

Meeting Record

Date	29 th April 2019 (Mon)
Venue	AHMM, Morelands, 5-23 Old Street, EC1V 9HL
Chair	Paul Bussey
Author	Goh Ong

Guest Speaker Toby Thorp, City of London Corporation

Details **Risk Assessment 2.0**

Compliance based systems including documented risk assessments and method statements have become commonplace, if not mandatory, but do they still deliver in regard to meaningful workplace safety as intended?

Toby Thorp is Chartered Environmental Health Practitioner at the City of London Corporation who have been campaigning to raise awareness and understanding of relevant stakeholders in relation to work at height risks in particular for many years. He will give his views on the regulatory approach to operational risk assessment and discuss the limitations of compliance systems alone including how a cultural approach is also necessary in order to deliver excellence in safety management.

Risk Assessment 2.0

Looking back, moving forwards

Toby Thorp – Environmental Health Officer



RISK ASSESSMENT 2.0

- Being a regulator at the City of London Corporation

“local authority” means—

- (a) in relation to England and Wales, a county council, the Greater London Council, a district council, a London borough council, the Common Council of the City of London, the Sub-Treasurer of the Inner Temple or the Under-Treasurer of the Middle Temple,
- (b) in relation to Scotland, a regional, islands or district council except that before 16th May 1975 it means a town council or county council ;

s.53 Health and Safety at Work etc. Act 1974



RISK ASSESSMENT 2.0



- In medieval London – you became a ‘freeman’
 - Privilege
 - The right to trade
 - The right to carry a ‘naked’ sword and drive your sheep across London Bridge

RISK ASSESSMENT 2.0

Looking to the past



Farming UK, 22 September 2015



ITV.com, Credit: PA

RISK ASSESSMENT 2.0

Looking to the past

- Freedom of the City of London
- By honour / redemption
- Historic rights now symbolic only

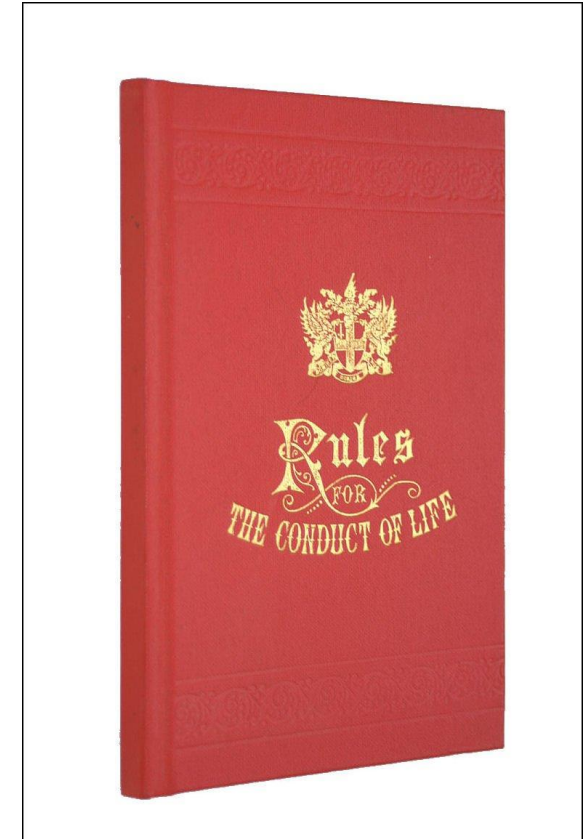


The Telegraph, 7 March 2017, Credit: Dominic Lipinski / PA Wire

RISK ASSESSMENT 2.0

Looking to the past

- Being a freeman
 - Duties
 - Uphold the standards of your craft or freedom withdrawn
 - Standards somewhat codified in the *'Rules for the Conduct of Life'*



RISK ASSES

Rules for the Co

Rules

FOR

THE CONDUCT OF LIFE



RULE I.—Whatever you at any time intend to do, consider the end which you therein propose to yourself, and be sure that it be always really good, or at least innocent. He who does anything, and knows not why or wherefore, acts foolishly: and he who aims at an unlawful end acts wickedly, which is the worst sort of folly.

