



# Safe delivery

► **A three-year HSE inspection project** which set out to reduce the number of work-related injuries sustained by postal workers and improve safety management at Royal Mail has recently ended. Evaluation of its success is still underway but, as **Nick Cook** reports, early indications show great promise.

**B**y the late 1990s occupational injury levels within Royal Mail were causing concern. This was reflected in financial, as well as human, cost. "As far back as 1997," Dave Joyce, national health, safety and environment officer for the Communication Workers Union (CWU), recalls, "accidents were costing Royal Mail about £70 million a year. This rose to £80 million in 2004. Successful claims made our legal department self-financing."

Slips and trips were, and still are, major hazards especially among staff delivering letters. At the time, overweight delivery pouches (the "sacks" carried by postmen and postwomen on their rounds) accounted for a high proportion of musculoskeletal injuries (MSDs), and then there were the dog attacks on delivery staff. The CWU estimates between five to six thousand Royal Mail workers are attacked by dogs each year.

In an effort to reduce the high number of work-related injuries reported by postal staff, in 2003 the Health and Safety Executive (HSE) carried out a small number of inspections on Royal Mail premises. These provided a useful snapshot of what was going on. "We saw opportunities for improvement in Royal Mail's safety culture, management and organisation," says Mark Dawson, an HSE inspector working in the Services, Transportation and Policy Group. ►

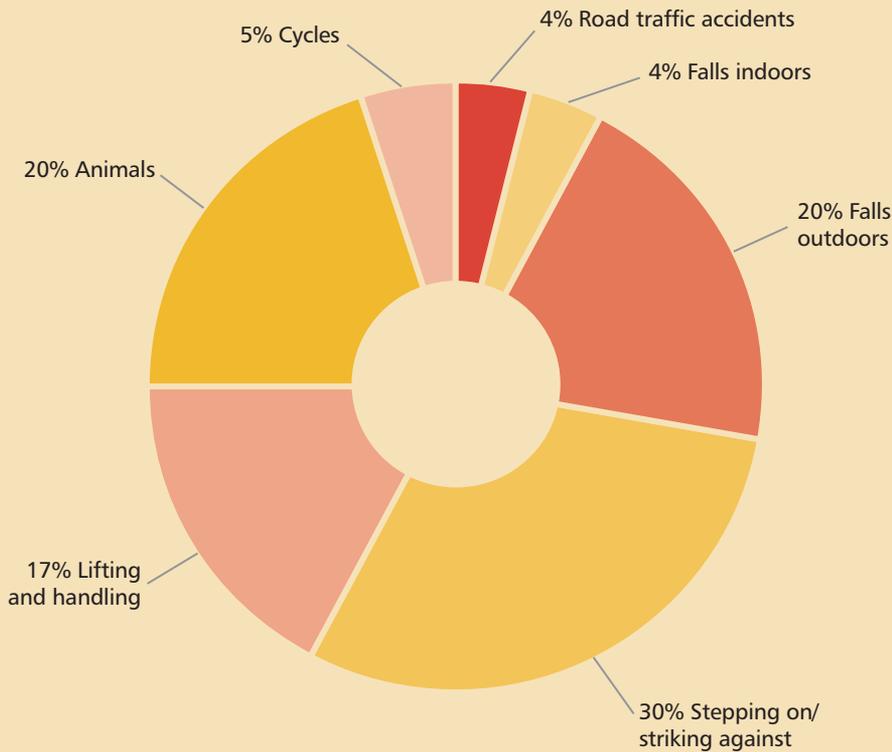
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# WorkingLife

## The most common causes of accidents in the Royal Mail Group over the last three years



Source: Royal Mail Group

HSE found the main problem was ‘a failure to implement national policies at a local level’. The 2003/2004 accident figures provided further justification for these concerns. In this year, the Royal Mail Group reported 7,273 accidents under RIDDOR (the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995*). These included 20 fatalities. Around 5,500 of the reported accidents occurred during peripatetic work activities, i.e out on deliveries.

Royal Mail Group plc consists of three separate organisations:

- **Royal Mail Letters UK** – sorts and delivers the mail.
- **Parcel Force**
- **Post Office Ltd**

In 2004 HSE launched a three-year inspection programme of the company, in an effort to try and reduce the number of work-related injuries. The inspection project focused purely on Royal Mail Letters UK (RM), which sorts and delivers the mail and is the major source of incidents within the group. But challenges to health and safety did not only lie with the company. The regulators also had their problems, not least of which was the fact that health and safety in RM is regulated by not one but two regulators – the HSE and the local authority (LA).

