

Leaflet 21 Workplace Health and Safety Inspections



AMENDMENT RECORD

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Leaflet 21

WORKPLACE HEALTH AND SAFETY INSPECTIONS

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Foreword

This leaflet is published under the authority of the Chairman of the Defence Occupational Health and Safety Board (OHSB). This leaflet is for application across all areas of MOD and the Armed Forces both at home and overseas, and reflects any changes in legislation and/or MOD practises.

1. SCOPE

1.1 The aim of this leaflet is to provide a framework for conducting Health & Safety inspections of the workplace and deals with the requirements for and the conducting of general health and safety inspections of the workplace. The leaflet covers relevant aspects of compliance with the Management of Health and Safety at Work Regulations (MHSWR), the Workplace (Health, Safety and Welfare) Regulations (WHSWR), the Safety Representatives and Safety Committees Regulations (SRSCR) (as amended), the Health and Safety (Consultation with

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¹ The WHSWR are not applicable to RN ships or submarines, however compliance is required so far as is reasonably practicable; Ref SofS policy statement on safety, health, environmental protection and sustainable development.

Employees) Regulations and the general duties under the Health and Safety at Work, etc, Act (HSWA) and, where applicable, the Merchant Shipping Act.

1.2 This leaflet is intended for use by Line Managers, both Service and civilian, who have been delegated responsibilities by the Head of the Establishment (HoE) / Commanding Officer (CO) for a workplace (the term workplace is used to define any area (indoors or outdoors) where work activities are carried out).

2. INTRODUCTION

- 2.1 Workplace health and safety inspections should aim to cover specific selected work areas within an organisation or workplace and should not be confused with health and safety audits designed to cover all aspects of a safety management system. Inspection reports may however form part of an audit trail demonstrating that appropriate arrangements are in place for active monitoring of the safety management system.
- 2.2 This leaflet does **not** cover areas where there are already clearly defined legal inspection requirements for work equipment (e.g. pressure vessels, lifts, cranes, chains, ropes, lifting tackle, scaffolds, local exhaust ventilation (LEV), groundwork's etc.). Guidance on these inspection requirements are detailed in other relevant leaflets within JSP 375 Vol 2.
- 2.3 Workplace health and safety inspections provide a key input to hazard identification, prioritisation and in monitoring the effectiveness of control measures instigated as a result of risk assessments. Where line managers are unsure of the requirements of any regulations relating to health and safety in their workplace they should contact their Unit/Establishment Health & Safety Advisor or appropriate Health &Safety Focal Point for advice.

3. MOD POLICY

- 3.1 It is MOD policy that all MOD workplaces are subject to a workplace health and safety inspection at intervals not exceeding 6 months.
- 3.2 Royal Fleet Auxiliary (RFA) vessels are to be inspected in accordance with the Merchant Shipping Code of Safe Working Practices for Merchant Seamen, Regulation 16 (1) (c).

4. ROLES AND RESPONSIBILITIES

- 4.1 Head of Establishments / Commanding Officers are to:
 - a. Identify and nominate Line Managers (Service or civilian), who are from this point on referred to in this leaflet as Nominated Line Managers (NLMs) who will be responsible for all work areas. The number of NLMs and at what level should be decided within each workplace but should be adequate to ensure all areas are included whilst avoiding duplication of effort.

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- b. Ensure that regular health and safety inspections are carried out within their identified area(s) of responsibility.
- c. Have in place procedures to manage the actions required as a result of the inspections.

4.2 Nominated Line Managers (NLMs) are to:

- a. Ensure that regular health and safety inspections are carried out within their identified area(s) of responsibility. However, the frequency of inspection will be dependent on the circumstances of the work being undertaken and the premises concerned.
- b. Produce an inspection report and, if required, an associated action plan.
- c. Raise and submit any works requests or requisitions identified as a result of the inspection.
- d. Where applicable, manage the implementation of the action plan, reporting through the chain of command any actions failing to meet the action dates or failing to adequately manage the risks.

5. SAFETY REPRESENTATIVES (SRs)

- 5.1 The Safety Representatives and Safety Committees Regulations (SRSCR) (as amended) and the Health and Safety (Consultation with Employees) Regulations also make provision for SRs to undertake workplace health and safety inspections providing they have given the employer reasonable notice of their intentions in the following circumstances:
 - a. If they have not completed an inspection within the previous 3 months.
 - b. Where there has been a substantial change in the conditions of work.
 - c. Where there has been a notifiable accident or dangerous occurrence or disease and the interests of employees they represent may be involved.

