



Unite comments on the HSE Manufacturing Industries Draft Sector Strategy

This response is submitted by Unite the Union. Unite is Britain's largest trade union, with just under 1.5 million members. Unite members work in most industrial sectors including the most dangerous, such as agriculture and construction.

Our members work in the following sectors, Aerospace and Shipbuilding; Vehicle Building and Automotive; Motor Components; Chemicals, Pharmaceuticals, Process and Textiles; Graphical, Paper and Media; Metals (including Foundry); Electrical Engineering and Electronics; IT and Communications; Servicing and General Industries; Local Authorities; MOD and Government Departments; Education; Health; Community, Youth Workers and Not for Profit; Energy; Construction; Finance and Legal; Civil Air Transport; Docks, Rail, Ferries and Waterways; Passenger Transport; Road Transport Commercial, Logistics and Retail; Food, Drink and Tobacco; Rural and Agricultural.

In particular our members work in all of the sectors covered by the HSE manufacturing strategy.

Summary

It is unfortunate that the strategy is so heavily based on the Government's flawed statement "Good health and safety, good for everyone". Inevitably some of our criticisms of the strategy stem from our disagreement with the Government's current, inept approach to health and safety.

So, while the HSE may see this strategy as the only way they can fit into a short-sighted, unjustifiable Government plan, it does not have the support of Unite – the union that is a major player in all of the industry sectors covered by the strategy.

Unite cannot support a strategy which oversees a reduction in health and safety standards and which, we believe, puts manufacturing workers, many of them Unite members, at greater risks to their health and safety.

It will be noted that our response to the draft strategy raises many questions, to which we request answers.

It should be noted that consulting on this important strategy during August has created difficulties for us in responding fully due to the absence of many people during this period. HSE should take this into account in terms of other consultations and try to avoid this situation wherever possible.

Detailed comments – and questions for HSE

Unite is fundamentally opposed to the Groupings A-D that are being suggested and opposed to the approach behind them that seeks to rationalise major cuts in HSE resources and inspectors. In order to cope with these cuts the HSE is attempting to justify extensive reductions in HSE activity within the manufacturing sector. The idea that some industries are characterised as lower risk, or even medium risk, is unbelievable (and possibly even laughable!) to many employees and employers who work in those industries.

At paragraph 12 and 13, the broad groupings under A-D appear to be based on the initial DWP categorisations (for which no evidence has been provided) and a simplistic assessment of accident rates, with no serious assessment of health risks. The groupings also make the mistake of assuming that all organisations within a group have the same approach to health and safety and exhibit the same level of risk.

At paragraph 14 the strategy refers to the future need to be more specific about which sub-industry, process or occupational group will be the focus of attention.

At what point of “taking this strategy forward” do HSE intend to be more specific?

Paragraph 15 refers to contractors. How is HSE dealing with the issue of contractor H&S in manufacturing and elsewhere?

The widespread use of contractors is already affecting accident statistics and leading to questionable figures being reported. When companies contract out parts of their business, how are the contracted out accident and ill health figures related back to the industries where they occur?

Paragraph 20 refers to broad based health and safety forums which have “potential on cross-cutting issues”. Are they effective or “potentially” effective?

Paragraph 23 refers to the potential of working together with other regulators. for example with regard to food hygiene and environmental issues. What are HSE’s specific proposals in this respect?

The **Future Trends** section of the draft strategy, starting at Paragraph 24, focuses generally on the future of the manufacturing sector in Britain.

CD235 (the proposal to extend costs recovery by HSE), in the impact assessment at pages 8, 10 and 12, notes that costs recovery may help to avoid “the costs of work-related injuries and ill health due to a decrease in health and safety standards which would otherwise result from the savings which HSE has been asked to make in the 2010 Spending Review”.

What about the future trends for occupational health and safety standards as a consequence of the ideologically driven public sector cuts to HSE? Progress has been very slow in any case. Please see elsewhere in our response, for example under the food sector.

At paragraph 30, HSE attempts to address health issues and refers to “HSE knowledge of ill-health in industry” to supplement the recorded ill health figures. Unite is well aware of the weakness of occupational ill health statistics, and the widespread failure of industry to address occupationally related ill health. Earlier we have criticised the whole approach adopted here for being too safety centred rather than health centred. So, how did HSE perform this task, given the poor recorded ill health figures for most industries?

Paragraph 31 deals with the various groupings and the industries that have been put into them. Under Group C it says “in those industries where TAs are less strong, the coherent structures and scale of operations make it feasible that improved standards could be achieved through the supply chain. It may be “feasible” but what is going to make it happen?

Later on in the paragraph under **Paper & Board** it refers to the sector being well placed to maintain recent progress. It is true that members of PABIAC are working hard to restructure the Committee and adapt to changing circumstances, and Unite plays a major part in that work. However it is worth noting that PABIAC is struggling to maintain the improvements made over past years because of the diminishing role being played by HSE inspectors in the industry. The considerable achievements of past PABIAC initiatives were heavily reliant on the enforcement element provided by HSE inspectors at a local level. In the absence of that level of enforcement, or threat of enforcement, it is difficult for PABIAC to have the same influence it had in the past.

In relation to the **plastics industry**, where new work is under way, supported by Unite, is SIMPL providing new leadership or **trying** to provide it. At the moment this appears to be a wildly optimistic comment.

The draft strategy refers to the **rubber industry** and RUBIAC. TAs may be well represented in the newly formed TRISAG, but there is little or no evidence that the downstream TAs are effective. Problems in the operation of RUBIAC have stemmed mainly from the ineffectiveness of the downstream, small TAs. Indeed, the existence of TRISAG represents a complete breakdown of national discussions between employers organisations and workers organisations on health and safety in the rubber industries.

Under **fabricated metal products**, we see a perfect example of the different levels of health and safety activity and effectiveness within a particular sector. As already stated in the strategy, this is a sector that cannot be characterised simply, since it contains within it huge variations in performance on health and safety. Unite believes this comment could be applied to many of the sectors.

Under **textiles, footwear and leather**, it is said that, “The industry advisory committee was wound up in 2010, and while a new committee may replace it, its effectiveness is not assured”. If this is the case, why has this sector been listed under D? It looks as though it needs intervention from the HSE.

In relation to **printing and recorded media**, it is well recognised that this industry is heavily skewed by the inclusion of publishing – a low risk accident sector (though not necessarily without health problems). In addition, throughout the sector there is heavy under-reporting of accidents, as well as major ignorance of duties and H&S needs.

Later in the section on printing and recorded media it says that, “The precautions for the remaining traditional presses and associated machinery are well known and well documented”. If it is true that hazards are well known and well documented, and HSE is going to take a watching brief, and the reach of TAs is limited and TU membership levels have declined, what is going to make any of these businesses improve their performance on health and safety? Are we really saying that the aim is for these companies to maintain their current poor performance?

With regard to **food and drink** industries (placed in both A and C groupings) – pages 12-13 and page 18 – we also note the comments about the Food and Drink Manufacturers’ Forum and Recipe for Safety. Unite strongly supports the work of the Forum and the various joint initiatives being taken in the sector.

At the same time, it is acknowledged in the draft *Common Strategy for Improving Health and Safety in the Food and Drink Manufacturing Industries* currently under discussion by the Forum that while considerable improvements have been made, the injury rate in the sector is still 1.6x that of the manufacturing sector as a whole.

Given the significant major injury rate and the large numbers of people employed in the sector (both factors are highlighted in the strategy) Unite believes that proactive inspections and other regulatory activity across the **whole** sector should be the norm.

