



# The UK's Paper-based Industries Health and Safety Strategy

October 2023 – December 2027

## Setting our future direction for health and safety

The Paper and Board Industry Advisory Committee (PABIAC) is the tripartite strategic health and safety delivery partnership for the UK's Paper-based Industries.

The partnership comprises the Health and Safety Executive (HSE), employer representatives, and Trade Unions.

PABIAC's mission statement is:

***“help the prevention of death, injury and ill health to those at work within the UK Paper-based Industries.”***

It will achieve this by coordinating activities that will support and take forward the strategic objectives outlined in this document.

## Building on our previous strategies

2023 will celebrate 25 years of delivering PABIAC strategies. The first strategy was launched in 1998 and during this time the industry has gone through many health and safety evolutions. In 1998, the main motivation for improving health and safety was one of high injury rates and targeted interventions by HSE. Back then the industry was 'regulation' led, but move forward 25 years, and through commitment and a different mindset to what was acceptable back then, we have improved significantly to an industry that today is now more 'people' led.

The work of PABIAC is valued highly by each of the representative partners and, since the mid 70s when IACs were introduced, HSE has been the central figurehead in the tripartite partnership. However, to make the best use of

our resources to achieve our strategic aims and priority programmes, and to satisfy ourselves that the PABIAC structure is still appropriate to deliver the task 50 years later, it is timely and appropriate for the UK's Paper-based Industries to become that figurehead. Reconstitution presents a good opportunity to set our own health safety agenda and to focus on the issues that the industry has chosen as its priorities for the future. It is also a reflection on the industry's maturity and HSE's confidence in our ability to set and manage our own health and safety agenda for the next four years.

This PABIAC strategy sets out the priorities we aim to achieve to make sure we do everything we can to keep everyone who works in the UK's Paper-based Industries safe and healthy.



## Objective 1

### Understanding and integrating human factors into health and safety

Behaviours and human factors are widely recognised as having an important effect on accident causation and prevention. When an accident occurs, the main reasons cited as the cause tend to be along the lines of “too much reliance placed on procedures to control risk, a failure to follow safe working procedures, or the use of inadequate procedures”. While any of these may well be factors, these alone will not prevent a reoccurrence of the accident, or prevent the accident from occurring in the first place.

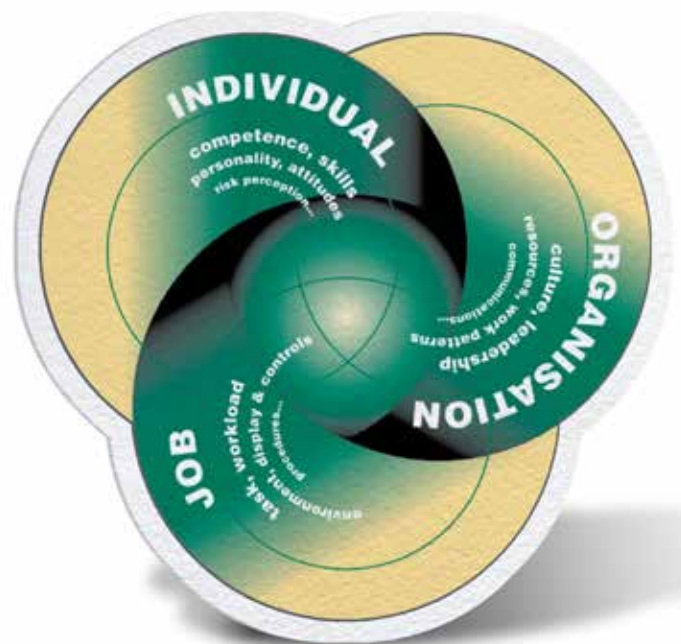
Safety critical tasks in the UK’s Paper-based Industries are tasks that have the potential to lead to a worker, or multiple workers, encountering a scenario where they may be seriously harmed or killed. These will likely be linked to the risk profile of the organisation, and the specific activities undertaken. Tasks that may be considered safety critical could include machinery or moving parts that could cause injury / entanglement, heavy loads that could crush, and work on high voltage systems that may cause electrocution.

**Objective:** This is multi-part objective which involves addressing human factors through hazard identification, during accident investigation, in the design and procurement of equipment and machinery, and in the day-to-day operations involving the workforce.

1. By **31 December 2024** all sites will have identified any gaps in people’s knowledge, experience or understanding in the principles of humans and risk, and how they can integrate human factors into hazard identification and accident investigation.

