

November 2017

Information, training and instruction for workers handling hazardous substances

KEY FACTS

As a person conducting a business or undertaking (PCBU), you must make sure that:

- All workers know about the hazardous substances in their work area and the dangers they pose.
- Workers have the training and supervision they need to operate safely with and around hazardous substances.

Introduction

Keeping your workplace healthy and safe includes making sure that everyone in the workplace has the knowledge and experience they need. If they don't, you must make sure they are supervised by someone who has this knowledge and experience.

You must ensure workers receive information, training and instruction about the safe use, handling and storage of the hazardous substances they will use in their work, the equipment they will use in their work, your workplace, and what to do in an emergency.

'You' - the PCBU

This guide is written for persons conducting businesses or undertakings (PCBUs) as they have a duty to provide workers with information, training, instruction and supervision. In this guide, 'you' means the PCBU.

In simple terms, a PCBU is an individual or a company carrying on a business, but it can also be other types of organisation. More information on PCBUs and other duty holders in the workplace and their duties is available on our website: www.worksafe.govt.nz

Providing information, instruction and training

What training will your workers need?

You must make sure that your workers' training covers certain topics, which are listed under *Training and Instruction* below.

When you make decisions about training, think about every aspect of the work a person will do. This includes not only the tasks, but the workplace, the surrounding area, and the people who will do the work. Consider:

- What is the workplace like? Is it a closed workshop or another site with many workers and members of the public present?
- What work will the worker do?
 - What machinery, equipment, personal protective equipment (PPE) and substances will the worker use?
 - Does the initial training need to cover everything a worker will eventually do or can they be trained in new tasks as the need arises?
- Who are your workers?
 - What experience do they have?
 - Are they lacking experience in any area?
 - Do they have any specific needs?

Engage your workers in discussions about their training. Decisions about training have an impact on worker health and safety.

Information

Before workers carry out or supervise work that involves using, handling, manufacturing or storing hazardous substances, you must make sure that they know:

- about any work with hazardous substances in their work area - this can be as simple as a daily/weekly meeting listing activities on a whiteboard, or a toolbox discussion with the team before each shift
- where to find information about handling and storing substances safely, including (but not limited to) the information found on safety data sheets (SDS).

Whichever method you use to provide this information, make sure it is effective and appropriate for your workers and workplace. Make sure you tell workers where to find this information during their induction.

Training and instruction

Before your workers do or supervise any work involving hazardous substances or work around hazardous substances, make sure they receive training and instruction on:

- the physico-chemical and health hazards of the substances they will handle (in other words, whether the substances are explosive, flammable, oxidising, toxic or corrosive, and what this means for the workers who handle them)
- any procedures for safely using, handling, manufacturing, storing and disposing of the hazardous substances
- how to safely use the plant (eg machinery, tools and equipment, including PPE needed to manage the hazardous substances)
- any other duties or obligations that they may have because of the substances they work with
- what to do in an emergency involving the hazardous substances or that could affect the hazardous substances.

You must also make sure workers complete a suitable period of practical experience in your workplace under direct supervision in the above matters.

Training needs to reflect:

- the work that your worker will carry out. Think about:
 - each task involved
 - where and how your worker will do the work.

- what you know about the risks involved with the work. In other words:
 - what risks do you know your worker is going to face?
 - how do you manage these risks?

From 1 June 2018, you must keep a record of training and instruction for each worker.

Supervision

You must give workers the supervision that you decide is necessary to protect them from the risks associated with their work when they:

- use, handle, manufacture or store hazardous substances
- operate, test, maintain, repair or decommission plant used to store, manufacture or handle hazardous substances at the workplace
- are likely to be exposed to hazardous substances at the workplace.

Supervision will vary depending on workers' knowledge and experience, and the information, training and instruction they have received previously.

