

# Nebosh national general certificate 3 practical application



NATIONAL GENERAL CERTIFICATE Candidate report template (2009 specification) UNIT NGC3 – THE HEALTH AND SAFETY PRACTICAL

APPLICATION Student number Location: A Private Security Company

Operating Base Date of review: Introduction including overview of area inspected and activities taking place The following is a report on the health and safety inspection conducted at A Private Security Company Operating Base (PSCOB) The PSCOB is located on a shared site in a remote location primarily administered by UK Government authorities that is positioned on a diplomatic site.

Due to this, the PSCOB and all visitors and staff and contractors working within are subject to the Health & Safety at Work Act 1974 and subsequent statutory regulations as if located in the UK. PSCOB is located in a hostile environment. Emergency procedures for hostile actions are standardised throughout the diplomatic area. They are administered and implemented by UK Government authorities and therefore out of scope of this inspection. The climate and environmental conditions are extremely hot and dusty in the summer and extremely cold and wet through the winter.

With this in mind, PSCOB country management have made it policy that bi-annual health and safety inspections take place. The PSCOB scope of inspection is the facilities used solely by PSCOB to prepare for and administer (including training) armed close-protection and body-guarding security operations. There are between 25 – 35 staff working within the PSCOB at any given time aged between 25 – 55 yrs. These include a Project Manager, Operations Manager and a number of Team Leaders. The

remainder are security operators and both UK and locally employed support staff.

There are no young persons, vulnerable persons or disabled persons working at PSCOB because of the dangers and environmental factors. All UK staff are former UK armed forces or UK police employees. Facilities in sole use by PSCOB employees consist of firstly a deployment preparation area (DPA). This consists of a small 'hangar' type building for minor vehicle maintenance tasks, vehicle loading and equipment user-preparation. There is also a management/administrative office and a training room.

The inspection took place on 10/10/2012. The aim of this report is to highlight particular areas of good practice and areas of concern to be addressed as a matter of urgency or in the medium- to long-term. Executive Summary PSCOB has a positive attitude towards health and safety. It is evident throughout that health and safety is a very high priority. There are however a significant number of concerns and shortfalls which need to be addressed and acted upon in order to further improve risk control and eliminate or reduce hazards.

There are some areas where supervision of staff and management of hazards is lacking and could lead to serious injuries. This is evident with regards to the storage of PPE, lack of use of available lifting equipment and the prevention of accidents caused by slips, trips falls. Some risk assessments have not been completed and signs and notices do not reflect the duty of care owed to locally employed nationals There are sufficient

quantities of fire fighting equipment and fire drills and maintenance are well managed but some equipment has not been deployed effectively.

There were also instances of very basic fire prevention measures not being adhered to – correct storage of flammable and easily combustible materials according to COSHH and fire prevention regulations is of utmost importance. Poorly maintained equipment can ultimately result in reports and cases of ill-health and can lead to serious injury. This is a more important factor given the climate and environment. There were examples of poorly maintained equipment (not reported) and evidence that inspection, maintenance and examination records were not up to date or even present in some cases.

All of the concerns raised in this report can be rectified with minimum cost in terms of resources and finances and all work can be conducted on site – an important consideration given the constraints of operating in a remote and hostile environment. A significant number of the concerns raised contravene current health and safety at work legislation so time, money and effort spent on putting them right will benefit PSCOB in the medium to long term and go a long way towards reducing accidents and improving the safety of PSCOB staff.. Main findings of the inspection (numbers refer to entries on observation sheets attached)

Workplace Health and Safety Shortcomings with regards to the workplace are a result of poor supervision and the need for employees to be made more aware of the consequences of their actions by managers, supervisors and their peers alike. Removal of objects causing obstructions or increasing risk of slips, trips and falls is mostly a supervisory responsibility. These

included unsuitable rugs, PPE storage and used pallets (5, 16, 24 & 27).

There were instances where simple, inexpensive alterations and consultation by management with staff and supervisors would reduce risks throughout all facilities.

Signs legible by all staff (6. ) and shared facilities (7) are cases in point. The use of available manual handling was not evidently enforced as a matter of routine (10) The environmental control systems were good and there was very good consideration of climate and temperature reflected in welfare provision. More care is required regarding the supply and availability of drinking water (1 & 12). There are well thought-through procedures and excellent work systems with regards to movement control, interaction with vehicles and safe/marked routes. Fire Precautions and Prevention Fire safety records are up to date.

Fire points and equipment are very well maintained. There are some areas where provision and redistribution of FFE would further reduce fire hazards. There is a lack of detailed consideration of 'classes' of fire hazard and suitable FFE for classes (3, 22, 23, 25). More stringent supervision is required to reduce fire hazards in particular areas and eliminate potential sources of ignition (16 & 25). An adequate electrical register and inspection record is maintained. Some items of electrical equipment are not listed. More information and instruction is required to emphasise the importance of updating the electrical register (9, 20, 27).