If you are careful always to observe this fundamental rule, you will

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RULES FOR THE

is an end beyond which there can be nothing; and therefore, whilst we have time, we ought to make due provision for it, this being the only true wisdom.

RULE V.—Since death is the only unavoidable passage into eternity, a wise man will make it the constant business of his life that he may die well, and that death may prove to him a passage, not into eternal misery, but into everlasting happiness. Whoever is careless of this, it had been much better for him never to have been born.

RULE VI.—The only sure way thus to die well, and at peace with God, is to live well. It is a foolish thing to rely upon what is very

RISK ASSESSMENT 2.0

Rules for the Conduct of Life

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RULES FOR THE

early, you will find that you have time enough to do all the business that you have to do, and much more than persons who rise late will think possible to be done.

RULE XXVI.—Where you are not able to finish a business without the help of others, call in speedily such persons to your assistance as are fit to be employed in it. The more hands are employed, the more work is done; provided they are managed in such good order as not to be a hindrance to one another.

RULE XXVII.—Always consider the probable consequences of what you intend to do, that you may guard against those that are evil or inconvenient. A thing may at first

CONDUCT OF LIFE.

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sight look very plausible, but if you look well to what may follow from it you may find good reasons for laying it aside, or at least for altering your measures.

RULE XXVIII.—Consult with yourself, and with others who are knowing and honest, about everything of moment which you are to undertake; but waste not that time in unprofitable talk which may be better employed in action. Thought is quick; and when a wise man is once well informed (of which he will take care), he will not be long in deliberating what is best to be done; but many a good opportunity has been lost by too much consultation. A wise man thinks much

RISK ASSESS

Looking to the

ACCIDENTS AT THE TOWER BRIDGE.

THE RETURN ISSUED TO-DAY.

A return is issued to-day of the most serious accidents which occurred during the construction of the Tower Bridge. The total number was twenty-nine, the first occurring on the 2nd of November, 1886, and the last on the 3rd of July, 1894. Of these, ten were fatal, the verdict in nine cases being "Accidental death," and the other instance "Deceased's negligence." The number of men employed at any one time in the construction of the bridge varied between 76, in July, 1886, and 848, in December, 1892. The average for the whole period from June, 1886, to July, 1894, was 432.

SEPTEMBER 6, 1894.

PALL MALL GAZETTE.



"Deceased's negligence"



WHAT IS A RISK ASSESSMENT?

Health and Safety
Executive

Company name: Smith's Cleaners

Date of risk assessment: 1/5/12

What are the hazards?	Who might be harmed and how?	What are you already doing?	Do you need to do anything else to manage this risk?	Action by who?	Action by when?	Done
Slips and trips Examples: spillages, loose cables	Staff may be injured if they slip on spillages or trip on machine cables or objects left on the floor	<ul style="list-style-type: none"> ■ There is general good housekeeping at the client company ■ Wet floor signs are always used ■ Cleaners use electrical sockets nearest to where they are working to reduce the risk of tripping over leads 	<ul style="list-style-type: none"> ■ Introduce a two-mop system for cleaning floors (wet mopping followed by dry mopping) 	Manager	31/5/12	
			<ul style="list-style-type: none"> ■ Remind cleaners to wear sensible shoes eg flat shoes with a good grip 	Manager	31/5/12	
Contact with cleaning chemicals Examples: bleach	Staff risk skin irritation or eye damage from direct contact with cleaning chemicals. Vapour from cleaning chemicals may also cause breathing problems	<ul style="list-style-type: none"> ■ New staff are asked if they suffer from skin problems when using cleaning products ■ Mops/brushes and protective gloves are provided and used ■ Staff wash rubber gloves after using them and store them in a clean dry place ■ Products are used in accordance with safety data sheets and PPE is used when appropriate ■ All staff are trained how to safely use and store cleaning products and never transfer them to an unmarked container 	<ul style="list-style-type: none"> ■ Replace 'irritant' chemicals with milder alternatives where possible 	Manager	25/5/12	
			<ul style="list-style-type: none"> ■ Remind staff to report any health problems they think may come from cleaning products, and to check for dry, red or itchy skin on their hands. 	Manager	25/5/12	
Manual handling Examples: lifting and moving heavy objects or objects that are difficult to grasp	Staff risk injuries or back pain from handling or moving heavy/bulky objects, eg cleaning equipment or heavy waste bags	<ul style="list-style-type: none"> ■ Trolleys are available for moving heavy waste bags ■ Staff do not overfill waste bags or buckets ■ Cleaning equipment is provided on each floor and staff are trained how to use it safely ■ All staff are trained how to lift properly 	<ul style="list-style-type: none"> ■ Provide a new mopping system with a long-handled wringer and a bucket on wheels to reduce lifting and carrying 	Manager	31/5/12	

