

Summary report

Health and Safety in the Waste and Recycling industry

Commissioned by Insight and Service Design Team, Health and Safety Executive

Conducted by Kantar Public

June 2021



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Background and objectives

Commissioning

This report is a summary of research conducted by Kantar Public between 2020 and 2021. The research was commissioned by Insight and Service Design in the Health and Safety Executive (HSE). The content of the report, including any opinions and/or conclusions expressed, are the views of the agency alone and do not necessarily represent the views of HSE.

Business context

The waste and recycling (W&R) sector presents significantly above average health and safety (H&S) risks: the fatal injury rate being around 11 times the average for all industries, and the non-fatal injury rate is 3% compared with 1.7% across all industries per year (HSE:2022).¹

Accidental deaths and injuries include being struck by moving or falling objects or workplace transport. Other issues often associated with the occupation include W&R workers suffering from musculoskeletal disorders (MSDs), work-related stress (WRS), occupational lung disease (OLD) and skin disease. Noise from glass and bioaerosols from organic material are also areas of concern.

Research objectives

HSE commissioned qualitative research to understand in greater detail the factors that support and hinder good H&S risk management, practices and behaviour; and to deliver actionable insight to inform and improve HSE's approaches and engagement with duty holders in the W&R sector.

More specific research objectives were to explore:

- inspectors' and stakeholders' perspectives on the W&R sector and their perceptions of how the sector can best be supported;
- W&R organisations' understanding of, and approaches to, developing and embedding H&S policy, and the extent to which this varies across different types/sizes of organisation; and
- how best to engage with the sector, especially smaller organisations, ultimately to help influence their behaviour around H&S.

¹ 'Waste statistics in Great Britain, 2022' available at: <https://www.hse.gov.uk/statistics/industry/waste-recycling.pdf>.

Research methodology

The research was conducted in two phases of online qualitative depth interviews. The first phase comprised interviews with HSE inspectors and industry stakeholders to gain an understanding of the overarching context. The second phase involved interviews with managers and workers in a range of roles, from a variety of W&R organisations in the public and private sectors, to understand organisations' specific circumstances, attitudes and behaviours.

Sample summary

Phase 1 involved 16 one-hour online depth interviews. This consisted of 7 HSE inspectors, across England, Scotland and Wales; and 9 industry stakeholders, representing cross-sector bodies, public sector forums, trade associations and worker representation organisations.

Phase 2 involved 60 one-hour online depth interviews with managers and workers. This consisted of 12 among large W&R businesses; 26 among Small to Medium Enterprises (SMEs)²; and 22 among local authorities. Further detail on diversity of the achieved sample is shown in the table below.

| Type of organisation | Sample details |
|--|---|
| Large W&R businesses. While a few businesses were generalists, others specialised in chemical waste and metal recycling. | 12 in total, of whom 6 were managers and 6 workers. Of these, 7 had H&S management roles, 1 had a supervisory role and 2 were H&S worker reps. |
| SMEs , including the following types of businesses: waste transfer stations, Material Recovery Facilities (MRF), commercial/domestic collections, Waste Electrical and Electronic Equipment (WEEE), anaerobic digestion, composting, End of Life Vehicles (ELVs) and metal recycling. | 26 in total, of whom 17 were managers and 9 workers. Of these, 7 had H&S management roles, 5 had supervisory roles and 1 was a H&S worker rep. |

² The definition of SMEs used in this research related to the number of employees in a company: all SMEs in this sample employed fewer than 250 employees.

Local authorities. Across the English local authorities there was representation of: Waste Collection Authorities (WCAs); Local Authority Trading Companies (LATCs) and partnerships; and Waste Disposal Authorities (WDAs). Within this, there was representation of authorities that provided services in-house and those that contracted them out to other providers. All Scottish and Welsh authorities were Unitary Authorities (UAs).