It is worth highlighting the huge numbers of agency and migrant workers in the food manufacturing industry, requiring specific actions to ensure that health and safety measures are recognised and understood. The meat processing industry has very specific issues but so do the salads, sandwiches, ready meals and fresh fruit processing industries.

The increasing number of agency, migrant and contract workers is now becoming a feature throughout manufacturing in general.

In addition, could HSE explain how it is envisaged that the close relationship between food hygiene and health and safety laws will impact on health and safety standards?

Under **other manufacturing** the draft states, “The variety of this section of industry makes industry specific approaches untenable, and the need for greater reliance on generic H&S guidance. “ So why is it in Group D?

Conclusion

Unite is opposed to much of the proposed HSE Manufacturing Strategy, and fundamentally at odds with the Government philosophy on health and safety that lies behind it. Unite cannot support a strategy which oversees a reduction in health and safety standards and which, we believe, puts manufacturing workers, many of them Unite members, at greater risks to their health and safety.

It is difficult to comment in further detail since we oppose so much of the philosophy behind the approach being taken. However, we ask HSE to take account our comments and provide answers to the questions raised.

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Manufacturing Industries - Sector Strategy

Introduction

1. [“The Health and Safety of Great Britain \ Be Part of the Solution”](#) sets the HSE Board’s Strategy for the health and safety system as a whole. Implementation of the Strategy will be based upon the development of sector-specific strategies. These sector-strategies are for the entire health and safety system, and will provide direction for both industry and regulator in their efforts to improve health and safety performance in Great Britain (GB).
2. Sector-specific strategies analyse the health and safety issues and explore what needs to be done to secure improvements within that sector of employment. Detailed consideration of how the strategy is to be delivered, including the potential activity, the resources necessary and the contributions from all parts of the health and safety system will be undertaken at a later stage. HSE’s contribution will be included within HSE’s business planning process.
3. This document outlines a sector-specific strategy for the various different industries that make up the Manufacturing Sector in GB. It has been developed by taking into account:
 - Sector-specific issues, such as the injury and ill health incidence and ‘cross-cutting’ perspectives (such as leadership, worker involvement etc);
 - The past investment by the regulator (HSE) and its business contacts in initiatives in different parts of manufacturing;
 - The findings of the Lord Young Review: [“Common Sense – Common Safety”](#);
 - The Ministerial statement ‘Good Health and Safety, Good for Everyone’
4. Manufacturing is a very diverse employment sector that encompasses a large number of industries and sub-industries, ranging from heavy industries to specialist, or delicate operations. They span large employers to those dominated by micro businesses or the self-employed, and include growing industries as well as those in decline. The health or safety hazards are often specific to the processes involved, which differ substantially between industry types and between sub-sectors of those industries. Management of the risks is partly dependent on the inherent hazards but also on their management at both industry, or sub-industry level, and at individual site level.
5. This Manufacturing Sector Strategy includes the following industries:
 - Basic and molten metals
 - Minerals (ceramics, glass, clay, concrete, stone working etc)
 - Fabricated metal products, machinery, and vehicles
 - Food & drink
 - Laundries

- Motor vehicle repair
- Paper & board
- Plastics
- Printing
- Rubber
- Textiles, clothing, leather
- Woodworking & furniture

6. Efforts to improve control of health and safety risks across manufacturing as a whole must accommodate the diversity between the industries yet continue to be efficient and effective by utilising consistent approaches. However, the strategy recognises that the approaches may need to be customised in order to meet the requirements of specific industries and sub-industries.

Sector Description

Scope

7. The manufacturing sector includes all of the industries as described in the 2007 Standard Industrial Classification (ie SICs 10.000 to 33.000), with a small number of exceptions¹. Chemical industries (SIC 19.000 – 21.000) are excluded and subject of a separate Sector Strategy². Motor Vehicle Repair (SIC 45*) is included as the equipment, processes and hazards are closely related to those in manufacturing. This strategy includes manufacturing where the feedstock is waste materials, but the collection, sorting and primary processing of waste materials is covered by the Waste and Recycling Strategy.

8. There are around 20 commonly used groupings within the SIC system that brigade manufacturing industries together, such as 'food and drink' (SIC 10.000 and 11.000) and 'plastics and rubber' (SIC 22.000). Mainly '2-digit' SIC codes (eg 10.000: Manufacturing of food) are used, but where greater distinction is required, sub-industries are identified at the level of '3-digit SIC codes (eg 10.6: Manufacture of grain mill products, starches and starch products). This finer segregation will be helpful when, for example, attention needs to be focussed on accident or ill health 'hot-spots' affecting particular occupational groups or specific sub-industries.

9. Whilst some of the SIC groupings are natural in that they reflect how the industries are structured, others are not. The risk profiles in plastics and rubber, for example, are quite different. The former generally has much lower RIDDOR rates, newer machinery (with risks increasingly engineered out) and the only significant health risks being MSDs, whereas rubber has the opposite characteristics. Conversely, wood and furniture have different SICs (16.000 and 31.000), but share similar hazard profiles and many of the same industry institutions.

Segmentation

¹ http://www.statistics.gov.uk/methods_quality/sic/

² Chemical Sector Strategy Trim Ref:

10. As manufacturing is a very diverse sector, selecting those industries/sub-industries for specific attention by the health & safety system is a challenge. Selection could be approached in a number of different ways - the range of options include:

- The sector as a whole;
- Individual industries;
- Groupings of industries sharing common characteristics;
- Hybrid groupings with a generic / default approach for most industries, but with one or more industries or clusters singled out for more customised attention.

11. HSE has concluded the fourth option provided the most appropriate approach for this complex sector. It should allow the sector strategy to accommodate the challenges posed by the diversity of the manufacturing industries, providing a basis for targeted attention in key areas whilst retaining sufficient scope for tailored industry, or sub-industry interventions. Industry/sub-industry groupings were developed by consideration of the following factors:

- (i) Utilitarian factors such as injury / ill-health rates (deservingness of attention), and numbers employed (benefit to the greatest numbers)¹.
- (ii) The leverage that industry bodies and intermediaries (eg trade associations, sector skills councils, unions etc) have in the industry, or sub-industry, by virtue of their: levels of membership; capacity to lead / influence their members and; ability to act as an effective conduit for how the wider health and safety system impacts on their industry beyond their membership.
- (iii) Whether current or past initiatives targeted on the industry, or sub-industry have resulted in sufficient improvements to allow the regulator to consider taking a more reactive stance and step back from pro-active involvement.
- (iv) Whether there are other important influences in the industry, or sub-industry which impact, or could be used to impact, on health and safety. Examples include food hygiene in the manufacturing of food and beverages; the criticality of the supply chain in motor vehicle manufacture; and the importance of machinery / 'substance' suppliers in general engineering.

12. As a consequence the following four broad groupings were identified within the manufacturing sector that will frame the strategy's perspective and action:

Group	Basis of Grouping	Approach by enforcing authority
A	High hazard and control of risks unsatisfactory Duty-holder coherence provides routes through intermediaries to exercise influence Sufficient scale for return of regulator investment	Proactive intervention / inspection Increasing focus on role of intermediaries
B	High or medium risk industries. Dispersed industries (eg small/micro-business dominated or without effective TAs)	Targeted proactive intervention on particular processes, occupational groups or duty holders
C	High or medium risk industries. Structural factors give clear role for others in H&S system (eg Trade Associations or supply chain intermediaries with influence)	Focus on role of intermediaries; Where HSE intervenes directly with duty holders it is likely to be reactive action by operational directorates
D	Lower risk industries <u>or</u> declining industries with (relatively) few at risk	Principally reactive

A more detailed version of this table may be found at Annex 2.