WHAT IS A RISK ASSESSMENT?

Collins

noun

the evaluation of the possible risks in a product, situation, activity or course of action

Oxford Learner's Dictionaries

risk assessment *noun*

BrE ; NAmE

[countable, uncountable](*business*)

★ Add to my wordlist

the act of identifying possible risks, calculating how likely they are to happen and estimating what effects they might have, especially in the context of a company taking responsibility for the safety of its employees or members of the public

Cambridge Dictionaries Online

The most popular online dictionary and thesaurus for learners of English

noun [C or U] /ˈrɪsk əˌses.mənt/ /ˈrɪsk əˌses.mənt/ SPECIALIZED



> the process of examining the risks involved in a planned activity

- A noun
 - 'an evaluation'
 - 'the process'
 - 'the act'
- A verb?

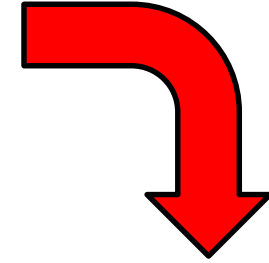
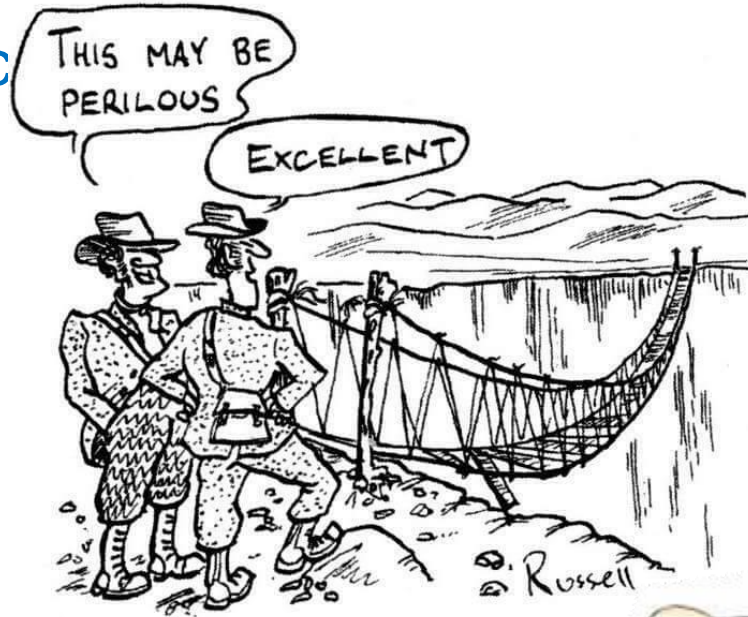
RISK ASSESSMENT 2.0

- Something you do, not just something you produce
- The 'risk assessment' documents that get produced are:
 - *A tool to assist in identifying risk and control measures*
 - *A compliance/evidence document*
- If you don't do the first, you can't do the second
- If you focus on the second, you may not be doing the first