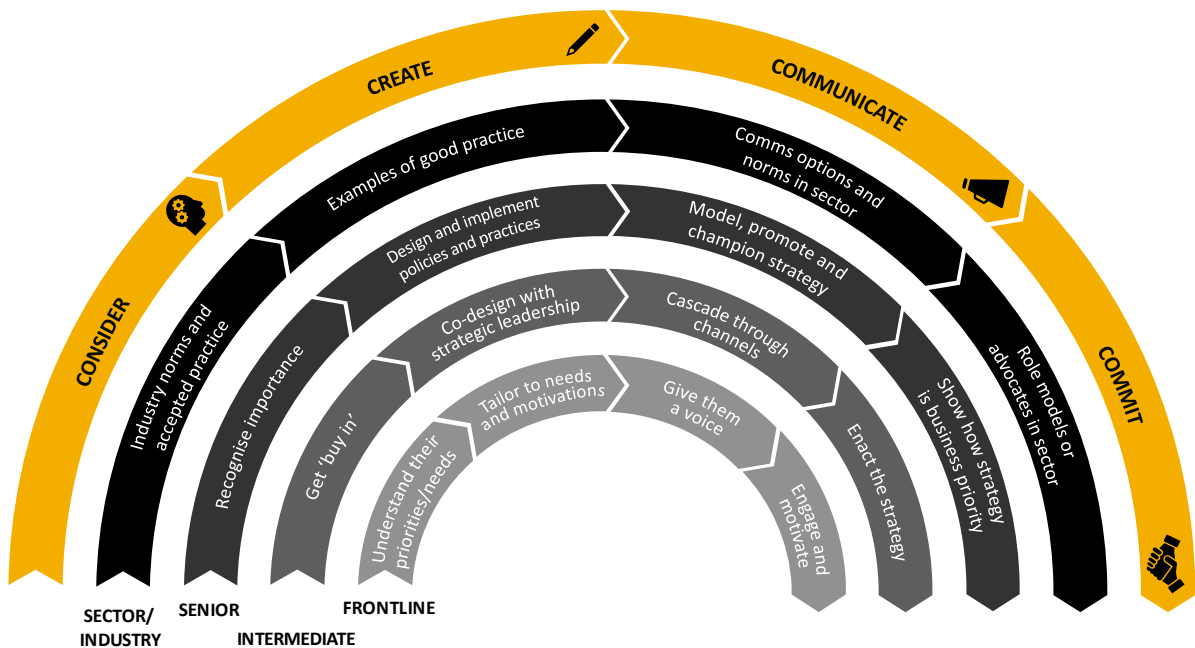
22 in total, of whom 11 were managers and 11 were workers.

Of these, 7 had H&S management roles, 10 had supervisory roles and 3 were H&S worker reps.

12 interviews were conducted in England, 7 in Scotland and 3 in Wales.

Analysis

Kantar Public’s Organisational Practice Model (OPM) was used to structure analysis of the interview output, and to identify barriers and points at which interventions could be targeted to achieve change. The OPM describes four domains which influence behaviours found within organisations, and differentiates between four levels (strategic, middle management, frontline and the wider sector) within each domain. A visual representation of the model is shown below.



Main findings

Overview of key issues and challenges

There is a perception that H&S in the W&R sector has improved considerably over time and that industry leaders are working hard to improve practice in the sector. There are examples of good H&S practice, and evidence of some exemplary organisations in this context, although the fact that the sector is extremely varied, with different types of organisations conducting different activities across a range of environments, means that good practice is not found uniformly or predictably across the sector.

W&R sector organisations all consider H&S issues in relation to their day-to-day practice, and all are consciously aware of the risks within their environments. However, there appear to be pervasive issues that hinder the adoption of good H&S practice in several organisations. Research participants specifically mentioned:

- perceptions among workers (and potential applicants) that the sector is less desirable than comparable industries. Responders suggested this can lead to a disproportionate proportion of staff with lower employment aspirations, work/workplace engagement and job satisfaction. This aggravates high staff turnover and compromises the retention/spread of developed skills and experience.
- neutral/negative worker attitudes towards H&S as a topic. This can include fatalism around levels of inherent risk and perceptions of H&S as 'common sense' or simply following direction (as opposed to a willingness to actively consider and manage risk).
- That while workers and managers have the inherent ability to identify risks relevant for them; they do not necessarily relate these to their own practices and may lack a sense of urgency around and/or clarity about which risks to prioritise and act upon;
- limited sharing of information across the sector regarding key risks and how to overcome these, compounded by limited resources to support this;
- limited capabilities at managerial level in accessing and interpreting H&S legislation;
- lack of faith among managers that the benefits of H&S measures outweigh the costs;
- inconsistent adoption of supervisory roles within organisations, which can mean management is not well connected with workers, leading to poor understanding of key H&S issues and poor design, communication, implementation and oversight of H&S policy measures; and
- managers not providing workers with sufficient opportunity to input into H&S procedures: aggravated both by a lack of believe by some managers that workers can meaningfully contribute and, as mentioned, a reluctance to engage by some workers.

