



## **WORKING SAFELY IN A MULTICULTURAL FOOD AND DRINK INDUSTRY**

### **1. Organisations involved**

Northwest Food Alliance, Greencore Group, Uniq plc, Greencore Sandwiches, Tulip UK Ltd, Improve Ltd, Health & Safety Executive, Northern Foods, Eversheds, Chris Lamb (Health & Safety Consultant).

### **2. Description of the case**

#### **2.1. Introduction**

In the United Kingdom, food and drink manufacturing is the largest industrial sector. Currently there are 650,000 people working in the sector, many from countries where English is not widely spoken and understood. There is increasing, but undocumented, evidence that many of these workers are not able to communicate in English and have to depend on colleagues whose own language and translation competencies may not be good. These language barriers make training difficult, and also prevent communication of urgent concerns on the shop floor.

A few years ago, following minor reportable accidents, the Health and Safety Executive (HSE) visited several food producers to investigate language barriers and effective communication of the safety message. The HSE were interested to find out:

- How employers communicated safety messages,
- Whether employers were able to demonstrate to the HSE that their employees were literate in their own languages,
- How employers test the individual's understanding of the information provided.

The investigation produced little evidence of existing initiatives to provide adequate instruction, training or supervision in a language that workers could comprehend, although it was required by the Management of Health and Safety at Work Regulations 1999 and discrimination legislation.

As a result, the Northwest Food Alliance organised and hosted a one-day conference in September 2004, an event endorsed by the HSE and the Food & Drink Federation and sponsored by Greencore Group. The aim of this conference was to examine current issues and good practice in the food industry, and to explore possible solutions to the challenges posed by a multicultural workforce. It was agreed that the challenges had to be addressed through new approaches and that guidance should be produced for employers, particularly SMEs, who needed advice and examples of good practice that were not available at the time.

A working group was set up to draw up a code of practice to address the health and safety implications of employing an ethno-linguistically diverse workforce. The group consisted of consultants, legal experts, health and safety professionals from several of the largest food manufacturing companies in the UK, and a representative from HSE.

#### **2.2. Aims**

The goals of the working group were as follows:

- To develop and disseminate guidance for recruitment, and for delivering health and safety information, instruction, training and supervision to multicultural workforces in the food industry,
- To help SMEs that do not have resources/in-house expertise and may be using temporary labour for the first time.

They further wanted to:

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- Clarify and define the needs of food industry
- Gather information on existing initiatives
- Identify good practice, and develop guidelines in partnership with HSE
- Develop a communication strategy
- Promote and disseminate guidance

### **2.3. What was done, and how?**

It took approximately 14 months to produce the guidance (Working safely in a multicultural food and drink industry), which is now available for free download on both the Northwest Food Alliance ([http://www.foodnw.co.uk/activities/documents/ Working-safely-in-a-multicultural-food-and-drink-industry/](http://www.foodnw.co.uk/activities/documents/Working-safely-in-a-multicultural-food-and-drink-industry/)) and the HSE websites. It is the first guidance note produced for the industry and the work is well ahead of many other European Member States.

Seven key areas are included in the Guidance:

1. Why employers should read the document
2. Managing Culture and Diversity
3. Effective Recruitment
4. The use of Risk Assessments
5. Key requirements – Induction & Training
6. Translation
7. Successful Supervision

The guidance advises employers to pay special attention to ensuring that the particular risks to which multicultural workers may be exposed are identified and the appropriate control applied.

Specific procedures and arrangements may have to be developed in policy areas such as:

- Health & safety
- Equal opportunities
- Discrimination
- Recruitment
- Harassment
- Training and development
- Absence management.

In particular, the guidance advises that health and safety policies:

- must be created and endorsed by senior management;
- must specifically recognise multicultural workforces and be reflected in all human resources policies;
- must be communicated to all employees in a manner that ensures all personnel understand the policy and its implications;
- must be promoted in induction processes and communicated in (all) relevant languages;
- must be posted on notice boards in relevant languages.

Companies have to ensure that all the policies have been implemented effectively across their sites.

The guidance advises employers of multicultural workers to consider:

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- taking steps to ensure that all relevant health and safety and training courses are translated into appropriate languages and that they can be fully understood;
- taking steps to ensure that all relevant written instructions and verbal information are properly translated into appropriate languages, or are in a non-verbal form which can be readily understood (e.g. fire safety instructions, safe systems of work, safety signs);
- providing translators to help supervisors during normal working hours;
- identifying jobs where communication difficulties might put non-English speakers at increased risk, and taking suitable measures to negate these risks, e.g. avoiding language barriers between the operator of a band saw and a colleague taking product away.