13. Applying these four groupings (drawing on the information provided in Annex 1 and our understanding of structures and organisation), the proposed initial positioning of the various industries and sub-industries within manufacturing is:

- **Group A**
 - Basic and molten metals
 - Shipbuilding and ship repair
 - Food (dairy products, meat & poultry products)
- **Group B**
 - Motor Vehicle Repair (MVR) (part)
 - Stone Working
 - Woodworking / Furniture
 - Fabricated metal products (part)
- **Group C**
 - Plastics
 - Rubber
 - Fabricated Metal Products (part)
 - Mineral industries (ceramics, glass, glazing, cement, concrete, bricks etc)
 - Other Food & Drink

- Paper & Board
- **Group D**
 - Leather
 - Laundries
 - Computer, electronic and optical products
 - Printing
 - Textiles
 - Other manufacturing industries, not listed elsewhere

14. In taking this strategy forward it will be necessary to be more specific about which sub-industry, process or occupational group is the focus of attention. The more detailed 3 figure SIC codes (or possibly, 4 and 5 digit SIC codes) will be helpful in clarifying these. In addition, individual industries, or sub-industries may be reallocated to a different grouping if this becomes appropriate due to the outcome of further research, consultation, or progress with delivery.

Demographics³

15. Manufacturing industries directly employ approximately 2.4m people⁴, or 8.5% of the UK workforce⁵. It also utilises, or indirectly employs, a range of contractors, for example for machinery and facilities maintenance. The diversity of the industries makes cross-sector generalisations difficult, but it is evident that manufacturing is capable of generating significant numbers of cases of injury and ill health due to the large number of workers affected coupled with relatively high incidence rates.

16. Small businesses (<50 workers) and the self-employed make up an estimated 97.5% of manufacturing enterprises⁶, employing approximately 35% of the workforce⁷. 43.5% are employed by large businesses (250+ employees)⁸.

17. Many manufacturing industries employ a broadly ageing workforce. 30% of all employees are between 50 and the state pension age (SPA). The industry accounts for 15% of UK gross domestic product and 50% of total exports. Manufacturing is geographically spread across the UK, although some industries, or sub-industries tend to be concentrated in certain regions.

Stakeholders

18. The stakeholders active in GB manufacturing are relatively well established and identifiable. There are a large number of trade associations

³ Nb – All statistics for Manufacturing as a whole include figures from Waste & Recycling and Quarrying Sectors

⁴ Insert ref

⁵ <http://www.bis.gov.uk/assets/biscore/business-sectors/docs/m/10-1334-manufacturing-in-the-uk-supplementary-analysis.pdf>

⁶ http://stats.berr.gov.uk/ed/sme/SMESStats2009_corrected_version.xls#UK Private Sector!A1

⁷ *Ibid*

⁸ *Ibid*

(TA) representing industries or sub-industries, with differing levels of membership and differing capacities to influence their members. Broadly speaking, TA in manufacturing act as an effective conduit for information on how the wider health and safety system impacts upon their members, and also in some cases indirectly influence the industry beyond their membership (for example by allowing free access to their on-line H&S information). Some trade bodies are represented in the Standards making process (EN or BS), sit on training and qualifications bodies (such as the Sector Skill Councils), negotiate with Government, professional institutions and HSE on benchmark compliance standards, as well as speaking to the media to reflect industry specific H&S issues and expectations.

19. Unions continue to exert a strong influence in some, usually more traditional, industries. However, many manufacturing industries are either non-unionised or have a mixed degree of union membership. The formal, strong tripartite H&S forums (with trade associations, trade unions and HSE membership) which were a feature of the industrial landscape 20 or 30 years ago remain in place in relatively few manufacturing industries (eg paper and board industry and printing). In some cases these have been replaced by less formally constituted but tripartite groups (eg Foundries, Motor Vehicle Repair).

20. Although manufacturing industry is characterised by its diverse sub-industries and specific trade bodies, there are several pan-sector bodies. The EEF, for example, now positions itself as “EEF: The Manufacturers’ Organisation”, (rather than its roots as the Engineering Employers’ Federation). Such organisations have the potential to spread learning and knowledge on cross cutting issues affecting the breadth of manufacturing such as leadership and worker involvement. There are also a number of broad based health and safety forums, which may be organised on either a regional (eg - Welsh Manufacturing Forum), or an industrial basis (eg - Food and Drink Manufacture Health and Safety Forum) which have a similar potential on cross cutting issues.

Regulation

21. There is very little industry specific legislation, and most legal compliance activity relates to enforcement of generic legislation (eg HSWA, Control of Substances Hazardous to Health Regulations, Provision and Use of Work Equipment Regulations),

22. In the vast majority of manufacturing industries the H&S legislation is enforced by HSE. Within small sub-industries (particularly steel stockholders and in some service centre type MVR) enforcement is by Local Authority (LA) enforcement officers. In recent years there have been a number of initiatives to transfer MVR premises from HSE to LA through formal enforcing authority transfer. Additionally visits to HSE enforced MVR premises have been made by LAs under a defined flexible warranting scheme. This approach had the potential effect of reducing regulatory burdens where LA H&S officers also had responsibility for environmental emission control visits.

23. For all premises where visits are paid by both HSE and other enforcing

authorities (eg to enforce environmental emission, or food hygiene legislation) there is a potential for the regulators to work together to convey key messages, and reduce regulatory burden for businesses.

Future Trends

24. The numbers of people employed in GB manufacturing industry has shrunk considerably over the past 30 years, partly as a result of improved automation and improved production techniques, and partly as a result of cheaper imports and the export of production capacity by GB manufacturers. However, the position now is relatively stable due in part to the diversity of the sector, which contains:

- High-tech industries such as aerospace which are not so cost sensitive;
- Those producing lower value items such as some construction products where transport costs favour domestic production;
- Food processing which is linked to the GB land industries that grow the produce / livestock and;
- Assembly plants for Far East motor manufacturers, representing their strategic decisions on where to locate within the EU, with their GB manufacturing supply chains providing 'just in time' delivery of parts.

Changes in manufacturing methods linked to new materials, new technologies and greater automation ('advanced manufacturing') should also support relatively high 'added-value' domestic producers rather than low cost (overseas) manufacturers, increasingly providing these benefits to GB manufacturers.

25. Looking forward over the next 3–5 years, however, it is difficult to predict the future direction of GB manufacturing with any certainty because of the influence of macro-economic factors. The cost differentials with overseas production will lessen, if anything, but variations in global demand related to a double-dip recession or differential exchange rates within Europe could affect the GB economy as a whole to a much more significant extent in either direction. Within GB, the Government has a stated objective of increasing employment in the regions and ending the dominance of the South East, so there may be some progressive changes in the geographic distribution of GB manufacturing. In view of the complexity and uncertainty, for the purposes of this strategy document, it is assumed that GB manufacturing will broadly retain its current shape and size.

26. Regarding other aspects of the GB manufacturing profile, it seems likely that the employment age profile will continue to rise as the state pension age increases and welfare provisions become marginally less attractive. There is no specific basis for predicting that the gender and skilled / unskilled mix is likely to change significantly in any particular direction and there is no basis for predicting a change in the migrant labour force – again it could potentially move significantly in either direction depending on political actions and relative economic fortunes. The potential cultural effects of a new generation of workers who have grown up in a digital age is again hard to predict – they could embrace advanced manufacturing, champion it

on the shop floor and introduce new outlooks / expectations, or they could shy away from the prospect of more traditional and industrial occupations as career options.

