**Phil Chambers**

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Strategic
Safety Systems

# Strategic Safety Systems Ltd. Newsletter

## September 2011

**Dear Philip,**

Welcome to the September edition of our newsletter. What we aim to do is to provide information which is of use to you and to let you know the activities in which we have been involved. We also aim to let you know of any incidents that have occurred in, and legislation that is related to, the areas in which we work. We realise that, with the broad sprectrum of our activities, some may not be relevant to you but we hope you find the rest useful.

Whilst the intention of this newsletter is to be useful, we realise that most people are plagued by spam and should you wish to prevent future issues being sent to you, unsubscribe using the link at the botton of the page.

Regards,

Philip Chambers
Strategic Safety Systems Ltd.

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## RIDDOR reporting changes

Don't get too excited; the change to 7 day reporting hasn't been implemented yet.

What has changed is that from 12th September, you will only be able to use the phone to report fatal and major injuries and incidents to the Health and Safety Executive (HSE). You will have to report all other work-related injuries and incidents via one of a suite of seven online forms available on HSE's website.

Also, HSE's Infoline telephone service which until the end of September provided a basic information service to callers has ended.

Instead, from 30 September, those seeking information and official guidance will be directed to HSE's website which the HSE state as being a huge knowledge bank where you can access and download resources and use interactive web tools free of charge

## Changes to waste transfer notes

From now on, waste transfer notes *should* have a box that the waste producer ticks to confirm that they have followed the waste hierarchy. I can't see that this is a problem with waste transfer notes for hazardous waste that are issued at the time that waste is collected but can foresee a problem with bulk transfer notes, ie those that are sent out once a quarter or once a year. What *should* happen is that these should have a box to tick and the waste producer *should* send these back. When you receive such a note, tick it and return it; if the note doesn't have a box to tick, then ask your waste transfer company for a note that complies with the Waste Regulations 2011.

## Beware how guard interlocking actually works on new machinery

Avid readers of this newsletter will already know that SSS often flags problems with CE marking; it isn't the most rigorous system. A common problem we see is that interlock systems for guards and emergency stops are used as inputs to the PLC control system. Whilst the interlock devices and their relays are high-reliability designs, this is not necessarily true of the PLC, or more precisely, the PLC's software. We know of two cases where this approach has caused injury; in one case this was multiple amputation.

What manufacturers must do is:

- Carry out an analysis under ISO 13849 - Safety-related parts of control systems

- Site the isolation devices so that the mean time to failure (MTTF) of the entire safety related control system meets the requirement from this analysis.

It may mean that the safety related control system acts downstream of the PLC.  This is good practice anyway and we know of one major company where this is one of their mandatory requirements on machinery they purchase.

One might take the approach that purchasing equipment from a reliable manufacturer meets the purchaser's obligations but you still have obligations under PUWER and we advise you to assure yourself that the manufacturer has actually followed that which is now required.

## INTACT used for ISO 27001 data

The SSS integrated action management system, INTACT is in use with many companies for 9001, 14001, 18001, FSC, PEFC and general safety management.  SSS have introduced a module for information security and we have been working closely with one company who is seeking certification to ISO 27001 Information Security Management.  The modules include a risk assessment capability tailored to information risks such as loss of confidentiality, loss of availability, etc., with action plans to address and defficiencies.
Whilst ISO 27001 isn't a common requirement, this function in INTACT does make life easier for those companies that require certification to meet customer requirements.

## New INTACT module for ISO 50001

The next phase of INTACT is underway. This will add a module to suit the requirements of ISO 50001 Energy Management Systems.  The new module will suit existing users of INTACT who are starting to work towards certification to this standard but it could be used by new users of INTACT.  When this is introduced, INTACT will have the following modules:

- Quality
- Health and safety
- Environment
- Training
- Calibration and planned maintenance
- Information security and business continuity
- Energy management

## CE assessment record system updated

As mentioned in the last newsletter, SSS has introduced a CE assessment record system.  This is the latest in a long line of SSS structured reporting systems which provide a rigorous structure for assessments whilst removing tedious tasks which were previously present. What we have now incorporated is an analysis and reporting function for ISO 13849 Safety Related Control Systems.  I know we criticised companies who are not yet following this system but I have to admit that ISO 13849 is a very clumsy standard and is difficult to follow.  This goes some way to explaining why it's mandatory implementation date was postponed for 12 months.

What the SSS CE system now does is to have a simple way of determining performance levels required (PLr), show how this may be attained and then enables you to verify that your safety related control system actually meets the requirements. Finally, the system delivers a report showing all of this, which is an essential part of the technical file.

I hope you have found this information of interest. If you have any suggestions of other information you would like to see, please contact me.
Regards,

Philip Chambers
Strategic Safety Systems Ltd.

**Forward email**