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KEYS HOUSE, 63-67 BROMHAM ROAD, BEDFORD MK40 2AG  
TELEPHONE 01234 351521 FACSIMILE 01234 270580  
[www.gpmu.org.uk](http://www.gpmu.org.uk)

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TO ALL BRANCHES

SUBJECT **HSE Safe Interventions Enforcement Initiative**

CONTACT Bud Hudspith  
OUR REF GS/BH/kh.180

The Health and Safety Executive is running a Safe Interventions Enforcement Initiative Project from 2004 to 2007. Inspectors will target, amongst others, corrugating companies using corrugating plant and balers, and recovered paper companies using balers, compactors, hoppers, shredders and conveyors. From 2005 to 2007 other industries using similar machinery will also be targeted.

The aim is to achieve, in the target industries, a major reduction in risk of serious or fatal injuries to people involved in clearing blockages or performing running repairs inside dangerous machines due to unexpected start-up. This will mean:

- Raising awareness about the risks and standards required for safe isolation and lock off;
- Ensuring, through formal enforcement by HSE where necessary, that robust isolation and lock off procedures are implemented; and
- Ensuring that employers have, or put in place, sound risk control systems for managing these procedures.

A copy of the proforma being used by Inspectors is reproduced below. Companies to be visited will be contacted by the HSE and asked to make certain information available to them, as well as being inspected. The proforma gives more detail about the circumstances, and the types of machines, that are being targeted by the HSE.

The proforma sets out the questions that HSE Inspectors will ask, if they visit a company. GPMU safety reps can also take action, with their employers, by asking the same questions to ensure that adequate standards are being met, **in all relevant companies**, in line with the proforma and the overall initiative.

The relevant standards can be found in:

- INDG392 "Guidance for the recovered paper industry".
- "The Printer's Guide to Health And Safety" ISBN0717622673 £12.50 HSE Books

### **Chapel Action**

Chapels in the potential target companies, and with the specified machinery, should ensure that employers are aware of the HSE initiative, and are taking action to meet its aims.

All chapels, whatever their industrial sector, using the specified machines (eg balers, compactors, large machines that rely on isolation and lock off procedures), or similar, can use relevant parts of the proforma as a checklist to ensure that their company is meeting the correct standards for isolation and lock off.

Tony Dubbins,  
**General Secretary**

# HSE MANUFACTURING SECTOR PROJECT 2004/5 SAFE INTERVENTIONS: ENFORCEMENT INITIATIVE

HSE Inspectors to complete this questionnaire during their inspection and send it to their HSE Divisional Project Champion.....

## 1 General information

Name of inspector:			
FOD Division:		FMU:	
Client name:			
Client number:		Location number:	
Type of industry (add SIC if known):			
Are they a member of a trade association? If yes, which?	Y	N	Name:
Date of visit:		First visit or follow-up?	First      Follow-up

Note - We would like you to look at machines for which access into, or working inside with safeguards removed, could result in serious personal injury if safe intervention procedures are not followed. e.g. baling machines, internal mixers, car crushers, agglomerators, hoppers and paper/film winders. The type of tasks you should consider are: setting; cleaning; clearing blockages; running repairs; adjustments on the run. Input the name or description of up to four machines that you sampled in the following table:

Machine 1	Machine 2	Machine 3	Machine 4

## 2 Hazard elimination and risk reduction

Has the employer taken all reasonably practicable steps to eliminate/minimise the need for people to gain access into danger zones by:

Question – Answer Y, N or N/A	Machine 1	Machine 2	Machine 3	Machine 4
2.1 Minimising the chance of blockages (e.g. pre-sorting of feed materials, ensuring feed conveyors are evenly loaded, ensuring steady feed rates etc)?				
2.2 Providing feed conveyors with reversing facility?				
2.3 Ensuring machines and guards allow rodding of blockages from outside the guard enclosure?				
2.4 Providing misfeed detection and warning systems?				