Provision and Use of Equipment Fault reporting and inspection and maintenance records for some equipment are not being kept up to date or

are not in use (2, 13, & 15). This extends to hand-tool kits where there is a quantity checking policy but no fault reporting or exchange procedure 15. On the same subject of documentation but under separate legislation, items of mechanical lifting aids also require inspection, examination and test certification and documentation (14). There is an inadequate understanding of the hazards and risks associated with workstations and DSE at management and supervisory level (8 & 21).

**Hazardous Substances** In general, there are adequate precautionary and preventative measures in place for the safe handling and accommodation of COSHH. COSHH information and instructions are readily available and good response procedures in place known by the staff questioned. Some articles of COSHH were very poorly accommodated and not marked as hazardous (17 & 25). Insufficient PPE use when handling COSHH was noted in one example (18). There appeared to be no good reason, accept poor supervision and a violation of what was seen to be an adequate COSHH policy. PPE

PPE use was generally good but again, good supervision and instruction were not apparent when staff were seen handling dangerous fluid without gloves. Gloves did not appear to be readily available. Evidence that poor enforcement had led to staff taking 'shortcuts' as the easy option in this case (18). Non-workplace hostile environment PPE in the form of ballistic protection is required in this particular case. It is readily available and there are clear instructions as to its use and availability. The means of routine storage – adequate to accompany the individual in his workplace – were not available.

There is risk of serious injury or worse if this PPE is damaged or degraded due to inadequate storage or stowage. Possible Breaches of Statutory Regulations Regulation 5 of PUWER require that equipment supplied must be maintained in an efficient state and working order and in good repair but further, Regulation 6 requires regular inspection and a record of faults, maintenance etc due to the adverse climate and environmental conditions to which it is exposed. Such conditions may cause dangerous situations such as overheating therefore inspections at suitable intervals should be conducted.

These regulations have been breached with regards to the faulty portable air-conditioning units observation (2). Regulation 8 of PPE Regs requires that PPE be accommodated appropriately when not in use in suitable storage area to prevent damage or deterioration. This is contrary to the findings regarding hostile environment PPE in the DPA (5). Regulation 10 of Management of HSW details the requirement for information provided about risk controls to be understood by all employees including translated into another language if required. Some notices and signs do not comply with this requirement (6).

LOLER requires that lifting equipment be thoroughly examined before initial use. There is no written record to prove this on a pallet truck in current use (14). No evidence of a risk assessment or information about hazards with regards to the CCTV workstation. This is in contravention of Regs 2 and 7 of DSE Regs. Under the Reg Reform Fire Safety order Part 2, the responsible person (in this case the Country Operations Manager) must arrange for the safe storage of dangerous substances (Article 12) and take reasonable precautions to ensure employee fire-safety (Article 8).

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COSHH Reg 7 requires that measures are put in place to control exposure by using procedures for safe handling including PPE. This has been breached due to the unavailability of gloves or gloves being worn and no markings on the bottles of a COSHH item (17, 18). The reputation of PSCOB and degree management commitment to the safety and well being of all those involved in PSCOB security operations will be measured by the response to this report. PSCOB have a legal responsibility to rectify breaches of statutory regulations. Such breaches are made clear above.

Actions taken to rectify breaches of regulations ensure potential investment proposals, contract and business development opportunities are not missed because PSCOB are dealing with unnecessary legal proceedings. For example, standardising procedures for documentation and certification of equipment will cost relatively little in time and resources. Better that than incurring much more expensive legal costs, personal claim pay-outs and fines: all of which could result but are avoidable. PSCOB operate in a hostile environment where the welfare of all involved is paramount.

In such circumstances, PSCOB management have a moral obligation to provide safe equipment, welfare and premises so that such provisions are a matter of routine. Enforcing PPE and correct lifting equipment use along with provision of safe drinking water should be part of the routine of any organisation that promotes a healthy and safe workplace and work environment. The PSCOB contract currently makes its profit from available personnel and security equipment and the number of successful security tasks completed per day.



Acute sickness or chronic illness resulting from, for example, inadequate COSHH precautions or faulty temperature control systems will cost money due to the unavailability of people and equipment they use and maintain to conduct core business. No core business – no pay. Securing close protection contracts and developing business gets increasingly difficult every year. It is well documented and proven that a prospective client visiting the site and seeing a well supervised, safe, organised workplace, with all necessary precautions in place is much more likely to invest or use PSCOB services.

### Conclusions

In general, PSCOB staff as a whole have a positive attitude towards health and safety but this report has brought to the fore a number of concerns to be addressed by managers and supervisors alike. Specific to the workplace, there is evidence of a lack of supervision to avoid slips, trips and falls and traffic obstructions. Pallets being left out, the shared staircase with no risk assessment and the unmarked curb step are all examples. There was also a concern about the lack of supervision and enforcement of aids to manual handling and action is required to ensure information and instructions can be understood by all.

