attitudes towards WPT

- Staff:
 - Generally very little has changed.
- Management:
 - Aware there are a number of issues still to address;
 - Are working under constraints;
 - Internal opportunities to make change;
 - Nervousness from a business point of view.

5.2.1.4 Comparison with regular inspection

The interviewees felt there was no difference to a standard inspection due to the nature of the site and the ongoing relationship with HSE. The visit was described as a WPT visit and therefore treated as a normal visit for the site

5.2.2 Interview 2

5.2.2.1 Background

Company 2 is part of an international company and a manufacturer with approximately 1000 people on this site; 600 blue collar, 100 manual staff and management staff and 200 contractors (mainly in stores). Generally there are 200-300 employees on site at any one time with day shift back up teams, maintenance crews, project workers etc.

The site is one of two manufacturing plants in the UK. They also have their distribution company whom their product is sold through.

There is a simple layout to the site but things change constantly and often they have to move machines. They have a large amount of stock and storage is required for this. These fluctuating stock levels can cause problems. The company try to separate pedestrians and workplace transport across the site as much but this is still a problem in some areas.

There are a number of WPT activities that take place on site including:

- Internally:
 - Fork Lift Trucks (FLT's) – a fleet of 20-22 with a max speed limit of 6mph. These are rarely used in the buildings;
 - Loading bays;
 - Battery operated tuggers – deliver parts to machines and have a max speed of 4mph.
- Externally
 - Deliveries of components via wagons and shunter vehicles (from other site);
 - Parking storage of wagons/ trailers.

The company stated that there are also problems at the warehouse area where a lot of international drivers come on site to. But they have printed safe working practices for all languages, e.g. polish.

5.2.2.2 Company recollection

What can you remember about the 'struck-by'/ WPT audit?

Did you receive prior notification of the audit?

The interviewees stated that they had two visits for the workplace transport because the inspector was called away.

The interviewees recalled that they received prior notification of a visit by letter to say that they are looking at workplace transport issues, and that at least a month's notice was given before the visit. In addition, the HSE inspector provided a checklist of workplace transport. This was then passed onto the safe working group for risk assessments to be done against.

The interviewees accompanied the HSE inspector around the site. They recalled that the HSE inspector came with a checklist but were more proactive than just utilising that. The risk assessments were checked, this process included managers and reps too. The inspector finished the visit by meeting with the senior union officials. In addition, after the visit the company discuss the issues with staff because it is an opportunity for them to voice their issues and for the workers to feel under less pressure.

What did you learn if anything from the struck by/WPT audit?

The interviewees stated that they knew what their problems were but that the inspector gave them more options. The WPT audit was used as a tool for senior management engagement and it was discussed in the safety meetings. Then the necessary adjustments for the next HSE inspector visit could be made.

Was the ‘struck by’/WPT audit useful? How?

The interviewees thought in the main that audits were always useful and that it helps the health and safety manager to focus and to give some clarity. The audits give safety managers/ reps backing and, therefore, it supports them in their role. They help to get the safety work initiated; the audits were deemed to be good though as it highlights to senior management that this is important. The only problem with having actions as a result of the audit is that being part of a multi-national company there can be time delays for getting finances released to carry out the work.

5.2.2.3 Changes/ Alterations

The interviewees report that they have made between £20000 and £30000 worth of improvements.

Any WPT changes made as a direct result of the visit:

- Re-routing of traffic/ pedestrians:
 - An analysis of all traffic was completed (eight trips per shift). In the factory it was noted that the bulk rolls are the problem area historically because of congestion. A new traffic route was created that freed up the area and took away all the FLT usage;
 - They also have one ways systems etc. and initiated general walk routes that FLT’s can’t go through or on;
 - Also a bridge has been put in over the conveyor and a barrow has been put in each row.
- Review of training:

Any other WPT changes made since the visit:

- Review:
 - The company reported that they have just reviewed in-house procedures and have put forward some plans to their inspector;
 - The WPT visit gave the company an opportunity to review costs for barriers and walkways.

The interviewees also stated that it is mainly the physical layouts that are the problem, not policy or training; ways of moving between the lines, pedestrian areas, rest areas are problematic and that there are new things that came out of the inspection.

Do you feel that the changes you have made have impacted on your business in any way?

The interviewees stated that there was no real business impact and that it has been minimal on this site. However, it was suggested that at the other UK manufacturing site there had definitely been more of an impact.

Have any of the changes been implemented at the companies other sites?

The interviewees stated they had assisted the other UK site by training, and passing on the checklists. There have been some great ideas and sharing of knowledge between the sites, making any changes easy to implement once the issues had been identified. The interviewees stated that there is a continual sharing of knowledge.

Have you sourced more advice regarding WPT safety?

The only further advice they sought had been the guidance.

Do you still have outstanding actions from the audit/inspection?

Is there a lot more you could do?

The interviewees report that they had no outstanding actions, but the interviewee stated that they did not look over all the areas. Senior management and the business are reducing risk but accepted that more needs to be done. The cultural difference in the senior management (as this is an international company)

meant communication is sometimes not what it should be and that health and safety are expected to deliver without support.

Have attitudes changed towards WPT in the last 12 months?

The interviewees felt that by managers taking this audit on board it subsequently feeds into the departments spending on health and safety as this has been continued. WPT is more at the forefront of the company's health and safety since the HSE visit, and management are looking at cost effective ways to make changes.

In terms of staff attitudes the interviewees stated that whereas health and safety used to be dealt with in the office, now people are more accountable and so this gets them involved and encourages personal responsibility. It was generally felt that when staff heard about the changes it helped them to think about the issues.

5.2.2.4 Comparison with regular inspection

How do you feel this audit process compares to a standard inspection?

The interviewees felt that generally the time for the visit was adequate and was without fear of prosecution. There are positives for both focused and generic visits. The interviewees thought that both types of visit have a place but that if they had limited knowledge of the site then they would prefer an overview approach.

Overall the WPT visit was positive and the company felt that it had not necessarily cost a lot of money. For the interviewees it has been really useful experience.

Do you think the audit approach was a good use of inspector's time?

The interviewees thought that it was a good use of inspector's time as they have over 1000 employees. They would like to see more of the inspector, not less, and that they would like their own managers to see the HSE inspectors more and to continue with having local regular inspectors. In general visits are quite good, and are made better because it's a local inspector.

5.2.3 Interview 3

5.2.3.1 Background

Company 3 is a manufacturer employing approximately 3000 members of staff, of which 2200 are permanent and a further 800 are contractors.

