



# **Safety in Ports Guidance**

**Strategy 2023 – 2028**

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### **WHERE WE STARTED**

PSS produces 'Safety in Ports' guidance (SiPs) on a range of port related activities. The first guidance was released in approximately 2015 and the documents have been regularly reviewed and updated circa every five years since. There are now 22 guidance documents in circulation. These resources have been produced through tripartite working with employer members of PSS, workers via Unite the Union, and government via the Health & Safety Executive (HSE).

The introduction of the SiPs came as a result of an unacceptably high level of fatalities, at a time when the UK port sector was viewed as having a secretive and internalised view of safety. The HSE was becoming increasingly concerned about the levels of safety in ports and members recognised the need to improve the industry themselves if they were to avoid closer governmental scrutiny and legislation.

The SiPs represented a moment in time for the HSE. With the introduction of the Approved Code of Practice (ACOP) the HSE supported guidance being produced by industry that would support ports to comply with government regulations, including the Health and Safety at Work Act.

Due to the tripartite nature of the guidance, they are freely available via the PSS and HSE websites and, whilst not compulsory, they are highly recommended to ensure compliance with the law on matters of health and safety. The SiPs are used as a reference point by the HSE, Marine Accident Investigation Branch (MAIB) and Maritime & Coastguard Agency (MCA) when investigating port-related incidents.

An impact review of SiPs conducted in June 2020 found that 93 per cent of members were complying with the guidance, with high-risk activities showing higher compliance rates than lower risk activities. The report concluded that “whilst the UK port sector is incorporating the SiPs using various methods, this could be improved by incorporating the content of SiPs into additional materials”. It recommended that PSS create a SiPs self-evaluation tool for organisations to measure their own compliance and that future SiPs be developed as survey tools.

As a result of this review, the HSE also called upon the ports sector to ensure that best practice was integrated more fully into operations and for the inclusive approach to be more widely adopted.

The PSS members' survey conducted in 2022 found that the Safety in Ports guidance (SiPs) were the most valued resource that PSS produced.

## WHERE ARE WE NOW

At the Port Safety Group (PSG) meeting in February 2023, members were placed into groups to discuss SiPs which had recently been approved by the HSE. Without promoting, all groups spent a large amount of time discussing the overall value of SiPs and the feedback session showed a consensus on what members wanted from the documents in the future.

Members agreed that SiPs represent a time when the industry was behind on safety legislation and therefore needed the documents to highlight what the legal requirements were for various operations. However, they recognised that the sector had improved since SiPs were first introduced. They noted that under PSS's leadership, ports and associated organisations were working more collaboratively on improving safety, and that PSS was providing many additional ways for members to monitor and improve safety; so there may be less need for SiPs to cover minimum standards in the future.

The Safety Group all agreed that SiPs must still refer to the legislation, but recommended they move to focus on what **best practice** not **minimum standards** looks like. There was some concern that this may mean they become outdated more quickly as best practice improves all the time, but measures could be put in place to make this manageable. There was also some concern that members may not agree what best practice looks like, but that this could be dealt with by the working groups tasked with updating each SiP. Where there was more than one 'best' option (e.g., around PPE types) the SiP could contain a pros and cons list to help members make informed decisions.

Members agreed that more work needed to be done to ensure that Stevedores and other workers 'on the ground' were aware of the guidance and therefore they needed to be shorter

and make better use of graphics. Additional formats and supporting resources, such as video, could also be introduced to supplement the guidance. Members felt that SiPs were not intended to replace internal procedures and be used as a guide to develop workplace-specific policies. However, it was agreed that simplified guidance would allow them to be more widely distributed in ports and of use to all staff.

The Safety Group recommended that the guidance be more specific for each operation and some of the overlap between guidance be removed. This way members could pull together all the SiPs which relate to their port operations into one complete pack.

### **Health and Safety Executive**

In order for HSE to have its logo on guidance it requires tripartite agreement and must focus on the legally enforced minimum standards, with anything over and above that being clearly identified (boxed in grey on current versions).

However, the HSE is able to state that documents have been “produced in conjunction” with them if there are involved in the process. An HSE statement of support is less likely to require tripartite agreement to the guidance and would also although greater coverage of best practice. This supporting statement would still require PSS to make the guidance freely available, but additional resources such as video guidance or deeper dives could be restricted to the membership to add additional value.