To generalise, the overall effect of these sector-wide issues is that:

- senior managers are not always sufficiently committed to creating, implementing and communicating effective H&S policies and processes
- this lack of commitment creates a culture that suggests to workers that other aspects of the job and their role should be given higher priority, and allows their underlying assumptions about and perceptions of H&S to determine their attitudes and approaches to it; and
- organisations may lack an effective ‘bridge’ between manager and worker levels, to help managers communicate policy to workers, and to help workers engage effectively with managers: supervisory roles are not widely in place; and where they are present, they are compromised in terms of how they can relate to H&S.

HSE inspectors’ perspectives

HSE inspectors perceive the W&R sector as wide and varied and believe that the H&S attitudes and behaviours manifested by organisations range considerably. They believe these variations depend on factors such as organisation type, the activities the organisation engages in, and the salience of risk (which may relate to an inherent understanding of risks or experience/knowledge of a serious incident or accident).

Due to these variations, inspectors have difficulty anticipating the support required prior to visiting an organisation. They also report that W&R organisations often require some kind of H&S improvement, even those with better H&S standards, as the latter tend to be focusing to a greater extent on ‘safety’ rather than ‘health’.

Some of the inspectors interviewed perceived that W&R sector organisations generally comply with instructions because of inspections, although experiences of inspection when on site are mixed. Inspectors are concerned that organisations do not always maintain improved H&S measures after an inspection.

Current tactics used by inspectors to support compliance include:

- contacting larger companies/those working with complex systems prior to a visit, to ensure that relevant information/personnel are available at the time of the visit;
- giving advice and referring businesses to appropriate guidance (via the HSE website and the Waste Industry Safety and Health forum (WISH)³ website);
- highlighting incidents in neighbouring areas to increase understanding/ salience of risks; and
- working with other agencies in certain geographical areas, e.g. the Environment Agency, to prioritise businesses to target

³ Waste Industry Safety and Health is a forum that is supported by members of the industry which aim to identify, devise and promote activities that can improve industry H&S performance.

- taking enforcement action (Notice of Contravention, Improvement Notice, Prohibition notice and Prosecution).

W&R Stakeholders' perspectives

Stakeholders are all motivated to support H&S in the sector. However, they come from a range of positions, relate to different audiences and have varying levels of resource and skills in relation to H&S, which influences what they are able to do. Particular organisations take a very proactive approach to supporting H&S, to the extent that they see themselves as active developers of best practice, whereas others are more reactive and focus on disseminating the information fed to them by HSE and WISH.

Views about WISH are positive, and stakeholders see WISH as a means of communicating and interacting with others in the sector. However, there is acknowledgement that the sector is broad and certain organisations, especially SMEs, are particularly difficult for WISH and wider stakeholders to reach.

Stakeholders report using a range of sources to inform themselves about H&S policy and practice, including HSE resources (such as reports, the website and ebulletins), WISH resources, interactions with specialists in their own organisations, surveys conducted via membership organisations of their own members and engagement with other departments/agencies, such as Defra and the Environment Agency.

Stakeholders also highlighted learning from other sectors. One example is Lantra's use of social media to target young farm managers to communicate about their H&S responsibilities, which is believed to have caused younger farmers to challenge the attitudes and behaviours of the older generation and improve their own knowledge and understanding of H&S. The construction sector is also felt to have made progress in the area of H&S, as it has a strong overall focus on designing processes that embed H&S effectively into working practices, and is judged to have succeeded in engaging well with smaller companies via the Construction Group Working Well Together initiative.

How W&R organisations vary in their relationship with H&S

An organisation's structure, activities, working practices and relationships between worker types have important influences on the way in which H&S policies and practices are implemented. Broadly speaking, different organisation types can be characterised as follows.

