

Office of Rail Regulation Occupational Health Programme : Emerging Lessons

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My luggage !



OFFICE OF RAIL REGULATION

ORR OH Programme 2010-14

- ORR OH Programme what we have done
- Inspection activities key emerging areas
- Promotion of the programme
- > Top 10 2012-13



A great deal from Britain's railways: safe, reliable, efficient



Our vision is an industry that consistently achieves best practice in occupational health

Our health programme aims to

- Change how health is led and managed by organisations in the rail industry
- Improve how health is regulated by ORR

Key part of our achieving excellence agenda



What success looks like

- More proactive approach to health
- Raised awareness at managerial/supervisory level on health risk control
- Designing out health risks in equipment/plant/ reduce the reliance on ppe
- Reduce the gap between practice and compliance level
- Raised awareness of good practice, health hazards and risk control
- Sood risk assessments to establish risk controls, e.g. paper mask versus airfed helmets
- More informed position to target and set priorities
- Screater use of medical science, e.g. when to receive primary care, diabetes
- Collaboration and sharing of what works



It's About

It's Not About

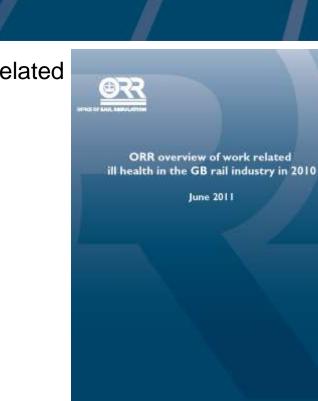
Evidence Judgement Consistency Dialogue with the company Challenge Sustained improvement Openness Targeting interventions Clear goals and aspirations

Pre-conceptions False precision Uniformity Silence Acceptance of the status quo Short term fixes For ORR only Labelling as "pass" or "fail" Accepting the mediocre as good



http://www.rail-reg.gov.uk/server/show/nav.2538

- Rail workers report a higher incidence of work-related ill health than similar occupation groups.
 - HSE Labour force survey data
 - Self-reported illness
 - Railway operatives: 5850 rate per 100,000 employed
 - > All industry: 3470
 - Transport: 3740
 - Transport drivers & operatives: 3510
 - Construction: 4800





• Consultant &/or GP attendance – MSD, mental health $\frac{7}{7}$

Where is the industry now..2010

- Pockets of excellence but..
- > Variable practice, patchy compliance with the law
- > Few companies with occupational health advisor directly employed
- Strong focus on pre-employment screening, rehabilitation and managing for attendance – less on proactive ill health prevention
- Role of line manager in occupational health not fully embedded seen as role of HR or OH advisor
- Less public visibility and accountability on health compared with worker and passenger safety
- Potential for significant economic and performance benefits from better occupational health management



Baseline survey

- Survey direct to 92 dutyholders December 2010
- Seeking few baseline indicators on current state of health risk management across industry
- Evaluate impact ORR health programme by looking again 2014
- Sood response rate 56% industry willing to engage
- Responses to be aggregated to industry level and published on our website



Baseline survey found

- Many companies do not know how much of their sickness absence may be work related – many reported zero work related ill health absence
- Cost is a significant issue 3.5 million hours lost and £2.76 million in Employers Liability Claims alone over 12 month baseline period
- Far fewer rail employers report publicly on health than on worker and passenger safety
- Encouraging signs of recognition of need to do more on all these indicators



Measures : Indicators to be repeated in 2014

Excellence

- Measure of incidence of work related ill health proportion working time lost due to work related ill health
- Measure of cost of work related ill health number and value of employers' liability claims arising from work related ill health

Leadership

Measure of visible leadership on occupational health – reporting publicly on health via annual reports?

Awareness

- Measure of level of reporting ill health under RIDDOR
- > Hits on ORR's web pages http://www.rail-reg.gov.uk/server/show/nav.2497



Way forward

Key themes

- better and more visible leadership
- Sharing of good practice
- > proactive management of ill health by line managers
- > competence in health management
- Inspection work to focus on key health risks, particularly stress, HAVs, plus known areas of poor compliance (COSHH, reporting)



Leadership

- RSSB led interviews, surveys, two workshops
 - Management of worker health is not new
 - There are areas where industry performs well but there are issues with transparency, visibility and understanding.
 - Realisation of potential scope and business case to proactively improve health management with rail companies of all types.
- Industry Safety Meeting, 16th February 2012
- RSSB Board, 8th March 2012
 - Development of health data causal classification and data collection
 - Development of suitable proactive metrics and benchmarking facilities
 - Identification and sharing of good health management practices including the creation of an online health resource centre
 - Research and development of health tools e.g. assessing risk from hazardous substances



Improvements in Health Risk Management

- Insufficient health risk assessment
 - Bridge refurbishment
 - Welding Fume
 - Ballast dust
 - Cleaning of train under frames
- Data sheets claimed as risk assessments







Collaboration







Competence



- Syllabus for managers and supervisors : NEBOSH
- ORRgrip document following internal Health in Construction training day
- Case studies of good practice
- Web pages
- Low awareness of legal compliance



Regulatory Levers

- Monitor and intervene Find & fine
 - Cleaning of train underframes
- Require specific outcomes
 - Eliminate or ban ?Toilet waste on the track
- Compliance with good practice Nudging behaviour
 - Legionella/bacteria in water tanks & train washes
 - Bridge refurbishment lead, HAVS, isocyanate-based paints, MSD
- Emerging / Changing
 - RCS Silica dust suppression & control
 - Proposed Musculoskeletal Directive
 - Legal powers REACH exemptions Asbestos Regulation changes
- Regulations and guidance
 - RGD Diabetes, insulin usage and train driving





Lead, HAVS, Isocyanate Paint, MSD, Solvents....





Legionella risks





Asbestos exposure

- 2 Improvement Notices Ribble Steam Railway Stripping the boiler of "Windle"
- > Other notices, plenty of asbestos
- Changes to regulations
- Need for ORR to be doing more



Stress Strategy

- National Stress Awareness Day
- Presentations with duty-holders
- Promote use of the HSE Stress Standards & Manager's Competence Tools
- Press articles
- Shadowing Alstom, implementing the Stress Stds



Good practice web pages





Plans for 2012-13

- Supporting Leadership / Governance WG formation
- Understanding of legal compliance
 - Regulatory change on asbestos, RIDDOR
- Excellence in health risk control
 - Silica, HAVS, Welding fume
- Provision of information
 - Case studies, web-pages, articles
- Competence of managers and supervisors
 - Promote syllabus for managers and supervisors
- Promotion of health programme



Finally

- Robust, health risk management be incorporated into a broader health programme
- Raise the standard of health risk management
- Share and learn from others, encourage efficiency gains
- Prevent ill health, particularly where potential for long term absence