27. A further issue that has been considered is the Government's drive on rebalancing the economy and manufacturing's contribution to that. However it is not possible to predict whether there are any industries/sub-industries that are likely to form part of that drive and where health and safety is likely to be an issue.

DRAFT

Problem Definition

Injury & Ill Health Rates

28. Manufacturing accounts for 8.5% of the GB workforce, but 16% of reported injuries to employees. The following table shows comparative data for different industries at 2 figure SIC level, giving 5 year averages from 2004/05 to 2009/10 (source - HSE and ONS):

	Number of Fatals per year	Major Injury Rate per 100,000 employees	Ill-health	Numbers at risk (2009/10)
Other non-metallic mineral products	2.8	257	3780	82,000
Engineering ⁹	2.5	139	3200	993,000
Basic metals	3.0	356	3120	63,000
MVR	5.4	192	?	182,000
Paper	1.2	184	3590	60,000
Plastics & rubber	2.0	187	2510	157,000
Printing	1.0	60	3410	122,000
Textiles/leather/footwear	0.3	80	966	83,000
Woodworking/Furniture	1.4	262	3235	184,000
Food/drink	3.4	237	3080	359,000

KEY

Fatal, major injury & Ill-health figures are 5 year averages

RIDDOR rates greater than 150% the manufacturing average are in red, less than 75% are in green. The five year manufacturing average is 174.

29. More detailed information on the extent of occupational disease and injury in manufacturing is found in Annex 1, but is mapped on 2003 SIC codes. Annex 1 also lists some initiatives that have been taken forward in manufacturing. This Annex will be updated in the next revision of the Strategy.

30. However, while these figures give a broad indication of relative risk between the industries, during the process of allocating industries into the separate groups (see paras 12 and 13) account was taken of RIDDOR accident data analysed at 3 and 5 figure SIC codes, and HSE knowledge of ill health in industry was used to supplement the recorded ill health figures. When reviewing the accident data by SIC in increasingly more precise but lower employment numbers, consideration was given to the numbers employed within those industry sectors and sub-sectors.

⁹ The engineering industries encompass a broad range of sub-industries and activities, from production of small parts, to aerospace.

High risk industries, falling into Group A, all have RIDDOR incidence rate of more than twice the manufacturing industry average, and have employment numbers exceeding 10,000,

High risk industries in Groups B and C have either RIDDOR incidence rates at about 1.5 times (or greater) than the average for manufacturing industries or have known significant risks to health (or both) and have employment numbers exceeding 10,000.

Industries in Group D have average or lower rates of accident incidence and lower risks of significant ill health.

31. The following descriptions look to characterise the operating context and health and safety issues for the various industries. However, the diversity even within individual industries is acknowledged - some of the industries grouped together under SIC codes are in reality different industry types with different hazards and different industry characteristics. Without detracting from the distinctions, the groupings (A to D) and supporting narratives attempt to draw out common performance issues and improvement opportunities in relation to the strategy goals. In the subsequent section, these are translated into potential aims and objectives for 'what' is realistic, suitable and key to delivering improvements. 'How' this might be accomplished (including HSE's role in delivery) will be considered as part of the more detailed business planning process, together with any sector-specific health and safety issues requiring customised approaches, together with identification of premises for targeted activity within a broader SIC code.

Group A

*Basic and molten metals; Shipbuilding, ship repair and dismantling;
Food manufacture (part - dairy products, meat & poultry products)*

All sectors in this group can generally be characterised by the presence of high hazard processes and relatively high injury and/or ill health rates. Health and safety incidents are often underlain by failings in corporate risk management and practices in relation to higher hazard activities. Although risk control may be unsatisfactory, the hazards are generally well recognised by industry, as are the requirements for effective risk assessment and controls. However, there remains a need for companies to raise standards regarding the practical implementation of this commitment. The scale of many of the organisations concerned, together with the presence of engaged, influential trade associations, and in some cases union membership, provides the basis for improvement and sharing of lessons learned. Aims and objectives for this grouping therefore focus on leadership, worker involvement and competence, not only with regard to safety but in relation to significant occupational disease issues. Where appropriate, the role of intermediary bodies could be extended in future (drawing on the input from the significant organisations) to take an increasing lead as control of the major risks improves.

Industries in Group A all fall within the definition of ‘Comparatively high risk areas’ where proactive intervention is to be retained, as indicated in the Ministerial Statement ‘Good Health and Safety, Good for Everyone’ (21 March 2011). Para 12 of this strategy identifies that intervention will be achieved through proactive inspection, coupled with an increased focus on the role of intermediaries.

Basic and molten metals:

- Approximately 62,000 employees
- Relatively high rates of fatalities, accidents and disease
- Higher than average rate of fatals and majors in relation to machinery, handling and transport
- Historical exposures to metal fumes and dusts (but improving)
- Long established, often large employers.
- Good TA representation

This sub-sector covers molten metal manufacture from basic metal production to processing of molten iron, steel, aluminium etc in foundries and pressure casting. The work is inherently hazardous as it involves significant masses, machinery, handling and transport activities, as well as high temperatures and related dusts and fumes. If the risks are not properly controlled, the consequences can be particularly severe, as evidenced by the fact that injury and ill health rates are among the worst for any manufacturing industry. Key health risks include the development of long-latency occupational diseases such as cancers, asthma and Chronic Obstructive Pulmonary Disorder (COPD).

Companies are generally long-established ranging from multi-national enterprises to micro businesses. Larger businesses are becoming increasingly prevalent as traditional demand falls for services in micro business sections of the industry (eg – foundries). Historically Sector Trade Associations, unions and HSE have worked together to try and generate improvements in health and safety, mainly through initiatives such as Aluminium Industry Made Safer (AIMS) and Safety & Health in Foundries Initiative (SHIFT).

Despite this attention, investigations continue to identify poor performance to deliver a healthy and safe working environment from failures to translate commitment through management systems and organisational structures. Effective leadership is required at all levels from the Board through to management and supervisors to generate an appropriate health and safety culture, where risks are not only recognised but controlled. This needs to involve the workforce to ensure they are provided with the necessary competence and awareness to play their part in risk control.

The predominance of large firms means that there should be opportunity for sharing information about, and direct learning from, severe incidents, ensuring that lessons are shared throughout their businesses and across the industry through the TAs.

Ship-building, -repair and -dismantling:

- Employment in this sub-sector is around 35,000, but varies, with employment of large numbers of contract or short term contract labour at times of demand
- Often hazardous work, eg heavy engineering
- Injury and ill health rates significantly above the manufacturing average
- Dominated by long-established, larger businesses

This sub-sector is involved in the manufacture, repair or dismantling of ships, which has a significantly higher injury and ill health rate than the manufacturing average and has the potential for multiple casualties from a single incident eg as a result of a fire. It does not include the manufacture, repair or dismantling of boats which does not usually have these features. Work activities include intrinsically hazardous processes such as hot or cold metal forming and 'heavy' engineering work. The safety risks typically involve machinery (from abrasive wheels to very large CNC machines), movement of heavy components, work at height and transport. Occupational diseases include cancer, asthma, COPD at significant levels (associated with welding fume, asbestos) and hand-arm vibration disorders (HAVs).

