

**Question:** *Would scrapping an audit programme affect ISO 18001 certification?*

**Answer:** It depends on what part of the audit programme you scrap. There is a requirement within 18001 to audit and review so failure to do so would affect your certification. My comments during the webinar were to review all of your compliance issues and decide on the audit/ risk assessment review frequency for each area. In addition you should decide on the format of any audit and who should carry it out. The standards and protocols that you decide on should be embodied in your H&S policy and procedures manual which will then form the basis of the 18001 audit for certification purposes.

**Question:** *Was the use of sanitiser for swine flu completely unnecessary?*

**Answer:** No – the point that I was trying to make is that many companies gave a knee jerk reaction and put hand sanitiser every where in the belief that this was all that they had to do. The use of sanitiser will decrease the bacterial and viral load on your hands but it is no substitute for hand washing. We must remember that the virus is transmitted by the inhalation, not ingestion, of the virus so the most probable way of catching it is by being next to an infected person who either coughs or sneezes. The virus will survive for up to 24 hours on hard surfaces so you could catch it by touching a contaminated surface and then sniffing your hands. I personally don't believe that the use of hand sanitiser is effective in controlling swine flu, however for faecal/oral infections such as Norovirus their use is important.

**Question:** *How do you objectively quantify value for money?*

**Answer:** If you sub contract out work the normal tendering process should ensure that you obtain a reasonable price, but it doesn't guarantee the quality of the work. When we carry out cost benefit analyses we look at all of the current spend, both external and internal, together with the compliance status. Where possible we also compare your spend with that of similar organisations. There is no simple way of calculating value for money and there will be a degree of subjectivity. It is, however an area that we could help you with if you so wish.

**Question:** *Auditing is becoming a real issue, with the different range of audits not just EHS, we are currently reviewing out international audit systems regime, currently its every 3 years. Would you suggest this is reasonable?*

**Answer:** There is no easy answer to this question. The size and diversity of Saint Gobain (190K employees in 61 countries) and your activities, many of which are high risk, mean that you will have a comprehensive EHS management system with a variety of layers of audit and control. I assume that you are referring to your overall regime in which case a full review every 3 years is probably reasonable but you should constantly review parts of your system as and when new legislation and guidance is issued or when there are technological developments that affect your industry.

**Question:** *Stephen mentioned the daily checks for e-lighting: I was under the impression that BS5266 Part 8 (BS EN 50172) no longer requires a daily e-lighting check? There is of course the caveat which should be applied that it should be continued if as necessary by the Fire Risk Assessment.*

**Answer:** I wasn't aware that the daily check had been dropped so I have looked at the standard again. As you can see below there still appears to be a requirement for a daily visual inspection.

EN 50172:2004 - 10 - **7.2.2 Daily** Indicators of central power supply shall be visually inspected for correct operation.

NOTE This is a visual inspection of indicators to identify that the system is in a ready condition and does not require a test of operation.

I can't find any amendments to this BS so would be interested to know where your information came from.

**Question:** *Is it necessary to continually improve on you H&S strategy?*

**Answer:** The simple answer is no. Deciding whether something is safe enough (i.e. the risk is reduced ALARP) is a separate exercise from seeking a continual improvement in standards. Of course, as technology develops, new and better methods of risk control become available. Duty-holders should review what is available from time to time and consider whether they need to implement new controls. But that doesn't mean that the best risk controls available are necessarily reasonably practicable. It is only if the cost of implementing these new methods of control is not grossly disproportionate to the reduction in risk they achieve that their implementation is reasonably practicable. For that reason, it is accepted that it may not be reasonably practicable to upgrade older plant and equipment to modern standards. However, there may still be other measures that are required to reduce the risk ALARP: for example, partial upgrades or alternative measures.

**Question:** *Have you thought about e-learning for the tool box talks?*

**Answer:** Yes – e-learning is an area we help clients with and our product development team are looking to convert the existing tool box talks into a more formal e-learning system.

**Question:** *I disagree that ACOP's are "guidance" – they are not. The HSE expect them to be followed.*

**Answer:** You raise a valid point. Technically ACOP's are guidance but do have a special legal status in that the HSE do expect them to be followed. If you don't comply with the provisions of the ACOP you have to demonstrate that your control measures are the equivalent or better than the guidance in the ACOP. The link below takes you to the HSE guidance to their inspectors on "Assessing compliance with the law in individual cases and the use of good practice" . You will see that "Good Practice" is clearly defined. Invariably compliance with the ACOP is the best course of action but having the flexibility to comply in another way can be of benefit to some situations.

<http://www.hse.gov.uk/risk/theory/alarp2.htm>

**Question:** *What about "machinery guarding" where this is qualified with the phrase "so far as is practicable" (i.e. dose not include the qualifying term "reasonably"). The HSE do not seem to enforce this (but they can) and this causes confusion about the degree of guarding that is required in different industries.*

**Answer:** Following a prosecution of a North Wales company for two separate incidents last autumn the HSE said "Employers operating machinery need to ensure that risks are fully assessed and that potentially dangerous moving parts are suitably guarded". So another vague term has crept in. Again this will come down to good practice. The British Standard Publication 'Code of Practice. Safeguarding of machinery' first published in 1975 is a good starting point but there are more detailed guidance documents for specific types of equipment. My suggestion would be to carry out the risk assessment and decide what level of guarding you consider appropriate and then seek approval from the HSE on your control measures.