

RoSPA NOSHC Inquiry into OSH assistance to SMES:

2nd report:

Core criteria in pre-qualification schemes

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1. INTRODUCTION

This report is the second to be commissioned by RoSPA's National Occupational Safety and Health Committee (NOSHC) to assist its Inquiry into occupational safety and health assistance to SMEs. The first report (April 2007)¹ comprised a map of the actors and activities involved in providing OSH to SMEs, together with conclusions and suggestions for issues that NOSHC might want to consider. Full details of the inquiry are set out in appendice 2.

The Committee subsequently invited written evidence on, and held a "hearing" in May 2007 into, the different approaches used by intermediaries to assess OSH management capacity in SMEs². Following the hearing, NOSHC decided initially to look further at the different sets of criteria that bodies use to assess OSH capacity and performance in SMEs, and commissioned this report to inform its work.

The decision reflected a finding of the first stage of the inquiry that there is a plethora of assessment, compliance and pre-qualification schemes that SMEs face in their bids to secure work. Although many of these schemes are of a high quality, few involve any mutual recognition or even, sometimes, mutual awareness. This can mean that many SMEs have to compile and submit different forms and supporting evidence to potential clients, work placement organisations and the like. This can result in considerable duplication of effort and resources, and accompanying frustration among SMEs, which could be using their time more profitably elsewhere. Some of the written and oral evidence presented to NOSHC also highlighted frustration among some bodies running such schemes that they were, in effect, doing the work of the HSE for it.

This report argues that the situation could be ameliorated and even avoided: most of the initiatives are driven by the same legal requirements, notably the Management of Health and Safety at Work Regulations 1999, the Health and

¹ "RoSPA NOSHC Inquiry into OSH assistance to SMEs: a map", Howard Fiddeman, 12 April 2007, www.rospace.com/occupationsafety/sme/map.pdf.

² NEC Hilton Metropole, 23 May 2007. A transcript of the proceedings is available at:

Safety at Work Act 1974 and the Construction (Design and Management) Regulations 2007 (and their predecessors). The criteria are therefore, de facto, usually legal requirements, but left to third-party, non-state enforcement, be it by insurers, construction clients or work placement organisations. Although arguably in line with the Robens' philosophy of "self-regulation", this has helped to produce an environment for SMEs that is not conducive to their growth, as well as doing little on the whole to help them to comply with the law.

1.1 Better Regulation

These findings, and potential remedies, should therefore fall firmly within the government's better regulation agenda. A genuine attempt to reduce "burdens" on employers needs to address the regulatory system as a whole and not just the interface with state enforcement bodies. The NOSHC Inquiry – both generally and specifically in relation to pre-qualification criteria – deals with the practical effects of legislative-related bureaucracy . The Hampton report³, concluded and recommended, inter alia:

- smallest businesses are hit hardest by regulation, often considering it a hindrance to growth;
- there are too many, often overlapping, forms and data requirements, with no scheme to reduce their number (although this was primarily about form-filling related to regulators);
- there should be a reduction in unnecessary inspections; and
- regulators should adopt positive incentive schemes.

Implementation of Hampton has proceeded apace, notably the Legislative and Regulatory Reform Act 2006, the draft Regulatory Enforcement and Sanctions Bill, and the work of the Better Regulation Executive (which is responsible for giving effect to the Government's targets for reducing the cost of administering regulations, as well as rationalising inspection and enforcement arrangements).

³ "Reducing administrative burdens: effective inspection and enforcement," HM Treasury, ISBN 1 84532 088 3, www.dberr.gov.uk.

On 25 July 2007, the secretary of state at the Department for Business, Enterprise and Regulatory Reform (DBERR), John Hutton, outlined further plans to implement the better regulation agenda. These include:

- simplifying the legislative requirements faced by employers;
- an amendment to the draft Regulators' Compliance Code to introduce an explicit duty on regulators to review the imposition and maintenance of burdens on business (and to reduce them); and
- work by the BRE and the HSE on the case for simplifying and reducing the costs associated with health and safety policy for low-risk businesses (particularly SMEs).