6. AIM & FOCUS

6.1 The aim of workplace health and safety inspections is to prevent work related accidents and ill health. Against the background of legal and policy requirements for workplace health and safety, workplace inspections should particularly focus on monitoring relevant Risk Control Measures (RCMs) and on identifying and correcting deficiencies that present significant risk.

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6.2 To be effective workplace inspections need to take account of the fundamental components common to most workplace activity and risk creation, namely: people, procedures, premises and plant, and substances. Due regard has to be given to the interaction between these components and the existence of related RCM.

7. PEOPLE

7.1 When conducting a workplace inspection the NLM needs to identify and list the various categories of people who may be affected by, or impact on, the workplace activity. This may include neighbourhood workers, contracted staff, trainees, visitors, Service dependants or members of the public, some of whom may warrant special consideration. The NLM should then consider the workplace hazards these people may face and the existence and effectiveness of related RCMs in operation. In addition the LM should also include a review of the training and competence of his staff.

8. PROCEDURES

- 8.1 Workplace procedures are concerned with all aspects of the way work is done establishing the 'what', 'where', 'when' and 'how' of the work activity. Generally workplace procedures exist and interact on three different levels:
 - a. Task-specific procedures directly related to the normal work activity, allocating who is to do what, where, when and how.
 - b. Supportive procedures or arrangements that provide for the supervision and management of the work activity, and arrangements for maintenance, training, resource supply, security, etc.
 - c. Emergency/change procedures to account for 'abnormal' conditions arising from breakdowns in control, significant changes in circumstances and traditional emergencies such as accidents, fire, flood, security alert, etc.
- 8.2 Procedures link people with the work environment and any plant, equipment, substances/materials used or generated at work. As such workplace procedures often make the most significant contribution to both the creation and control of workplace risks.
- 8.3 The NLM should refer to workplace risk assessments to identify the most significant procedures. The NLM should be competent to identify any flaws in existing procedures or the difference between what / how work should be done and the actual methods being employed. This latter point is vitally important as, having perfect written job instructions, work rules or Standard Operating Procedures (SOPs), will count for nothing if they are not applied in practice. A safe working environment is the product of what is done and how, not purely what is written.

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9. PREMISES

- 9.1 The nature, design and construction of premises where work activities are conducted have a significant impact on workplace health and safety. The WHSWR detail general requirements for ensuring workplaces are safe and without risk to health. These are a useful guide for the NLM to determine the general conditions which, so far as reasonably practicable, should exist within a 'safe' workplace, and include:
 - a. Maintenance and repair of workplaces.
 - b. Ventilation, temperature and lighting.
 - c. Cleanliness, workspace, workstations and seating.
 - d. Floors, traffic routes, doors, windows.
 - e. Fall protection.
 - f. Sanitary conveniences, washing facilities and welfare arrangements.
- 9.2 In addition to the general requirements of the WHSWR, other statutory and non-statutory requirements may apply to the premises and its facilities, e.g. the Health and Safety (First Aid) Regulations, the Work at Height Regulations or the Joint Services Accommodation Code (JSP 315).
- 9.3 The NLM should conduct his workplace inspection with a view to determining the extent to which relevant requirements are met and the need for any specific remedial works or RCMs. The inspection should enable the NLM to draw conclusions about the overall suitability of the premises for which it is being used.

10. PLANT & SUBSTANCES

- 10.1 In most work places plant, equipment, or substances/materials are likely to be stored, handled, transported, used or produced. Indeed workplace plant, equipment or substances will often represent the primary hazards and significant risks within premises, necessitating suitable RCM.
- 10.2 When conducting a workplace inspection the NLM must consider the existence of plant and substance hazards/risks. These should be related to where and how work activities are being carried out and the potentially exposed population. Particular attention should be given to:
 - a. The availability of adequate information, and if necessary warnings regarding the nature of the plant/substance hazards concerned;

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- b. The existence and maintenance of suitable engineering controls, where appropriate, rather than the reliance on use of personnel protective equipment (PPE);
- c. The arrangements to deal with possible loss of control or emergencies.