The scale of investment needed for the processes means these are generally long established, larger businesses with formal management structures. The Shipbuilding and Shiprepairers Association have the potential to influence the industry. Evidence from inspections and investigations underlines the need for improvements in the way health and safety is managed in terms of competence, leadership and worker involvement, even where the risks and responsibilities are recognised at a senior level. Improvement rests with individual businesses equipping employees (particularly contractors and short term employees) with the skills required to recognise and control health and safety risks. There is also a need for the industry to progress development of a health and safety culture where lessons are learned and shared at all levels, across multi-site businesses and all aspects of their operation.

Food and Drink - part (dairy, meat and poultry products):

- Numbers at risk: 90,000
- Main issues are associated with manufacture of dairy products and meat and poultry products
- Well established & effective trilateral Forum works across food & drink sectors

Overall, food and beverage manufacture constitutes a large sector employing approximately 395,000, which has had a very strong industry initiative 'Recipe For Safety' running over the past decade. (This is discussed further under Group C, below). However, dairy & cheese-making and meat & poultry products are sub-industries which still have particularly high RIDDOR injury rates, suggesting more needs to be done by these businesses to implement appropriate health and safety management controls. The numbers employed in the worst performing sub-industries are not insignificant (approaching

60,000), so a direct focus on these businesses may be warranted.

Group B

Motor Vehicle Repair (MVR) (part - excluding dealerships of vehicle manufacturers and national chains for vehicle part replacement/servicing); Woodworking & Furniture; Stone Working; Fabricated metal products (part – SIC 25.61, 25.99 and 28.22)

The significant hazards faced by large numbers of dispersed small businesses in this grouping require continued efforts to secure improvement, ensuring the risks and reasonably practicable controls are recognised, understood and implemented. In particular, this extends from the familiar safety topics to include occupational disease issues. With trade or intermediary bodies having limited penetration or influence, proactive work must play an important role, geared specifically to the needs and priorities of small businesses.

All industries within Group B fall within the definition of 'Comparatively high risk areas' where proactive intervention is to be retained, as indicated in the Ministerial Statement 'Good Health and Safety, Good for Everyone' (21 March 2011). As indicated in para 12, this strategy identifies this to be achieved through targeted proactive intervention on particular processes, occupational groups or duty holders.

Motor Vehicle Repair:

- Numbers at risk: 182,000
- Risks well documented
- Safety issues give rise to high fatality incidence – elevating vehicles, vehicle movement, petrol fires
- Health risks – isocyanate spraying and HAVs (in body shops)
- Large number of SMEs and self-employed – difficult to reach
- Large players represented through HSE hosted MVR Forum

MVR has a greater public interface than many aspects of manufacturing, due to the prevalence of consumer service activities such as tyre and exhaust fitting. The standard of working environments can vary substantially between organisations. At the better end there can be good facilities (mainly linked to vehicle show rooms and internationally recognised vehicle brands and to national chains involved in vehicle servicing or parts replacement) and these are excluded from Group B. The part of the MVR sector that is included in Group B involves all bodywork repair and refinishing businesses, and small and micro businesses carrying out mechanical repair. These often have self-employed workers and work in low-grade industrial accommodation. Despite significant under-reporting of injury and ill-health, RIDDOR rates are still about the manufacturing average and, significantly, include a number of fatalities each year linked to safety issues such as elevating vehicles, vehicle movement and petrol fires. Occupational disease linked to isocyanate paint spraying and hand-arm vibration (HAVs) is also prevalent.

Enforcement in MVR is mainly by HSE, while many of the premises excluded from Group B are under LA enforcement. However, in some regions HSE has

transferred MVR premises to LAs for enforcement or enabled LAs to visit HSE enforced MVR premises by flexible warranting schemes. HSE has hosted an MVR Forum in which the bigger players are well represented and collaborative. However the significant numbers working within SMEs remain at risk, as they are often ill-informed and disinclined to address health and safety matters. Without a direct focus on these small businesses to ensure a widespread awareness of risks and adoption of practicable controls, the injury and ill-health toll in this sub-sector will remain unchecked.

Woodworking and Furniture:

- Numbers at risk: 184,000
- Greater than manufacturing average RIDDOR rates, mainly due to high risk machinery that's difficult to guard
- Difficult industry to influence due to low TA membership, micro/SMEs, and operator competence (relies on operator setting machines correctly)
- Overall, well documented safe working practices.

This sub-sector spans a wide range of activities from primary processing (sawmills) to the manufacture of furniture. Much of the machinery is hand-fed and intrinsically difficult to guard. Consequently, controlling the risks tends to rely on operators selecting and setting machines correctly. The result is major injury rates well above the manufacturing average.

Health risks relate to dusts and solvents and are reflected in high rates of work-related cancer registrations, asthma and COPD, even though exposures can be readily controlled with LEV and other measures.

Wood and furniture manufacturing is dominated by micro businesses. TA influence is limited by low membership levels and the diversity of the sub-industries, which has resulted in the existence of a numerous specialist TA with limited individual reach. Although safe working practices are generally well documented, operator autonomy over the use of machines means there is a clear need for greater worker engagement and competence to ensure their recognition of risks and effective implementation of controls.

Stone Working:

- Less than 8000 employed
- From unskilled processes to high-end craftsman
- Increasing reliance on migrant labour at the low skill end
- High fatality rate

This sector covers unskilled, factory-type processes through to from the work of stone masons, who generally have higher competency levels and are more highly qualified. This sector in total employs fewer than 8000 workers, often in small businesses and with an increasing reliance on migrant labour. The fatal accident rate is high, being associated with heavy loads, lifting operations, transport; and there is a risk of occupational diseases (COPD and silicosis) strongly linked to silica exposure. TA membership levels are low and consequently is unable to exert a significant influence on health and safety issues. There is a need for greater understanding of the risks and necessary

controls which could best be achieved through a variety of intervention techniques including targeted communication activity, inspection and enforcement action.

Fabricated metal products¹⁰ (part – SIC 25.61, 25.99 and 28.22)

- About 163,000 employed in the relevant sub-industries
- Mainly semi-skilled processes
- Difficult industry to influence due to low TA membership, micro/SMEs, and operator competence
- Greater than manufacturing average RIDDOR accident rates or use of high hazard substances

The manufacture of fabricated metal products and electrical equipment is a large, diverse industry employing about 385,000 people. Some companies make specific products, often purchasing some or all components from other suppliers and manufacturers, while others produce parts or sub-assemblies to order or carry out specific processes. Specific products and processes are given specific 3 figure SIC codes, while those companies with diverse product ranges or which produce parts to order are classified as 'other'.

The businesses within the SIC code 25.99 (Manufacture of 'other' fabricated metal products) and 28.22 (Manufacture of lifting and handling equipment) employ about 47,000 and report accidents significantly higher than the manufacturing Sector average. Health risks are prevalent, commonly dermatitis and sometimes respiratory ill health from exposure to metal working fluids, solvents, welding fume or other product specific substances or processes. Other health risks eg MSD or from noise/vibration are not uncommon. The vast majority of companies are SME or micro-businesses. This product diversity and small business size means there are no TAs with effective coverage or influence on this employment sector.

Businesses within SIC code 25.61 (Treatment and coating of metals) often use high hazard substances, including in some cases substances classified as carcinogenic, and employ about 22,000. While risks can be satisfactorily controlled, HSE experience suggests that parts of this industry find it difficult to maintain suitable controls. The diversity of the risks, and limited effective leverage routes, makes effective influence on control unlikely by any method other than involving some direct proactive work.