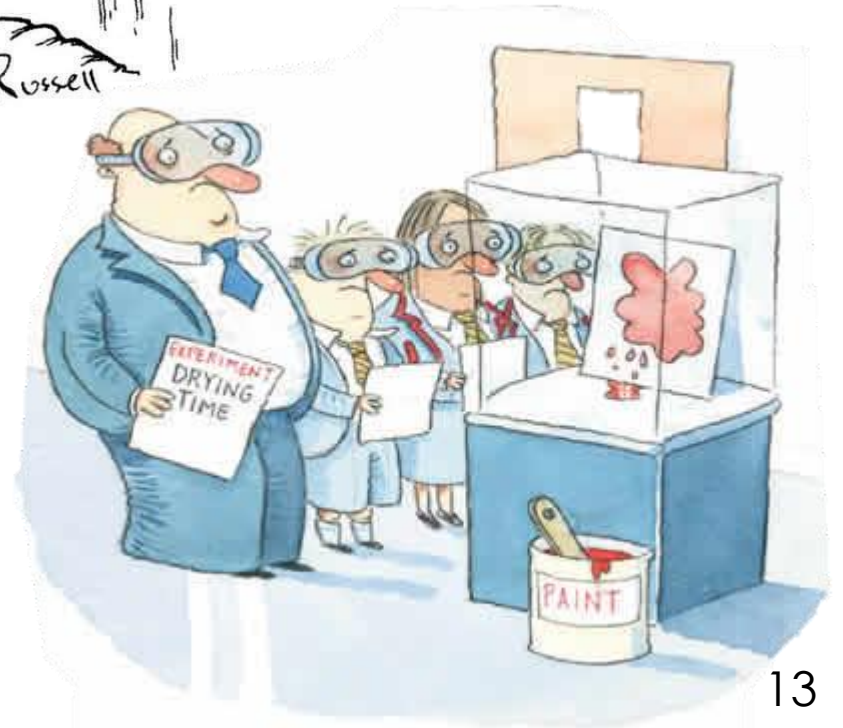
RISK AS

Doc

Victorian risk assessment



- The UK health and safety journey
 - ‘health and safety gone mad’
 - How did we get here?
- Documented RA/MS now commonplace
- Why?
 - Regulators demand them
 - Insurers demand them
 - PC, accreditation schemes, clients demand them
 - H&S managers/consultants produce them
- Standards have risen but are documents still fit for purpose?



RISK ASSESSMENT 2.0

Paper safe

- What really drives improvements in safety standards for high performing companies today?
 - Documents and procedures?
 - Safe systems of work? Training?
 - Behaviours?
- Culture
 - the attitude, beliefs, perceptions and values that employees share in relation to safety in the workplace (Cox, S & Cox, T, 1991)
 - "the way we do things around here"
 - Does typical paperwork address culture? Does typical risk assessment process even address culture?
 - Documents can't reflect that people are ... people
- The things you 'have to do', not how you make someone 'want to do it'.
- No-one is reading 30 page RA/MS full of generic general working practices

Has risk assessment become the end, rather than the means to the end?