## **Uniq Prepared Foods - an example of good practice in establishing a positive health and safety culture in a multicultural company**

Uniq Prepared Foods Ltd, a pan-European food manufacturer, was part of the working group. Uniq has business operations in several countries, including

France, Germany, Spain, Holland, Poland, Belgium and the United Kingdom. Preliminary audits and evaluations showed that there were important cultural differences among workers in the perception of health and safety procedures. After a review with senior management, a new vision was reached and targets set for the entire business. A common policy was translated and communicated throughout the European operations.

On the induction day workers are assessed to identify those who can speak some English, so that their translation skills can be used to ensure that the workers with little or no English understand the company's procedures and rules.

Generic training such as Health and Safety, Manual Handling and Food Hygiene are taught with the use of subtitled training videos available in 20 languages. Working procedures and safe systems of work are introduced in stages with the help of the identified English speakers. Operational manuals containing photographs of the correct procedures are used.

At the Spalding site, several migrant workers have now been promoted to line setter, responsible for setting up the lines and the machines. Some have also progressed to being key personnel, operating filling and packing machines. Uniq has recently contracted an agency which has an on-site supervisor who speaks several languages. This has assisted greatly with the integration of the non-English speaking workers and is helping them to realise their full potential.

As a result, lost-time accidents dropped by 13% in the first year, followed by a further 16% fall in the second year. Uniq reduced its reportable accident rate from 34.2 per 1000 employees to 16.0 per 1000 employees over a five-year period.

Furthermore, the business benefited from a reduction in the taxes imposed for accidents by European Member States (the equivalent of insurance in the UK). The key message is that leadership from the top is critical in creating and implementing a positive safety culture in a multicultural business environment. More information: Northwest Food Alliance.

## **Tulip Ltd - an example to illustrate how risk assessment and training can take in the special hazards and risks associated with employment of multicultural workers.**

Tulip Ltd is the UK operation of the Danish Crown Group, an international food conglomerate with operations and sales in some 140 different countries. In some Tulip plants, more than one-third of staff do not speak any English.

The following actions are taken by the company to address problems faced by employees who speak English very little or not at all:

- Carrying out a basic assessment during the initial recruitment process to verify the individual's understanding of English
- Including within the Health and Safety Policy a section covering the provision of translation services, and procedures for managing non-English speaking employees

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- As part of the risk assessment process, identifying critical roles where a poor understanding of English increases the risk of injury, and prohibiting employees from undertaking those roles until language training or other control measures have moderated the risk
- Following the identification of those critical roles, using a skills/language matrix to assist in effective supervision and deployment of non English speaking employees
- Generating pictogram-based training materials, and keeping written documents to an absolute minimum
- Maintaining a register of the first languages of employees
- Displaying photographs of translators to ensure that all employees know who to approach if necessary
- Establishing a library of all documents that have been translated across the Group and making them available on the Group Health and Safety Management System
- Including in the safe system of work and training records a statement such as 'training/documentation has been presented to me in a language and manner that I can read and fully understand'
- Providing ESOL (English for Speakers of Other Languages) courses
- Supplying basic translation cards to supervisors
- Encouraging supervisors and other employees to attend other language courses to provide them with basic skills in a relevant second language
- Encouraging non English speaking employees to become members of the site Health and Safety Committee to ensure that their voice is heard
- Maintaining a list of emergency translators on the Group Health and Safety Management System.

More information: Northwest Food Alliance.

## **2.4. What was achieved?**

A review is currently under way to evaluate the effectiveness of the initial publication of the document as well as examples of best practice used before its second publication. It is not clear whether there has been any improvement in the industry as a result of the document, but companies in the working group have definitely tried to tackle the situation as best as they can.

The document has been well received by the HSE. It has been presented at a number of conferences across the country at the request of the HSE and various industries.

## **Problems faced**

First, there was problem in acquiring funding for publication of the final document. In the end, Uniq UK, Greencore and Northern Foods covered the printing costs. Second, only a few companies joined the working group or offered good practice examples. This was thought to be for a number of reasons. The group assumes that perhaps the companies that declined did not have many non-English speaking workers, did not acknowledge it was a problem or simply waited for someone else to take the lead as they did not have any suggestions or good practice examples.

## **2.5. Success factors**

The guidance would not have come into being without the concerted effort of participants in the working group.

## **2.6. Further information**

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## **2.7. Transferability**

Similar guidance could be published in other Member States.

## **3. References, resources:**

- <http://osha.europa.eu/en/publications/reports/TE7809894ENC>