

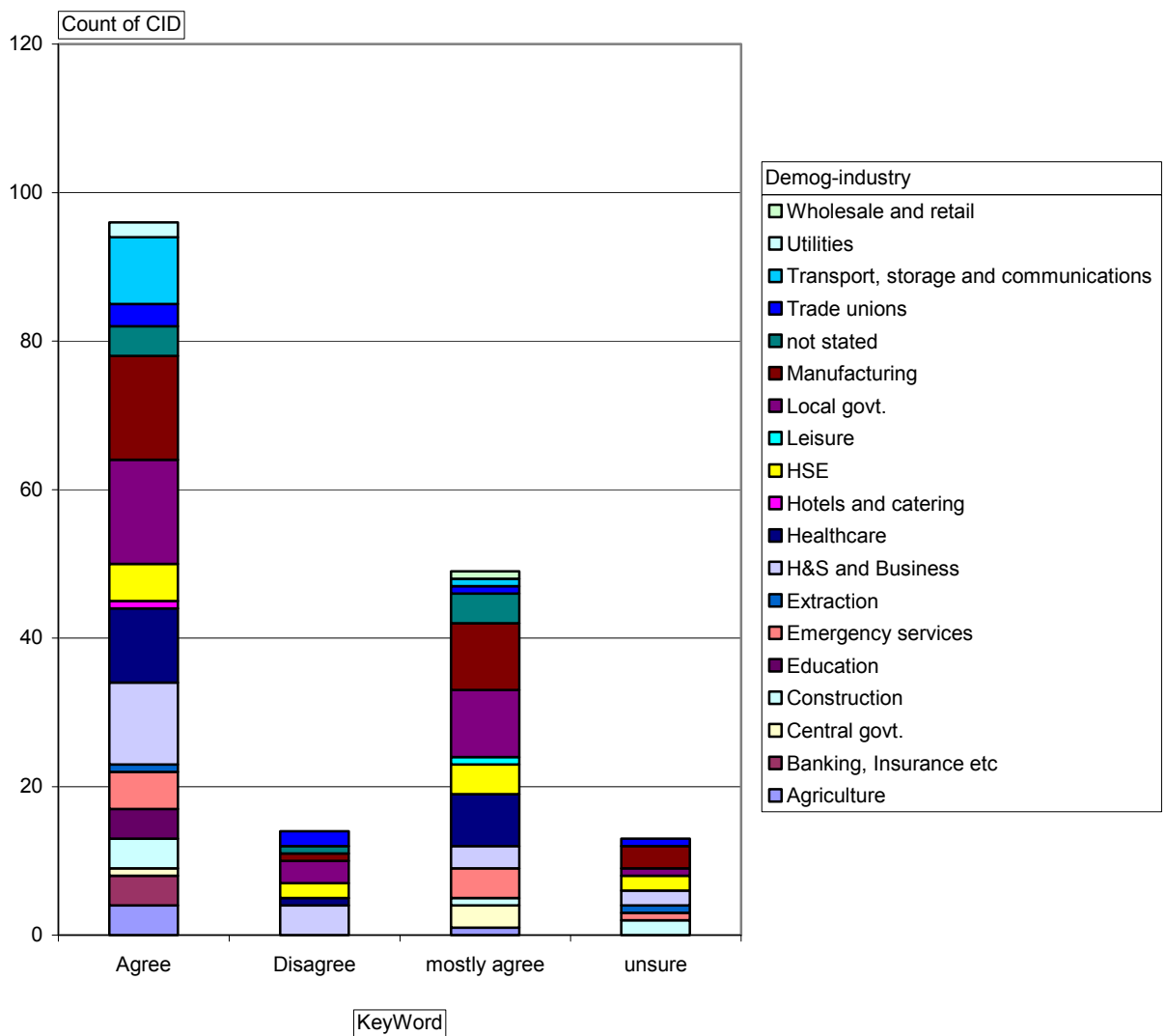
Different strands of consultation have provided a diverse range of views from stakeholders. The information below is from the consultation exercise where 2,000 copies of “Strategic Thinking – work in progress” were distributed to regular consultees and the CEOs of the FTSE 350 companies. 237 responses were received. The analysis below is qualitative not quantitative as the responses do not correspond to a representative sample

QUESTION 1

172 people (73%) responded to the question “**Have we got the right issues?**” The table below shows the response rate for each question. The graph has also been broken down into industry sector.

Field(All)|lv10_KeyWord(All)|lv11_KeyWord(All)|lv12_KeyWord(All)|lv13_KeyWord(All)

(This Chart is for Key Words Analysis Only) - ALL DATA



For this question respondents who indicated broad support for the issues and didn't raise any specific where classified as 'mostly agree'.

QUESTION 2

179 people (76%) responded to the question “**Are there issues that are equally, or more, important and if so, why?**” These have been broadly grouped into themes.

