

Report of the Assistant Director of Economy & Place

Highways Personal Protective Equipment (P.P.E.) REPORT

Summary

1. The Highways Service has undertaken a review to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees while they are at work, in relation to the provision and use of PPE.

2. The review has been done to ensure, and to comply with all relevant legislation, including:
 - Health and Safety at Work etc. Act 1974
 - Management of Health and Safety at Work Regulations 1999
 - Personal Protective Equipment at Work Regulations 1992 (as amended)
 - The Equality Act 2010.

Recommendations

3. The Executive Member for the Environment is asked to note the review undertaken and the decision to increase the base level of PPE for Highways staff.

Background

4. The highway maintenance service covers a wide range of activities. It is delivered by a number of in-house teams, working in conjunction with

external service providers. The Highway Maintenance Service teams are responsible for the maintenance and repairs of the highway assets.

5. Personal Protective Equipment (PPE) is all equipment (including clothing providing protection against the weather) which is intended to be worn or held by people at work and which protects them against one or more risks to their health or safety. Examples include: safety helmets, gloves, eye protection, high-visibility clothing, safety footwear, water and weather proof safety harnesses and insulated clothing.
6. Items not classed as PPE under the current legislation include:
 - ordinary uniforms and work clothes which do not provide any protection
 - equipment used while taking part in sport
 - Personal protection used for travelling on a road, as defined by the Road Traffic Act.
7. The main purpose of PPE is to protect employees from risk of injury. According to the hierarchy of controls, PPE should only be used as a last resort or in combination with other risk control measures. It is vital that PPE is issued in conjunction with adequate training.
8. Throughout the industry it is evident that some commercial contractors have taken the approach to standardise PPE for their employees. The city of York Councils Highways teams have not historically followed this approach; the team has previously chosen to flex the PPE requirements based on the task being undertaken at the time, along with the associated risk assessment and workplace instruction.
9. Moving forward the intention is that the service will now adopt a base level of PPE for all tasks.
10. To ensure that the use of PPE will be undertaken safely and that our policy will be clearly understood throughout the service, we will:

- ensure suitable PPE is provided free of charge where necessary;
- ensure that where PPE is provided, it is suitable for use;
- provide employees with adequate information, instruction and training to enable them to use PPE safely;
- provide adequate storage facilities for PPE;
- provide resources to maintain PPE;
- monitor the use of PPE to ensure that it is being used correctly;
- ensure that adequate resources are made available to fulfil the requirements of this policy; and
- Review this policy at least annually or more frequently if significant changes occur.

11. To fulfil our responsibilities as outlined above, we will:

- All PPE will conform to an appropriate standard i.e. CE or BSEN and will be provide the appropriate level of protection for employees.
- identify all operations and activities that may require the provision of PPE;
- avoid, wherever possible, the requirement for PPE by introducing other risk control measures;
- ensure our risk assessments identify the need for PPE as a control measure, where relevant, and that they take into consideration fit, comfort and compatibility with other items of PPE used simultaneously;
- train all employees in the risks presented by their work activities and how these can be controlled by using PPE in the correct manner;
- arrange for adequate accommodation for the correct storage of PPE;
- implement steps for the correct maintenance, cleaning and repair of PPE, according to manufacturers' instructions;
- implement a fault reporting system for employees to report broken or damaged PPE;
- replace PPE provided as necessary and at no cost to the employee;
- monitor the use of PPE in the workplace to ensure it is being worn correctly as outlined in the risk assessment process; and
- review, and amend as necessary, risk assessments on an annual basis, when significant changes or accidents occur or when we have any reason to believe the assessment is no longer valid.

Consultation

12. Through our current staff and trade union engagement we will work with the staff and their representatives as well as health and safety colleagues to ensure a smooth transition process and resolve any issues that may arise.

Options

13. The options open to the Executive Member for Environment are to comment on and review the work undertaken to date and comment on any future work.

Analysis

14. Ongoing liaison will continue between the Executive Member for Environment and the CYC Flood Risk and Asset Manager, future briefings to the Executive Member for Environment Decision Session will be made to ensure key outputs and decisions are supported by CYC and to provide formal opportunities for members and the public to consult. Further recommendations will be made for agreement at these sessions.

Council Plan

15. An improved and safe highway workforce supports a prosperous city for all through safer communities for residents, businesses and visitors.

Implications

16. Financial – This report is an update on the work undertaken so far the delivery of the change will be met by the existing capital and revenue funding for the service.