11. PREPARATION & PLANNING

- 11.1 Workplace health and safety inspections need to be more than just a simple hazard spotting tour of the premises and should adopt a more holistic and planned approach to the task. The NLM should already be familiar with the workplace activity, premises, equipment, personnel and procedures pertaining to his area of responsibility and should draw on this valuable knowledge when preparing for a workplace inspection by:
 - a. Thinking about each of the four fundamental components, firstly as individual issues, then collectively, to identify significant hazards and other factors (who does what, where, when and how).
 - b. Considering the interaction between these components to establish how risks are generated and controlled.
 - c. Reviewing previous inspection reports, accident/incident reports and other records.
 - d. Preparing a workplace inspection checklist that covers general workplace health and safety requirements and any other significant matters. (A suggested format for a checklist, including some general requirements is given at Annex A).
 - e. Planning to ensure that the inspection takes place during a time considered to be representative of normal working conditions.

12. PRACTICAL ASPECTS OF WORKPLACE INSPECTIONS

- 12.1 The following list provides some practical guidance to help the NLM complete the workplace inspections in the most effective manner:
 - a. Throughout the inspection refer back to the interaction between the four components of workplace activity and risk creation people, processes, premises, plant and substances.
 - b. Use an inspection checklist as an aide, but do not let it limit the scope of the inspection.
 - c. Review competencies and training requirements/records for staff.
 - d. Check risk assessments, equipment documentation and maintenance records.

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- e. Talk to as many staff as possible, listen to their observations/problems and suggestions.
- f. Expect people to be on their best behaviour; beware of false impressions.
- g. Do not get distracted by trivial risks or issues.
- h. Look for potential shortcuts in work procedures or deviations from good practice.
- i. Take account of both normal and potential abnormal work conditions and activities.
- j. Where possible, put remedial measures in place immediately.

13. POST INSPECTION ACTIONS

- 13.1 In all cases formal reports should be produced detailing any observations, and the recommended actions to be taken, additionally the NLM shall:
 - a. Prepare an action plan setting follow-up/review dates and responsibilities.
 - b. Submit any works requests, training bids or equipment demands in a timely manner.

14. RECORDS & INSPECTION REPORTS

- 14.1 Records should be maintained of any workplace health and safety inspections undertaken. This should include any inspection notes and checklists raised, as well as any formal post inspection reports and action plans produced. For audit purposes these should be retained in the relevant workplace in accordance with JSP 375 Vol 2 Leaflet 55.
- 14.2 Copies should also be kept available of any work services request; equipment or material demands and training support requests. These records should include, as appropriate, the dates of submission, review, any hastening action and completion of task.

15. RELATED DOCUMENTS

15.1 The following documents should be consulted in conjunction with this leaflet:

JSP 375 Vol 2

a. Leaflet 23 – Site Risk Assessment.

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- b. Leaflet 28 Workplace, Health, Safety and Welfare.
- c. Leaflet 39 Risk Assessment.
- d. Leaflet 55 Retention of Records.

Guidance and Legislation

- a. The Management of Health and Safety at Work Regulations (MHSWR).
- b. The Workplace (Health, Safety and Welfare) Regulations (WHSWR).
- c. The Safety Representatives and Safety Committees Regulations (SRSCR) (as amended).
- d. The Health and Safety (Consultation with Employees) Regulations.

16. DEFINITIONS

Audit means the structured process of

collecting independent information on the efficiency, effectiveness and reliability of the health and safety management system and drawing up

plans for corrective action.

Line Manager A person, military or civilian, with direct

responsibility for the safe conduct of the

work activity.

Premises includes any place and, in

particular, includes:

• Any vehicle, vessel, aircraft or

hovercraft;

 Any installation on land (including the foreshore and other land intermittently covered by water), any offshore installation, and any other installation (whether

floating, or resting on the seabed or the subsoil thereof, or resting on other land covered with water

or the subsoil thereof); and,

Any tent or movable structure.

Routine inspection means an inspection carried out at suitable and sufficient

Routine Inspection

intervals considered proportionate to the risks associated with the workplace in question. Guidance on the intervals may be sought from the unit/establishment Health and Safety Advisor and appropriate Health and Safety Focal Points within the normal chain of command.

Risk Control Measures

An item, procedure or system introduced to eliminate or reduce risk.

