

The Construction (Design and Management) Regulations 2007: Industry Guidance

Annex H: Effective worker engagement for health and safety

Introduction

Worker engagement is the participation by workers in decisions made by those in control of construction activities, in order that risks on site can be managed in the most effective way. Involving the workforce in identifying and controlling risks is crucial to reducing the high accident rate and ill health that occur in construction work. The workforce has direct experience of site conditions and is often the first to identify potential problems (ACoP para 241).

Worker engagement is most effective when the workforce has sufficient knowledge to provide feedback, identify risks (ACoP para 242) and make suggestions on how to eliminate or reduce them. People have the confidence to do this when they are properly trained, know how to report their concerns and see prompt action being taken as a result (ACoP para 242). A vital component of worker engagement is employers consulting their workers on matters relating to their health and safety (ACoP para 247).

Effective worker engagement means that everybody on site will benefit from safer working conditions. Sites where workers are engaged have generally been found to be safer than those where they are not.

There are also good business reasons for worker engagement. Actively engaging the workforce can lead to increased productivity and efficiency and a more motivated workforce. It can result in a lower staff turnover, and it can reduce the rate of accidents on site and work-related ill health. It can also stimulate improvements in technical knowledge throughout the organisation or project team.

Elements of effective worker engagement

There are three areas that can be used to assess the worker engagement process:

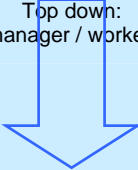
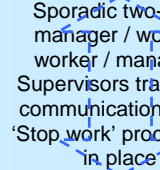
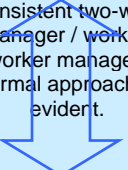
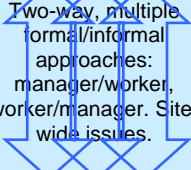
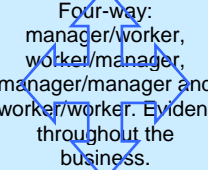
1. **Leadership:** management leadership in providing resources.
2. **Communication and consultation:** opportunities for two-way 'meaningful' communication and consultation of the workforce.
3. **Results:** proof of worker input to decisions and worker issues being addressed.

Table 1 summarises how progress can be charted in each of these areas; Level 1 is below legal compliance while Level 5 is considered good practice and should yield the best results.

1. Leadership

This includes setting up a framework, allocating resources such as training and management support, and allowing time for on-site communication and consultation. Ongoing measurement and building on results is then required to sustain the process. There should be a policy to explain how worker engagement is achieved. Senior managers need to set objectives for training, including health and safety training for workers and communications training for supervisors. Procedures and responsibilities need to be established, for example, the methods of communication to be used, who is responsible for instigating and managing the process and who will be informed of outcomes.

Table 1: Worker engagement progress chart

Pillars	1: LIP SERVICE	2: THINKING	3: ACTING	4: MEASURING	5: IMPROVING
Leadership	No worker engagement policy in place or no evidence on how it is implemented	Plan for implementation is developed and objectives set. Responsibilities and duties allocated	Objectives being implemented. Support available to implement worker recommendations.	Objectives set and performance of managers and workers measured and monitored by senior management. Workers rewarded for input.	Process fully audited. 360° reviews. Continuous improvement. Objectives build on last year's results. Management have workers' trust and respect.
Communication & consultation	Direction Top down: manager / worker. 	Sporadic two-way: manager / worker, worker / manager. Supervisors trained in communication skills. 'Stop work' procedures in place. 	Consistent two-way: manager / worker, worker manager. Formal approaches evident. 	Two-way, multiple formal/informal approaches: manager/worker, worker/manager. Site-wide issues. 	Four-way: manager/worker, worker/manager, manager/manager and worker/worker. Evident throughout the business. 
	Issues	Workers put forward arguments for not implementing SSOW. No positive recommendations.	Workers understand why SSOW is in place but only welfare issues are discussed.	Includes physical site hazards. Knowledge of accident causation but proposed solutions are reactive e.g. PPE	Full knowledge of AC and prevention from management, planning and design issues, but proposed solutions restricted to site controls.
Results Key	No action. Worker has no influence over any management decisions.	Sporadic results. Worker views rarely considered. Little awareness of results or benefits.	Some influence. Worker views considered on minor issues. Results monitored.	Worker opinions always considered but not always actioned. Organisational learning through monitoring and communicating results.	Worker opinions always considered and actioned. Examples of management changing in response to challenge. Learning shared with others and benefits realised.

Abbreviations: SSOW safe system of work

PPE personal protective equipment

AC accident causation

2. Communication and consultation

The movement must evolve from a 'one-way', 'top-down' communication from management to workers to a 'two-way', 'top-down' and 'bottom-up' communication between management and workers.

Therefore, informing workers of health and safety rules that satisfy other regulations is just one half of the worker engagement equation specified under CDM 2007. The other half is that all required methods are in place that allow workers to actively communicate their views and concerns to the management.