Risk Management

17. The change to a minimum standard of PPE regardless of the task is supportive of a risk based approach.

Contact Details

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Approved

Wards Affected: List wards or tick box to indicate all

All

For further information please contact the author of the report

Background Papers:

None

Appendices:

Appendix 1 – PPE

Appendix 2 – Highways Risk Assessment and Work Instruction Report

Appendix 3 – Highways Training and Instruction Report

Appendix 4 – Highways Welfare

Appendix 5 - Highways Performance Monitoring

Appendix 1

PPE

All PPE MUST be worn at ALL TIMES by ALL Highways Operatives, Contractors, Visitors, and regardless of “rank” and “stature” .

CYC issued Hi –Visibility full length trousers **must be worn** outside of other clothing whilst working or visiting any C.Y.C. Roadside or Construction site. **Must be of EN20471 -2013 Standard**

CYC issued Hi- Visibility either; Polo Shirt, Sweat Shirt, Fleece, Hoodies or Coat will be worn on the outside of other clothing whilst working or visiting any C.Y.C. Roadside or Construction site. **Must be of EN20471 -2013 Standard**



CYC issued Hard Hat will be worn whilst working or visiting any C.Y.C. Roadside or Construction site. **Must be of EN 397 2012 Standard**



CYC issued Eye Safety Protection will be worn whilst working or visiting any C.Y.C. Roadside or Construction site especially there is impact injury or chemical splash. Employees, who wear prescription glasses, will be provided with over glasses. **Must be of Minimum Requirement of EN 166 Standard**

CYC issued Ear Protection will be worn whilst using or in the vicinity of any working vehicle, plant or machinery. **Must be of 352-3 Standard**



CYC issued Safety Footwear whilst working or visiting any C.Y.C. Roadside or Construction site. **Must be of 20345- 53 Standard**



CYC issued Safety Gloves whilst working or visiting any C.Y.C. Roadside or Construction site.

All clothing must be Orange

All Contractors, Agency Staff and Visitors must comply with this policy

Appendix 2

Highways Risk Assessment and Work Instruction Report

A risk assessment is nothing more than a careful examination of what, in our work and environment, could cause harm to people. It enables us to weigh up whether we have taken enough precautions or should do more to prevent harm. It is an important step in protecting workers and our businesses, as well as complying with the law. Risk assessments help us focus on the risks that really matter in our workplaces: the ones with the potential to cause harm. In many instances, straightforward measures can readily control risks.

The law does not expect us to eliminate all risk, but we are required to protect people as far as is reasonably practicable. Accidents and ill health can ruin lives and affect our businesses if output is lost, machinery is damaged, insurance costs increase and/or we have to go to court.

There is a general legal requirement to carry out suitable and sufficient risk assessments of all activities undertaken by an organisation. If there are five or more employees and there is a significant risk to the health and safety of those employees, or any others, the risk assessment must be recorded.

Statement of Intent

The aim of this is to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees while they are at work, through the risk assessment process, and to comply with all relevant legislation, including:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999.

Employer Responsibilities

To ensure that all activities are undertaken safely in accordance with the risk assessment process and that this policy is clearly understood throughout Directorate of Economy and Place Highways Maintenance Services, we will:

- ensure that suitable and sufficient risk assessments are carried out on all risks to the health and safety of our employees which they are exposed to while at work;
- ensure that these risk assessments take into consideration persons not in our employment but who could be affected by risks to their health and safety, arising out of, or in connection with, our undertakings;

- provide such information, instruction, training and supervision as is necessary to ensure all staff undertaking risk assessments understand the process;
- ensure that adequate resources are made available to fulfil the requirements of this policy; and
- review this at least annually or more frequently if significant changes occur.

Procedure

To fulfil our responsibilities as outlined above, we will:

- provide risk assessors with adequate information, instruction and training to ensure that risk assessments are suitable and sufficient;
- identify all operations and activities undertaken by our employees;
- complete a detailed assessment of each activity or operation;
- review risk assessments on an annual basis and amend as necessary. A review will also take place when significant changes or accidents occur, or, when we have any reason to believe the risk assessment to be invalid.
- Incorporate all risks and control measures into the work Instruction

Appendix 3

Highways Training and Instruction Report

SECTION 1: SAFETY MANAGEMENT SYSTEM (SMS) ARRANGEMENT DETAILS

Policy & objectives

CYC's policy is that all employees and volunteers (under the control of CYC) are competent to carry out their duties safely. Employees and volunteers are given training and instruction to fully understand the arrangements for ensuring the health and safety of themselves and others. Personal records of training and instruction are stored locally by managers.

