

Case Study Four

Huntsman Polyurethanes

BACKGROUND

Huntsman Polyurethanes is an international chemical company. The site at Shepton Mallet, Somerset, forms the focus of this case study. The polyurethanes business was previously owned by ICI, before being taken over by Huntsman. There are 80 employees on the site, 40 involved in the production areas and another 40 in administration, technical and administration roles. The site forms the UK headquarters as well as having three production areas, two owned by Huntsman and one other. The site produces goods for the footwear and automotive industries.

NATURE OF OPERATION AND DRIVING ACTIVITIES

There are 19 registered car drivers at this site, the remainder of the employees are casual car users and may use leased, pool or rental cars as required. Many of the commercial employees are required to drive substantial distances across the UK due to the remote location of the site and the requirement to carry goods. Also due to the global nature of the business, many drivers are required to drive in different countries across Europe.

THE POLICY

Why the policy was developed

When the site was taken over from ICI there was already substantial health and safety procedures in place. However, following two fatalities across the company it was recognised that hazards associated with driving formed the greatest risk of injury to employees of the company. As a consequence, there has been a greater emphasis on raising awareness of, and reducing the risks associated with, work-related road incidents.

Who developed the policy

The policy was developed by the Production and EHS Manager in conjunction with Devon Drivers' Centre (DDC). DDC is a specialist wing of the Devon County Council Road Safety Unit. The centre provides practical training, education and advice for every sector of the road-using community including occupational road risk management. The Shepton Mallet Site has been earmarked as the leading centre within the company with regard to work-related road safety. Consequently DDC was involved in developing the company wide procedures and guidance information. The consultants at DDC conducted lectures and focus groups at sites in a number of European countries. These focus groups provided the background regarding the risks across the company and formed the basis of the company wide procedures and guidance. These procedures are communicated through the company intranet site.

What the policy covers

There are a number of Safe Driving Principles that all employees should adhere to (See Attachment 1). In addition there are documented procedures and guidance that cover the following issues:

- Management approval for car travel
- Driving performance and review
- Accident reporting

- Procedural training
- Mileage limits and journey planning
- Skills training
- Personal responsibilities
- Legal requirements
- Essential equipment, including specifications for company cars
- Accident report forms
- General precautions
- Driving unfamiliar vehicles and in unfamiliar countries
- Motorists travelling alone

How the policy is communicated and implemented

The policy, procedures and guidance information are located on the company's intranet site.

SPECIFIC ROAD SAFETY PROCEDURES

The following procedures are in place:

Risk assessment	Conducted by an external consultant in collaboration with the Production and EHS Manager (see 'specific examples' below).
Induction training	The EHS induction training for new employees details the procedures that apply when driving for company business
Driver training	Driver training has been provided for many years and has taken different forms (see 'specific examples' below).
Driver assessments	Recently company car drivers have received a one-hour assessment with a qualified instructor. This assessment highlights gaps in skills and forms the focus of future training.
Vehicle maintenance procedures	Company cars are subject to lease maintenance contracts
Journey scheduling	Journey scheduling forms part of the training and assessment of driver skills. Guidance is provided on the intranet. There are no support systems in place to assist in scheduling.
Car specifications	Company cars are required to meet certain specifications to be accepted as suitable for company business, including: <ul style="list-style-type: none"> • Seat belts • Head restraints • Roadworthy tyres • Airbags (driver and passenger) • ABS • Side impact protection • High mounted brake lights • Rear fog lights • Headlight washers • Emergency flash / warning triangles • Fire extinguisher • First aid kit • Push button radios • Air conditioning • Communications (hands free sets, supplemented with guidance on use)
Incident report	Incidents and accidents are subject to reporting. Whilst accidents are reported it is perceived that minor incidents are not always reporting and this is the focus of effort in the forthcoming months
Other	Much of the training is focused on those who are greater exposed to the risks, i.e. company car drivers. However, every year there is an initiative on road safety that is open to everyone. This may be conducted in house, for example using a CD Rom to test skills or

	may be a 'fun day' at the DDC. This is thought to be important in sustaining the positive safety culture across the whole site.
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SPECIFIC EXAMPLES OF PROCEDURES

Risk assessment

A risk assessment has recently been conducted by DDC. This risk assessment involved an interview with the EHS Manager. The format of the risk assessment follows a draft developed by a working Group of ROSPA. In addition one driver was interviewed as part of the risk assessment to review the policy and procedures from the perspective of a high mileage driver. The assessment reviewed the following:

- Driver activities and driver characteristics
- Number and nature of vehicles
- Characteristics of drivers, age, gender, experience
- Training
- Nature of training provision
- Outcome of training, skill assessments
- Nature of journeys
- Mileage
- Nature of journeys
- Roles of those greater exposed
- Review of accident history
- Review of accident and incident records
- Frequency and themes
- Costs
- Costs of accidents and incidents
- Review of claims procedure
- Safety policy and practices
- List of procedures
- Review of appropriateness of procedures
- Organisation and allocation of responsibilities
- Review of responsibilities
- Management competence
- Planning and implementation
- Risk assessment history
- Planning
- Monitoring
- Accident and incident analysis
- Review and audit
 - Review of policies and procedures

The risk assessment has highlighted a number of targets for risk reduction (see future developments below).