There are a number of workplace transport activities at company 3. These can be separated into internal and external activities.

Internally - forklift trucks and towers are used to transport materials and move goods. In addition to this at the end of general assembly the produced items that have passed quality checks are driven out the building or those that need some alterations are driven to a bay inside the general assembly to have work carried out on them. Those that leave general assembly are passed to sales and then moved on the external site roads to a storage site to wait being dispatched. In addition, externally materials are moved around site.

There are also international drivers who deliver to site and this can be problematic, e.g. once an international driver demolished a stanchion. However, it is only company 3's vehicles that are on site not the international delivery drivers; dispatch drivers drive the produced items to the transporters. International drivers still present an issue as there is a real cultural difference with some drivers turning up in flip-flops or with their children. The interviewees reported having basic phrase books to try and deal with this.

The interviewees discussed that WPT was already on their plan for the year and they are being proactive.

5.2.3.2 Company recollection

What can you remember about the 'struck-by'/ WPT audit?

Did you receive prior notification of the audit?

The interviewees recall that they had a checklist sent prior to the visit and as a result felt that they knew why the inspector was coming. They also felt this prior warning enabled them to plan for the visit and repair anything necessary. At the inspection this checklist and a tick box sheet was used. The senior Trade Union Official was present at the meeting.

They reported that the visit was based on the check sheet and during the visit the inspector looked at many procedures such as how the vehicles are checked, the policy for drivers on site, present outstanding actions. The inspector was also shown the areas that were considered to be the 'worst' for workplace transport risks such as the stores and general assembly. The interviewees reported doing this because they want more visits to be more open and honest so that they have good communication and work well with HSE.

What did you learn if anything from the 'struck by' WPT audit?

The interviewees felt that the visit allowed them to focus on things such as the movement of materials in the plant. Workplace transport was already put in the plan for the site but the visit helped to focus more on the issue and reinforce this with senior management and staff. As a result of the visit there were a number of action points and they were publicised to staff.

Was the 'struck by'/WPT audit useful? How?

The interviewees felt that in addition to it being useful to reinforce WPT issues with senior management and staff, it also slotted into what was already being done internally regarding internal workplace

transport. They reported that the visit reassured them in terms of what they were already doing and it enabled them to discuss the existing plans and there was no diversion of resource.

5.2.3.3 Changes/ Alterations

Any WPT changes made as a direct result of the visit:

- **Staff consultation scheme:**

The interviewees reported that the staff consultation scheme has come about as a direct result from the visit. It is an improvement process and the site use it as a tool that identifies potential problems and creates solutions that can be applied to any area of work such as WPT. In the case of WPT it was used to pin point where pedestrians and vehicles come into contact.

This process lasts for a day during which the employees taking part help with an assessment of the area in question to identify any problems or issues. The employees who take part can include for example drivers or production staff plus there are always employees who are external to the area in question. These 'external' employees are brought in as 'fresh eyes' in an area to try and avoid any complacency. The topics that are to be looked at are explained and then ideas of problems or issues are put forward. The aim is to come up with a recommendation for a change/alteration that is then given to the panel. The panel, including senior management, then go through the points and make a decision on whether the work is to be agreed. A facilitator assists the whole process.

An example of a recommendation that has been approved and actioned on the consultation process on WPT is an exit route that has been changed. In addition to the WPT day another day was run on street furniture removal and this looked at items such as bollards and signs that were now redundant and could be removed or need to be changed/ put in place.

The interviewees reported that this scheme was easy to implement and a quite effective way of getting a result. The information collected is not disseminated across the site but people in that area are involved in the process and therefore see the results.

Any other WPT changes made since the visit:

- **Policy Changes:**

The interviewees reported that recently they have been looking at a policy on safe driving for the plant. This has involved collecting and sharing information with others from the same industry and amalgamating the good practice from all. It was reported to be a difficult consultation process negotiating with the TU and their legal representation, but it was eventually agreed to.

- **DVD:**

The interviewees had created a 5-minute DVD looking at WPT issues such as defensive walking. This was shown to all the staff on site in July 2007 during a series of 30-minute senior management presentations across shifts. The reaction was reported to be very positive; the element of the DVD where a web cam was placed on a forklift truck to demonstrate the poor visibility the driver actually has seemed to of had the biggest impact.

This DVD awareness video was not a direct result of the visit. It was a way of being pro-active.

- **Speed fine system:**

The interviewees reported having a speed fine system operating externally on site using their own speed gun to monitor employees' speed whilst driving. They report that they have been stopping people but at present the punishment is down to the manager's discretion. Again this is not as a direct result of the visit and is one of the sites own initiatives. In addition to this,

information on other issues such as using mobile phones whilst driving is passed out to employees.

Do you feel the changes you have made have impacted on your business in any way?

The interviewees reported that the visit has positively impacted on the business as it helps them focus. It has reinforced issues and the site has had 11 million hours without a serious accident.

Have you sourced more advice since the visit?

The inspector has been in since and the company reported that they have given them feedback.

Is there a lot more you could do?

The interviewees believe that there is definitely more they could do but it's an evolving science and they are developing as they are going on. For example, the company identified that they could reduce forklift use internally by using a smaller dolly delivery tower.

There is commitment from senior management, e.g. a speed reduction from 10 to 8 mph for forklifts has been supported, and it is suggested that this could be reduced further.

Are there any barriers to making changes or actions since audit?

The interviewees report that there have always been constraints but the changes that have been made have been done within their financial limits. Another barrier to making an impact with any changes is awareness, but the time and effort the interviewees put into this process is high.

Have attitudes changed towards WPT in the last 12 months for staff and management?

The interviewees feel that there has been a positive change in attitude. For example it's hard to say that the video has had an impact, but there is an appreciation of other people's awareness.

5.2.3.4 Comparison with regular inspection

How do you feel this audit process compared to a less focused general inspection?

The interviewees reported that normally there is one area of the site as the focus and this rotates. This visit was different in that one topic was covered over several areas.

In general the interviewees felt they got more out of this visit. They reported that it made them think about the specific issues more and it helped to check what they were doing was right and it was thought provoking.

5.2.4 Interview 4

5.2.4.1 Background

Company 4 is a manufacturer with 10 sites in the UK, 5 in Europe and 1 in China. The site visited has approximately 850 employees and runs 24/7 operations.

All of the workplace transport (WPT) activities on site are overseen by the WPT manager, whom is assisted by two transport managers (*NB: these individuals were not present at the interview*). The interviewees reported that the main WPT hazards for the company at this site relate to driving, both within and outside the site. The company has a number of vehicles including 10 forklift trucks, 100 loaders and 150 trailers. These are used by company 4's own employees whom have been through a weeklong induction prior to being able to use them.

