What's in a Safety Statement?

Employers invest significant time and money in ensuring they have a Safety Statement so as to comply with Sections 19 & 20 of the Safety, Health and Welfare at Work Act 2005 (the 2005 Act). So how do you know that your Safety Statement is compliant with the 2005 Act?

In the first of three articles, we will show you how to spot potential problems with your Safety Statement. We will also offer some suggestions on how to keep your Safety Statement compliant yet practical.

1 Safety Statement Content:

Section 19 of the 2005 Act requires employers to have adequate Risk Assessments. Section 20 of the Safety, Health & Welfare at Work Act 2005 states that every employer must have a Safety Statement and clearly states that each Safety Statement must be workplace specific and must contain the following:

- **Hazard identification** and **risk assessments**
- **Protective and preventive measures** taken for protecting safety, health and welfare at the place of work
- **Resources** for protecting safety, health and welfare at the place of work
- **Emergency plans and procedures**
- **Duties of employees**
- **Names and titles or positions** of persons responsible for performing tasks assigned to them
- **Arrangements for the appointment of safety representatives**

This month

This month we will give you some pointers on what to watch for under the headings of:

- Risk Assessment
- Protective & Preventive Measures, and
- Resources.

In each case we will look at the **purpose, pitfalls and solutions** when reviewing these areas.
2 Hazard Identification and Risk Assessment:

Purpose
Employers are required to identify all workplace hazards and assess the degree of risk in each case.
A hazard may be defined as a condition or activity likely to cause harm or loss.
Hazards may affect employees, visitors, members of the public or anyone else.

Pitfalls
Hazards may be missed: Are all hazards identified in the Safety Statement?
Do risk assessments contain details of:
• the activity or condition presenting the hazard
• harm or loss which may arise
• persons affected
• control measures in place (not suggested controls)
• a rating of the degree of risk

Risk assessments and control measures listed in them often contain wording which suggests something is optional or an intention, rather than statement of fact e.g.
• “Harnesses should be used when working on flat roofs” (optional)
• “The company will provide training in manual handling” (intention)

Solutions
Keep a register of hazards in list form. As new hazards are identified, complete a risk assessment and add them to the register. This will give you a quick point of reference for checking the completeness of risk assessments.
Modify the risk assessment template so it has space for recording the details as listed above.
Revise the wording in risk assessments to reflect actual controls.
Remove controls which are not correct or true since this hides gaps in your control mechanisms. Any gaps in the control measures will stand out and give the organisation something to work towards.

Using the examples listed under “Pitfalls” (above), an example of better wording would be:

- All persons working on flat roofs are required to use harnesses in line with training they have received.
- The company provides training to all persons who perform manual handling tasks.

3 Protective and Preventive Measures:

Purpose

What does protective and preventive measures mean? These are the high-level controls to ensure the hazard is eliminated or the risk is reduced to an acceptable level. Specific control measures are dealt with in individual risk assessments. Examples of protective and preventive measures include policies and procedures for purchasing, design of workstations and safe operating procedures for plant and equipment.

Pitfalls

High-level controls may be inadequate or missing. Does the Safety Statement specify procedures for the prevention of harm? The Safety Statement may be missing details on what top management actually do to plan for health and safety and to prevent harm.

The Safety Statement may contain an emergency procedure but does it specify procedures for planning for health and safety e.g. procurement procedures, workplace or site set-up, machine set-up, building maintenance or plant certification? These procedures need not necessarily be in the Safety Statement, but if they exist outside the Safety Statement they will need to be referred to.

Solutions

Draw up a list of high-level procedures which top management will be responsible for implementing. Devise and implement procedures for areas such as purchasing (including chemicals, work equipment and services), workplace set-up, preventive maintenance on buildings and equipment as well as the certification of plant (where required).
4 Resources

Purpose
In order to control health and safety in the workplace, management will need to allocate resources. Resources for achieving compliance with legal and company requirements include: personnel, time, money and access to competent advice.

Pitfalls
Some Safety Statements omit to state exactly what resources the employer allocates for protective and preventive measures. There may be no mention of budgets, time allocated to checking safety arrangements (via inspections and audits), or access to in-house or other expertise.

Solutions
Under each of the headings mentioned (time, budget etc.) write down what the organisation has in place and what it does or does not do in each case. Agree what the organisation must do in each case and write these arrangements into the Safety Statement. An example would be:

“The company sets a budget every January for the following twelve months. The budget covers training, equipment upgrades, building and work equipment maintenance, personal protective equipment and training. The budget allocated for 2010 is €####.##”

or

“The organisation has engaged the services of (insert name) to provide expert advice on health and safety matters”

About Business Safety
We hope you have found the above information useful for assessing the suitability of your safety statement. In the next issue, we will cover the remaining sections of the Safety Statement which includes a) Emergency plans and procedures, b) Duties of employees, c) Names and titles or positions of persons and d) Arrangements for the appointment of safety representatives.

Business Safety provide expert advice in compliance matters and can assist your organisation in putting together a compliant Safety Statement or other documentation which will assist you in managing health and safety. For further information, please call us on 051 356323 or log on to: www.BusinessSafety.ie