Workplace

Workplace means any premises or part of premises (including ships, aircraft etc) which are not domestic premises and are made available to any person as a place of work, and includes:

- Any place within the premises to which such person has access while at work.
- Any room, lobby corridor, staircase, road or other place used as a means of access to or egress from the workplace or where facilities are provided for use in connection with the workplace other than a public road.
- Where areas such as corridors and staircases are shared by more than one workplace an agreement should be made with the unit/establishment "landlord" (i.e. the organisation in charge of the site) as to who is responsible for inspecting those areas.

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CONDUCTING HEALTH AND SAFETY INSPECTIONS OF THE WORKPLACE

CONTENTS

- 1. Introduction
- Checklist
- 3. Bullet point matrix
- 4. Sample Health and Safety Inspections of the Workplace Checklist
- Sample Action Plan Performa

1. INTRODUCTION

1.1 The following checklists and bullet point matrix are designed to give general guidance on what facilities may be needed to make the workplace safe and healthy and to provide a reasonable standard of welfare for workers and visitors alike. The list is not considered a definitive one and is not designed to cover every aspect of every workplace.

2. CHECKLIST

A SAFE	PLACE	TO V	NORK

Adequate space for easy movement and safe machine adjustment

No tripping hazards (trailing wires etc)

Handholds or guard rails where people might fall

Emergency provisions e.g. life belts/jackets for work near water, means of escape from freezer rooms

Safety glass in spring doors and on busy gangways

Neat and tidy storage of tools

Furniture placed so that sharp corners don't present a hazard to passers-by.

DESIGN FOR HEALTH

Seats and benches at a sensible height, and lifting aids to reduce back injuries

Seats of suitable design, construction and dimensions with a back rest supporting the small of the back and, if needed, a foot rest

Machine controls and instruments designed and arranged for best control and posture

Engineering controls, like local exhaust ventilation systems, to reduce health risks from dangerous substances and noise

Special tools and good design of working areas to reduce hand and forearm injury caused by repetitive movements.

CLEANLINESS

Premises, furniture and fittings kept clean

Good housekeeping to clear trade waste, dirt and refuse

Rubbish and food waste covered and regularly removed to keep premises clear of pests

Regular cleaning up of spillages

Floors and steps washed or swept regularly

Internal walls and ceilings washed or painted regularly

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FLOORS AND GANGWAYS

Kept clean, dry and non-slip

Good drainage in wet processes

Suitable footwear or working platforms provided where necessary

Ramps kept dry and with non-skid surface

Gangways and roadways (pedestrian & vehicular separated) well marked and kept clear

Level, even surfaces without holes or broken boards

Floor load capacities posted in lofts, storage areas etc

Salting/sanding and sweeping of outdoor routes during icy or frosty conditions

Steps, corners and fixed obstacles clearly marked e.g. by black and yellow diagonal stripes

Floor openings, e.g. vehicle examination pits, kept covered when not in use and the edges clearly marked

LIGHTING

Good general illumination with no glare

Regular cleaning and maintenance of lights and windows

Local lighting for dangerous processes and to reduce eye strain and fatigue

No flickering from fluorescent tubes (it can be dangerous with some rotating machinery)

Adequate emergency lighting

Specially constructed fittings for flammable or explosive atmospheres e.g. during paint spraying

Outside areas satisfactorily lit for work and access during hours of darkness for security as well as safety

Light coloured wall finishes to improve brightness, or darker colours where appropriate (e.g. to reduce arc welding flash)

HYGIENE AND WELFARE

Separate toilets for each sex (subject to certain exemptions), marked appropriately

Toilets ventilated, kept clean, in working order and easily accessible

Ventilated space between toilet and any workroom

Wash basin with hot and cold (or warm) running water

Soap and towels (or electric hand dryer). Nail brush where required

Barrier cream, skin cleansers and skin conditioning cream provided where necessary

Waste bins (regularly emptied)

Special hygiene precautions where necessary (e.g. showers, or long handles taps where food is handled)

Adequate provision for workers away from base

Drying space for wet clothes

Lockers or hanging space for work/home clothing

Clean drinking water supply – clearly marked

Adequate facilities for taking food and drink, particularly for shift and night-time workers, with wash-up sink and means of heating water

COMFORT

Comfortable working temperature – usually above 16°C (60°F) for sedentary occupations

Suitable clothing in high or low temperatures (e.g. freezer rooms) or a heated rest room (e.g. tyre changing premises)

Good ventilation (avoiding draughts) particularly in high humidity

Mechanical ventilation where fresh air supply is insufficient

An easily read thermometer in the workroom

Heating systems should not give off fumes into the workplace

Noise levels controlled to reduce nuisance as well as damage to health

Heat stress reduced by controlling radiant heat (especially near head level) and local 'hot spots'.