Besides examining the case for reducing "third party" OSH regulatory burdens, this report also attempts to assess the extent of contact by such regulators with SMEs (see appendice 3), and makes suggestions about ways in which the nature and quality of this contact might be improved to help SMEs improve their OSH management. If a common, appropriate and competent approach can be adopted by such "regulators", not only can unnecessary bureaucracy be reduced but procedures can be improved to enable SMEs to receive improved advice and signposting to other sources of information and assistance, for example to help them avoid making excessive and costly responses to their legal duties.

NOSHC is keen to receive views on this report and to bring key stakeholders together to explore its implications for improving OSH compliance in small firms.

1.2 Methodology

The Committee's Inquiry Steering Group decided that it wanted initially to compare the approaches of Workplace Health Connect, Construction Health and Safety, the SME indicator, the Learning and Skills Council, a trade association scheme accepted by the ABI's Making the Market Work initiative and the SEC group "core criteria". This report aims to inform that examination.

An analysis of six schemes, however, could not, in itself, demonstrate quantitatively an extensive presence of common criteria. This report therefore

examines a dozen additional schemes: their inclusion is as examples, not as exemplars; other schemes, just as valid, have not been included.

This report uses as a starting point the *Core criteria for assessing contractor safety (SEC group core criteria)*. These were developed by the Electrical Contractors' Association (ECA) and the Heating and Ventilating Contractors' Association (HVCA), with the help of the HSE, and have been adopted and published by the SEC Group. The use of the SEC core criteria should not, however, be taken to mean that this report is focusing on the construction sector. This report looks at schemes in different sectors; the SEC core criteria are used as a starting point here mainly because the NOSHC project wishes to avoid reinventing the wheel and because they already enjoy significant stakeholder support:, notably:

- they are of a high, practicable calibre, and are generally as brief and simple as it is possible to be without degenerating into a lack of specificity and practicality (subject to the observations made later in this report), and therefore likely to be attractive to SMEs;
- they are mostly based on the core requirements of the Management of Health and Safety at Work Regulations 1999, and so relevant in all employment sectors;
- they are enshrined in the Approved Code of Practice (ACoP) to the Construction (Design and Management) Regulations 2007 (CDM);
- as a construction umbrella, the SEC Group comprises the Association of Plumbing and Heating Contractors, British Constructional Steelwork Association, Lift and Escalator Industry Association, Electrical Contractors' Association of Scotland, as well as the ECA and HVCA), and therefore offers a degree of buy-in; and
- the constitution of the newly formed National Health and Safety Prequalification Forum (see section 3 below) states that it aims to provide a forum that “can advise and influence clients” on acceptable interpretation and appropriateness of health and safety competency standards in UK schemes particularly relating to

the CDM Regulations 2007 and the “core criteria”. The aims of the forum include: elimination of unwanted health and safety; bureaucracy in procurement; promotion of the CDM competency core criteria standards in non-construction works; helping clients and contractors to achieve value for money by avoiding needless duplication; and provide confidence in first stage safety competency assessments through a consistent, reliable, and quality-controlled standard of vetting.

Information was initially gathered from electronic and hardcopy publications. The analysis was then supplemented by telephone and/or email interviews. Finally, all scheme operators were asked specifically for: quantitative information on their SME membership totals; the number of organisations that have taken part in their schemes; the effect of participation on insurance arrangements; and for their views on whether duplication of compliance schemes was a problem and on the desirability of a mutually-recognised set of core criteria.

2. THE SCHEMES

The schemes covered in this report are just a selection of the schemes available. Altogether, the schemes have the potential to reach 100,000s of SME suppliers and contractors and tens of thousands of clients (see appendice 3).

2.1 SEC

The SEC document, *Core criteria for assessing contractor safety*⁴, lists 12 core criteria, with corresponding “standards” that the contractor needs to achieve. SEC believes the criteria will be of use as part of the “pre-qualification” or “stage one” assessments, and provide “a clear picture of what good (enough) looks like”. They are not, however, a prequalification scheme in their own right, and they should not prevent clients asking for further information if it is needed to ensure safe working.

The criteria cover: the occupational safety and health (OSH) policy; OSH arrangements; competent advice; training and information; individual qualifications and experience; monitoring, audit and review; workforce involvement; accident reporting and enforcement action; sub-contracting arrangements; risk assessment; cooperation with other employers; and welfare provision. These criteria and a summary of the standards are set out in col.1 of the table in appendice 1.