### **Unite the Union**

Trade unions provide the worker representation for tripartite agreement and Unite will continue to be invited to provide input into the guidance. However, there are other trade unions who also represent areas of port work including Nautilus International, RMT and UK Marine Pilots Association. PSS will invite these unions to review SiPs which cover the work undertaken by those union members.

## WHAT THE FUTURE LOOKS LIKE

In the future, SiPs will be produced in conjunction with the HSE but not be dependent on a formal recognition process. They should retain the link to legislative minimum standards but also highlight best practice where possible, with this difference being clearly defined. SiPs should be agreed with the HSE ports inspector (or similar) and published by PSS once the internal process has been approved. Once agreed, they will be sent to the HSE to undertake the longer formal sign off process. If they meet the higher HSE standards, they will be re-published with the HSE logo. Trade unions will be invited to take part in working groups developing SiPs where relevant and will be included in the final sign off group.

In the future, SiPs should be much more specific and focussed on operations. They will highlight best practice alongside information on minimum standards, with online links to legislation. There will be a need going forward, to balance minimum standards with best practise so that the SiPs can still be relied on to demonstrate that members have met the agreed and published industry minimum standards in the event of any incidents.

Guidance will make much better use of imagery to demonstrate the operations in practice and members-only versions will include videos of operations and give the option to select chapters from all SiPs in order to create a 'master' company SiP covering all operations.

A new introductory SiPs will be created which covers the standard information contained in all current SiPs including regulatory framework, risk assessment and consultation, cooperation and coordination chapters.

## New SiP development process

To develop or revise SiPs in future, PSS will call for volunteers from the membership who undertake the specific operation to form a working group. A group of no more than 12 members (with each member nominating one employee as their contact) will work in person and remotely to define relevant legislation and agree best practice. The PSS Safety Lead will work with this group to bring together members' contributions and draft the guidance document.

This working group will also be asked to volunteer to showcase their port in the images and videos used for the guidance. The design agency working on the new PSS logo will also be producing a standard SiP document so new text can be dropped into it by the Safety Lead without the need for a contracted designer.

Once the working group has agreed the text for the SiP, it will be circulated for feedback and signed off by a **SiP sign off group**. This group will contain the Chief Executive, the Board Chair or Deputy Chair and Board Safety Champion; the Chair and Vice Chair of the Port Safety Group, two representatives from the working group, an HSE representative, union or staff representative lead where available, and up to two other contacts as relevant to the SiP.

All existing SiPs will be reviewed and revised within the next five years as per the new PSS five-year KPIs. The development of new SiPs should follow a recommendation from the PSG or through analysis of the PSS data dashboard where emerging or increasing risk has been identified.

All current SiPs will be revised and updated as per the following schedule:

2023	2024	2025	2026	2027
002 – General Cargo	010 – Ro-Ro / Sto-Ro	006 – Bulk Liquids	005 – Mooring Operations	022 – Biomass
004 – Timber Handling	012 – RoPax and Cruise Ops.	009 – Lighting Guidance	011 – Occ. Health Info.	017 – Fitness to Work
003 – Container Handling	016 – Emergency Planning	021 – Access to Fishing Vessels	015 – Confined Spaces	018 – Safety Induction
	020 – Water Safety	001 – Workplace Transport	014 – Safe Access / Egress	007 – Load / Unload Dry Bulk
				008 – Dry Bulk Storage

## SiP review process

1. PSS review previously published SiP to amend and standard text or incorrect legislation. Also highlight clear areas for improvement.
2. Working Group consisting of between 10 and 20 member representatives (with no more than one per employer) reviews the current text to provide initial recommendations for updates.
3. PSS to review initial comments and organise in person meeting.
4. Working Group meets in person to confirm updates and agree best practice.
5. PSS to incorporate changes and organise collection of images and video where necessary.
6. Working Group to continue with changes remotely until the final version is agreed.
7. SiP sign off group to review text and provide suggested amendments where necessary.
8. Working Group to agree any recommended changes.
9. SiP sign off group to approve SiP.
10. SiP to be published by PSS.
11. SiP to be submitted to HSE for review. If approved by HSE, SiP is updated and re-published.