2.5 Providing machinery that can be adjusted automatically (by motorised adjusters etc)?				
2.6 Providing machinery that can be adjusted manually from outside the guard enclosure?				
2.7 Ensuring dimensions in fixed guards for insertion of adjustment tools do not allow bodily access into the danger zone?				
2.8 Providing viewing aids (e.g. internal lighting, clear viewing panels, CCTV, mirrors etc) that allow people to see critical parts of the process without the need to gain access?				

2.9 In relation to **reducing the need for access**, what course of action was taken as a result of your visit? *Answer none, verbal adv, written adv, IN, PN, proposed PR – all that apply and numbers in ()*.

Machine 1	Machine 2	Machine 3	Machine 4

### 3 Hardware

#### 3.1 Machinery safeguarding, interlocks and emergency stop devices

Note – The quality of safeguarding and any associated interlocking devices will vary depending on the potential harm if access is gained behind it. Points to consider: How large is the opening when the protection is removed? Severity of injury? Frequency and/or exposure time to the hazard? Possibility of avoiding the hazard?

Question – Answer Y, N or N/A	Machine 1	Machine 2	Machine 3	Machine 4
3.1.1 Are you satisfied with the method of safeguarding?				
3.1.2 Are you satisfied with the standard of safeguarding?				
3.1.3 Are you satisfied that interlocking is provided where required?				
3.1.4 Are you satisfied with the standard of interlocking where provided				
3.1.5 Are all items of machinery fitted with one or more emergency stop devices (ESDs) that have clearly identifiable, visible <b>and</b> quickly accessible controls?				
3.1.6 Where several machines operate together, does each ESD stop the other machines where necessary?				
3.1.7 Do the ESDs stop the dangerous movement or process as quickly as possible without creating additional hazards?				
3.1.8 Where necessary do the ESDs trigger safeguard movements e.g. release of clamping pressure?				

Question – Answer Y, N or N/A	Machine 1	Machine 2	Machine 3	Machine 4
3.1.9 Does the operation of the ESD require physical resetting to start the machine?				

3.2 In relation to **machinery safeguarding, interlocks and emergency stop devices**, what course of action was taken as a result of your visit? *Answer none, verbal adv, written adv, IN, PN, proposed PR – all that apply and numbers in ()*.

Machine 1	Machine 2	Machine 3	Machine 4

3.3 Isolation and lock-off devices

Where access is required, has the employer provided robust isolation and lock-off devices that ensure that:

Question	Machine 1	Machine 2	Machine 3	Machine 4
3.3.1 The drive to the dangerous part of the machine can be isolated from energy sources?				
3.3.2 Any stored energy can be dissipated before access is allowed?				
3.3.3 Actuators for energy isolation systems are suitably positioned, clearly labelled to identify the items of machinery they isolate <b>and</b> marked ON/OFF?				
3.3.4 They are fitted with the means of locking in the off position where necessary?				

3.4 In relation to **isolation and lock-off devices**, what course of action was taken as a result of your visit? *Answer none, verbal adv, written adv, IN, PN, proposed PR – all that apply and numbers in ()*.

Machine 1	Machine 2	Machine 3	Machine 4

## 4 Procedures

4.1 Safe systems of work

Where the need for access into danger zones cannot be eliminated, has the employer:

Question	Machine 1	Machine 2	Machine 3	Machine 4
4.1.1 Identified the tasks that require access?				
4.1.2 Performed a suitable and sufficient risk assessment for each task?				

Question	Machine 1	Machine 2	Machine 3	Machine 4
4.1.3 Taken account of the potential for human error (e.g. slips or lapses of memory, communication errors etc) as part of the risk assessment?				
4.1.4 Taken account of the potential for violation of rules by employees and the factors that influence the potential for rule violation (e.g. workload, time pressures, practicality of the rules)?				
4.1.5 Taken account of the need for safe access and egress?				
4.1.6 Taken account of the risk of slips, trips and falls from height?				
4.1.7 Taken account of the risks from manual handling associated with the task?				
4.1.8 Taken account of the relevant instructions in machine manufacturers' instruction manuals?				
4.1.9 Provided and maintained a suitable permit-to-work system where appropriate?				
4.1.10 Provided appropriate emergency shutdown procedures?				
4.1.11 Provided a safe system of work for each task?				