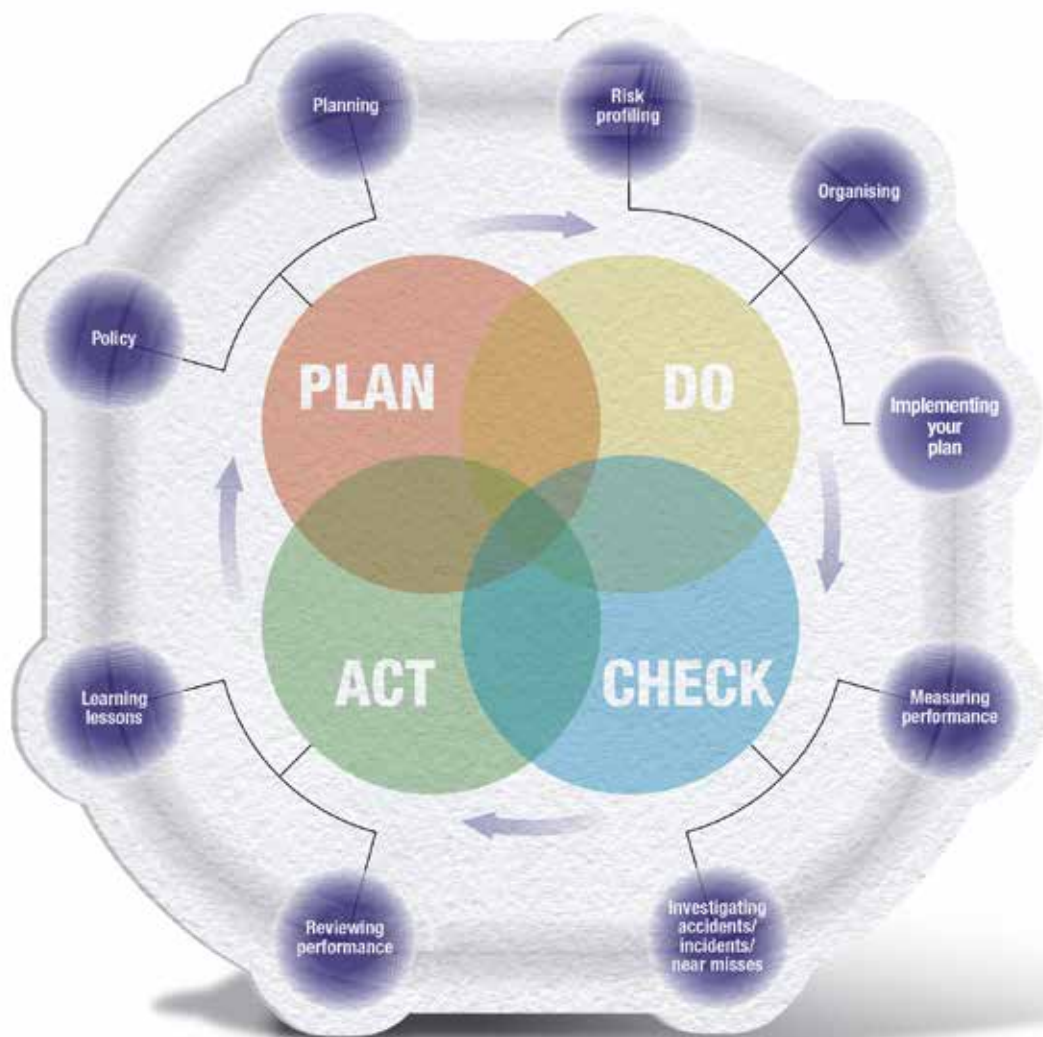
For relevant new employees, and within six months of their start date, this will be integrated into their induction and training programme.

**NB:** All sites will have undertaken risk assessments, which will involve identifying potential hazards and determining what could happen if the hazard results in an accident. However, a safety critical task risk assessment is a methodical step by step approach to determine the hazards and all eventualities, including those relating to human error.



# Strategic Objectives 2023 - 2027

2. Where appropriate, all sites should identify a competent person (internally or externally) or a recognised organisation who can provide the knowledge, tools, and skills necessary to deliver training to enable others to undertake safety critical tasks analysis.
3. By **31 July 2025** all sites will have identified all safety critical tasks, starting with those tasks where people potentially approach dangerous parts (e.g., start ups / shutdowns, making adjustments, cleaning, clearing blockages, planned and unplanned maintenance, and inspection). Once complete all sites should then compile an action plan prioritising areas for improvement.
4. Building on the previous strategy for all sites to adopt the PABIAC procurement policy and as part of the critical task analysis review, all sites will review the policy and update where applicable any machine and plant design issues identified through Objectives 1 and 2, to ensure these are engineered out at the procurement stage.