Tailor supervision to your workers' needs. When making decisions about supervision, consider:

- What is the nature of the hazardous substances and what are the risks associated with them?
- What knowledge and experience do workers have?
- Do new and inexperienced workers need close supervision until they can work without it?
- Do new and inexperienced workers need supervision only for certain tasks?
- Do experienced workers need supervision only the first time they carry out a task in your workplace?

Supervision is also important when there are changes in the workplace. This can include changes in workforce or rosters, or even changes outside your control, such as daylight savings.

Workers with previous experience

If you can demonstrate (with documentation or certification) that a worker has equivalent previous experience and/or training for their work, you will not need to provide the above training and instruction unless you feel the worker needs refresher training.

However, a worker with equivalent training who is new to the workplace must still receive an induction to your workplace and its procedures (for example its emergency response plan) and appropriate supervision at your workplace.

Remember, training is not a one-off occurrence. You must make sure workers have the knowledge they need to do their work at all times and update this knowledge if anything about their work or the workplace changes.

Who provides the training, instruction and supervision?

Think about who is going to deliver training, instruction and supervision. Make sure they have the skills and knowledge they need to train and supervise your workers correctly. Trainers and supervisors can be internal or external.

If you use external trainers, look into their qualifications and experience, and if you use internal trainers, make sure they are sufficiently experienced and have the knowledge that they need.

Is the training right for your workers?

Your workers need to understand and benefit from the information, training and instruction they receive. Think about:

- their age and experience
- their native language and culture
- the best way to engage them in the training.

Engaging your workers could mean thinking about how you deliver training, for example:

- What experience or abilities do trainers or supervisors need to have?
- Do workers learn better on a one-on-one basis or in a group?
- What is the best way to deliver information (eg print, audio-visual aids, computer, tablet or smartphone)?
- Can workers get qualifications from the training (eg unit standards)?

Make sure supervisors and trainers know what to do. You could:

- set supervision procedures
- tell trainers what you want new workers to learn in inductions or for new tasks
- provide documented training procedures or checklists.

Engage your workers in supervision, training, information and instruction decisions. Make sure material is easy to understand, and spend extra time with workers with reading difficulties and whose native language is not English.

Training records

Records are able to show what training has taken place and when a refresher is needed.

Document each worker's training and instruction. An inspector or compliance certifier may ask to see these records.

When you decide how to keep records, think about:

- using written or electronic records (eg a training register/log)
- how you will enter new training into workers' records.

The training record should include details such as:

- date of training
- materials covered
- name of trainer or institution
- results of evaluation and any qualifications obtained
- any other relevant information.

Remember: It is mandatory to keep records of training and instruction for each worker from 1 June 2018.

Is the training, instruction and supervision working?

Make sure workers understand training and instruction. Training should improve workers' skills and allow them to show how they have improved.

All workers, no matter how experienced they are, need to remain competent on an ongoing basis. You could check this by:

- giving workers written, verbal or practical tests at the end of the initial training and regularly after the training is completed
- having the trainer observe the worker, and check that workers have understood their training.

Finally, think about how you can give workers practical opportunities to reinforce what they learn after the training.

Keep training up-to-date

It's easy for bad habits to slip into work practices, so make sure training is an ongoing exercise. If you see bad habits starting to appear, you may need to provide refresher training. Think about:

- how often all workers need to be reminded about safe practices
- what training you need to refresh (all of it or just key points).

Sometimes these changes are outside workers' control, so engage with them to find out why practices have changed.

You need to be sure that training and supervision continue to manage risks. This could mean reviewing training or supervision programmes to make sure they are up-to-date and meet objectives. Review and update training and supervision programmes when:

- there is a change in the workplace (eg new equipment or processes, or changes to rosters or workforce)
- you put in place new controls to manage new risks in the workplace, for example if you start working with a new hazardous substance
- it is clear control measures are not managing risks properly (eg if there is an incident or there are unsatisfactory monitoring results).

Training in other requirements

Information, instruction and training are also required for different types of certification and as part of emergency preparation.