Points to note:

- there is nothing specifically in the SEC criteria about sickness absence and return-to-work;
- SEC does not ask about insurance arrangements;
- SEC asks about enforcement action as explicitly as any of the other schemes, and more explicitly than most;
- nearly all the criteria could apply immediately to a non-construction environment, although one or two of the criteria or standards might be deemed

⁴ “Core criteria for assessing contractor safety”, SEC Group.

too construction-orientated for a wider application (particularly welfare, cooperation with others and the arrangements standard);

- the criteria can be further simplified to apply to “sole traders”, ie by removing the employer elements;
- the criteria and standards are based on sound principles of health and safety and risk management, and do not mention individual hazards; and
- the SEC standards do not specifically cover some of the criteria frequently found in other schemes reviews in this report, notably first aid, fire and other emergency arrangements (although their coverage is implied in the need for “management arrangements”).

2.2 Workplace Health Connect

The Workplace Health Connect (WHC) documents examined in this report are a benchmarking tool and a record book used by advisers when visiting companies⁵. The benchmarking criteria were drawn up by David Bryant for WHC in the north east: the *WHC draft benchmark standards* are easy to use, divided into seven criteria, which are split into 35 sub-criteria, each requiring a “yes”, “no” or “partly” answer.

Compared with the SEC core criteria, the WHC standards:

- are more overtly judgmental, in that they comprise statements such as: “The employer manages the health, safety and well-being of workers (including managing absences and return-to-work issues) and others”. And: “The employer provides a safe and healthy working environment” (which is then broken down into safe and healthy premises, working environment and appropriate welfare facilities);
- cover most aspects of all the SEC criteria;

⁵ WHC draft benchmark standards, Workplace Health Connect (north east).

- do not explicitly require that, unless supervised, the worker has the specific qualifications and experience for the task. It is likely, however, that this aim would be achieved through compliance with the other WHC criteria;
- do not ask about enforcement action;
- provide lists of significant risks;
- do not explicitly require the OSH policy to be signed by the MD or equivalent;
- not surprisingly, separate health from safety in terms of the risk assessment, with a specific criterion on occupational health risk assessment;
- ask explicitly about provision for emergencies and first aid; and
- ask specifically about work arrangements when away from the employer's site.

The books can vary between advisers; the one analysed in this report is used by WHC advisers in the north east and comprises a general section (including sections on work placement, accreditation, young and disabled workers, safety committees, compensation claims and working with other bodies) and 10 specific areas. Together these cover similar territory to those in the WHC standards above, although the 10 areas include separate sections on absence management (two), stress, musculoskeletal disorders and the SME indicator. As a "record", they are also framed differently, in terms of whether they were raised by the adviser or the SME, discussed and what action was agreed.

2.3 Learning and Skills Council

The Learning and Skills Council (LSC) sets out 10 *Standards for health and safety*, divided into 53 sub-standards⁶. The standards cover "learners" – a category that includes trainees, apprentices, students, pupils and others (for example an employer's employees who receive training or learning funded by the LSC). This will often mean carrying out health and safety assessments of

⁶ Standards for health and safety, Learning and Skills Council, February 2006

employers and the work locations where learners are going to train, learn and work. The LSC agreed its procurement *Standards* approach with the HSE and the Department for Education and Skills. The LSC advises that the purpose behind the approach was “to provide clarity, provide consistency of standards and the assurance that learners are in safe, healthy and supportive environments.” As such, the standards reflect the main OSH legislative requirements and “should be no more than employers do already”. The LSC advises that this will particularly help SMEs better understand their obligations.

The LSC expects their funded organisations to use the standards when judging, for example, employers, when considering work placements: it is not the LSC making these assessments. The LSC has other benchmarks and contract clauses that it uses when making judgments on the suitability of funded organisations’ OSH management systems. This includes a *LSC learner health and safety questionnaire* (HSQ1) that covers: insurance arrangements; enforcement experience (prosecutions and notices); confirmation of awareness of, and compliance with, health and safety legislation; OSH policy; young persons and other groups of workers; competent persons; OSH arrangements; employee participation; risk assessment and control measures, plant; responsibilities; monitoring; investigation, reporting of ill health and accidents; review and audit; OSH annual development plan; promotion of the “safe learner” concept, including the provision of information, training, instruction and supervision of learners; ensuring that learning takes place in a safe environment; and that if learning takes place in other locations, for example work placements, that there is an assessment of OSH suitability prior to the learning taking place.