## Objective 2

### Accident and Incident Investigation

Health and safety investigations are important tools in developing and refining your risk management system. An effective investigation requires a methodical, structured approach to information gathering, collation, and analysis. The findings of the investigation will form the basis of an action plan to prevent the accident or incident from happening again, and for improving your overall management of risk.

**Objective:** This objective complements Objective 1 and will assist companies / sites in determining why an accident or incident has occurred and will provide you with a deeper understanding of the risks associated with your work activities. This is a multi-part objective:

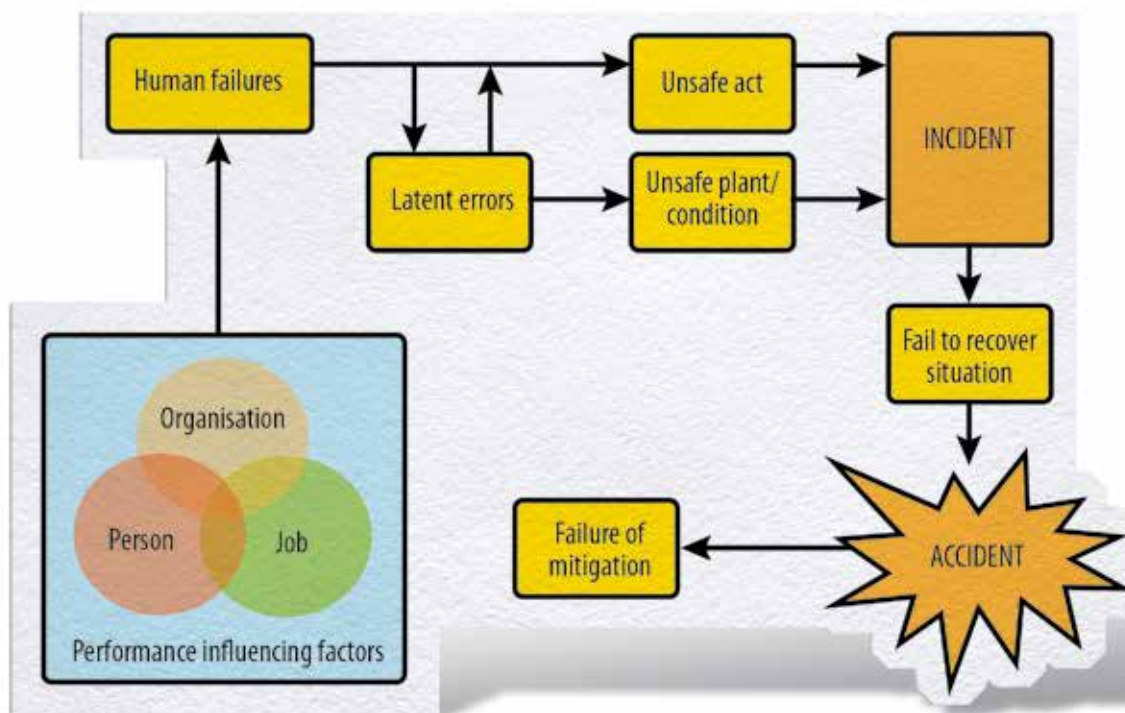
1. By **31 December 2024** all sites will have undertaken a review of their existing accident / incident investigation procedures by comparing these against the HSE guidance HSG245

'Investigating accidents and incidents', and have a system in place for demonstrating that all identified corrective actions as part of the investigation are prioritised, allocated, acted upon, and monitored to ensure they are not delayed or forgotten.

2. By **31 March 2025** all sites will have in place an accident / incident investigation team.

Depending on the level of the investigation (and the size of the business), supervisors, line managers, health and safety professionals, union safety representatives, employee representatives, and senior management / directors may all be involved.

3. To demonstrate an understanding of what should be investigated in terms of legal requirements and organisational needs, the investigation team will have undertaken training in accident / incident investigation.



## Objective 3

### Proactive and reactive mental health and wellbeing measures

Statistical information collated under the previous PABIAC strategy indicates employees in the UK's Paper-based Industries are as susceptible to work-related psychosocial issues as those in other industries. Since the launch of the PABIAC strategy in 2019, the number of days lost at work due to stress, depression, or anxiety has increased significantly.