Eventually, workers should also have the confidence to communicate with each other on health and safety issues, even between different sub-contractors. For this to work effectively the method of communication and consultation needs to be flexible, according to individual project conditions. For example, small projects will probably rely more on informal means of communication and consultation, while large projects will also need more formal methods.

Meaningful discussion will only take place when workers have received sufficient health and safety training. There are four main issues to consider when measuring progress:

- **The area of issues covered:** do the issues raised relate purely to welfare and/or physical hazards or do they extend wider, e.g. organisational management, safety culture, etc?
- **The objectives in developing the solutions:** where do these rank in the hierarchy of risk controls? Are solutions aimed at prevention, e.g. by design, or are they solely reactive, e.g. PPE?

- **The depth of understanding:** how well do workers understand how accidents happen beyond the immediate physical circumstances of an accident, e.g. lack of planning or last minute changes to the project, health and safety culture?
- **The ability to transfer issues:** what processes are in place to identify the sphere of influence when an issue needs action by someone other than the immediate line manager, e.g. senior management, plant manager, etc?

3. Results

These will depend on how the process impacts on the decisions of both management and workers – that is, the ability of workers to influence management and of management to influence workers. This should result in better informed, and therefore improved, management and worker decisions. As the influence of worker consultation on management decisions increases so does organisational learning. This is because the technical knowledge possessed by workers will make its way through the entire organisation. Likewise, the two-way process should result in worker behaviour changing, leading to improved health and safety.

Management should communicate the results of the worker engagement process, including how issues have been closed out, to workers. An 'action list' in a prominent place displaying measures that have been taken to improve health and safety can be one method of feedback to the workforce.

Choices available

Possible ways for engaging the workforce are described below (ACoP para 255). CDM 2007 has placed additional duties on principal contractors to consult with all workers involved in a project in order to ensure that the measures taken to protect the workers' health and safety are effective (ACoP para 254).

Safety representatives

Health and safety law recognises two types of worker representatives:

1. Those appointed by recognised trade unions under the Safety Representatives and Safety Committees Regulations 1977.
2. Those elected by the workforce under the Health and Safety (Consultation with Employees) Regulations 1996 (ACoP para 247).

Both types of representatives are entitled to paid time off in order to carry out their functions and for training to enable them to play a full and active part in securing health and safety provisions.

The roles of safety representatives include:

- being consulted 'in good time' over a large range of health and safety issues
- representing the workforce in discussions with the employer on health, safety or welfare
- inspecting the workplace for potential hazards, and being involved with risk assessment procedures
- attending safety committee meetings
- investigating notifiable accidents, cases of diseases or ill health, and dangerous occurrences
- receiving information from health and safety inspectors
- having access to relevant health and safety information.

Trade union safety representatives will usually receive training from the trade unions. Training for those who are representatives under the 1996 Regulations must be paid for by their employer (ACoP para 247).

In general, sites with safety representatives have been shown to be safer than those without. Trade union safety representative training is considered one of the best options. Safety representatives offer a source of information for workers and can influence others by example. Representation at board level and where many workers are present makes it easier to manage the process.

Site-specific induction

All workers need to receive an induction to inform them about any existing methods of worker engagement. In addition, arrangements for health, safety and welfare must be explained. This should include any relevant findings resulting from a risk assessment. Site rules need to be made clear, and the identity of the person who is responsible for implementing health and safety procedures on site clarified (ACoP para 244).

Pre-task briefings

These should be instigated at the beginning of a shift or task, or when something changes that will affect the worker. The briefing consists of discussing the work to be done and asking the worker to compare the risk assessment controls and method of work with the actual task in hand. Feedback is not restricted to the task and the worker is invited to also discuss any health and safety issue they desire. This can be communicated using a **feedback card**. However, like written surveys, problems may exist when asking construction workers to communicate issues in writing, hence other methods should also be considered.

Toolbox talks

These play an important part in worker engagement. Short talks focused around specific health and safety issues (such as lifting, slips and trips or falls from height) allow workers, safety professionals and managers to explore risks and develop strategies for dealing with these dangers. Toolbox talks help to demystify health and safety and show the relevance of specific topics to particular jobs. Toolbox talks should be concise and relevant, with plenty of opportunity for workers to input their ideas.

The right to stop work

Importantly, in the case of serious and imminent danger, all workers have the right to stop work and immediately proceed to a place of safety. Serious and imminent danger means that the risk of injury and ill health is serious, and that the danger will arise as soon as the work would begin (ACoP para 248). Contractors should consult with the workforce to ensure that all workers are aware of this right, and that they have procedures in place to effectively deal with such situations when they arise (ACoP para 248).

Safety committees

These also offer representation with the added advantage of including others, but committees must include workers to count as true worker engagement. If two or more union safety representatives request the employer to set up a safety committee, the employer must do so within three months of the request.

