

ANNEX K

## Company K Royal Mail

### Supply chain team structure

HSE - Team Leader

HSE Inspector

HSE Inspector

LB Wandsworth Officer

LB Islington Officer

LB Barnet Officer

**Comment [t1]:** LA inspectors? Not sure what positions they are.

### Overview of the organisation structure

Company K consists of several brand companies. One collects and delivers letters and packages, another deals with urgent post and parcels throughout the world and the other is an everyday service for products services and information. Also within the group are a company responsible for maintenance across the group.

Inspection has focused primarily on the collection and delivery part of the group, as this is the company with the greatest movement of goods. It handles an average of 82 million letters each weekday, 40 million on Saturdays and 20 million on Sundays. Peak periods include mid March to April with 90 to 100 million letters per day and the end of September sees the start of the Christmas build up to a peak of 160 million items per day.

### Health and safety management system

#### Key figures

Director of Corporate Responsibility

Reporting to the Director of Corporate Responsibility the Head of Health & Safety for the whole group.

Communication Workers Union's National Health, Safety & Environment Officer

Company K failed to respond effectively to advice given in 2003. Improvement Notices were served in 2004 and checked off in February 2005. The National Head of Safety is responding positively to the service of Improvement Notices on local offices under MHOR. It is his opinion that the enforcement action has targeted the right place in the organisation and is resulting in action being taken. The object of this year's inspection programme is to see whether enforcement action has achieved lasting compliance and whether the organisation can take a coordinated approach and achieve compliance London-wide.

### Supply chain structure

In London Company K operates Mail Centres and Delivery Offices.

The Mail Centres are the main sorting offices for the area. There are 3 Mail Centres for the Central London area. Mail Centres are LA enforced unless there is also a delivery office on site.

Mail is then distributed to Delivery offices where it is sorted by hand into walks and then delivered by postal workers using various different means: Pouches, Trolleys, Bicycles, Cars etc. For some rounds, where required, additional mail bags are dropped off at pouch drop boxes or safe points along the round to be picked up by the postal worker.

Work within the delivery office is LA enforced but the peripatetic delivery is HSE enforced. The only way to effectively inspect the management of health and safety out on delivery is to visit the delivery office.

Transport between Mail Centres and Delivery Offices is not contracted out.

### Inspection program methodology

This work with Company K has been a continuation of an ongoing programme of local and National Inspection projects undertaken by HSE. However, there had been very little joint working with LA's on this despite overlapping enforcement authority. HSE has taken a lead authority role with the company and some EHO's have reported feeling that this lead has meant that head office level contact has had a HSE bias and has not tackled the issues they have found in delivery offices. It was therefore decided to bring Company K work under the umbrella of the Supply Chain Project in order to address this. However, it was felt that the work should be allowed to continue using the protocol agreed at national level with Company K and the CWU rather than using the Supply Chain Protocols.

Contact was made with all the Area General Managers within the M25 area. All were content for inspections to take place without an initial meeting. It was agreed that the Delivery Offices to be visited would be informed in advance (although not necessarily visited by appointment) and that local CWU reps would also be contacted in advance.

It was hoped that Inspections would take place in the autumn of 2005. In practice the resources available within FOD London have meant that only three Inspectors were allocated to the project and this was not agreed until late in the year. Inspections therefore did not start until December and have been further delayed by the Christmas period.

In addition, several LA's that had expressed an interest in joint working with Company K came back with a lukewarm response when contacted to make firm arrangements. Most said that they now did not have the resources to commit now but would be interested in joint working in the next work year. It was agreed that HSE would contact all the LA's where they were planning to

visit and invite the local EHO to accompany them, if only for training purposes this year.

Joint visits have been carried out with LB Wandsworth, LB Barnet and LB Camden.

### Significant MGS issues found during visits

#### ***Manual Handling***

- Training

In most cases manual handling refresher training was being delivered by untrained Delivery Office Managers using a video in Work time Learning sessions. This was explained as being acceptable because it was only intended to refresh the training given at induction. However, many long serving postal workers have not received the induction training that is now given to new starters.