SMEs are, by definition, relatively small companies often without depth of systemisation. They commonly conduct a restricted range of activities with relatively limited resources. Managers tend to be busy, have many functions to perform and lack focus on H&S, perceiving it primarily as a business cost: they mainly focus on H&S as a way of avoiding

future liability. Supervisory roles are generally not present in these companies, and workers tend to reflect the overall lack of managerial focus on H&S.⁴

Large businesses are more highly systemised, relatively well-resourced and diversified, engaged in a range of activities across different sizes, locations and types of sites, and employing many different types of workers. Managers tend to focus on H&S as a way of improving the organisation's corporate reputation, or in response to client/customer demands. Supervisors may be present; however, they are often stretched and may not have the capacity to focus on H&S as part of their day-to-day activities. These businesses report high levels of staff turnover, with numerous transient and agency workers, and/or foreign nationals with different first languages, which can present communication challenges.

Local authority W&R teams vary in size but manage a relatively limited number of activities, sites and worker types. Managers are strongly focused on H&S, due to governance requirements and an emphasis on worker welfare. Supervisors are often in place, although again may be stretched and less able to focus on H&S than would be ideal. There is lower reported staff turnover and greater formal worker representation than in large businesses. However, workers' engagement with their roles – and hence H&S – is often low, with a stronger focus on completing their allotted tasks, so that workers can go home ('task and finish'), rather than completing them safely.

Best practice specialist companies engage with innovative, specialised waste technologies, such as anaerobic digestion, composting and waste electronic and electrical equipment. These companies are often, but not always, small, and can have a strong focus on H&S in recognition of the highly salient risks inherent in their processes. Managers may have worked in other sectors: where this is the case, they may have brought in H&S learning from these different contexts. Supervisors are generally in place and there is a focus on engaging workers with H&S and involving them in managing the risks.

The following sections of this report focus on what affects the amount of attention organisations pay to H&S, and their approach to developing, implementing and communicating H&S policy.

What affects the level of attention H&S gets in organisations?

Findings indicate there is strong awareness across the W&R sector that the level of incidents resulting in illness and injury is high. However, significant sector-wide norms and expectations reduce the extent to which particular organisations, especially SMEs, take the risks seriously enough to act on them. Key themes include:

⁴ This analysis of SMEs represents broad generalisations made to distinguish between smaller and larger W&R businesses. The description provided is representative of the SME organisations that were recruited for the research. However, SMEs were a challenging group to reach, due to their increased workload in the context of Covid-19 and wariness around engagement with HSE. Therefore, it may be the case that the research, although indicative of the broader SME population, is not fully representative.

- poor salience of relevant H&S risks – although awareness of the risks is high, a lack of clarity around what types of injuries/accidents occur means that organisations do not necessarily relate risks to their own context;
- more generally, a lack of awareness of existing mechanisms for sector-wide learning (e.g. WISH), especially among SMEs;
- an assumption that the variability of the H&S sector means that all sites are different, hence learning from specific incidents is not necessarily transferable; and
- a fatalistic attitude that W&R work is inherently risky, so accidents are inevitable, as well as a tendency to underestimate risk due to lack of personal experience, knowledge or habituation.

Levels of consideration of H&S throughout an organisation are higher where there is clear understanding at a managerial level of risks and the importance of managing these. However, not all senior managers recognise the importance of action on H&S. SME managers are particularly likely to perceive the costs of acting to improve H&S as being high. Managers across organisations also admit to lacking clarity on how to translate high-level H&S legislative principles into practice in their own organisations.

A key issue in the sector is a lack of supervisors in place who can provide a constructive and empowered link between managers and workers, and hence ensure that a focus on H&S is fed down from managers to workers, and similarly that H&S concerns/issues are fed back up the chain. Moreover, where supervisors are present, they often lack the authority, resource or inclination to act or carry out these roles effectively.

The cultural issues relating to H&S in the sector pervade worker behaviour, especially when they remain unchallenged by a lack of managerial focus on H&S. This means workers often reflect a lack of managerial focus on H&S and may exhibit complacency around H&S, optimism that H&S risks do not relate to them or may even knowingly take risks to achieve their own/organisational objectives (such as to maintain productivity, reduce perceived effort or leave work on time/ early).

While all organisation types tend to consider H&S at least to some degree, SMEs are least likely to be taking it seriously and most likely to be failing to act further to develop and implement H&S policy.

What affects the development and implementation of H&S policy?