The tasks of safety committees include:

- developing safe systems of work and safety procedures
- reviewing risk assessments
- monitoring the effectiveness of health and safety training

- monitoring and reviewing the adequacy of health and safety communication and publicity within the workplace
- monitoring all arrangements for health and safety and revise them whenever necessary.

It is important that safety committees actually review health and safety systems. Any actions identified from meetings should be recorded and the completion dates logged. Where there has been close co-operation between managers and workers, good results have been achieved.

Informal approaches

These consist of *ad hoc* meetings or conversations, usually initiated by management walking through the site, at breaktimes or even during conversations about the work to be done. This is one of the most frequently used forms of engagement. To ensure it works properly it is recommended that site supervisors or managers carry a site diary or record actions in some way so they can be closed out. Successful informal methods can include regular scheduled walkabouts with members of management and the workforce.

Safety action groups

Also known as 'safety circles', these consist of volunteers who come together for the purpose of solving specific problems. They differ from a safety committee in that they do not have to meet at regular intervals. The group can follow up on recommendations from a **suggestion box**, but for larger organisations a **free phone number** may be better. The group is subsequently dissolved after each meeting until another problem arises that needs a solution. This is essentially a reactive approach but could be developed to be more proactive. Only required actions need to be recorded, which keeps paperwork to a minimum.

Surveys

This collectively describes any means of communication through paper-based media. Although this is usually without direct contact, it has the ability to reach every worker and can provide anonymity, which makes it a useful approach to alleviate any feelings of apprehension. However, asking construction workers to write down their views or recommendations may yield few replies. Oral communication can be better.

Non-English speaking workers

Language barriers to communication will adversely affect worker engagement and therefore an individual who may not speak or understand English will need the most help. A common way to deal with this problem is to have a supervisor or ganger who can interpret for the group. However, this person needs to be with the group at all times and alternative arrangements will need to be made when they are not available. This may include using an external interpreter. Risk assessments and method statements may need to be interpreted for special groups, assuming they can read. There are also some free leaflets available from the HSE in a variety of languages (www.hse.gov.uk/languages). Employers should offer English language courses for long term workers. Some employers already fund language courses, and there has been an enthusiastic take up of this provision.

Worker engagement on projects

Skills registration schemes such as passport, CSCS, CPCS or their equivalents, are a useful method of ensuring that everyone working on the site has some basic awareness of the hazards on construction sites and why controls are in place. Nevertheless, it is important that employers understand that passing the ConstructionSkills' health and safety test, for example, does not in itself constitute training. Thorough and continuous training needs to be provided to make sure that workers understand the physical hazards on construction sites and the underlying causes of accidents. Training also has the purpose of conveying a deeper understanding of how accidents may arise from issues beyond physical circumstances, and to make workers aware of the benefits and importance of their engagement and influence.

A site induction is expected on any site or place of work before a worker who is new to the site can start their job. This is an excellent opportunity to explain procedures for any worker engagement approach that is in place. It is also the first point at which feedback can be gained from workers on their initial impression of the site and/or procedures in place. Any feedback should be recorded and, if necessary, actioned.

Briefings should be undertaken by line managers to cover the work to be done that day (or shift) or prior to the nature of the work changing. Two-way communication is crucial at this point. Ensuring feedback is recorded and actioned can be done informally or formally, depending on the process adopted.

It is expected that site managers will, through the course of the day (or shift), 'walk the site' at least once. It is also customary for them to carry a notebook or site diary, and possibly a camera. This is an opportunity to discuss issues informally and record actions if necessary. Transferring any items that cannot be dealt with immediately to the action list will serve as a visual reminder.

Safety representatives enhance worker involvement by being a member of the health and safety committee and by assisting:

- formal employer/employee consultations
- any pre-project training
- day-to-day communications on site.

Safety representatives have access to training so they are likely to be more alert than other workers to health and safety issues and how to resolve them. Another advantage is that they are involved in practical work activities all the time, unlike safety advisors, supervisors or managers who have other office based tasks to perform. Their knowledge, training and experience can be utilised at the precise time that things start to go wrong.

When a worker leaves the site for the last time it is a good opportunity to gain an understanding of what they thought of the site and its management. This does not need to be a formal process but a pro-forma may help. Issues should include:

- how the worker rated the site for health and safety
- a similar rating of the site manager
- reason for leaving
- any recommendations for improvement.

Conclusion

Management leadership, through the allocation of resources, will create opportunities for improved communication and consultation and successful worker engagement. Benefits of effective worker engagement are numerous, most importantly leading to healthier and safer working conditions of those working on site. However, meaningful discussions will only take place if workers possess the competence, i.e. knowledge, training and experience.

They also need to be motivated. Intangible benefits thought to motivate workers in this respect may include increased knowledge, respect from their peers and even possible enhanced employment opportunities. Therefore, to sustain the process and realise the benefits of worker engagement, managers need to act on workers' feedback in order to win their trust and respect.

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