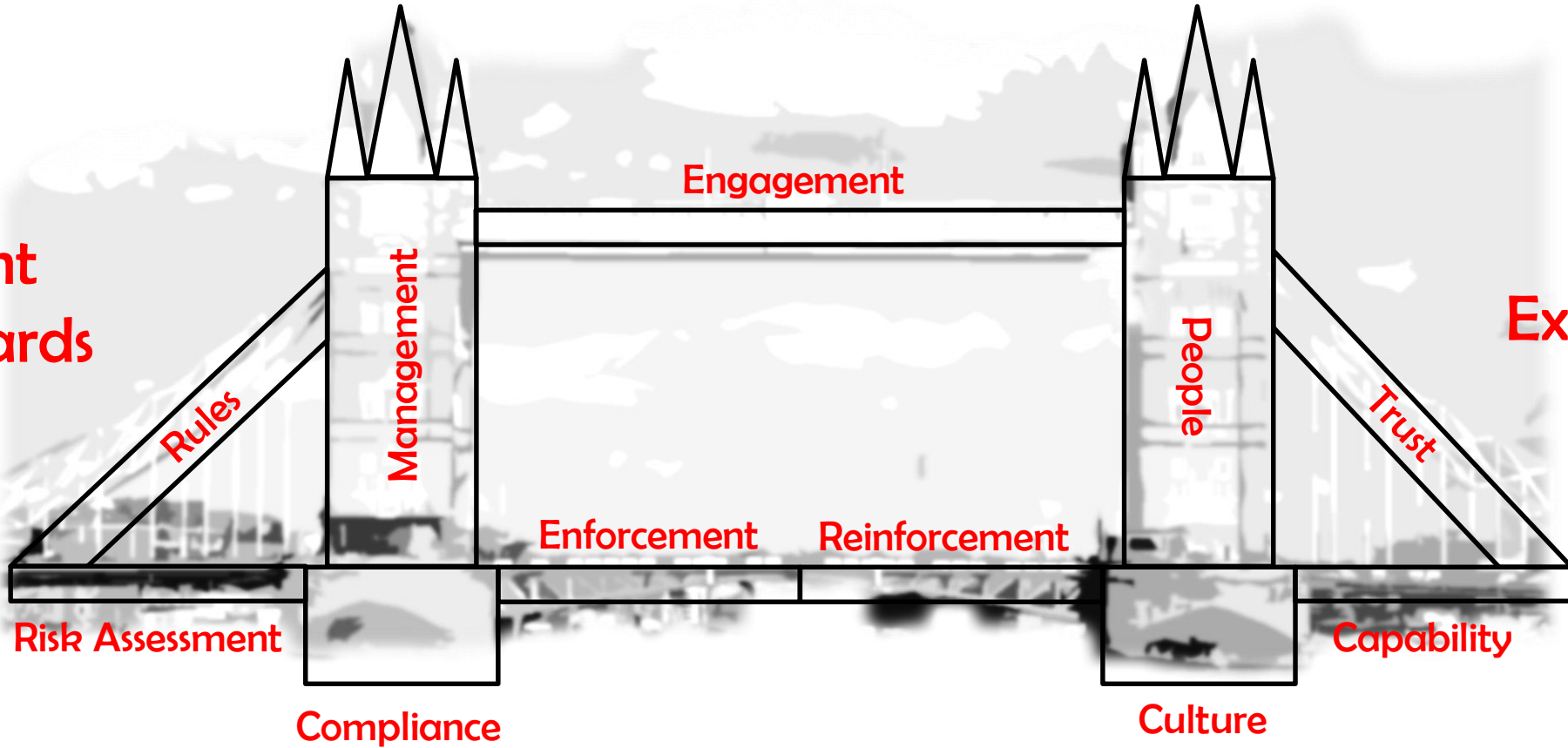
City of London



City of London



Current standards



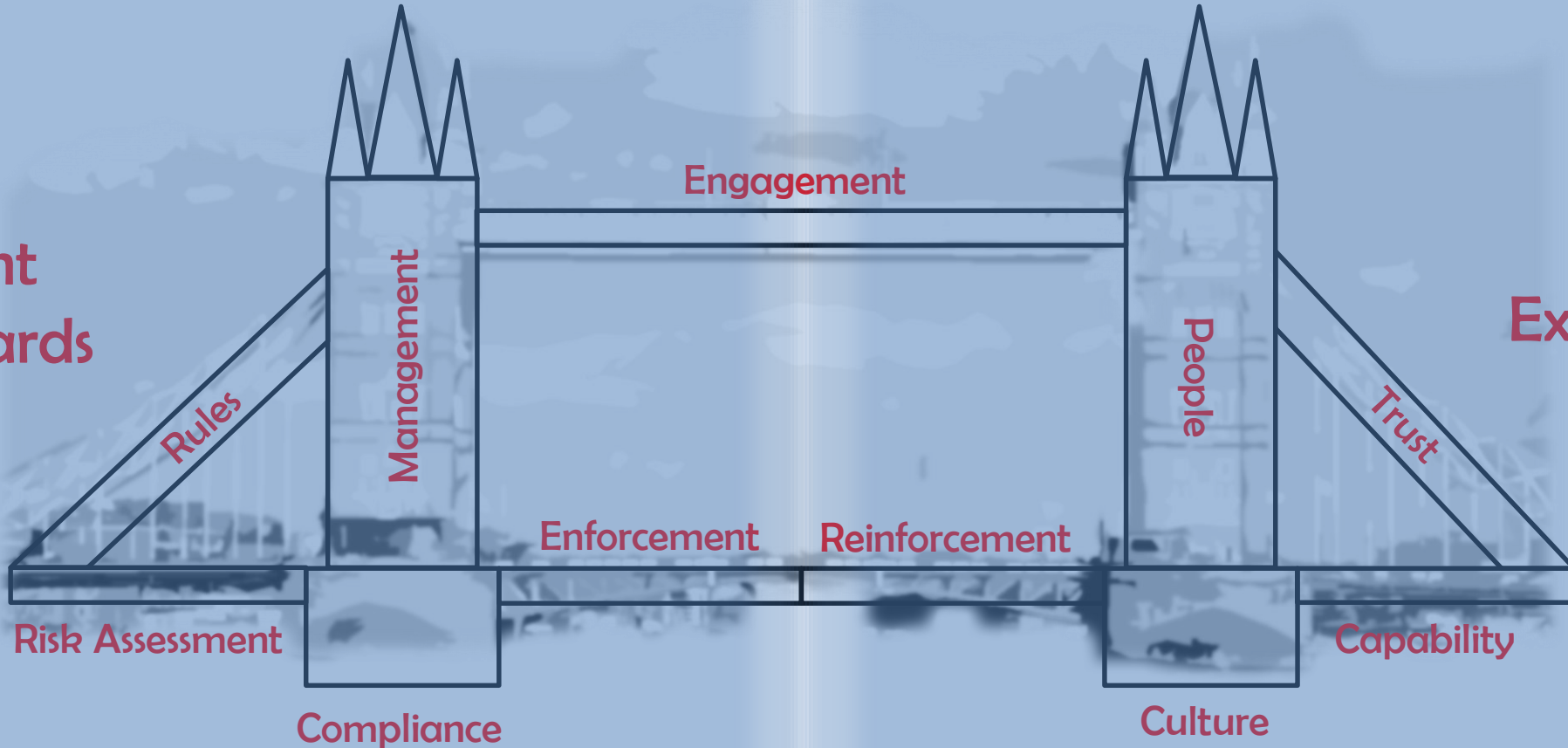
Excellence

Preventing failure

Improving performance

Current standards

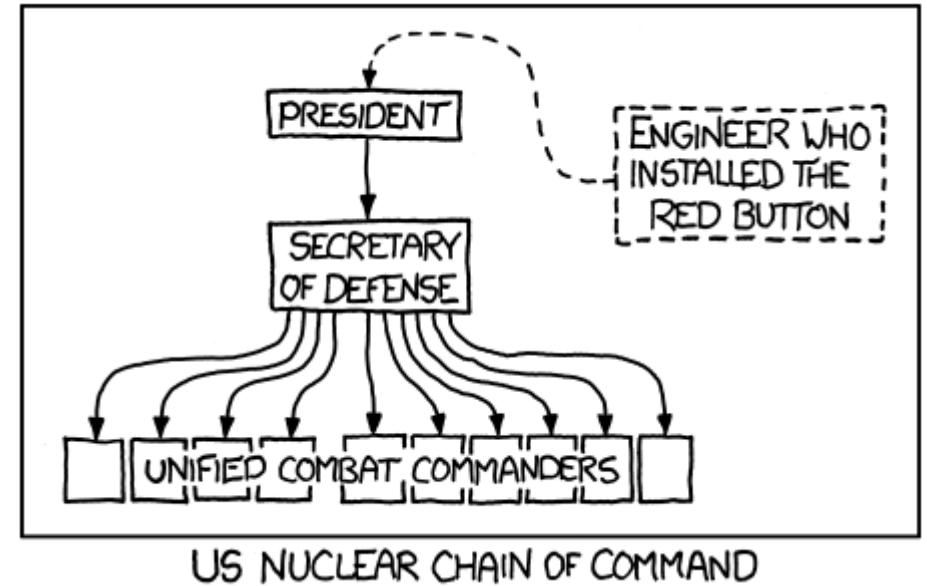
Excellence



RISK ASSESSMENT 2.0

Beyond compliance – CDM and Design

- Do you understand the genuine risks?
- What haven't you thought about? What are your assumptions?
 - Trusting to compliance and not testing it
- How do the workforce interact with the plans made for them?
 - What are they REALLY doing on site?
- Clever people do silly things
- What prevents employees from acting in accordance with systems of work and their training?



RISK ASSESSMENT 2.0

Beyond paper safety – CDM and Design

- How could an organisation move on with regards undertaking and assessing risk assessments?
- Permit simpler documents (why demand a fixed template e.g. with a matrix? – focus is not on risk control)
- Aim to reduce size and amount of paperwork for you AND suppliers – if you ask for paper, you'll get it!
- Don't conflate risk assessments with work instruction/training manual/communication tool
- Consider two tier RA system – broad risk controls including cultural development vs job specific controls