Broadly speaking the LAs regulate health and safety within premises (eg. inside the 60 mail centres and the sorting offices) while the HSE regulates health and safety outside (eg. the delivery rounds or “walks” taken by postmen and women as they deliver letters). Traditionally the two regulators operated in isolation and this caused problems.

HSE’s Mark Dawson explains: “Hazards faced by a postman or woman while out on the round are regulated by HSE. But those hazards may result from decisions or administrative arrangements arising within RM offices which are the responsibility of the LA.”

It also makes things complicated for those Royal Mail managers responsible for health and safety both inside and outside premises. They have to deal with two sets of regulators and this can lead to duplication of effort.

“The National Inspection Project was not intended to confer an enforcement holiday.”





**“Effectively “Job and Finish” undoes all the work we have put in to improve health and safety.”**

ment between the regulators and ourselves in the past. This was a new experience. Not surprisingly people were concerned as to how it would work out.”

The CWU had different concerns. Would partnership make the HSE and LAs draw back from necessary legal action?

Answering these concerns, Mark Dawson says. “The only way we could reassure Royal Mail and the unions was to make our position absolutely clear. In the first year we would be offering a lot of advice. Essentially we would be setting the scene. But there must be no doubt that we were also there in a regulatory capacity. The National Inspection Project was not intended to confer an enforcement holiday.”

In fact, the number of Prohibition Notices

issued since the start of the project has actually increased – by 11%. These mostly concern inadequate “walk” risk assessments and manual handling issues.

## Inspection

The project saw the beginnings of engagement between the Royal Mail regulators, the HSE and the LAs. An inspector from each regulator worked on each inspection and, to help ensure a consistent approach, HSE produced a series of Sector Information Minutes (SIMs). These provided guidance to inspectors, for example, by listing topics for special attention on visits.

Inspections in the first two years (2004/5 and 2005/6) highlighted concerns which included:

- the management of health and safety at a local level;
- the quality and number of risk assessments;
- failure to control the weight of the pouch (the “sack” in which the post is carried);
- slips and trips;
- implementation of the dangerous animals policy;
- Single day delivery; and
- ‘Job and Finish’.

Nor does split enforcement lend itself to a consistent approach from the regulators.

Dave Joyce from the CWU recalls: “We had an ironic situation where a worker fell from a ladder. He was working outside a Royal Mail Group building fitting lights over a fire escape. His fall took him through a skylight and into the building where he fell another 20 or 30 metres onto a floor below. He died. Because his fall took him from an HSE regulated area into an LA regulated area there was quite a debate as to who should investigate. In all fairness this particular issue was resolved sensibly. But the incident does illustrate the potential for split enforcement to cause complications.”

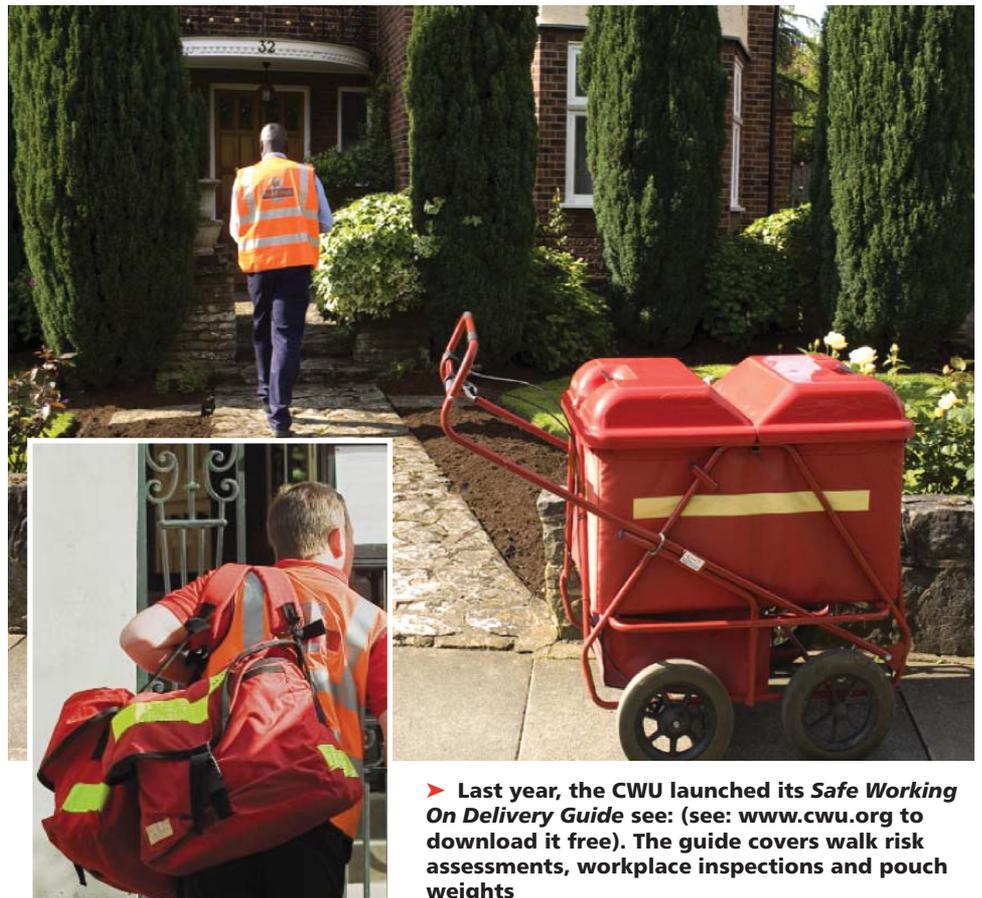
Another problem with regulation was that, prior to 2003, it was largely reactive. “We investigated incidents or complaints which were reported to us,” says Mark Dawson. “But we did not do much proactive work to help prevent those incidents in the first place.”