Rest facilities for pregnant women and nursing mothers.

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3. BULLET POINT MATRIX

3.1 The following matrix is designed to complement the sample questionnaire at the end of this section in providing a range of bullet points that may be relevant to a particular workplace. It may also be used as a guide if individuals wish to design a workplace health and safety inspection form for a specific workplace.

ISSUE	PEOPLE	PROCEDURES	PREMISES	PLANT & SUBSTANCES
GENERAL	All staff and contractors identified. Potential risks to non-employees. Provision for Information, Instruction, Training and Supervision. Control of access/movement. Provision of PPE. Welfare and hygiene requirements.	Safe Systems of Work: Standing Operating Procedures (SOPs). Maintenance/cleaning procedures. Permit to Work procedures. Emergency arrangements. Risk Assessment arrangements. Training needs assessments. Accident Reporting and First Aid. Waste Disposal.	Suitable design and construction. Maintenance and repair. Housekeeping and hygiene. Access/Egress arrangements / routes. Heating lighting and ventilation. Services: water, gas electricity. Physical hazards: Noise. Radiation. Warning signage and markings.	Suitability and maintenance/ repair. Examinations and controls. Operator/User training requirements. Risk Assessment. Associated hazard control: Noise. Dust, fumes, gases. Temperature or pressure.
ACCESS EGRESS	Control of Access. Induction training. Emergency arrangements.	Security Arrangements. Escorting visitors. Emergency drills. Speed limits.	Vehicle routes. Pedestrian routes. Signage / markings. Housekeeping. Maintenance/repair – floors/ stairs/ roads.	Speed limits. Spillage risk / control.
FALLS & HEIGHTS	Restricted access. Hazard training. PPE - Helmets/ harnesses etc.	Risk Assessments. Permits to Work. SOPs.	Stairways/ladders. Edge protection. Fall arrest anchors. Handrails / guardrails. Signage / markings.	Ladder maintenance. Fall arrest/restraint equipment specification & examination. PPE – helmets/harnesses
	Authorised user/operator/driver. Training of user/operator/driver. Supervision. Maintenance and cleaning staff. PPE.	Risk Assessments. SOPs for use. Use of safeguards. Restricted use. Maintenance arrangements/SOPs	Maintenance and cleaning. Signage/markings. General lighting. Noise assessment / control.	Guarding of dangerous parts. Power isolation / cut-off. Maintenance, repair and exam. Task lighting. Ventilation & fume / dust control. Fail to safety.
ELECTRICAL EQUIPMENT	User/Operator training. Electrical hazard awareness. Authorised maintenance/repair. User checks.	Registration and examination. Maintenance arrangements/SOPs. Permits to Work. Isolation procedures. Emergency power supplies. User visual checks.	System specification & integrity. Environmental factors – water / vapour proofing, insulation/protection. Provision of RCD / breakers. Signage/markings.	Maintenance, repair and examination. Suitability for environment. Use of extension cables/sockets. Low voltage alternatives. Use of RCD.

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WELFARE	Awareness. Supervision.	Rules on eating, drinking and smoking. Maintenance and cleaning. Working hours/ rest arrangements.	Sanitary conveniences – access/adequacy. Ablutions. Washing/changing facilities. Dining arrangements. Drinking water – access.	Maintenance and repair. Cleaning arrangements. Clothes storage.
FIRST	First Aider training/competency. First Aid information. Awareness/ Induction training.		First Aid room requirements. Notices and Signs.	First Aid equipment – suitability and availability. Maintenance and control.

4. SAMPLE HEALTH AND SAFETY INSPECTIONS OF THE WORKPLACE CHECKLIST

UNIT / ESTABLISHMENT	SERIAL NO
SUB UNIT	
BUILDING / WORK AREA	
NAME	DATE

- 1. The checklist below is an example. Checklists should cover all areas of the workplace to be inspected.
- 2. Various categories are already identified and specific points for consideration bulleted, this is **NOT** an exhaustive list.
- 3. Any required actions identified shall be included on the action plan and monitored through to completion.
- 4. Completed checklists and action plans form part of the inspection report and must be kept for a minimum of five years.

