



OFFICE OF RAIL REGULATION

Office of Rail Regulation Occupational Health Programme : Emerging Lessons

Dr Claire Dickinson, ORR Health Programme Manager

25th May 2012

My luggage !



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



OFFICE OF RAIL REGULATION

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
- Good risk assessments to establish risk controls, e.g. paper mask versus air-fed helmets
- More informed position to target and set priorities
- Greater use of medical science, e.g. when to receive primary care, diabetes
- Collaboration and sharing of what works

It's About

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

It's Not About

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



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
- Good 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



THE HERALD, TUESDAY 31.05.2011

Rail bosses are urged to come clean on legionella

Risk to the public extremely low, claims ScotRail

ALISON CAMPBELL and
DARRIN MURPHY
TRANSPORT CORRESPONDENTS

RAILBOSSES are urged to come clean on the risk of legionella bacteria on ScotRail trains, after it emerged a trial of water testing failed to find any traces of the potentially fatal bacteria.

Over 100 million litres of water are used daily for the trains in the ScotRail network.

ScotRail tested the water in its two main depots in Glasgow and Edinburgh.

The Scottish Transport Users' Association (STUA) has urged the Scottish Government to fund a trial of water testing on ScotRail trains, which has been rejected by the government.

The results of the trial were said to be "inconclusive".

The trial was said to be "inconclusive" because it was not possible to test the water in all the depots.

Yesterday, STUA said the government should fund a trial of water testing on ScotRail trains, which has been rejected by the government.

STUA said it was "concerned" about the risk of legionella bacteria on ScotRail trains.



WARNING: How the Herald looks like every morning.

Passengers will want to be assured that their journeys are safe and that the risk of legionella is extremely low.

STUA said it was "concerned" about the risk of legionella bacteria on ScotRail trains.

The trial was said to be "inconclusive" because it was not possible to test the water in all the depots.

Yesterday, STUA said the government should fund a trial of water testing on ScotRail trains, which has been rejected by the government.

STUA said it was "concerned" about the risk of legionella bacteria on ScotRail trains.

ScotRail said the risk of legionella bacteria on its trains is extremely low.

The trial was said to be "inconclusive" because it was not possible to test the water in all the depots.

STUA said it was "concerned" about the risk of legionella bacteria on ScotRail trains.

The trial was said to be "inconclusive" because it was not possible to test the water in all the depots.

Yesterday, STUA said the government should fund a trial of water testing on ScotRail trains, which has been rejected by the government.

STUA said it was "concerned" about the risk of legionella bacteria on ScotRail trains.

The trial was said to be "inconclusive" because it was not possible to test the water in all the depots.

Yesterday, STUA said the government should fund a trial of water testing on ScotRail trains, which has been rejected by the government.

STUA said it was "concerned" about the risk of legionella bacteria on ScotRail trains.



OFFICE OF RAIL REGULATION

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