The three-year inspection project was welcomed by HSE as a good opportunity to put that right.

“In the first year we focused on getting to know the Royal Mail, getting to understand its operation, their business procedures and their internal management structure. It was a process of engagement – a process that also included the unions. We were beginning to forge a partnership,” explains Mark.

Not surprisingly the inspection project initially raised some concerns from both the company and the unions.

In 2004, right at the beginning of the project, Ian Stockdale left the chemical industry to become Royal Mail head of safety, corporate social responsibility. His role includes health, safety and the environment. “Trust was an issue at first,” he says. “Especially as there had been little engage-



➤ Last year, the CWU launched its *Safe Working On Delivery Guide* see: ([see: www.cwu.org](http://www.cwu.org) to download it free). The guide covers walk risk assessments, workplace inspections and pouch weights



# WorkingLife

**Fig 1: The LOPP Model**

**LOPP employs five key elements:**

**ELEMENT 1**

Top level commitment from employer with specific targets set for improvement.

**ELEMENT 2**

The use of auditing, benchmarking or other relevant methods to prepare an Improvement Plan.

**ELEMENT 3**

An organisation Improvement Plan agreed with the LOPP partners.

**ELEMENT 4**

A regulatory Engagement Plan to support delivery and achieve targets.

**ELEMENT 5**

An agreed process of audit and review of the plans between the employer, employees, trade unions and regulators.

Single day delivery (SDD) is the term used for RM's decision to deliver mail just once a day to each premises. Its introduction in 2004 has led to concerns that the reduction in deliveries could encourage overfilling of the mail pouches carried by postmen and women. This in turn could lead to manual handling injuries.

'Job and Finish' is an arrangement by which staff can go home once they have made all their deliveries. It is, in effect a carrot, but a potentially risky one. The CWU's Dave Joyce points out that it encourages staff to cut corners and take risks simply in order to finish early. These risks include overfilling pouches, jumping garden walls, reading the addresses on letters whilst walking, and even running rather than walking the round.

"Effectively 'Job and Finish' undoes all the work we have put in to improve health and safety," comments Dave Joyce.

In the final year of the inspection programme, inspectors focused on:

- slips/trips/falls;
- MSDs;
- violence and aggression against postal workers;
- suitability of risk assessments; and
- workplace transport.

**Partnerships**

Identifying what can be done to improve health and safety is one thing. Doing it is quite another. HSE inspector, Mark Dawson, was particularly keen that any improvement process should be continuous and self-sustaining. And this could only be achieved through partnerships which were also continuous and self-sustaining.

To foster such partnerships, HSE and the local authorities launched the *Large Organisations Partnership Pilot* (LOPP) in October 2005. LOPP aims to improve health and safety in large organisations by building effective relationships. These relationships are between the regulators (LA and HSE), the organisation, and last but not least the trade unions.

"The union contribution to health and safety has been a great credit," comments HSE's Mark Dawson.

As the "account manager" for LOPP, Mark plays an important co-ordinating role not least of which is to provide a one-stop shop through which RM can interface with the regulators. Key elements of LOPP are shown in Fig. 1 above. An important feature is the fact that an improvement plan is agreed among all the partners.

At ground level, LOPP is implemented



**Fig 2: Royal Mail Group plc – Statistics**

	2003/4 (baseline)	2004/5	2005/6	2006/7	Variance
Total RIDDOR Accidents	7,273	5,598	5,173	4,902	↓ 32.6%
Fatal Accidents (employees and 3rd party)	20	8	10	10	↓ 50.00%
Days Lost to Accidents	214,226	179,891	163,156	149,710	↓ 30.12%
Total Accidents per 1,000 staff	127.7	132.4	128.93	123.0	↓ 28.78%

Source: RM Corporate Social Responsibility Report/Royal Mail



through a series of *Local Action Plans* (LAPs). In 2006, ten Royal Mail areas were selected to pilot the scheme. Each area generated its own LAP. Each plan contained a number of health and safety objectives. Importantly these objectives were not imposed but agreed. Management and unions in each of the ten RM areas decided the objectives for their area, using the findings from the inspection project for general guidance.