CERTIFIED HANDLER COMPLIANCE CERTIFICATION

Workers need information, training and instruction to become certified handlers, which are required when your workplace needs to handle certain highly hazardous substances.

For more information on certified handler requirements, see our *Guide to Certified Handler Requirements*.

APPROVED FILLER CERTIFICATION

Workers need training and instruction to be certified as approved fillers.

For more information on approved fillers see *Your Practical Guide to working safely with hazardous substances*.

HANDLING ECOTOXIC SUBSTANCES

Workers may need to hold special qualifications if they are involved in handling:

- (a) a class 9.1A, 9.2A, 9.3A or 9.4A pesticide, other than a fumigant or vertebrate toxic agent: or
- (b) a class 9.1A, 9.2A, 9.3A or 9.4A plant growth regulator.

For further information see the Hazardous Substances (Hazardous Property Controls) Notice available on the Environmental Protection Authority (EPA) website: www.epa.govt.nz

HAZARDOUS SUBSTANCE LOCATION COMPLIANCE CERTIFICATES

If you manage or control a hazardous substance location (HSL), you must make sure workers receive information, training and instruction for the substances at the HSL.

If you need a location compliance certificate for an HSL, the certifier will check that you have provided information, training and instruction before issuing a compliance certificate.

EMERGENCY RESPONSE PLANS

Training and information are part of the emergency response plan requirements.

The emergency response plan must provide information about any special training that any person identified in the plan needs to have to deal with emergencies involving any substances in your workplace.

The plan also needs to show how to find information about the properties of hazardous substances that could be involved in an emergency and about how to control these substances.

To see a template that contains all the requirements for an emergency response plan, see our *Emergency Response Flipchart* available at: www.hazardoussubstances.govt.nz

Checklist: Training for hazardous substances

Use this checklist to help your workers receive all the information, instruction and training they need to do their work. The training your workers need depends on the substances you have and how you use and store them.

This checklist is a good start but also consider the specific substances your workers handle or any other work they do that means they will require further training. You can adapt this checklist for your workplace and the substances in it.

ITEM	CHECK
Does the worker know the harm each hazardous substance they use at work can cause?	<input type="radio"/>
Does the worker know which substances are incompatible and need to be stored separately?	<input type="radio"/>
Does the worker know how to do the jobs they are given that involve hazardous substances?	<input type="radio"/>
Does the worker understand the control measures at the workplace to reduce exposure to the substances and keep safe and healthy?	<input type="radio"/>
Has the worker been provided with the right safety equipment and PPE?	<input type="radio"/>
Has the worker been trained to use safety equipment and PPE?	<input type="radio"/>
Is PPE in good repair?	<input type="radio"/>
Does PPE fit properly?	<input type="radio"/>
Does the worker know where the SDSs for substances are kept and how to access them?	<input type="radio"/>
Have you trained workers to use the SDS?	<input type="radio"/>
Does the worker know what to do in emergencies involving the substances, for example, a spill?	<input type="radio"/>
Has the worker been trained to use the first aid equipment to deal with incidents involving hazardous substances, such as splashes?	<input type="radio"/>
Has the worker had practical experience under direct supervision reflecting the risks associated with the hazardous substances?	<input type="radio"/>
Does the worker know to ask their supervisor questions if they don't know how to safely use or store a hazardous substance?	<input type="radio"/>
Do you keep records of worker training and instruction?	<input type="radio"/>

Further information

More information about training, hazardous substances, and other workplace health and safety matters is available on the WorkSafe website: www.worksafe.govt.nz

If you need a certified handler, our *Guide to Certified Handler Requirements* provides more information on training, instruction and supervision for certified handlers.

The following resources are available at: www.hazardoussubstances.govt.nz

- *Your Practical Guide* to working safely with hazardous substances.
- *The Emergency Response Flipchart*.

Abbreviations

TERM	DEFINITION
HSL	Hazardous substance location
PCBU	Person conducting a business or undertaking
PPE	Personal protective equipment
SDS	Safety data sheet