Company 4 uses regular contractors (Contractor Company) for servicing of the trucks and the machines. These regular contractors are from an approved list i.e. 'tried and trusted'. All of the contractors have an induction to the site, which lasts between 40 minutes to an hour. The contractors are not permitted to use the forklift trucks.

In addition, the interviewees stated that they have been working to lower the risk of WPT. For example, previously they had 8 injuries in 2004 and since then the injury rate has been lower.

5.2.4.2 Company recollection

What can you remember about the 'struck by'/WPT audit?

The interviewees reported that they were not aware the visit was a WPT audit. They recalled that the HSE inspector came along as normal however only half of the checklist questions were covered initially. The HSE inspector then had to leave and come back at a later date to complete the rest of the checklist questions from the audit.

The visit looked at: training, competence, layout, parking, refuelling, and maintenance of vehicles. The site Risk Assessment (RA) had already covered a lot of issues that came up in the visit. So company 4 reviewed their previous RA covering the WPT issues and built onto the RA from the HSE Inspection pack and tailored it to suit their needs. The interviewees considered the inspection pack to be a good source of information.

What did you learn if anything from the audit?

Was it useful? How?

The interviewees stated that they had built on WPT from the visit and have set a time frame of 3 - 6 months to do this. The interviewees stated that they were now more focused.

The interviewees reported that there is now better communication of WPT including issue follow-ups. WPT is now discussed twice a month in business meetings.

Did you receive prior notification of the audit?

The interviewees stated that they had received no previous notice and were, therefore, not able to prepare for the HSE audit.

5.2.4.3 **Company changes/actions since audit**

Any changes made:

The interviewees stated that they were doing a lot of work and that changes were being made. They believed that they were driving the initiative forward. They acknowledged that the company had made changes due to the HSE audit. These changes included:

- **Segregation of pedestrians and vehicles**
 - Concentrating on the walkways used by both people and vehicles, and they acted straightaway and made the site a ‘full hi-vis site’; so hi-visibility clothing is now used in all areas (in case of forgetfulness etc);
 - Adding barriers.
- **New lighting** - in the form of a new light column.
- **Speed Limiters** – has been fitted on four trucks. These had been retrofitted, so that the trucks could only reach speeds of up to 3 mph if carrying a load.
- **Personal key on trucks** – A personal key code that has to be entered to start the vehicle had been fitted to the trucks. Previously there had been a lot of damage to trucks but nobody had owned up to it – this will hopefully reduce this.

The interviewees believed that in some areas they ‘had gone beyond the regulations’.

The interviewees stated that they looked further into WPT issues after the visit and identified some areas that needed addressing. For example, they covered who’s responsible for WPT and they talked to the forklift truck drivers and created driving cards for them to fill out. In addition, the interviewees said that they looked into the lighting, surface repairs, and that they have drawn up a RA plan of what to do. The interviewees argued that their Risk Assessment was a working document – that it was ongoing. Once one change had been completed they moved onto another WPT issue. They felt they were on top of the WPT issues.

The interviewees discussed that the company was attempting to get to grips with behavioural change and the interviewees stated that they were ‘about to go onto that area’.

In addition, the interviewees then explained that currently the site had a lot of foreign nationals whose first language was not English. The site poster, ‘what – what not to do’ is currently displayed in eight different languages. However, there is no one in the company that can translate or speak in all the languages required. The interviewees mentioned that there was an employee on the ‘shop floor’ that could speak seven languages but it was different for the supervisory and management staff that only speak English. Due to these issues, nine months prior to the Interview, company 4 changed the rules for selection of staff so that now employees have to have a good understanding of the English language.

In the short term, the interviewees stated that they were going to try and achieve some quick hit to improve WPT safety, and they gave the example of placing speed bumps. However, they said that these ‘quick hits’ still need to be planned, purchased, and signage created to keep people informed.

How easy/difficult were the changes to implement?

The interviewees said that some changes were easy to implement whilst some were hard. They explained that they were required ‘to get the changes through the system’ and agreed by the finance director.

They gave an example of a lighting tower to help increase visibility - they argued that this was on the surface a simple quick hit, however, the cost actually involved was high (£20K).

The interviewees also discussed how they would like to put in a logging system that would automatically reduce the speed of a truck entering a particular area - caused by a vehicle passing over a loop in the system. This system was priced at £50k. They explained that an engineer had looked into the feasibility

of such a system and informed them that they would have to produce their own interface, so the idea was halted.

The interviewees discussed why it was not practical to stop transport altogether, stating that vehicles were needed to keep production flowing. They also mentioned that previously they had tried to introduce a combined truck, which could be side loaded, and could go in all directions. Unfortunately this truck had failed because it was too big and twice as much space was needed.

Have the changes made impacted on the business in any way?

The interviewees reported that in certain ways the changes they had made to WTP had impacted on the business because they had lost stocking levels. They explained that forklift trucks had previously been allowed inside but now they were only allowed to 'drop-off'. The company needed to introduce other equipment to do the jobs that a truck would have previously done. The interviewees argued that although there had been a drop in forklift truck incidents they could not say that it is due to changes.

Have any of these changes been made at the companies' other sites?

The interviewees stated that the transport RA and plan had been rolled out, but explained that the other sites work independently.

Have you sourced more advice regarding WPT since the audit/inspection?

Afterward the visit the interviewees located the information about the initiative from the HSE website.

Do you still have outstanding actions from the audit/inspection?

The interviewees stated that they had to move a lot of the plant processes and equipment around – so there were still actions ongoing.

How much more do you think your business could do to reduce the risk of accidents involving vehicles in the workplace?

Apart from the remaining WPT issues, the interviewees stated that there are always things to improve. The engineering side of WPT has been considered, and the interviewees believed that the next area to concentrate their efforts on was the behavioural safety side of WPT; believing that behavioural safety issues were the key.

How satisfied are you that senior management have taken all the necessary precautions regarding WPT safety?

The interviewees stated that senior management were supportive but they could be more supportive. They believed money was not an issue but if they want to make things more difficult for production, then senior managers will question their requests.

Do you/senior managers consider there to be any significant barriers to achieving good standards of WPT safety?

The interviewees thought that senior management had not really created any barriers and they argued that all the WPT issues should be workable, however as previously discussed there do have to seek agreement from senior management.

Has there been a change in attitude?

The interviewees say that they thought that attitudes had 'definitely' changed.