**Objective:** This objective aims to build upon the policy and procedural foundations laid down under the previous strategy, but with an emphasis on sites introducing more proactive measures.

1. By **31 December 2024** all sites should have a nominated person for developing or maintaining a management system and implementing effective controls to manage stress and other psychosocial hazards in the workplace.
2. Managing psychosocial hazards and evaluating the sources and effects of stress and other work-related health hazards is no different to managing safety. By **31 December 2024** all sites should have in place proactive and reactive measures to reduce the number of hours lost through work-related ill health.

**NB:** During the first six months of the strategy, and to ensure this objective is not too onerous for the industry to achieve, CPI will canvas members on existing proactive / reactive measures already in place and will use the most common as initial industry benchmarks. Throughout the duration of the strategy these will be periodically reviewed and where appropriate changed accordingly.

### Implementing Leading Indicators

Traditionally, the UK's Paper-based Industries' measure of health and safety improvement is based around lagging indicators, where we measure failure rates (injuries, lost time incidents, etc.), analyse those rates and then react to them. There is a legal requirement to report injuries and, in this strategy, we will continue to record and monitor all incidents which result in injury. PABIAC is keen to promote the benefits to companies of introducing health and safety key performance leading indicators to measure, monitor, and evaluate health and safety performance.

CPI will canvas members on existing proactive measures currently being used. Industry can then decide which ones to introduce, and these will be incorporated into the PABIAC Strategy.



# Delivering the Objectives

## This strategy:

- Will only be effective through strong leadership, commitment, and accountability, from top management and at all other levels within the organisations, coupled with effective workforce involvement and engagement.
- Recognises the key in achieving the objectives is for everyone to work together through the PABIAC partnership.
- Supports and promotes worker involvement to cultivate the development of a genuine management / workforce partnership based on trust, respect, and co-operation.
- Focuses action on key health, safety, and wellbeing issues identified for improvement by industry.

In delivering this strategy PABIAC will use a combination of lagging and leading indicators to measure the industries performance against achieving each objective.

**Lagging Indicators** - PABIAC will track HSE's reported 'All Manufacturing' injury rate and will aim to be at, or below, this rate. In addition, CPI will record and monitor all work-related accidents due to incapacitation from work for seven days and below.

In the previous strategy, CPI collated data relating to the number of hours lost due to work-related mental health and stress. Based on the number of hours lost between 2019 – 2023, CPI will continue to track these, and by the end of the strategy in 2027 we aim to have reduced the total number of hours lost specifically relating to work-related mental health and stress by 15%.

**Leading Indicators** - To assist the industry in working towards achieving the strategic objectives PABIAC, and its constituent members, actively encourage employers to work together with their employees to prepare and implement their own H&S improvement plan in support of the strategy.

## Sharing Success

One of the key actions in the strategy is the open and transparent sharing of information. To support the industry, PABIAC will develop a knowledge management system with the expectation that companies are willing to share experiences of ways to reduce injuries and work-related psychosocial health issues.

## PABIAC Pledge

To demonstrate commitment to working towards achieving the objectives within the strategy PABIAC invites CEOs from all companies and senior managers from all sites to provide a written pledge committing their company to the PABIAC Strategy for 2023 - 2027. The pledge should be a joint signature signed by the senior person and, where applicable, either the FOC / MOC for the site, or a recognised union / employee health and safety representative.

In return, each company / site will receive a certificate from PABIAC, and their name will be displayed on the CPI website under PABIAC. Companies are encouraged to share and promote this commitment internally and to the wider community.

## Support

PABIAC recognises the key to success in achieving the strategy is for everyone to have a clear understanding of what each objective means, how these can be achieved, and to provide the necessary support mechanism to enable the industry to work towards achieving the objectives.

Following the official PABIAC Strategy launch in October 2023, and with the support of PABIAC, the industry will have until **31 July 2024** before commencing the work.

## Further Information

For further information on this strategy, the activities of PABIAC, and supporting documents please visit the partner's websites at:

### Confederation of Paper Industries

[www.paper.org.uk](http://www.paper.org.uk)

### GMB

[www.gmb.org.uk](http://www.gmb.org.uk)

### Health and Safety Executive

[www.hse.gov.uk](http://www.hse.gov.uk)

### The Recycling Association

[www.therecyclingassociation.com](http://www.therecyclingassociation.com)

### Unite the Union

[www.unitetheunion.org](http://www.unitetheunion.org)