Group C

Paper & Board, Plastics, Rubber, Fabricated Metal Products (not covered in Groups B or D), Other Food & Drink, Non-metallic mineral products

For industries within this group work is required to ensure standards are maintained and improved, but with effective trade bodies already addressing health and safety priorities there are opportunities for these intermediaries to lead and accommodate the needs of SMEs and occupational disease issues.

¹⁰ 'Fabricated metal products' covers a wide range of industries. Initial analysis identified 3 sub categories with high risk, and some with low risk, but further work will be needed to better delineate the sub-industries, the risks and the solutions

In addition, or in those industries where TAs are less strong, the coherent structures and scale of operations make it feasible that improved standards could be achieved through the supply chain.

All industries within Group C fall within the definition of 'those sectors where there remains comparatively high risk but proactive inspection is not considered a useful component of future interventions'. As indicated in para 12, this strategy identifies that interventions should be achieved through focussing on the role of intermediaries, and HSE intervention directly with duty holders is likely to be reactive action by operational directorates.

Paper & Board:

- Numbers at risk: 51,700
- Rates of fatalities, accidents and illness – mid to high range
- Higher than average rate of fatals and majors in relation to machinery, handling and transport
- Safety standards are well-known
- No specific health issues
- Highly effective trade associations

The high capital costs of paper & board manufacture mean that this sector is dominated by well-established, large / multinational businesses. Activities range from paper production through to corrugated / cardboard products, as well as an increasing number of newer (and generally smaller) businesses manufacturing recycled paper products. RIDDOR injury rates are significant, including serious incidents often linked to machinery, mechanical handling and transport activities. There are limited health risks from substances in the sector but reported ill-health rates overall are high, due to inadequate control of Musculoskeletal Disorders (MSDs) and noise. The Industry Advisory Committee (PABIAC) has been particularly effective over the years in improving health and safety, with the latest 'Making a Difference' initiative running from 2008 to 2011. Their challenge is now to extend their influence to the smaller, newer businesses to ensure that recognised controls and standards are implemented. In other respects, the sector is well placed to maintain recent progress.

Plastics:

- Large sector employing about 125,000 people
- Rates of fatalities, accidents and illness – lower range
- Safety issues largely overcome due to machine design – largely automated
- Risks from exposure to substances are low (mainly due to design and substitution)
- Trade associations, but low membership
- Viable dynamic industry

This is an industry with large numbers employed, and with a significant proportion of SMEs. RIDDOR and ill health rates are around or below the average for manufacturing, with safety having been improved through machinery design and interlock arrangements. Process design and

substitution have similarly reduced exposures to harmful substances, although manual handling issues remain. The industry has recently established a trade body-led initiative known as SIMPL (Safety in manufacturing plastics), which is providing new leadership for health and safety in the sector.

Rubber:

- Numbers at risk: 20,000
- Heavy industry giving rise to risk of serious accidents
- Health issues mainly well controlled
- Significant decline in rubber-tyre plant; Industries moving into other areas eg retreads, tyre distribution and fitting and rubber crumb recycling – resulting in increase in SMEs
- Effective trade associations

Rubber is a mature industry. The process is quite specialised and many firms are long established. Numbers employed are continuing to decline. The bulk of the materials and forming processes create a hazardous environment with significant RIDDOR injuries linked to machinery, handling and transport. Historical health problems mean the sector is attuned to occupational disease issues generally, and control is by established working practices. The risk posed by MbOCA, a suspect human carcinogen used in polyurethane production, is an ongoing issue.

Rubber crumb recycling and the manufacture of associated products are drawing in newer, smaller businesses that are potentially less aware / compliant with established standards. Additionally, there are potentially serious risks from long smouldering rubber crumb fires. However the trade associations are well represented and have been effective in instilling good practice through health and safety initiatives such as 'Rubbing out Risk' (2006-2009). The Industry Advisory Committee has recently been replaced by a new and refreshed Tyre and Rubber Industry Safety Action Group (TRISAG) which positions the industry well to maintain performance and to ensure that SMEs are equally involved so they are equipped to effect improvements.

Fabricated metal products¹¹ (part - see annex 3):

- Metal forming – high TA coverage, medium/low RIDDOR rate
- Steel stockholding – high TA coverage, medium RIDDOR rate
- Manufacture of transport vehicles (road, rail, air) - Mostly large employers
- Micro-electronics – high TA coverage; medium RIDDOR rate, use of high hazard substances
- General engineering – low TA representation, medium RIDDOR rate
- Wire and tube manufacture – medium/high TA representation, low / medium RIDDOR rates.

Some fabricated metal products sub-industries (eg production of machinery and plant, road vehicles, rail equipment, aircraft), can be differentiated from

¹¹ See footnote 10

hazardous heavy engineering (Group A), the higher risk, SME dominated producers (Group B) and the low risk activities (Group D). The activities are diverse and the sector accounts for around 520,000 employees, more than a fifth of all of those employed in manufacturing overall. Risks associated with operating machinery and lifting and transporting components exist across the sub-sectors, varying in severity but broadly in line with the manufacturing sector average. There are also specific health risks linked particularly with welding (fumes), metal working fluids, handling of components and noise and vibration. Employers range from very large businesses to small and micro firms. Some sub-sectors have specific trade associations or safety groups but the fragmentation limits effectiveness, although EEF takes an active lead to raise standards across the board. A common feature irrespective of scale is the dependence on consumables, production equipment and other supplies for the manufacturing processes. As these are supplied in significant quantities across multiple businesses, the supply chain may prove to be an effective conduit for information and advice.

Food and drink manufacture (excluding dairy and poultry products):

- Large sector – 395,000 employed
- Close relationship between food hygiene and health and safety laws
- Significant major injury rates
- Strong TA membership and influence

This is a very large sector employing some 395,000 workers. Businesses span from very large multi-national firms with strong consumer awareness and reputational drivers for good performance, to micro businesses working close to source in basic conditions. Food hygiene considerations and the stricter manufacturing disciplines required are a common feature across the sector, demanding well documented standards. Alignment between the regulators (eg FSA and HSE) with proportionate interventions is necessary to ensure management controls are equally effective for food hygiene and health and safety offers potential scope to reinforce compliance. Major injury rates are significant and above the manufacturing average, linked typically to slips given the nature of the production and machinery interventions. Ill-health issues centre on MSDs resulting from packaging and transportation processes, with specific substance issues where dusts are generated. There is a strong and inclusive trade association, which established the long-running 'Recipe for Safety' initiative that continues to provide a lead and focus for health and safety in this sector.

Non metallic mineral product industries (other than stone working – see section B):

- About 87,000 workers
- Inherently hazardous workplace activities
- High levels of relatively severe injuries and ill health
- Strong and influential TA well engaged in health and safety

Activities in these long-established businesses involve cement making, ceramics, concrete, glass & glazing, heavy clay & bricks and refractories. The work is sometimes heavy and inherently hazardous, with some processes being undertaken outside in a changing environment. There are high levels of relatively severe injuries and ill-health (linked to Silica and COPD). A number

of the businesses are large multinationals but many activities are undertaken within SMEs. Trade associations such as the British Ceramics Confederation, British Glass and British Pre-cast Concrete Federation have a high level of industry representation and are extremely influential, having exerted considerable discipline in clarifying standards across the industry. In doing so they have demonstrated the ability to influence and affect operations beyond their direct membership. The industry advisory committee, CHARGE, has established a health & safety strategy and addressed specific sub-sector issues through tailored initiatives such as 'Concrete Targets 2010', the 'Ceramics Pledge' and 'GLASS Charter'. The focus remains on maintaining engagement and action on health and safety, predominantly through the effective lead of the trade associations and larger companies' promotion of good practice.