Analysis of the findings indicate that while organisations may recognise the importance of having H&S policies in place, there is significant variation in their motivation for developing these policies, and in the structures that support their implementation. Senior managers in SMEs and large businesses tend to be extrinsically motivated, to develop policies in response to needs set out by others (such as legislation, customers or clients), or to avoid future liability. This can lead to development of H&S policy being contracted out, and/or treated as an 'add-on' or a 'tick box exercise'. Local authorities and best practice specialist companies are more likely to be intrinsically motivated by their governance structures

and/or their commitment to a duty of care for their workers. These types of organisation are more likely to internalise responsibility for action on H&S and embed this in all areas of activity.

Several managers, independent of organisational type, also appear to lack a detailed understanding of how to apply H&S legislation in their own contexts.

Workers who are involved in the design and implementation of H&S policies are generally more engaged with H&S; and the policies that are developed are generally more relevant to their roles, and more effective in addressing H&S issues. Best practice specialist companies are focused on ensuring workers are involved in policy design and implementation; for a range of reasons other organisational types tend to find it more difficult to do this well.

Training is an important way for organisations to embed understanding of what is expected in terms of H&S practice, as well as improving workers' ability to work safely. Beyond induction sessions for new workers, the level, frequency, format and formality of training offered is highly variable, as are the topics covered.

Organisations highlight HSE as a key source for information for W&R sector organisations, and are positive about the accessibility, presentation and usability of HSE resources in general. Other sources are mentioned, but these are often relevant to specific W&R sub-sectors. As above, awareness of WISH is generally low among SMEs. It is notable that even those organisations that express negative perceptions of HSE, because of interactions during inspections and/or responses to fee for intervention, feel that developing a more positive relationship with HSE around H&S policy guidance would be beneficial for them and the sector.

Inspectors also express a desire to develop more positive relationships with businesses but are aware that limitations on resources make this challenging.

How well is information about H&S communicated within organisations?

Across the sector, appreciation of the importance of communicating H&S policy effectively throughout organisations is limited, as is access to examples of how to do this well. Moreover, H&S policy is seen as a difficult topic to communicate, due to its sometimes complex, abstract nature; and there is often insufficient focus on the importance of ensuring that communications are accessible and engaging to all workers. Workers often complain that their organisations' H&S communications are long, wordy, boring and not applicable to their role.

Organisations with large and/or diverse workforces often experience particular challenges, as communication methods need to vary across sites and take into account different worker requirements – especially variations in access to technology, reading levels and languages spoken. Where present, supervisors often lack the confidence and/or skills to engage workers with H&S policy, unless they are supported by management.

Local authorities and especially best practice specialist companies tend to communicate H&S policy most effectively. These types of organisations use a range of formats tailored to each worker group, including face-to-face meetings (ranging in levels of formality), on-site messaging and visuals, electronic and/or personally targeted communications, and novel methods to increase the salience of a message such as stickers or customised clothing. Good practice is to repeat and reiterate key H&S messages frequently, as well as actively checking comprehension.

What other factors affect an organisation's H&S culture and practice?

Although role models and advocates for good H&S practice exist at a sector level, awareness of these (or indeed awareness of the channels that might promote these) is not widespread. As a result, managers and workers may not have access to inspiring examples of successful commitment to good H&S practice in the W&R sector, and are instead subject to the personal assumptions, perceptions and biases outlined in this report.

Given the lack of prioritisation among managers, the lack of focus on engaging workers and communicating effectively, and the strength of factors preventing workers from taking it seriously, it is unsurprising that emphasis on good H&S practice and commitment to H&S policy is not always embedded in the day-to-day operation of organisations. However, those organisations that have managed to achieve this (mostly best practice specialist companies) tend to exhibit the following characteristics:

- are active at a sector level, taking in and sharing learning;
- have an explicit stated commitment to H&S;
- have committed time, staff and/or training resources to H&S;
- have embedded H&S policy in structures, environments and training, ensuring that workers at every level have H&S responsibilities;
- have checks in place to ensure policies are implemented and delivered;
- have supervisors involved in developing policy, cascading it to workers, overseeing its implementation and feeding back on progress to management;
- ensure workers are actively involved in developing and implementing policy; and
- ensure engagement with H&S is positively reinforced.

Further information

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Published by the Health and Safety Executive 07/23.