5.2.4.4 Difference from a standard inspection

The interviewees felt that it was a bit unfair not to have known what the HSE visit was about prior to them arriving. They would like to have seen the document used by the HSE Inspector as they felt that they could have used the framework and worked from it to plan for the visit.

The interviewees explained that they felt HSE was not as helpful as other government agencies they had dealt with. The interviewees felt that they did not want to tell HSE where the company was up to because HSE were only likely to use a 'big stick later on'.

The interviewees again stated that they believed that they were onto the issues of WPT: 'was on with it anyway, so not an issue, we knew what the issues were... So maybe just helped us focus.'

However, the interviewees believed that overall they had learnt from the experience of the visit and that they could build on the findings. However, they were neither positive nor negative, but neutral about the audit because they were already working on improving the issues of WPT.

Overall the interviewees did not believe that the audit was a good use of HSE inspection time.

5.2.5 Interview 5

5.2.5.1 Background

Company 5 is a manufacturing company with 4 sites across the UK (although they are currently undergoing a reorganisation of activities at some sites). On the site visited, there are 10 production lines and these carry out the majority of the manufacturing for company 5. Approximately 750 individuals are employed full time at this site (although due to shift working patterns, only 250 people would be onsite at any one time). There may also be some seasonal changes in staffing patterns.

The site receives visits from road tankers delivering raw materials and packaging, and lorries distributing the finished product from the site. Distribution is contracted out and the drivers who come on site are from a variety of nationalities (instructions, and a basic guide to banksmen's hand signals are provided in a variety of languages).

Onsite transport consists of forklift trucks; powered pallet trucks (only ridden in restricted areas – identifiable by signage) and reach trucks. Although legally FLT drivers only have to be 'competent', the site has recently initiated a scheme for training/refresher training of FLT drivers, based on who requires training on different vehicles.

The warehouse area is where the majority of the WPT can be found in operation. Company 5 had previously identified hazards associated with the movement of employees through these areas (a result of the constrictions on the site layout, due to the age of the building). In addition a number of other hazards were identified e.g.

- Requirement for lorries to reverse after using the weighbridge (due to it being situated near a dead-end);
- Requirement for barriers to separate vehicles and pedestrians (pedestrians to walk through factory where possible);
- Improved lighting in the yard;
- Removal of staff parking (due to the location necessitating movement of pedestrians from one end of the site to the other).

5.2.5.2 Company recollection

What can you remember about the 'struck-by' / WPT audit?

The interviewee recalls that the 'struck by' audit 'covered everything'. The visit also included consideration of wider WPT, and lasted from mid morning until mid-afternoon, including a tour and the inspector meeting numerous staff (including representatives from the distribution contractor).

The inspector was particularly interested in how company 5 had arrived at the changes (briefly mentioned above), and specifically asked about barriers and site rules. The inspector was also interested in the banksmen and training they received, as well as the general management of the site, including ensuring the vehicles themselves are safe. Company 5 had been provided with a pre-visit checklist, and considered the audit to contain 'nothing surprising'.

What did you learn if anything from the audit?

Was it useful? How?

The interviewee felt that there are numerous activities occurring on site, everything is covered by legislation, and therefore the focused audit was useful due to it encouraging the interviewee (and the site) to focus on one area for consideration. It also gave an opportunity to review the Risk Assessments, ensuring they were up to date. The inspector not finding anything 'safety critical' on site was also reassuring.

Did you receive prior notification of the audit?

The interviewee was sent the pre-visit checklist. Company 5 had provided the inspector with all relevant RAs and other paperwork relating to WPT. The inspector had obviously read through the information before the visit, and regularly referred back to information.

5.2.5.3 Changes/ Alterations

Any changes made:

The majority of changes have been made as a result of an issue being highlighted:

- Site:
 - Signage used to supplement inadequate road markings highlighted by the inspector;
 - Signage used to clearly indicate visitor parking area;
 - Existing signage amended (removal of picture of FLT) to clarify intended meaning.
- Vehicle:
 - Reviewed use of reach trucks out side (no change made to usage);
 - FLT (used outside) fitted with ‘all weather’ cab. In addition to the inspectors comments, plans to fit reach trucks with scratch resistant Perspex to weather proof them;
 - Use of seatbelts questioned, decision taken to implement compulsory seatbelt use (despite this not being a legal requirement);
 - FLTs now checked every 6 months due to their occasional use with ‘safety cages’ (H&S manager previously misinterpreted the requirement for ‘equipment’ requiring 6-monthly checks);
 - Introduction of laminated guide to banksmen’s hand signals for use by drivers coming on site;
 - Banksmen given the authority to stop pedestrians.
- Driver:
 - Revised programme for training/refresher training of drivers (including provision of certificates/permits on completion);
 - Policy drafted regarding ‘who’ drivers are.

In addition to the inspectors’ observations, staff arriving for work on a motorcycle now have to wear hi-visibility vests. Many of these changes built on changes made by the company before the specific ‘struck by’ audit.

How difficult/ easy to implement?

There are a couple of barriers to implementing changes:

- The interviewee noted one instance where the inspector stated that a current road marking system needed to be improved, but was unable to offer any potential/ practical solutions.

Have the changes impacted on the business?

The interviewee believes that any changes that improve the efficiency of activities on site are beneficial to the business.

Have any of the changes been implemented at the companies other sites?

The provision of site rules and a guide to banksmen’s hand signals has also been implemented at other sites, and the group H&S manager works with all sites, but other changes were not appropriate to implement across sites due to vast variances between sites (different issues requiring different interventions).

Have you sourced more advice since the visit?

Since the visit Company 5 has worked in consultation with the distribution contractors (resulting in the development/ provision of the site rules for drivers in a variety of languages).

Management commitment

Senior management were involved in the inspector's focused 'struck by' audit, and they have supported the interviewee by giving him the ability to discipline/stop work as he deems appropriate.

5.2.5.4 Comparison with regular inspection

Overall, the interviewee felt that the focused audit helped to focus his mind and the reviews (RAs etc). Company 5 found the focused audit to be a positive experience, and would like more visits, as well as suggestions for practical solutions.

5.2.6 Interview 6

5.2.6.1 Background

Company 6 is part of a global group with this site being part of a division and a manufacturing site. The site was purpose built in the late 80's and production started on site in 1991. It is one of 20 UK sites within the global group. The functions at each of the sites are different but H&S teams tend to work together across the sites.