Ideally these objectives needed to be challenging but achievable. To ensure this, areas were encouraged to adopt SMART (Specific, Measurable, Achievable, Realistic and Time based) objectives.

"The intention is to do ten areas each year until we have covered them all," says Mark Dawson. "In any year those areas not covered will be the focus of a targeted inspection."

## Success?

Have the National Inspection Project and LOPP initiatives been successful? The jury is still out until completion of a formal evaluation. Early indications, however, show great promise.

Certainly tangible results are beginning to come through. Since the start of the Royal Mail Inspection Project in 2004, RIDDOR accidents have fallen by nearly one third and fatal accidents have fallen by 50% (see Fig 2).

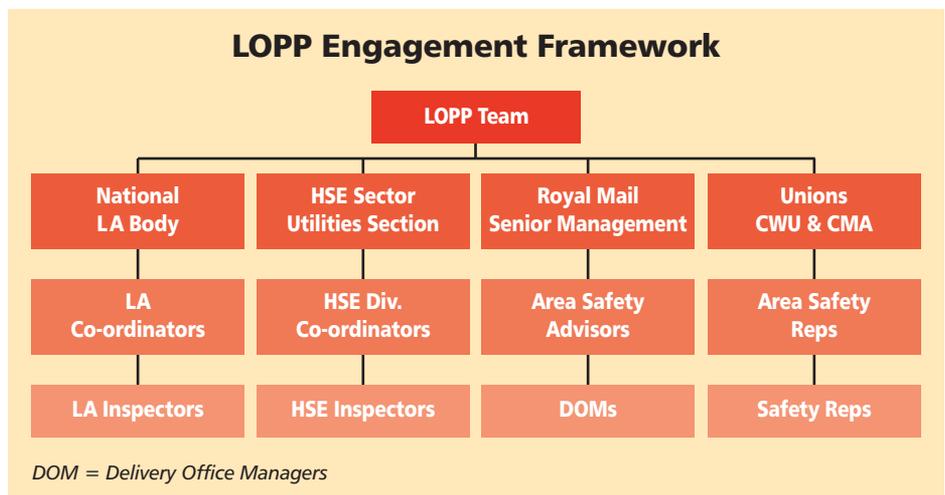
Projects are underway to review the way Royal Mail delivers letters. Soon we could see postmen using a range of delivery methods ranging from the electrically-operated trolleys to small vans. A project being carried out in conjunction with the Health and Safety Laboratory in Buxton has reviewed footwear in order to reduce slips and trips.

The Large Organisations Partnership Pilot marked an evolution from pure enforcement towards collaboration underlined by enforcement. This has brought benefits. "Essentially, enforcement is a tool to focus attention on specific issues," says RM's Ian Stockdale. "The Local Action Plans help to foster continuous general improvement."

He adds, "The joint approach by the HSE and LAs has helped considerably. Mark's role is key. It provides me with a specific interface."

By including the unions, the company has been able to tap into the expertise of a highly trained network of union safety reps. This network will perhaps assume greater importance in the light of declining government investment in the HSE.

Mark Dawson comments: "The real changes, the real improvements have been gained



"The real changes, the real improvements have been gained through collective partnership and joint working."

*Pics: courtesy Royal Mail*

through collective partnership and joint working. We have now set up an enforcement framework through which RM can benefit. Communication is now more efficient."

But all are aware there is no room for complacency. Darrell Bennett is a full-time CWU area health and safety rep for S&E Yorkshire. His concerns centre not on the LAP initiative itself but on its delivery.

"Partnership schemes are always good but you need all sides to meet their commitment. I do not feel that at present we are getting that commitment in full from the HSE and employers. Our policies and procedures are very good but implementation is woeful."

Royal Mail is a huge organisation. The RIDDOR reduction, employee health and wellbeing initiatives such as a 24-hour anti-bullying actionline, the recently launched online health checking and assessment service, the new health trainer scheme which will see specially trained employees providing health advice and practical support to their colleagues, as the forthcoming review of Royal Mail's policy and procedure for dangerous animals – which will look at training and PPE for postal staff – indicate that health and safety is moving in the right direction.

But comments such as those made by safety reps like Darrell Bennett indicate there are still significant challenges to be overcome before a robust health and safety culture permeates to every level within the organisation.