	Area to Consider	Yes/No/NA	Comment
1.	Are workers aware of the general health and safety legislation applicable to their workplace?		
2.	Is the organisation's health and safety policy statement available to the workforce?		
3.	Have departmental safety representatives been nominated and are personnel aware who they are?		
4.	Are persons aware of specific health and safety responsibilities associated with individual TORs or job descriptions?		
5.	Have suitable and sufficient written risk assessments been carried out on significant hazards within the workplace and findings		

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	brought to the attention of staff and other relevant persons?	
6.	Have other risk assessments in respect of the following been carried out: Substances hazardous to health. Noise and risks to hearing. Manual handling operations. Display screen equipment. Personal protective equipment. Work equipment.	
7.	Do written systems of work exist for hazardous operations?	
8.	Are workplace health and safety rules available, promoted and enforced?	
9.	Are documented procedures presented in such a way that they are comprehensible to staff?	
10.	Are staff aware of formal procedures for emergency responses (e.g. fire, bomb and explosion)?	
11.	Are health and safety training records available?	
12.	Are procedures in place for the reporting of injuries, near misses, diseases and dangerous occurrences?	
13.	Are there procedures in place for staff to report health and safety problems or suggest improvements to existing procedures?	
14.	Is a hazard spotting system in operation?	
15.	Is the provision for first aid adequate?	
16.	Are first aiders adequately trained and retrained?	
17.	Are first aiders known to all staff?	
18.	Are staff aware of the organisation's health and safety committee?	
19.	Are items of machinery, plant, hand tools, access equipment, electrical equipment, storage equipment, warning systems, first aid boxes, welfare and amenity areas etc. inspected on a regular basis?	
20.	Are fire and emergency plans practised on a regular basis?	

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21. Are all fire exits and escape routes marked, kept free from obstruction and operational?	
22. Are all fire appliances correctly maintained?	
23. Are there adequate cleaning schedules in place and are they monitored?	
24. Is housekeeping of a high standard e.g. material storage, waste disposal, prompt removal of spillage?	
25. Are all gangways, stairways, fire exits, access and egress points to the workplace maintained and kept clear?	
26. Is environmental monitoring of temperature, lighting, ventilation, humidity, radiation, noise and vibration available and carried out if required?	
27. Are local exhaust ventilation systems (LEVs) examined, tested and maintained on a regular basis?	
28. Are LEV test and maintenance certificates available in the workplace?	
29. Are hazardous substances stored and handled in a safe manner?	
30. Are hazardous substances identified and correctly labelled?	
31. Is appropriate protective clothing available where risk assessment identifies a need?	
32. Is personal protective equipment used correctly?	
33. Are storage facilities for PPE provided?	
34. Are welfare amenity provisions i.e. sanitation, hand washing, showers and clothing storage arrangements adequate and kept clean?	
35. Is the means of promoting health and safety adequate?	
36. Is effective use made of safety propaganda e.g. safety posters?	
37. Are safety signs adequate in terms of assessed risk?	
38. Are fire instructions prominently displayed?	
39. Are individual training needs of staff	

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identified and assessed on a regular basis? 40. Is staff health and safety training undertaken: At the induction stage. On their being exposed to new or increased risks because of: Transfer or change of responsibilities. The introduction of new work equipment or a change in existing works equipment. The introduction of new technology. The introduction of a new system of work or a change in existing systems of work. 41. Is the training repeated or adapted to take account of new or changed risks and carried out in works time? 42. Is specific training carried out for workers exposed to specific risks (e.g. first aiders, forklift truck drivers, crane drivers etc.). 43. Are staff trained in the correct use of fire appliances? 44. Other Issues (Specify)

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5. SAMPLE ACTION PLAN PROFORMA

ACTION PLAN HEALTH AND SAFETY INSPECTIONS OF THE WORKPLACE							
UNIT / ESTABLISHMENT SERIAL NO							
SUB UNI	Т						
BUILDIN	G / WORK AREA		NAME			DATE	
Serial No	Required				npletion Date	Effectiveness of Remedial Action	

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