

## Justification for action 1

Action	Purchase a mobile 'bridge' to allow mechanics to be able to safely access both sides of the inspection pit when working at ground level (hazard category 'work at height').
Specific legal arguments	The specific legal duties that NGG need to meet are under the Work at Height Regulations 2005. There is a duty to ensure that work at height is "4(a) properly planned ... 4(c) carried out in a manner which in so far as is reasonably practicable safe...". Instructions are given to the workforce to walk around the inspection pit if they are working in the area, but these instructions are usually ignored; workers will jump across the pit rather than work around it. Relying on instructions alone for something that could cause severe injury ie, falling into the inspection pit accidentally, would not satisfy the legal requirements for working safely. NGG Ltd are, therefore, failing in this duty.
Consideration of likelihood AND severity	<p>The <b>likelihood</b> of injuries occurring from working in and around the inspection pit is very likely. This is due to the inspection pit being in daily use and most mechanics will work in this area at least two to three times per week for an average of two hours per job.</p> <p>When considering the <b>severity</b>, I set 4 categories:</p> <ul style="list-style-type: none"> <li>• minimal: no injury or damage occurred</li> <li>• minor: injury requiring first-aid and/or repairable damage caused to plant/equipment/buildings</li> <li>• major: injury requiring hospital treatment/stay and/or significant damage caused to plant/equipment/buildings</li> <li>• catastrophic: death and/or irreparable damage to plant/equipment/buildings.</li> </ul> <p>The severity rating for this hazard being realised has been set at 'major'. It is very probable that injuries will require hospital treatment eg, broken limbs or possibly head injuries. Damage to equipment is also likely to be significant if it is dropped into the pit while workers are trying to jump across.</p>
How effective the action is likely to be in controlling the risk. Explanation to include: <ul style="list-style-type: none"> <li>• the intended impact of the action;</li> <li>• justification for the timescale that you indicated in your risk assessment;</li> <li>and</li> <li>• whether you think the action will fully control the risk.</li> </ul>	<p>The bridge will improve working practices in the area of the inspection pit as it will stop workers from jumping from one side of the pit to the other.</p> <p>I have given a timescale of two months as this is a specialised piece of equipment that nobody in the business has used before. The business will need to source a supplier and then arrange a delivery date. It is hoped that this project will be completed well within the two-month timeline.</p> <p>This action will fully control the risk as long as the bridge is used, maintained and inspected as set out in the safe system of work that will be produced following the purchase.</p>

## Justification for action 2

Action	Enclosed area to be set up for sanding/grinding operations including a suitable local exhaust ventilation system (hazard category 'hazards substances').
Specific legal arguments	Specific legal duties come under the Control of Substances Hazardous to Health Regulations 2002. The employer must “ <i>ensure that the exposure of employees to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled</i> ” (Regulation 7). This duty is not, therefore, not being met due to excessive amount of dust currently present on site. Any cases of occupational asthma or cancer must be reported to the Health and Safety Executive (HSE) (Reporting on Injuries, Diseases and Dangerous Occurrences Regulations 2013, Regulation 8).
Consideration of likelihood AND severity	<p>The <b>likelihood</b> that workers will become ill through inhaling the process dust from sanding/grinding activities is very high. The worker is close to the source and, at the moment, facemasks are not worn regularly by all relevant workers.</p> <p>Please see 'Justification 1' for the severity categories. Most of the workforce and the general public using the garage are currently exposed to the process dust as these operations are not carried out in an enclosed area. Inhalation of dust could cause occupational asthma; breathing in dust over a prolonged period could also cause occupational cancers. The <b>severity</b> is likely to be between 'major' and 'catastrophic' for workers carrying out the activity or those working nearby. For members of the public it is likely to be 'minimal' as they will rarely visit the garage and will not be directly in the area where work is carried out.</p>
<p>How effective the action is likely to be in controlling the risk. This should include:</p> <ul style="list-style-type: none"> <li>the intended impact of the action;</li> <li>justification for the timescale that you indicated in your risk assessment; and</li> <li>whether you think the action will fully control the risk.</li> </ul>	<p>The dust enclosure will have a major impact on reducing the amount of dust in general work areas as the enclosure will stop the spread. I have given a timescale of six months for this to be completed as plans will need to be drawn up and the budget for the project will also need to be agreed with the managing director. I would hope that this will be the maximum amount of time that this project will need to be completed.</p> <p>Once installed the dust enclosure alone will not fully control the risk but will significantly reduce it. If it is used in conjunction with the other suggested control measures eg, 'on tool extraction' it should fully control the risk.</p>

### Justification for action 3

Action	Purchase of 'on tool' dust extraction systems (hazard category 'hazardous substances').
Specific legal arguments	Specific legal duties come under the Control of Substances Hazardous to Health Regulations 2002. The employer must " <i>ensure that the exposure of employees to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled</i> " (Regulation 7). This duty is not, therefore, being met due to excessive amount of dust currently present on site. Any cases of occupational asthma or cancer must be reported to the Health and Safety Executive (HSE) (Reporting on Injuries, Diseases and Dangerous Occurrences Regulations 2013, Regulation 8).
Consideration of likelihood AND severity	<p>The <b>likelihood</b> that workers will become ill through inhaling dusts from sanding/grinding activities is very high. The worker is close to the source and, at the moment, facemasks are not worn regularly by all relevant workers.</p> <p>Please see 'Justification 1' for the severity categories. Most of the workforce and the general public using the garage are currently exposed to dust as these operations are not carried out in an enclosed area. Inhalation of dust could cause occupational asthma; breathing in dust over a prolonged period could also cause occupational cancers. The <b>severity</b> is likely to be between 'major' and 'catastrophic' for workers carrying out the activity or those working nearby. For members of the public it is likely to be 'minimal' as they will rarely visit the garage and will not be directly in the area where work is carried out.</p>
<p>How effective the action is likely to be in controlling the risk. This should include:</p> <ul style="list-style-type: none"> <li>the intended impact of the action;</li> <li>justification for the timescale that you indicated in your risk assessment; and</li> <li>whether you think the action will fully control the risk.</li> </ul>	<p>This action will have a major impact on the majority of the workforce; the extraction tool will remove the dust at source meaning that the amount of dust present in the air won't be as concentrated as it is at present. I have given a timescale of within one month for the on-tool extraction systems due to the immediate impact this will have on reducing the amount of dust in the area. The budget for the purchase of the systems needs to be agreed with the Managing Director.</p> <p>This action alone won't fully control the hazard. It needs to be used in conjunction with the other controls that have been identified in the risk assessment.</p>