At present there are 1100 employees and some temporary staff on site. These staff work different 24/7 shift patterns in different parts of the operations. Shift patterns include:

- 12-hour shifts that run from 6am to 6pm and 6pm to 6am across 4 teams over an 8-day shift pattern.
- Standard 8-hour shifts split across days, afternoons and nights from Monday until Friday.
- 8 hour shifts of 6am to 2pm and 8am to 4pm
- Flexi ("bendy") time starting between 7am to 9am and finishing between 3pm to 7pm.

On company 6's site external WPT activities relate to logistics (items being delivered and transported from site) by customers own vehicles or contract companies, company cars (35 onsite but they rarely move on a day-to-day basis) and employees vehicles (at the gatehouse). The interviewee reported having a number of international drivers coming onto site many of whom speak German, as do many of the staff on site.

Company 6's internal WPT activities involve vehicles such as forklift trucks (FLT's) and the 'milk train'; these are all speed controlled to 5/6 mph. The milk trains are used in production areas but FLT's are occasionally required; the declared intention is to be FLT free in production areas. The milk trains can move twice as much as FLT's.

5.2.6.2 Company recollection

What can you remember about the 'struck-by'/ WPT audit

During the visit the interviewee went through the site map with the inspector to show where the main WPT transport activities take place and identify areas of concern. The main areas of concern for the inspector were the warehouse area, vehicles on external roads and foreign drivers (turning up in flip flops etc). The focus was on HGV's and not internal WPT; although the inspector did ask about forklift trucks.

The interviewee recalled that the inspector also reviewed some work that the company had previously done on risk factors using questions from the WPT topic pack.

What did you learn if anything from the audit?

Was it useful? How?

The interviewee reported that they personally did not learn anything more from the visit. However, some of the others who were in the meeting (German managers) learnt a lot more during the visit, for example about the law.

The visit was not necessarily a catalyst for some of the changes to be made. A previous visit from the inspector a year prior to the targeted visit had highlighted some issues such as pedestrian walkways that were already being looked at.

Did you receive prior notification of the audit?

The interviewee reported that they were initially contacted by telephone as they had been in recent contact with the regular inspector. The inspector reported that they were going to focus on HGV during the visit.

Prior to the inspection the interviewee had access to a WPT topic inspection pack and utilised this to prepare for the visit and think about the areas that would be covered. The interviewee felt this was very useful.

5.2.6.3 Changes/ Alterations

Any changes made:

- **Planning logistic vehicle arrival times**

During the visit the movement of vehicles and delivery times were plotted out and discussed. The warehouse/ logistics manager has the responsibility for planning the delivery, receiving, shipping out of goods, and movement within the warehouse. As a direct result of the visit the delivery times were mapped out and subsequently redistributed over all shifts rather than having peak number of visits during the day. There are around 100-125 vehicle movements across the site during 24 hours.

In addition, communications with security at the gatehouse were also improved. A spreadsheet detailing deliveries is maintained by the warehouse staff but can be accessed by security to check if a delivery is in its allotted time slot, expected or urgent. The system also allocates the delivery to certain bay. It is designed to ensure there are no more than 7 HGV's on site at any one time.

There is a temporary holding area at the gatehouse for deliveries to wait to be allowed on site. However, when deliveries are unable to be dealt with they are now turned away and have to wait at the local motorway services for their new time slot. A lorry park on site was considered but the financial cost of doing so was considered to be too much. Instead it was decided to try and reduce the number HGV's coming onto site during shift change over to try to reduce the number of staff cars and lorries in the holding area at any one time.

- **Foreign drivers - PPE**

Since the visit company 6 insist that all drivers coming onto site wear hi-visibility clothing. It was also debated whether these drivers should wear safety footwear but as the drivers are not in loading areas and use pedestrian walkways within the warehouse to access rest facilities it was decided that this was not necessary.

- **Instruction cards for foreign drivers**

Prior to the visit, information cards were available for the international drivers but were subsequently modified and improved as a result of the visit. These are in a variety of languages and detail the site rules plus a map of the warehouse with the approved walkway to the rest facilities marked on it. There is also an additional card with a number of pictures illustrating appropriate PPE, e.g. hi-visibility clothing and safety footwear.

Many of the drivers coming onto site can speak German, as can members of staff at company 6, so they can communicate.

Is there anything else that the company could be doing?

The interviewee reported that there is always more that could be done but there are financial constraints on what can be done. Any expense has to be justified, as management want to check that risks cannot be controlled without additional costs.

The changes that have been made are being monitored, for example traffic monitoring is still going on to see how the improvements are going.

Have any of the changes been implemented at the companies other sites?

The improved versions of the instruction cards for foreign drivers have as yet not been shared with the other sites but will be in due course at a meeting in October.

Have you sourced more advice since the visit?

The inspector wrote after the visit with the findings and did a follow up visit with senior managers and the warehouse manager to discuss what had been done.

Has there been a change in attitude?

The interviewee reports that as a result of the visit and the changes that were made staff now feel more prepared, especially with the logistics delivery drivers, to challenge others if they are not following the correct route through the warehouse.

5.2.6.4 Comparison with regular inspection

The interviewee reported that a focused inspection is far more useful than a general inspection and a better use of time. The tone of the visit was to help rather than enforce and was focused rather than diluted trying to cover everything. The company knows what the visit is going to be about and can prepare accordingly to get the best use of the time with the inspector.

It was also useful to get individuals involved in the relevant areas to take responsibility and the interviewee preferred this type of visit.

5.2.7 Interview 7

5.2.7.1 Background

Company 7 is a manufacturing company with 3 sites across the UK (although each site has responsibility for different activities). There are a number of production areas on the site, which include a series of production lines.

The site is active 24/7, with production running for 22 hours per day. There are approximately 5000 people working on the site; 3000 employed by company 7 and 2000 agency staff. Employees are arranged across three shifts, and therefore there can be approximately 1500-1800 employees on site at any one time.

The site receives deliveries of components, whilst onsite transport is fairly self-contained. The contractor is responsible for WPT onsite, which company 7 oversees, and audits regularly. The site also has the capability to distribute finished products by rail, with a railhead at one end of the site.

Company 7 has benefited from over £150 million investment over recent years, which amongst other things has focussed on addressing internal logistics, clarifying pedestrian routes and improved use of barriers, and has resulted in improved roadways (layout and signage) and surfaces.

At the time of the visit, this site was undergoing major changes to the plant design (a result of changes to the production process), which allowed changes (highlighted during the HSE visit) to be implemented that may not normally have been possible, due to time/cost.

5.2.7.2 Company recollection

What can you remember about the 'struck-by' / WPT audit?