- Encourage templates that draw focus on actual location/environment/individual risks – how the job might deviate from 'the norm' – isn't the rest already covered in policies etc.?
- Acknowledge potential impact of foreseeable unsafe behaviour and premises evolution – don't just design 'to meet a standard', design for the operational reality (lowest level of control = highest risk of injury)
- Ensure that assumptions made that are critical to design and plan are captured and provided to the site – life long memory.

RISK ASSESSMENT 2.0

Moving forward

- Consider how your compliance system actually influences behaviour
 - Consider how your compliance system contributes to a paperwork culture?
- Risk assessment without the baggage can be achieved
- Smarter documents
 - Easier for clients/contractors to read and understand – lessen the blue tape and increase effective communication about site issues
 - Retain compliance – so long as part of an integrated system focusing on culture
 - Demonstrate a more mature organisation with proactive ownership of risk
- Success is not by measured by the volume of your safety management system
- Sustained compliance is not simple and is not demonstrated by documents alone

RISK ASSESSMENT 2.0

Moving forward

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RULES FOR THE

thereby avoid many sins which would disturb your conscience, and also many trifling actions which would tend to your discredit, or trouble your repose.

RULE II.—When you have thus fixed upon a proper end to aim at in each action, then consider not only what are the lawful means to be used in order to this end, but also how these means are best to be applied. That which is unlawful ought not to be done, even for the obtaining of a good end; and means in themselves good have often failed of success for want of prudence in the management of them.

RULE III.—When you are seeking

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for a good end, proper means, and the right way of using them, remember that the knowledge of all this must not rest in idle speculation or plausible discourse, but ought to be effectually reduced to practice, as often as you have an opportunity for it. The man who thinks wisely, and discourses judiciously, is never to be excused if his practice, when there is occasion for it, is not answerable to his thoughts and words. *To him that knoweth to do good, and doeth it not, to him it is sin. And that servant which knew his Lord's will and prepared not himself, neither did according to his will, shall be beaten with many stripes.* James iv. 17; Luke xii. 47.