There were also several examples of poor practice noted with regard to the use of equipment such as roll cages and dock levelers so it would appear that the training is not addressing these practices.

- Bag weighing

Delivery staff are supposed to weigh their pouches, trolleys and drop bags record the weights of each before they go out. This is to ensure that they do not exceed the company's guidelines. In most cases some weighing seemed to be taking place but at some sites it was clear that this was not being done routinely. Recording was also insufficient and in some cases appeared to say that overweight bags had been knowingly taken out, as any follow up action was not recorded.

- Sorting frames

Sorting frames in most locations are fitted with a raised base order to reduce the risk of bags being overfilled and exceeding the agreed weight. In one location some of these bases were missing and in some cases there were newer pieces of this equipment that had not even been designed with a raised base. There appeared to be a number of overloaded mail sacks as a result. In addition, several sacks were over spilling frames where there was a raised base again leading to them exceeding the agreed weight.

- Walk Logs

Walk logs are the instructions issued to postal workers on each walk derived from the risk assessment of that walk. It should contain information about the route to take and the hazards likely to be encountered such as dangerous dogs, slippery surfaces, low letterboxes, unlit stairwells and construction sites. It should also list the control measures that should be taken to avoid these hazards. In many cases these logs were found not to contain sufficient information. In particular the control measures were usually missing. This information is usually available elsewhere (national policies, generic risk assessments) but there is no single document where this kind of information is brought together.

- Provision of pouch drop boxes

Pouch drop boxes are provided so that the postal worker does not have to carry so much at the beginning of the walk. In some areas insufficient boxes have been provided so workers are routinely exceeding the company's own guidelines for the weight carried. In these offices the Delivery Office Managers were able to list the walks that had insufficient boxes and had even obtained planning permission to install new ones, which has proved to be very difficult in the past. However, the company responsible for maintenance has not yet installed the boxes and the Inspector was told that they would not be installed until the next financial year.

- Maintenance of equipment

There were several examples of roll cages and dock levelers with string and other debris tangled around the wheels. Debris can lead to the equipment coming to a sudden stop, which can lead to injury. As this type of equipment moves around the country it would appear that no one takes responsibility for the maintenance of this kind of equipment.

### ***Workplace Transport***

Workplace transport was a key issue for LA Inspectors. The organisation of some sites was found to be poor and adherence to site rules about hi-vis clothing was variable. Both LB Wandsworth and LB Barnet plan follow up action on these points.

### Examples of good MGS practice seen during the visits

There has been much improvement in the general picture since interventions with Company K started three years ago. Where there used to be no bag weighing, at least in some offices there was evidence of some weighing going on, even if the recording was patchy. In one office the Delivery Office Manager had devised his own weight recording form and this appeared to be working well. Most walks were found to have logs where previously these were rare. In most offices it was at least recognised that there were agreed weight limits in place.

#### Ongoing issues that need to be followed up

It has been agreed by the HSE inspectors that no enforcement action will be taken until all the visits have taken place. They will then meet to agree a consistent enforcement line and to agree the form of words to be used in letters and notices.

It is expected that LB Barnet will take enforcement action on Workplace Transport. LB Wandsworth have written to Company K requiring a response in one month.

#### Positives and learning points from joint LA / HSE working and cross borough working

Where joint working was possible it was felt that the approach has worked well. In the past Inspectors found that staff frequently approached them on issues that were not within their enforcement authority and so were unable to address them, so having both on site at once helped with this.

There are a number of initiatives going on with Company K involving LA's including MGS, MGS2, LOPPS and Synergie. This has led to some confusion about how these fit together. Better coordination is necessary to make sure there is no duplication of effort or misunderstanding.

Several LA's expressed an interest in working together with HSE on Company K but then did not follow this up due to lack of resources available and late planning on HSE's part. Many LA's do not routinely inspect Company K currently and felt that it would be useful to gain more experience of the company using the HSE Inspector. It is hoped that more joint working will be possible in 2006/7.

#### Feedback from the organisation about the intervention

This intervention is ongoing. Local and national wash-up meetings will be held at the end of the work year.