Group D

Printing, Textiles, Leather, Laundries and Metal Products (part - Computer, electronic and optical products), (MVR) (part - dealerships of vehicle manufacturers and national chains for vehicle part replacement/servicing), Other manufacturing industries not elsewhere specified

The challenge for the sectors in this group is for businesses to maintain compliance with established standards using recognised controls and to seek health and safety improvements, particularly in light of any changing processes or technologies. This relies on ongoing commitment to health and safety at all levels within organisations and a proportionate response to the risks. For the more organised sectors with mature and effective trade associations, these bodies are already positioned to deliver support to this end. In the more fragmented sectors, greater reliance rests on the individual businesses and the recognition of established standards, as central interventions are unlikely to benefit from gearing. Ongoing reactive work in line with the EMM will be important to detect new issues or any decline in standards which may warrant more intensive activity. This would be complemented by a watching brief in terms of the trends and prospects for the sectors that may have a bearing on health and safety.

All industries within Group D fall within the definition of 'those areas where proactive inspection is not justified in terms of outcomes'.

Textiles, footwear and leather:

- Numbers at risk: 85,000
- Declining industries
- Largely warehousing issues

Textiles, footwear and leather have suffered massively in the face of foreign competition and are continuing to decline. Primary processing of raw material into cloth/textiles is largely carried out overseas and the majority of garments are imported ready made or put together here. The sector now includes significant logistics and warehousing activities to manage the import and distribution of clothing / material from abroad. There is a low trade association membership, meaning centrally coordinated activity has limited impact. This is exacerbated by a dominant focus on economic survival. The industry

advisory committee was wound up in 2010, and while a new committee may replace it, its effectiveness is not assured.

Leather tanning and processing now employs few people in GB. It is largely carried out by just two well established groups which are relatively well engaged with health and safety. Those companies manufacturing leather products and footwear tend to be niche or high-end focussed SMEs rather than mass producers.

Across the industry RIDDOR rates are low but there are occupational disease concerns around COPD, cancer, asthma (possibly due to historic exposures) and noise in relation to textile machinery.

Laundries:

- Numbers at risk: 39,000
- Some specific machinery risks but few in number
- Health limited to MSDs, no substance exposure risks
- Growing industry

This is a relatively small sector which spans small premises providing consumer services (LA enforced) through to large scale laundries serving hotels, residential homes or hospitals. . The latter part of the industry is dominated a small number of national companies. The need for a fast turnaround has largely insulated the industry from foreign competition. Compliance standards are well documented. The Textile Services Association is an effective and influential trade association on health and safety matters. It has been proactive in addressing confined space working, as well as producing guidance in relation to new technologies etc. Health and safety is a criterion for membership. Injury and ill-health rates are low in the sector, with a few key issues relating to MSDs and machinery risks, including work in confined spaces (e.g. for maintenance). Substance exposure risks are minimal.

Fabricated Metal Products¹² (Part – Manufacture of computer, electronic and optical products):

- 117,000 employees
- Low RIDDOR rates
- Relatively engaged regarding health and safety

This sector employs some 117,000 people but has RIDDOR injury rates well below the manufacturing average and modest levels of occupational disease, Although in some parts of these industries there may be exposure to solder fume, the precautions are well documented. In general, the nature of the products requires controlled environments and work to precise specifications and the health and safety risks and standards required are generally well recognised.

Printing and recorded media:

- 121,000 employees)
- Stronger than average TU representation

¹² See footnote 10

- Technological advances significantly reducing risks
- Risks generally well recognised and controlled

The printing industry has suffered badly as a result of foreign competition in recent years. It is now dominated by SMEs with few medium / large companies. Many small firms continue to use old presses (which are less well guarded and require more operator intervention). However, digital printing is spreading rapidly – the safety and health risks are intrinsically lower and there is less need to rely on operator skill to control risks.

The reach of the various trade associations is limited in part because of the low level of membership among the many SMEs. TU membership levels have declined markedly in recent years. The industry is continuing to contract, although output has remained broadly stable indicating increased productivity. However, with the market demands continually driving the shift to inherently less hazardous processes it is becoming easier for businesses to apply simple health & safety precautions. The precautions for the remaining traditional presses and associated machinery are well known and well documented.

Other manufacturing industries not elsewhere specified

- 161,000 employees
- Miscellaneous industries with no common features
- Low to moderate accident rate, and no specific health risks

A range of other miscellaneous industries, including manufacture of tobacco products, musical instruments, sports goods, toys, games, medical and dental instruments and the repair of metal products, machinery and equipment generally have low to moderate accident incidence and no specific or outstanding health risks. The variety of this section of industry makes industry specific approaches untenable, and the need for greater reliance on generic H&S guidance.

32. The segmentation is summarised in the table at Annex 2

Strategic Goals

Group A – Basic and molten metals; Shipbuilding, ship repair and dismantling; Food manufacture (part - dairy products, meat & poultry products)

Aim A1: Leadership

At Board, and throughout management and supervisory levels, people are held accountable for delivery of health and safety.

Objectives:

- A1.1 Senior managers create an effective health and safety culture that permeates through all levels of the organisation
- A1.2 Performance is reviewed regularly to identify key learning points for sharing good leadership examples across the industry.
- A1.3 All members of the workforce understand the importance placed on health and safety by their managers and there is an on-going commitment from individuals at all levels to accept their rights, roles and responsibilities and work together to improve health and safety [Link to Worker Involvement]
- A1.4 Systems are in place to ensure all personnel are sufficiently competent to identify and proactively manage the risks [Link to Competence].

Aim A2: Health

Organisations are aware of significant work-related health risks and take appropriate actions

Objectives:

- A2.1 Duty holders ensure that necessary controls are in place to reduce exposure to the relevant health risks.
- A2.2 Key stakeholders, including government, work together to support organisations to reduce occupational disease.

Aim A3: Safety

Duty holders and others actively seek new ways to reduce accidents, particularly where progress has slowed.

Objectives:

- A3.1 Organisations have systems in place to investigate causes of incidents, learn lessons and share findings with others.
- A3.2 Organisations actively learn from others' experiences to improve risk control.

Group B – Motor Vehicle Repair (MVR) (part); Woodworking & Furniture; Stone Working; Fabricated metal products (part)

Aim B1: Customising approaches for SMEs.

SMEs are aware of their obligations and areas where action is required in order to effectively manage health and safety in their business

Objectives:

- B1.1 Ensure SMEs have access to consistent, accurate and aligned messages on health and safety from government and key stakeholders (link to Competence)
- B1.2 Ensure SMEs have the skills and knowledge to recognise the actions they need to take.
- B1.3 Ensure SMEs are aware of significant work related health risks relevant to their subsector.
- B1.4 Effective influencing and communication routes are available for the targeted sub-sector H&S systems.
- B1.5 Improve attitudes and behaviours in SMEs towards taking proportionate action to control health and safety risks.

Aim B2: Securing Justice

Learning from investigations is captured and shared, and those found to fail in their health and safety responsibilities are held to account, with enforcement action taken to secure both immediate and sustained compliance with the law.

Objectives:

- B2.1 Regulators carry out proactive enforcement action on targeted issues relevant to the specific sub-sectors
- B2.2 There are effective mechanisms for bringing enforcement action and lessons learned to the attention of SMEs

Group C: Paper & Board, Fabricated Metal Products (part), Other Food & Drink, Non-metallic mineral products

Aim C1: Leadership

All representative bodies can demonstrate what they are doing to improve health and safety across their sector

Objectives:

- C1.1 Key bodies take the lead in actively promoting the setting and sharing of good practice
- C1.2 Key bodies take the lead in using their influence to improve performance and recognise success, in their sector.