A trainee inspector accompanied the HSE inspector on the visit. The inspector began by running through the activities on site, before focusing on specific areas (the paint shop, logistics centre) and included a general walk around the site.

The inspector discussed the competence and training of drivers, met management and union reps, and then summarised his feedback during a final meeting lasting an hour and a half.

Although there were no critical comments, the report generated provided formal feedback to company 7. Issues highlighted in the report were then considered and some changes implemented by company 7.

The inspector returned to the site following the visit and was able to see the progress made on some of the actions.

What did you learn if anything from the audit?

Was it useful? How?

The interviewees felt the visit was useful as it provided a period in which to focus solely on WPT issues (an approach not usually taken). The visit was also considered 'well-timed', allowing the company to discuss potential aspects of the new plant design, and allowing greater option (due to the changes in the production process). The visit also helped to focus team members, who otherwise would deal with issues as they identified them (i.e. whilst 'out and about').

Did you receive prior notification of the audit?

The interviewees were contacted prior to the visit by telephone. One of the interviewees was previously a HSE inspector and still had a working relationship with the current inspector. The inspector followed up the telephone call by sending the campaign letter and checklist, and the interviewee reported referring to other literature. Company 7 then used this checklist as a structured 'task list' to check before the visit. Team meetings were held to agree the plan of action, and review the guidance.

5.2.7.3 Changes/ Alterations

Any changes made:

The majority of changes have been made as a result of an issue being highlighted:

- Although RAs did exist before the visit, these were improved, and detail was added to clarify the circumstances to which the RAs applied and covered;
- Changes were made to the road layout and signage (making the signage more focused and less confusing);
- A review and audit of the general activities on site was carried out;
- Internal logistics were also considered, specifically the diligence of tugger-truck drivers, whilst the site rules (for drivers) were also clarified;
- A small number of floor markings were also changed (colour wise), making them consistent with those used in other buildings on site.

Indirect changes:

- Changes were made to the type of trailer used on site, although there were no major problems with these vehicles, company 7 were 'unhappy' with them, and took this opportunity to change them. This incurred a cost to the contractor;
- Sensors were also fitted to forklift trucks, causing the FLT to cut out following a collision. This was something that had been considered before the visit, and company 7 was able to discuss with the inspector.

How difficult/ easy to implement?

There are a couple of barriers to implementing changes:

- There are obvious costs associated with implementing changes, as company 7 is a commercial organisation;
- The visit from HSE also gave the interviewee leverage when speaking to senior management regarding budgets required to implement changes;
- The interviewee emphasised that some of the changes may not have been possible if the site was not undergoing amendments due to new production processes.

Have the changes impacted on the business?

The changes and awareness of HSE on site have helped to keep employees 'on their toes'.

Have any of the changes been implemented at the companies other sites?

Company 7 has three sites in the UK, and holds a (cross-site) safety managers meeting every 2 months. The HSE audit was discussed before the inspectors visit, and there had been a focus on line markings/pedestrian walkways. However, due to differences in the use, age and layout of the different sites, it has not necessarily been appropriate to implement changes at other sites.

Have you sourced more advice since the visit?

Since the visit company 7 has not sought additional information. The interviewees stated they were lucky, already having relevant knowledge and experience as well as access to technical indexes.

Management commitment

The interviewees stated that senior management were receptive to safety issues, and that WPT issues were better 'recognised' due to HSE's focus, and visit.

5.2.7.4 Comparison with regular inspection

- The interviewees felt that, due to the size of the plant, regular inspections tended to be 'targeted' to some degree;
- The targeted 'struck by' audit also picked up on other issues (i.e. not WPT-related);

- Company 7 had never known a ‘random’ visit by HSE, with past visits usually prompted by union contact with HSE;
- The interviewees appreciated the pre-audit information, as it enabled them to prepare for the visit, and encouraged a self-regulatory approach from HSE;
- The interviewees also appreciated that the pre-audit information could lead some companies to changing the running of the site for the duration of the visit etc.

Overall, the targeted approach was beneficial for company 7, who believe HSE should use their judgement to prioritise/ target companies for this type of visit.

5.2.8 Interview 8

5.2.8.1 Background

Company 8 is a manufacturer with a total of 8 sites (manufacturing and distribution) in the UK.

The site visited employs 330 permanent members of staff and 30 agency staff on this site. There are also 15 contractors on site per month. The site has 3 main production areas, a packing area and dispatch. The site is busy with an average of 25000 baskets of produced goods being shipped out every day; this can fluctuate at certain times of the year e.g. Easter, Christmas, and summer holidays and result in a surplus of baskets on site.

The main WPT activities relate to the sites own fleet of 70 vehicles distributing over 45 routes. These vehicles include forklift trucks (FLTs), hand pallet trucks, clamper trucks, 3.5 tonne, 7.5 tonne, 10 tonne, 12 tonne, 17 tonne, single deck trailers and double deck trailers. The site also has external vehicles delivering produce such as flour etc to site.

5.2.8.2 Company recollection

What can you remember about the 'struck-by'/ WPT audit

The interviewees reported previously taking part in the backs initiative as they have been targeted as a site to participate and that this was very similar.

What did you learn if anything from the audit?

Was it useful? How?

The interviewees reported that it was useful to have a set fresh of eyes look critically at the site and HSE coming on site backs up the H&S staff. The audit identified things that were already being looked at as they had previously done a lot of work on WPT.

Did you receive prior notification of the audit?

The interviewees recalled having a lot of prior warning from a telephone call and a letter. They also had additional information through prior audits and the company steering group.

5.2.8.3 Changes/ Alterations

Changes made:

- **Basket storage**

There were changes made to the storage of baskets outside of the factory as the inspector identified this is an area of concern. Where the baskets were stacked near the building they were moved away from the building and railings were put in place to create designated areas to store the baskets with gaps in between. The company also had to put extra fencing up around the site to stop local youths getting onto site.

- **Signage**

The inspector also identified needing to put signage to warn people about FLTs.

- **Control of contractors on site**

The interviewees also reported improving recording procedures for contractors on site.

Is there anything else that the company could be doing?

Are there barriers?

The interviewees recalled coming out of the visit looking at the tiredness of the site, e.g. potholes, things painted etc and realised things needed brightening up and looking at. The yard area is one that they would like to improve further.

The interviewees also reported that there are financial constraints to any changes being made on site but that one of the biggest barriers to change is the attitude on the shop floor and getting the staff to accept

things as help rather than a hindrance. For example, now vehicles are taken off the road for a minor problem whereas previously staff would not have bothered.

Have any of the changes been implemented at the companies other sites?