Drinking water provision requires more monitoring and effective distribution. Shared facilities or access/egress points need to be considered in risk assessments. Some of these examples contravene Health & Safety (Workplace) Regulations and general requirements of the HSW Act 1974 Section 2. The fire safety concerns highlighted show that attention is being paid to the general principles of fire safety – especially in terms of records/documents – but sufficient detail is lacking in places.

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Distribution of appliances and un-needed bulk supplies of paper being kept in the office are examples along with the inadequate electrical safety measures highlighted in the findings and observations. Both are possible contraventions of the Reg Reform Fire Safety Order and Elec Safety Regs. There is improvement needed in the area of maintenance, inspection and efficiency of equipment. This was evident when records and documentation were not available for portable air-conditioners, lifting equipment and exhaust extractors which are contrary to the requirements of PUWER and LOLER.

Precautions and responsive/preventative measures for hazardous substances are in place but again, lack of supervision and general lack of application saw instances of poor storage and labelling and inadequate PPE use. Both contravene the general requirements of COSHH Regs. PPE use is a recurring theme throughout this report but emphasis should be placed correct storage of potentially life-saving PPE providing ballistic protection from hostile acts. Supervision and instruction will ensure PPE such as gloves are used when appropriate in order to comply with the statutory PPE Regs. The majority of the points raised could be easily and inexpensively resolved with minor adjustments and alterations to management, supervision and facilities.

Recommendations	Recommendation	Likely resource implications	Priority	Target date
Plan & conduct refresher training. The aim being to reiterate the hazards and risks resulting from poor housekeeping and use of aids to lifting. Include on induction training. Record outcomes.	1 hour per 12 weeks per employee plus competent person's delivery prep time approx 1 hour per session. No external resources required.	High	1 month then every 2-3	

months per employee| Conduct risk assessment and consultation for shared access facility: stair case. | 1 hour 1 of employee time. | High| Immediate then 6 month review| Fit ducting for leads in training room and purchase and lay rubber wire covers on floor| \$50 – local contractor fitted including labour| Medium| 1 month| Use yellow paint to mark curb surrounding floor of DPA. Line marking paint for temporary – immediate). | Paint – \$30 and competent person local hire \$30 job until complete| Medium| 2 weeks| Translate safety warnings, information and notices into Pashtu| 4 hours of translator’s time (internal translator). | High| 1 Week| Remove date-expired drinking water. | 1 hour of employee time. | High| Immediate| Establish a drinking water delivery and expiry date record by batch in conjunction with a year planner or calendar. 1 hour of 1 employee time| Medium| Before next delivery| Construct and fit a PPE storage area, suitably guarded for temporary storage of ballistic PPE in the DPA. E. g. hooks and a cage cover guard | \$400 fitted and labour – externally sourced. | Medium| 1 Month| Redistribute DP FFE and signs from office (x 1) to training room and DPA (x2)| 1 hour of 1 employee time| High| 1 week| Register and user check items not listed in electrical register| <1 hour of 1 employee time| High| 1 week| Place CO2 FFE in vicinity of CCTV workstation| Purchase and fit – 1 day of local mployee’s time| High| 1 week| Remove hazardous aerosols and bulk paper from office and store appropriately| 1 hour of 1 employee time| High| Immediate| Conduct maintenance, repair, thorough examination and any required proactive or reactive maintenance on air-con units, exhaust extraction units and lifting equipment and other necessary equipment. 4 days maint and repair contractor time and daily rate – \$360 per day plus spares approx \$300 – 400|

Medium (with temporary measures in place as per observation sheets)| 1  
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month| Maintenance, inspection and examination records to be instigated and/or updated for the portable air-con units, exhaust extraction units and lifting equipment. Renew and overhaul files and ensure information documented is easily accessible and understandable. 1 hour consultation with maint contractor \$802 hours of 1 employee time| Medium| 1 month| Establish a checking and sign off system for user inspection of hand tools located with each vehicle kit| 30 minutes of all designated drivers' time then on weekly equipment checks| Medium| 2 weeks| Identify inadequately or inappropriately labelled hazardous substance containers. Make labels or write onto bottles using permanent marker or ink. 2 hours of 1 employee time| High| Immediate| Control access to COSHH items using a key sign out system and authorised persons register to prevent unnecessary use and opening of hazardous substance containers. | <1 hour of one supervisor time to establish| High| Immediate| Fit disposable glove dispensers to 2 walls in DPA ensuring hand/wrist protection from hazardous substances is available and to hand. | Gloves – 3 month's supply approx \$300Dispenser purchase and fitted – \$120| Medium| 2 -3 weeks|