Big 5 issues: This area covered those responses that were labelled ‘other issues’ but that were covered in our understanding of the 5 issues presented in the Strategic thinking document. However, these were sometimes looked at with a different perspective. For example: **Changing world/changing economy** – people raised issues such as the increasing diversification of the workforce or increasing numbers who speak English as a second language. **Health** – we envisaged health issues in the document to be inclusive of occupational health, but this was frequently raised as an ‘other’ issue and related in particular to guidance, resourcing and role of GPs. **Public protection and security** – this was a general term that we envisaged to include lower level workplace security and large scale terrorism/security issues. It also covered protection of the public at large. However, both workplace security and national security were raised as other issues in response. **Role of local authorities** – although this was one of our ‘big issues’ it was frequently raised, especially in relation to funding and resources.

Intervention: This covered various issues, in particular with regards evidence for intervention strategies, “*How can we get better intelligence on occupiers and duty holders so that we can efficiently plan inspections and target other intervention methods*” (HSE). There were also issues raised about the need for the use of a variety or alternative interventions. “*There is a need for HSE to make clear that whereas the technical and administrative interventions typical of such standards maybe necessary conditions for health and safety success, they are insufficient on their own.*” (H&S Professional)

Education: Education is seen as an issue in itself – not just an option for how to improve health and safety in Britain. The areas that respondents point to in particular are the long term effects of a lack of education in the workforce, education and risk, and the need for education in schools and universities. “*While implicit in some parts, there needs to be a holistic approach taken to promoting risk assessment across society. Risks at the workplace cannot be isolated or developed in isolation from other risks in society. It is clear that in many of the key training or education courses in the professions do not give prevention enough promotion*” (Consultancy)

Risk- Risk was raised as an issue relatively frequently in relation to education and training. HSE’s guidance on risk in general was also raised. Occupational road risk was also raised by various industry sectors as an important issue missed in the document “*Because the ACoP on risk assessment is not precise and effectively speaks in general terms, it leaves the way open to differing interpretations and evaluation of the perception of risk as demonstrated by the activities of local authority enforcement officers compared with HSE personnel.*” (H&S Professional)

Resources – The resources of local authorities, the resourcing of HSE and the division of resources in both were all elements raised in this area. There were also issues around training and retention of staff in health and safety raised.

Responsibility/Accountability – Issues were raised about employee responsibility (not enough done to reinforce this (construction)), duty responsibility (dutyholder is the one that has to comply and they need help to comply and at times this can include strong enforcement (local government)) and regulator responsibility (clear guidelines should be given as to where the public should be directed – not all things should fall to health and safety)

International - The issue of Europe and regulation came up from a range of industries, in particular the aspect of health and safety abroad and the lack of a 'level playing field' for UK businesses. The effect of contracting out overseas was also highlighted as a drain on UK industry and competitiveness. There were also issues over how regulations were implemented in this country compared to other countries. *"There is not consistent approach by the regulators (HSE) to implementing SEVESO 2 directive in Europe and as a result the UK Chemical Industry is being competitively disadvantaged (manufacturing)"*

Partnership – Working in partnership with others was seen as an important issue that the document did not emphasise proportionately to potential for improving health and safety. Areas covered included working with local authorities, working with OGD's and working with trade associations or other intermediaries.

Employee participation – this was advocated by various groups. It was generally agreed that HSE and business should promote and encourage employee involvement as a means to improve health and safety, especially in smaller workplaces. *"It appears to me that in every instance where employees of a company are given a genuine active role in health and safety there are less accidents than in similar companies who simply impose management rules"* (Local government)

SME's – There was concern over the growth of SMEs and their needs for greater support where health and safety issues are concerned. Respondents felt that SMEs were unlikely to have the resources or staff necessary to make an appropriate commitment to health and safety.

QUESTION 3

152 people (64%) responded to the question “**What should we do about each of the issues?**” Responses were grouped into 5 broad categories. There were:

Education/guidance – In general there was support for HSE continuing to provide guidance on health and safety issues. This does not necessarily refer to written guidance but also applies to encouragement and advice. Where written guidance was identified it is industry or issue specific. There was a particular call for guidance on occupational health issues. *“Encouragement and guidance by the HSE should channel industry to seek OH provisions.” (Manufacturing)*. Targeting of guidance through intermediaries is also advocated strongly.

Inspection/enforcement – This section actually relates to various issues. The roles and responsibilities of HSE vis-à-vis local authorities was a particular area of response, but with various different options outlined. Fear of HSE as a regulator was also an issue. Other issues were raised, such as centralisation of health and safety inspection, working in greater partnership with local authorities, separating enforcement from advice role, but none elicited universal support.

Recognition/Incentives – There was general support for recognition of good health and safety practice. Various ideas have been put forward on how this could be implemented, ranging from tax breaks to accreditation similar to Investors in People but it also covers the use of the insurance industry as a lever, which of itself has been strongly advocated. *“Would it be possible that for a business to gain employer or public liability insurance, the owner/proprietor must produce a certificate of competence in health and safety knowledge and management?” (Education)*

Financial assistance – This relates not only to incentives and recognition but also the issue of HSE/Government funding. People also used this to advocate increased use of working in partnership, especially with trade associations and other government departments.