Scope

The arrangement applies to:

- Permanent and temporary employees
- Agency employees
- Partnership employees
- Young persons/work experience/volunteers (under the control of CYC)

NB: Contractors and subcontractors employed on CYC premises must be competent in their specialist areas. Instruction and information relating to any H&S issues specific to the relevant CYC site and service must be provided by CYC to the Contractor – see the Contractors compliance note (CYC/HS/CN8).

Specific requirements

- All employees, young persons at work or on work experience and volunteers (under the control of CYC) receive health and safety induction training which includes emergency safety procedures
- Redeployed, relocated or promoted staff receive training to satisfy their new activities and responsibilities
- CYC employees receive specific task and role-related training which covers the findings and control measures of risk assessments
- Extra safety provisions are ensured during the induction of persons with disabilities
- Extra importance is placed on inductions with young persons due to their lack of awareness of existing or potential risks, immaturity and inexperience

- Training, instruction and information is suitable for the target audience and the nature and complexity of the subject
- Managers should ensure they monitor performance to ensure training has been understood and that safe practices are being followed in their areas
- CYC support the training of Trade Union Safety Reps by allowing time off work to attend appropriate Trade Union courses

SECTION 2: INDUCTION TRAINING

- The depth of induction must reflect the complexity and risk of the activities being undertaken.
- Induction checklists are signed off and stored locally by managers.

Initial Induction training (to be completed as soon as possible)

This must cover:

- Emergency procedures (eg fire, first aid, security)
- Information/equipment that is essential for carrying out immediate tasks safely (and for which further training may be needed without delay)
- Personal Protective Equipment (issue, use, storage, replacement)
- Incident reporting
- Hazards and controls identified in risk assessment. Information and instruction verbally communicated and where necessary backed up with written workplace instructions.
- Information re: contacts eg safety reps, self explanatory guidance material
- Other work equipment eg travel first aid kit, personal alarm
- Signposting to relevant documents on the CYC Safety Management System (SMS)

Any further training, workshops, work shadowing requirements etc should be identified at this time.

Managers in higher risk areas eg care, construction, vehicle maintenance etc should attend the IOSH Managing Safely course, book via WDU.

SECTION 3: TASK AND ROLE-RELATED TRAINING

This training is provided prior to taking on a task or role and may be carried out in the following ways:

- **Formal training sessions** to ensure appropriate standards of competence as set out by regulatory demands or guidance - examples include fork lift truck drivers, working with gas, people handling etc.
- **Group sessions** toolbox talks, small groups of employees, related to a specific task or issue (eg PPE or training from a manufacturer on a piece of equipment)
- **Interactive workshops** eg incident reporting
- **On the job experience** use of equipment incorporating the relevant health and safety key points eg emergency controls, the requirement to wear PPE etc
- **One-to-one training** will sometimes need to be tailored to an individual eg for individuals with learning disabilities, where English is not the first language or for work experience students who are more at risk due to immaturity and inexperience
- **Online training** eg Legionella

Much of the training is delivered by a manager or supervisor but some training requires specialist input as advised by the WDU and the Health & Safety Team.

SECTION 4: REFRESHER TRAINING MINIMUM STANDARDS

Refresher training is carried out when:

- There is a legal requirement eg first aid
- The need has been highlighted eg following an incident, ill-health or concerns raised about current practices or there is reason to believe it is no longer valid
- There is a change in procedure or equipment
- Courses have not been revisited in a reasonable timeframe (this varies depending on the context of the risk, individual, work environment and any statutory requirements)

It is also good practice to regularly reinforce safety messages, eg a cycle of toolbox talks, fire and fire drill awareness etc.

SECTION 5: RECORD KEEPING

- Required and achieved competencies and any certificates are recorded locally by managers
- *Summary of the content of training and instruction should also held*

Within Highways, the training records are being updated and where required, are identifying Training needs with all staff whether it be refresher training or looking for further development to ensure that the service remaining compliant throughout.

Highways are ensuring that all out side contractors, visitors and volunteers have adequate training and are competent for any task that required to be undertaken within the Highway Services.

Appendix 4

Highways Welfare

Introduction

Workplace regulations cover a wide range of basic health, safety and welfare issues and apply to most workplaces. The exceptions are those workplaces involving construction work on construction sites, in or on a ship or below ground at a mine.

The regulations aim to ensure that workplaces meet the health, safety and welfare needs of all members of a workforce, including people with disabilities. All areas of the workplace including, in particular, doors, passageways, stairs, showers, washbasins, lavatories and workstations, should be made accessible for disabled people.