4.2 In relation to **safe systems of work**, what course of action was taken as a result of your visit? *Answer none, verbal adv, written adv, IN, PN, proposed PR – all that apply and numbers in ()*.

Machine 1	Machine 2	Machine 3	Machine 4

#### 4.3 Energy isolation and lock-off

Are there robust energy and isolation lock-off procedures that:

Question	Machine 1	Machine 2	Machine 3	Machine 4
4.3.1 <b>Specify</b> the correct isolators for the intervention task?				
4.3.2 <b>Check</b> that stored energy has been dissipated where appropriate?				
4.3.3 Ensure the isolator(s) are <b>securely locked</b> in the off position?				
4.3.4 Include a final <b>check</b> to confirm that machinery has been isolated from all sources of energy?				

Question	Machine 1	Machine 2	Machine 3	Machine 4
4.3.5 <b>Communicate</b> the fact that people are working in the danger zone to everyone who needs to know e.g. anyone who might start the machine?				
4.3.6 Personal padlocks <b>are provided</b> and, where appropriate, multiple lock hasps?				
4.3.7 Spare keys for isolator locks are <b>not</b> accessible?				

4.4 In relation to **energy isolation and lock-off procedures**, what course of action was taken as a result of your visit? *Answer none, verbal adv, written adv, IN, PN, proposed PR – all that apply and numbers in ()*.

Machine 1	Machine 2	Machine 3	Machine 4

4.5 Routine maintenance and inspection of safety related parts

Note – Please consider preventive maintenance **and** inspection by both the operator and maintenance staff. e.g. In many industries two levels of safety checks are appropriate: Daily visual and fictional tests; and Less frequent but more detailed inspections and checks carried out by a competent machine setter or maintenance staff.

Has the employer provided effective procedures for routine maintenance, inspection/testing of **and** reporting defective:

Question	Answer Y or N
4.5.1 Fixed and moveable guards and access doors, gates, panels and electro-sensitive protective devices?	
4.5.2 Interlocking devices?	
4.5.3 Emergency stop devices (ESDs)?	
4.5.4 Power isolation devices?	

4.6 In relation to **routine maintenance and inspection**, what course of action was taken as a result of your visit? *Answer none, verbal adv, written adv, IN, PN, proposed PR – all that apply and numbers in ()*.

Machine 1	Machine 2	Machine 3	Machine 4

## 5 Management system

5.1 Managing and organising the safe systems of work (SSOW)

Is there evidence to show the following:

Question	Answer Y or N
5.1.1 Managers and supervisors understand and accept their responsibilities for the operation of the SSOW?	
5.1.2 Managers and supervisors are held accountable for the correct operation of the SSOW?	
5.1.3 That, where appropriate, employees or their representatives were adequately involved and consulted during the preparation of any safe systems of work they are required to follow?	
5.1.4 Rules relating to the SSOW are effectively communicated and understood?	
5.1.5 Employees required to apply and follow the SSOW have been properly trained in the SSOW?	
5.1.6 The SSOW are properly followed in practice?	
5.1.7 Managers and/or supervisors monitor compliance with the SSOW?	
5.1.8 Managers and/or supervisors take appropriate remedial action if SSOW are not followed properly?	
5.1.9 Managers review the operation of the SSOW at appropriate intervals?	

5.2 In relation to **managing and organising the safe systems of work**, what course of action was taken as a result of your visit? *Answer none, verbal adv, written adv, IN, PN, proposed PR – all that apply and numbers in ()*.

Machine 1	Machine 2	Machine 3	Machine 4

## 6 Comments

Please make any comments you think would help in the space below.