Self -regulation – Self regulation was mentioned not only here but also later in question 5. In this section people used the term when referring mainly to rewards and incentives. It was made clear in both sections that self regulation was not sufficient on its own, and it needed to work with other mechanisms.

Two other prominent issues were ill- health (specific the issue that we do not utilise GP’s, or that companies should appoint doctors to specifically work with their staff) and rehabilitation (not enough done to put people back to work, when they have been injured in work).

QUESTION 4

88 people (37%) answered the question “**Increased activity in some areas requires reduced activity in others; where should HSC/E and local authorities be reducing their involvement**”.

Nothing – A group of respondents believed that there should be no withdrawal from any area. All respondents within this group felt that there should be increases in funding to ensure that there was no reducing of involvement, “*Whilst we understand that for budget purposes, to increase activity in some areas requires a reduction in activity in others, we don’t believe this approach supports your strategy. In fact, it undermines it.*” (Insurance)

Respondents from a number of industries and sectors, including several trade unions, expressed these views.

Gas – There was a view expressed that gas was something that HSE should not be concentrating on.

Investigations – There were views expressed that in some cases, HSE should not be investigating accidents and incidents. However there were differences in views on what investigations HSE should pull out of. Some felt that in criminal investigations, HSE should hand responsibility over to the appropriate police force. There was also a view expressed that HSE should stop investigation in “all but the most serious cases”.

Local authorities – This section embodies two streams of thought. One was that at the moment local authorities do ‘low risk’ activities and that this should be looked at to see if it is a productive use of health and safety resources. An issue more frequently raised however was the opinion on dealing with this would be to transfer local authority resource to HSE to help with ‘higher risk’ inspection, or using them to interact on behalf of HSE with small businesses etc. “*[we] favour a strategic review of the current involvement of local authorities in health and safety promotion and enforcement. There could be merit in Agency Agreements between each LA and HSC/E in which the operational control of inspectors would pass to HSE managers*” (health and safety business)

Legislation – There was strong support for the assertion that there would be no major new legislative programmes. Most saw this as an opportunity to address the more crucial issue of focussing resources enforcing the legislation which is already in place. Some also advocated using this as an opportunity to reassert employer responsibility.

Low-risk - Many respondents felt that once an evidence base had been established there should be a withdrawal from areas where intervention was no longer needed. There was also views expressed that intervention should be withdrawn from areas where there is no problem. “*Suggest reduced activity in areas where constant low risk/low accidents rates are recorded*” (local government)

Some views were also articulated that activity should be reduced were people where making informed choices.

QUESTION 5

103 people (43%) responded to the question “**What mechanisms can be put in place to maintain standards in areas in which HSC/E and local authorities have reduced their involvement?**”

Nothing – A strong view was expressed that new mechanisms could only be introduced if it was proven that some degree of self regulation would work. People who responded in this way did not feel that there was an option of putting new mechanisms in place.

Guidance – Respondents like guidance/ACoPs and felt that this should continue. *“Where HSC/E determines there is little need for inspection – produce guidance, codes for employers to benchmark against.” (Emergency services)*

Insurance – Insurance was frequently mentioned as a new mechanism which could be utilised to improve health and safety standards. However views then diverged into what this would actually mean/look like. *“Reward good performance by lowering of insurance premiums” (Banking/insurance)* or *“Encourage more involvement from the insurance industry, such as liability assessments etc.” (Construction)*

Partnership Schemes - There were opinions put forward that more could be made of other ways of ensuring compliance. Opinions raised included peer assessment and dissemination of best practice. Some respondents also felt that they, and their experience/links could be better utilised. These responses came mainly from trade association, but other respondents mentioned more use of bodies such as the “authoritative” bodies such as the police.

Reporting – For the respondents who indicated reporting there was strong support for a system where companies should report their health and safety performance. However views differed on how this should be presented. Some favoured reports to HSE and then some form of auditing. Other put forward that health and safety reports should be presented in company reports. Others suggested that these reports could be presented to insurance companies (tying this in with using insurance).

Safety Representatives - There was views expressed that safety representatives should be utilised to help improve compliance and help companies improve. Some respondents suggested that safety representatives’ role could be strengthened. *“Greater legal powers for safety reps, to audit SMEs – supplemented by consultants if safety reps do not meet the criteria for carrying out auditing.” (Extraction)*

Self-regulation – Self-regulation was a frequently mentioned opinion when respondents were asked to consider new mechanisms for reduced involvement. However, it is important to note that all those who mentioned self –regulation, none allowed it to stand alone. All respondents asserted the view that any degree of self regulation must be accompanied by other measures such as accreditation, reporting or auditing. *“Make certain sectors more accountable with self-regulation, but increase the penalties for failure to comply with legislation.” (Manufacturing)*