Policy - Statement of Intent

The aim of this policy is to ensure, so far as is reasonably practicable, that we provide and maintain a safe and healthy working environment for our employees, customers and contractors, we promote best practice and high standards in the management of our premises, we meet or exceed the minimum requirements and we comply with all relevant legislation, including:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Workplace (Health, Safety and Welfare) Regulations 1992.

Employer Responsibilities

To ensure that our workplaces meet the health, safety and welfare needs of all employees and any visitors and contractors who may visit our premises, we will:

- protect the health and safety of everyone in our workplaces;
- provide adequate welfare facilities for people at work;
- maintain our workplaces, equipment, devices and systems in an efficient working order and in good repair;
- protect the health of our employees, visitors and contractors by considering; ventilation, working temperatures, lighting, cleanliness and waste materials, room space and the dimensions, workstations and seating that may be within such room space;
- protect the safety of our employees, visitors and contractors by considering; maintenance, floors and traffic routes, access and egress,

- falls and falling objects, doors, gates, walls and windows and any escalators and moving walkways;
- protect the welfare of our employees, visitors and contractors by considering; sanitary conveniences and washing facilities, drinking water, accommodation for clothing, any facilities for changing and rest facilities; and
 - review at least annually or more frequently if significant changes occur.

Procedure

To fulfil our responsibilities as outlined above, we will:

- determine the necessary frequency of maintenance work and inspections through a risk assessment process;
- provide adequate information, instruction and training for the employees who are to undertake inspections;
- undertake visual inspections of our workplaces, equipment, devices and systems at sufficient frequency to mitigate the impact of any shortcomings on the health, safety and welfare of our employees, visitors and contractors;
- identify and report any defects identified in our workplaces, equipment, devices and systems that could have a detrimental effect on the health, safety and welfare of our employees, visitors and contractors;
- ensure that a system of planned preventative maintenance (PPM) is put into place for items that require it, such as; emergency lighting, fencing, anchorage points for safety harnesses, ensure that maintenance is undertaken by competent persons and that written records are maintained; and
- ensure that every workplace, vehicle, plant and machinery are kept sufficiently clean.

Appendix 5

Highways Performance Monitoring

Introduction

Performance monitoring is a proactive, as well as reactive, process that enables the Service to monitor and measure its health and safety performance. Performance monitoring also measures the effectiveness of the safety management system which is important to the business for several reasons, among them, financial, moral and legal.

Financial

The working time that is lost through injuries costs businesses money. Where plant and equipment are damaged, additional costs are incurred. This can also have a knock-on effect on insurance premiums.

Moral

Good health and safety performance provides many benefits to the business because it helps to:

- prevent fatalities
- prevent injury
- prevent ill health
- raise morale
- reduce the impact on the environment.

Legal

An employer has a duty of care to their employees and members of the public. In the event of a dispute it may be necessary to prove that this duty was properly and professionally discharged and to produce supporting evidence.

To accurately monitor performance you need to have systems which provide data on the following:

- what's happening now
- what's happened so far
- what response we might need to make.

To have a successful health and safety management system, it is important to set measurable objectives in order to be able to gauge progress and compliance.

Objectives fall into two types, proactive and reactive:

- Proactive measures include regular inspections, benchmark targets, risk assessments etc.
- Reactive measures include incident and accident investigation, audits, fault reporting, reviewing accident data etc.

Policy - Statement of Intent

The aim of this policy is to ensure, so far as is reasonably practicable, the health, safety and welfare of our employees while they are at work, by monitoring performance and taking all actions identified as necessary, and to comply with all relevant legislation, including:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999.

Employer Responsibilities

To ensure that all our work activities are undertaken with due regard for the health, safety and welfare of all our employees, it is of paramount importance that our policy on performance monitoring is clearly understood throughout the company. Consequently, we will carry out:

- proactive monitoring, by taking action before accidents happen; and
- reactive monitoring, by examining events after they have happened.

Procedure

To fulfil our responsibilities as outlined above, we will:

- review accident, incident and near miss statistics and ensure remedial actions have been completed;
- review results of regular health and safety inspections of the workplace and ensure that all agreed remedial actions have been completed, within agreed timescales;
- review training records to ensure employees have been provided with adequate information, instruction and training to carry out their job roles;
- ensure that an annual safety audit is undertaken which will be a detailed and analytical review of the management of health and safety across all the areas of the company;
- set company objectives for the next 12 months; and
- review, and amend as necessary, our health and safety policy at least annually or more frequently if significant changes occur.