Driver training

- Training has been provided since the early 1990s and is provided by DDC. The training has been a mix of theory and practice, including skid awareness and control. Training has taken place every year, always involving higher mileage drivers but, on occasion, open to every member of staff. Training has included:
 - Training following in-car skills assessment, concentrating on individuals' skills gaps
 - Training following examination based skills assessment
 - Training based on standard, advanced or defensive driving techniques

- Individual modules selected by the driver from a range of topics
- On-road skills training alone
- Theory training alone
- Combinations of theory and practice

Huntsman has records of achievement levels in both off-road examinations and on-road assessments for all drivers. Progress is consistent across drivers and incident levels have dramatically decreased since the training began in the early 1990s.

Employees suggested that the training had been extremely useful, particularly that targeting individuals skills gaps. Employees felt that the commitment to training reflects the organisation's commitment to health and safety and recognises the risks associated with driving. It is acknowledged that employees have very few accidents either at work or privately and this was thought to be due to the level of competence across the workforce resulting from the training that people had received.

The training is not formally reviewed although the views of drivers are sought on an informal basis. However, drivers have shown consistent improvement in their skills over time. It is acknowledged that there needs to be a constant review of the nature of the training. The training was initially very general and comprehensive, as the drivers have become more competent there has been a need to tailor the training to meet individuals skills gaps so as to ensure continued improvement.

COSTS AND BENEFITS

Initially, before the training was provided there were a number of incidents each year (up to 9 incidents initially). With extensive training and focus on other procedures and practices. These have been substantially reduced, as there were no accidents in the last 12 months. It is considered that the costs associated with the training exceed the benefits in terms of reduced incidents as the standards of driving are so high and incidents are now so few. However, Huntsman recognises that without the refresher training these standards may begin to slip. The investment is considered to far outweigh the costs if the positive culture is maintained.

LESSONS LEARNED

The standards of training provision vary widely and it is therefore important to identify and review the effectiveness of the training provided.

CURRENT AND FUTURE DEVELOPMENTS

- Following the risk assessment, a number of areas for improvement have been identified. These include:
 - Improved incident reporting, particularly minor incidents. It is thought that these are being under reported and therefore the costs of work-related road incidents cannot be accurately assessed.
 - There is an opportunity to tailor the training more appropriately, particularly for those that have received extensive training already. The individual assessments help identify the skills gaps of individual drivers.
 - Maintaining the safety culture is always a challenge and there are particular individuals whose attitudes threaten this position. The greatest challenge is to instil this safety culture across the entire workforce. Alternative means of achieving this are always being sought.

- Some basic information on driving in different countries is located on the intranet. This information is fairly basic and covers speed limits, road signs etc. It is thought that this information could be improved providing information on what can be expected when driving in certain countries, as the culture in each is very different. It is often found that certain violations become the norm and this kind of information would be useful to know before driving in an unfamiliar country.

Huntsman Polyurethanes Attachment 1

Huntsman Polyurethanes Guidelines

1. Safe Driving Principles

The principles

The following principles apply to all Huntsman Associates and Contract Staff under the direct supervision of Huntsman associates worldwide:

- Alternatives to travel should be considered, particularly for regular internal meetings. These include; Video conferencing, Teleconferencing and Web based networking.
- The use of public transport services such as rail and air transport shall always be considered for journeys beyond local visits.
- Car driving should normally be avoided after a long air journey. Local advice shall be sought on the use of cars in parts of the world where travel conditions differ widely from those at home. As a rule avoid driving, and use local drivers in foreign countries.
- Any vehicle driven on company business shall be driven in a safe and lawful manner.
- Drivers have the personal responsibility to ensure that they are fit to drive and are not under the adverse influence of any medication, drugs or alcohol.
- The distance traveled before taking a break is left to the discretion and common sense of the driver. But account must be taken of the hazards associated with the journey so as not to plan or accept over-demanding schedules which could give rise to increased risks caused by fatigue, stress, adverse weather, etc.
- Drivers must avoid any activity which may prove to be distracting whilst driving, such as reading maps, preparing food, making notes or using cellular phones.
- The use of cellular Phones whilst in control of a motor vehicle can be a major distraction. Steps should be taken to avoid this distraction or safely stop the vehicle to make or receive calls.

- Unless a voice activated, hands free, system is installed no calls should be made or received whilst the vehicle is being driven. If such systems are installed conversations should be kept short.
- All associates who drive a vehicle on Huntsman business shall attend 'hands on' defensive training courses at a determined frequency appropriate to the mileage driven on company business.
- All company owned or leased vehicles shall as a minimum be equipped with the Huntsman specified safety features, and shall be serviced and maintained in line with manufacturers guidelines.
- All regularly contracted driving firms shall be required to comply with the PU safe driving principles.
- Hire cars should have the same standards as normal company cars. In those areas where that is not possible a higher level of car shall be selected that incorporates as many of these features as possible.
- All travel and vehicle accidents, including non-injury incidents, shall be reported and investigated in line with normal internal reporting requirements.

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- Drivers have the personal responsibility to ensure that they do not drink and drive and that under the influence of any medication, drugs or alcohol.
- The distance travelled before taking a break is left to the discretion and common sense of the driver. But should mind be taken of the hazards associated with the journey so as not to plan or accept over-demanding schedules which could give rise to incidents or risks caused by fatigue, stress, adverse weather, etc.
- Drivers must avoid any activity which may prove to be distracting while driving, such as texting, using a mobile phone, making calls, or using cellular phones.
- The use of cellular phones while in control of a motor vehicle can be a major distraction. Steps should be taken to avoid this distraction or reduce the weight to make it less likely.