C1.3 Key bodies recognise the needs of SMEs within the industry and ensure they have access to consistent, accurate and aligned messages on health and safety [SMEs]

Aim C2: Wider perspective

Active engagement from within and beyond the system on matters directly and indirectly effecting health and safety

Objectives:

C2.1 In relevant industries other regulators (such as FSA in Food and Drink industries), actively exploit opportunities to minimise regulatory burdens and take proportionate action.

C2.2 Improve standards of health and safety design, training, and information in the supply chain.

Group D – Plastics, Rubber, Printing, Textiles, Leather, Laundries, Metal Products (part), Other manufacturing industries not elsewhere specified)

Aim D1: Injury & Ill-health

Organisations are aware of health and safety risks and take effective and proportionate action to prevent accidents and occupational diseases.
(Aim is for these industries to maintain their health and safety performance)

Objectives:

D1.1 There is an on-going commitment from individuals at all levels to accept their rights, roles and responsibilities and work together to maintain or improve health and safety.

D1.2 SMEs are taking positive and proportionate steps towards achieving compliance.

D1.3 New health and safety risks from changes within the industry are recognised and effectively managed at, or before, their inception.

Annex 1

Sector/Sub-sector	SIC 2003	Disease & Injury Picture						'Hot spots'?	Numbers at Risk 2009/10e	Initiatives
		Major Injury Rate per 10000 employees (5 year average)	Ill-health Rate per 10000 employees (5 year average)	Attributable cancer registrations	Asthma	Chronic obstructive pulmonary disease	Hand and arm vibration disorders			
Manufacture of food products & beverages	15	237	3080					-Dairy products -Meat and poultry products	395,000	
Manufacture of textiles	17	152	2900						83,000	
Manufacture of clothing	18	41	N/A							
Manufacture of leather & leather products	19	46	N/A							
Manufacture of wood & wood products	20	311	3820						184,000	
Manufacture of furniture; Manufacturing nec	36	213	2650							
Manufacture of pulp, paper & paper	21	184	3590						60,000	Making a Difference 2008-2011

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Sector/Sub-sector	SIC 2003	Disease & Injury Picture						'Hot spots'?	Numbers at Risk 2009/10e	Initiatives
		Major Injury Rate per 100000 employees (5 year average)	Ill-health Rate per 100000 employees (5 year average)	Attributable cancer registrations	Asthma	Chronic obstructive pulmonary disease	Hand and arm vibration disorders			
products										
Manufacture of publishing & printing	22	60	3410					248,000		
Manufacture of rubber & plastic	25	187	2510					157,000 (of which Rubber - 25,000?)	- Rubbing out Risk 2006-2009- Safety in Manufacturing Plastics (SIMPL)	
Manufacture of other non-metallic mineral products	26	257	3780				Respiratory disease - Silica	82,000	- Concrete Targets 2010 - Ceramics Pledge - Cementing Good Practice	
Manufacture of basic metals	27	356	3120					63,000	- Aluminium Industry Made Safer (AIMS) - Safety & Health in Foundries Initiative (SHIFT)	
Manufacture of fabricated metal products	28	287	3450					293,000		
Manufacture of machinery & equipment nec	29	122						232,000		
Manufacture	31	96	2970					98,000		

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Sector/Sub-sector	SIC 2003	Disease & Injury Picture						'Hot spots'?	Numbers at Risk 2009/10e	Initiatives
		Major Injury Rate per 100000 employees (5 year average)	Ill-health Rate per 100000 employees (5 year average)	Attributable cancer registrations	Asthma	Chronic obstructive pulmonary disease	Hand and arm vibration disorders			
of electrical machinery & apparatus nec										
Manufacture of medical, precision & optical instruments	33	44	2690					103,000		
Manufacture of motor vehicles, trailers & semi-trailers	34	166	4090					114,000		
Manufacture of other transport equipment	35	123	2030					153,000		
Motor Vehicle sale & repair	50	192						182,000		

Traffic light allocation

Self-reported ill health

Red rate is higher than 95% confidence interval for all industries

Amber rate is within 95% confidence interval for all industries

Green rate is lower than 95% confidence interval for all industries

Cancer registrations/deaths

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Red	Rate of attributable cancer registration clearly above average (for all industries)
Amber	Rate of attributable cancer registration close to the all industry average
Green	Rate of attributable cancer registration below average (for all industries)
HARM index (NB This is real data but the HARM Index is still experimental)	
Red	Average HARM per 1000 employees is above average
Amber	Average HARM per 1000 employees is close to average for all industries
Green	Average HARM per 1000 employees is below average

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Manufacturing Industries – Segmentation for Sector Strategy

Group	A	B	C	D
Considerations	<ul style="list-style-type: none"> Higher hazards/risks (and control unsatisfactory) Influential DHs / intermediaries Scale for return on input 	<ul style="list-style-type: none"> Significant hazards / risks Dispersed industries (eg small/micro business dominated or without effective TAs) 	<ul style="list-style-type: none"> Significant hazards / risks Structural factors give clear role for others in H&S system (eg TAs, supply chain intermediaries etc) 	<ul style="list-style-type: none"> Lower hazards/risks Small / declining industries Clear compliance standards
Sectors	Basic and molten metals; Shipbuilding, ship repair and dismantling; Food manufacture (part - dairy products, meat & poultry products)	Motor Vehicle Repair (MVR)(part); Woodworking & Furniture; Stone Working; Fabricated metal products (part)	Paper & Board; Plastics; Rubber; Fabricated Metal Products (part); Other Food & Drink (not in Group A); Non-metallic mineral products	Printing; Textiles, Leather; Laundries; Fabricated Metal Products (part); Motor Vehicle Repair (MVR)(part); Other manufacturing industries not elsewhere specified
Approach by HSE	<ul style="list-style-type: none"> Proactive DH intervention With improvement, move focus to role of others → C 	<ul style="list-style-type: none"> Targeted proactive work (processes, occupational groups, hazards, subsectors) With improvement → C or D 	<ul style="list-style-type: none"> Work with intermediaries to support / strengthen role As lead strengthens → D 	<ul style="list-style-type: none"> Watching brief

Annex 3 - Segregation of industry into Groups by 2 or 3 figure SIC

<u>SIC 2007</u>	<u>Industry descriptor</u>
Group A	
24*	Basic and molten metals
30.11	Ship-building -repair -dismantling
10.1, 10.5	Food and Drink (part)
Group B	
45.2 (part)	Motor Vehicle Repair
16*, 31*	Woodworking and Furniture
23.7	Stone Working
25.61, 25.99, 28.22	Fabricated metal products (part)
Group C	
17*	Paper & Board
22.1	Rubber
22.2	Plastics
25.1 - 25.5, 25.62 - 25.94, 27.1 - 28.21, 28.23 - 29.3, 30.12 - 30.9	Fabricated metal products (part)
10.2 - 10.4, 10.6 - 10.9, 11*	Food and Drink (part)
23.1 -23.6, 23.9,	Non-metallic mineral industries
Group D	
18*	Printing,
13*, 14*	Textiles

15*	Leather,
	Laundries
26*,	Metal Products (part)
45.2 (part)	Motor Vehicle Repair
12*, 32*, 33*	Other manufacturing industries not elsewhere specified

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