The company are trying to get formalised procedures for everything across all the sites and, therefore, share all changes at the company steering group.

Have you sourced more advice since the visit?

The interviewees reported that the only additional guidance they would have sought would have been in relation to walkways.

5.2.8.4 Comparison with regular inspection

The interviewees reported that they have yearly regular inspections and being involved in this type this type of audit (which they have been involved in before) was a positive experience. It comes across as a visit “to help us” and highlight problems rather than to punish.

The interviewees reported that they much prefer this targeted audit type of visit as it gives a point of focus. They thought from a logistics point of view they are not just an after thought, second to the manufacturing. They felt it was a good use of the inspector’s time.

5.2.9 Interview 9

5.2.9.1 Background

Company 9 is a manufacturer with multiple sites across the UK.

The site visited employs 250-300 members of staff and is involved in the manufacturing of plastic and metal components. At the site there are 30 management staff. The staff work according to two shift patterns, 8:00am-16:30 and 16:30-01:00. The majority of the manufacturing is during the day shift.

The WPT activities relate to a 2.5 tonne counterbalancing truck, an external truck for waste disposal and four forklift vehicles used for stacking components in the shelving racking at the site. There are also HGV's regularly on site delivering goods and transporting manufactured components off site. The employees' car park is integral to the site.

Prior to the 'struck by' visit there had been a traffic accident at one of the company's sites, resulting in an improvement notice. This led them to put into place a number of improvements to WPT safety, such as marking walkways, safety barriers and improved signage.

The interviewees stated that due to management restructuring over the previous two years, Health and Safety management systems have been disrupted.

5.2.9.2 Company recollection

What can you remember about the 'struck-by'/ WPT audit

The interviewees reported that the visit involved explaining to the inspector their policies and procedures relevant to WPT and then the inspector would visit the specific areas on site to assess compliance. The visit covered all aspects of the company, from transportation of goods to waste disposal.

What did you learn if anything from the audit?

Was it useful? How?

The interviewees reported that it was useful to have the inspector to review their existing policy and practices and to help raise the profile of Health and Safety within the company. The audit identified that behaviour was generally positive, however there were some examples of poor practice, such as goods being stored on walkways.

The inspector's site walk around was perceived as very useful because it involved staff at every level of the organisation. Areas for improvement were also identified through discussion with staff, such as identifying issues with the vehicle logbooks.

Did you receive prior notification of the audit?

The interviewees received prior notification of the visit through a telephone call and a letter. From this contact, the agenda and timings for the visit were established prior to the inspections. The interviewees felt that this was useful as it allowed the company to organise their staff and collate the relevant documentation ahead of the visit.

5.2.9.3 Changes/ Alterations

Changes made:

- **Goods storage**
Inspection highlighted some examples where goods were stored on walkways. This led to the management team providing training and improving signage within the site to ensure that this behaviour was not repeated.
- **FLT driver training**
Although documentation relating to the refresher training of FLT operators was stored, company 9 had no documentation to record the original training and assessments undertaken on FLT operators. Company 9 therefore carried out a comprehensive refresher training of all FLT operators in order to generate the correct documentation.
- **Vehicle maintenance**
Company 9 uses a logbook process for operators to report maintenance issues with vehicles. The audit highlighted confusion over the roles and responsibilities of the maintenance engineers, for example, vehicle maintenance engineers were not replacing lights on forklifts, as they assumed these were not being used at night – however as they had not visited/spoken to anyone at the site to confirm, this could have led to inappropriate judgements being made. This led to an improved reporting and monitoring system (e.g. jobs are now recorded at a call centre and assigned a job number) and regular meetings between the maintenance company and company 9 are held to improve communication and monitor performance. As a consequence, there have been significant improvements, with vehicle efficacy rising from 60% to over 80%.
- **Competence**
Experienced contractors were undertaking work they were not qualified or necessarily competent to do, such as performing repairs to vehicles when they were not qualified mechanics. This led management to clarify with staff what they could do within their current job role.

Is there anything else that the company could be doing?

Are there barriers?

The interviewees stated that changing safety culture is the biggest challenge to improving health and safety.

The company has experienced significant change to management structure and job security. This has led to a culture that is more focused on productivity than health and safety. To help challenge this the health and safety team have developed a number of audits to promote safety conscious behaviour and instil best practice in their staff.

Have any of the changes been implemented at the companies other sites?

Changes made by company 9 at other sites were as a result of the inspections carried out at those sites.

Have you sourced more advice since the visit?

The interviewees didn't feel the need to source additional information as they have an internal Health and Safety department with the necessary experience and knowledge.

5.2.9.4 Comparison with regular inspection

The interviewees expressed the opinion that themed inspections are more beneficial than the traditional 'scattergun' approach as they provide a focus for staff to work towards. Such a focus allows strengths

and weaknesses in terms of existing policies and behaviour to be identified and as a consequence achievable objectives to be set.

The interviewees thought that the struck-by initiatives impact would be enhanced by an unplanned follow-up inspection. This would ensure that staff maintain their performance over a protracted period of time, helping the changes to become routine and more long-term. For example, if staff routinely ensure that walkways are kept clear of trip hazards, that Personal Protective Equipment (PPE) is worn where needed, this will help raise health and safety standards across the plant.

5.2.10 Interview 10

5.2.10.1 Background

Company 10 is a manufacturer with several sites in the UK. The site visited employs a total of approximately 2500-3000 members of staff, with around 2000 being on site at any one time. The employees work shifts and the company operates a limited number of night shifts (currently there are no night shifts operating). The manufacturing in site covers all stages from stampings/ press shop work through to the final assembly of the product. There are essentially nine blocks on the site, that can be thought of as a plant on their own, and they all complete their own risk assessment which then has to be reviewed by the key logistics players, and the TU.

The site visit has several areas involving workplace transport (WPT) the majority of which relate to different vehicles involved in logistic movements:

- Delivery lorries;
- Goods receiving area;
- Movement of goods around the site;
- Finished product;
- Pedestrian Activities.

A lot of logistic movements are outsourced to an external company, however company 10 own the vehicles used and are responsible for the maintenance of them. The maintenance of the vehicles is also outsourced to another company.

In addition, company 10 has their own fleet of fork lift trucks (FLT's). However, there has been an ongoing policy change within company 10 to move towards having fork free areas on site where this is possible. Some areas it is necessary to use FLT's for example when moving goods at different heights. When the FLT's require replacing company 10 are doing so where possible with tow trucks.

The interviewees described a wealth of work that has been done over the past few years on the site in relation to WPT. Last year \$50, 000 was spent on updating road markings around the site and preventative measures such as pedestrian/ vehicle segregation has been in place for years.

5.2.10.2 Company recollection

What can you remember about the 'struck-by'/ WPT audit

The interviewees recall two inspectors came to the visit, and that they wanted to do several things – go through the checklist in a logical order, look round the site and complete the paper exercise.

Firstly, the inspectors walked around the full site looking at:

- Delivery areas;
- Internal delivery points;
- Movement of goods around site;
- Transport system; including one way systems;
- Receiving decks (this was outside the checklist but is essential to the motor industry);
- Meet managers to ask questions;
- Meet the external company responsible for logistics to look at how they manage the fleet.

Following the site tour the interviewees recalled that they then went through the checklist point by point. However, a number of points on the checklist were not relevant to the company but it was still useful as it gave direction to look at.

What did you learn if anything from the audit?

Was it useful? How?

The interviewees were not sure that they learnt anything from the visit but they felt it was useful as it gave them backing on what they were doing. It also gave them opportunities to question things that they have or are planning on doing to see if the inspectors thought it was OK. The interviewees thought it was particularly good chance to ask for help and advice on the receiving decks.

Did you receive prior notification of the audit?

Other sites within the company group had been involved in more general inspections by the HSE and the inspector, whom the interviewees had met several times previously, requested that they come to the site to carry out the targeted visit.

The interviewees also reported that they received the checklist prior to the visit. However they had actually already used this prior to any contact from the inspector as they keep an eye on initiatives on the HSE website. The interviewees explained that they had used the checklist with the external company who manage their logistics as a start point to check for any problems.

5.2.10.3 Changes/ Alterations

Any changes made:

The interviewees reported that the inspectors made a couple of suggestions on pedestrian safety looking at the gate 5. Gate 5 is a busy part of the site as this is the main logistics point and also where employees get on/off site. The inspectors suggested looking at the walkways (barriers) and the movement of pedestrians including pallet-stacking areas to ensure they can move through the areas safely. This has since been included as part of an ongoing project that was signed up worth \$200, 000; which is looking at:

- Signage;
- Lighting;
- Clatter boards (for height restrictions);
- Etc.

The interviewees also reported that they discussed a couple of other issues with the inspectors to seek their advice/ guidance:

- *Receiving decks*
 - o As there is limited guidance on this issue the interviewees sought the advice of the inspectors to ensure what they were doing was OK.
- *FLT Governance*
 - o The interviewees also sought clarification on the governance of FLTs relating to the speed limiting and the risk of them turning over, as they wanted to check they were up to industry standard. Currently the FLTs are limited up to 6-7mph to allow for difference weights/ loads/ activities.

Have any of the changes been implemented at the companies other sites?

One of the interviewees had responsibility for the companies other sites also. The interviewees reported that they share information across the sites with their counterparts and details of these sorts of visits etc are fed back at meetings. However it is difficult to make everything consistent across sites due to the different activities.

The interviewees explained that the company is a member of an international group and that if there are any incidents at any of their sites the relevant information is filtered through, and vice versa if anything happens at their site and everyone learns from events.

Have you sourced more advice since the visit?

The interviewees reported that they are constantly downloading relevant information from the Internet and as part of this check the HSE website regularly. Currently they are using the information on falls from vehicles as the autumn initiative on site. In addition, the interviewees report look at the department of transport regulations.

Management commitment

The interviewees reported that they feel they do have senior management commitment on this issue, for example they have secured \$200, 000 this year for a WPT project to complete 60-70% of the work with the rest to be financed next year. The plant manager directly sponsors these sorts of projects and one of their team sits on the panel for the work. This is despite that the company may possibly being bought out.

Staff Attitudes

The interviewees report that pedestrian safety is fairly imbedded in the site culture and employees are aware of WPT; although this has taken a long time and is probably best in the external logistics company. They feel the biggest challenge is probably to make people use the walkways continuously. Staff now know from day one on site that they have to maintain an attitude looking at their personal safety.

5.2.10.4 Comparison with regular inspection

The interviewees recalled at previously they have had general inspections at the site, although these have been few and far between. They comment that the targeted visit did not differ greatly to a general inspection apart from they knew what was going to be covered and what was on the agenda for the day. Although even on a general visit they usually know what they are going to look at.

The interviewees reported that neither inspector who visited had been to the site to do a visit on WPT nor had the site received a targeted visit on WPT issues and in that sense it was very positive to have this contact. In addition, it is useful to get both positive and negative feedback about what is being done. All visits from HSE raise the profile in the plant and staff are very keen to get feedback after the visit to check they are doing things right.

In addition, the interviewees commented that they found the focused visit good in comparison to a normal visit where the inspectors can become distracted on two or three issues. It meant that the day could be managed more effectively especially as on this site there are a number of key players that may need to be involved in a visit relating to WPT, and therefore it is easier to make sure those who might be required are available.

They also commented that having a checklist prior to the visit was a positive element to the targeted visits but that going through the points on the list in the visit was probably the least useful part of the inspectors' time. The interviewees suggested that the checklist could perhaps have been completed prior to the visit and sent to the inspector for evaluation. In addition, they commented that a number of the elements were not relevant to the company or the site, and suggested that a 'not applicable' option which would have been useful.

The interviewees reported that they might be willing to take part in more targeted visits in future depending on the topic area. Due to the size of the site a general visit would take a week to cover everything and therefore targeted visits are more time effective. They concluded that there needs to be a fine balance between doing too many targeted visits and doing something useful like a multi faceted WPT visit.

Tracking research for HSE's workplace transport programme 'struck by' initiative

People being hit or run over by workplace vehicles ('struck by' incidents) resulted in 41% of all workplace transport (WPT) incidents in 2004/05. The Health and Safety Executive 'struck by' initiative was part of a 2-year workplace transport project running from April 2006 - March 2008 aimed at reducing the number of incidents.

The 'struck by' initiative consisted of a targeted audit, that involved reviewing transport activities undertaken in the manufacturing sector and parts of the service industries (eg waste disposal). Several large companies were targeted to take part in an audit where their policies and procedures for controlling all workplace transport risks were reviewed against the precautions that were actually observed on site by a HSE inspector. A structured questionnaire was produced to apply this audit technique.

Following on from the 'struck-by' initiative audits, HSL carried out tracking research with ten of those companies that had been visited as part of the initiative, to provide an assessment of the effectiveness of the audits; specifically, companies experiences of the audits and the actions they had taken since, or as a result of, this intervention. This work is described in this report.

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