Nine of the standards are “core”; a tenth is specific to the learner. Much of the text is similar – almost verbatim – to the WHC criteria, and elsewhere covers in general the same ground. Most of the above points under WHC therefore apply to the LSC. There are, however, some differences, in particular the LSC standards:

- require the communication of OSH arrangements to “employees”, rather than “workers” of WHC;
- do not provide lists of significant risks;
- address OSH risks as a single category, whereas the WHC separates health risks from safety risks;
- cover emergencies in a slightly different manner in that they focus on first aid, and do not explicitly require that arrangements have been made for fire and other emergencies (although the standard does require that incident arrangements are communicated to employees). Instead, the LSC has a separate section on fire;
- have a separate standard on machinery, whereas the WHC highlights machinery as a significant risk in the risk assessment section;
- have a specific section on personal protective equipment (PPE);
- do not cover arrangements with sub-contractors; and
- may not be as stringent in terms of cooperation with other employers.

The LSC advises that there are some problems of duplication of assessing OSH at employers between our funded providers, and that the LSC has in the past encouraged funded organisations to share information where appropriate.

Further: “If a common set of standards were to be developed, the LSC would be interested to ensure we are aware of these and to make employers we work with (through our funded organisations) aware of the standards, as appropriate.” The LSC is not, however, planning to review the OSH standards at this time.

2.4 Health and Safety Performance Index

The Health and Safety Performance Index (HSPI) or Small Firms Indicator⁷ differs from nearly all the other schemes reviewed here in that it concentrates only on hazards. The index takes the SME through 10 sets of questions on the

⁷ Health and Safety Performance Index / SME Indicator, Business Link/HSE

10 most common hazards: manual handling; repetitive tasks; hazardous materials; working at height; machinery; workplace transport; slips and trips; noise; vibrating tools and equipment; and incidents, including injuries, ill health, compensation claims, prosecutions, enforcement notices and fire. If the SME answers “yes” to the presence of any of these hazards, it is taken through further questions that, while specific to the hazard, will also cover issues such as involvement, information, instruction, competent persons and PPE. Each of the sections is allotted a maximum score of 10: there are also overall hazard and incident scores of 10 and a benchmarking facility. There is no verification of the entries.

The value of HSPI is likely to lie in alerting an SME to the main hazards it might face and the suggestions of issues that it might need to address as a result. But contrary to its own claims, the index does not show employers “how well they are handling health and safety issues”. This is because the mere presence of a hazard automatically generates a low score even if the SME’s management of the hazard is exemplary.

HSPI is therefore of little use in pre-qualification in its current form. It cannot properly help insurers set lower premia (one of the initial aims) unless they do so only on the presence of hazards, not on how well they are managed. It will be of no use to client companies, because the information does not tell them about how, or whether, the hazards are managed.

This is not to say, however, that HSPI could not incorporate a core set of criteria, not least because there is virtually no overlap between HSPI and core criteria schemes. Alternatively, it could be argued that a concentration on hazards might be popular among SMEs, if not to a client company, and so it should not be automatically dismissed.

2.5 Contractors Health and Safety assessment scheme

The Contractors Health and Safety (CHAS)⁸ assessment scheme currently has 17,346 registered contractors , of which:

- 6,636 are micro employers (1–10 employees);
- 6,153 are small employers (11–49); and
- 3,059 are medium (50 – 250).

CHAS contains comprehensive requirements in all the SEC criteria fields. These are set out in two main documents: an evaluation questionnaire and “assessment standards” that address some of the questions in the questionnaire. There is also a separate evaluation questionnaire for organisations with fewer than five employees. CHAS additionally has two additional sets for CDMC and designers. These follow the same format, but focus on regulations specific to the duty holder, for example training and qualifications.

Although the scheme applies beyond the construction sector, some of the questions are mainly or fully applicable only to construction companies. The main sets of questions are preceded by questions on competence and enforcement. The questions cover: policy; organisations; training; monitoring, audit and review; consultation and involvement; accident reporting; risk assessment and safe assessment of work; health surveillance; subcontracting; first aid; fire precautions; asbestos; portable electrical equipment; work equipment; and the principal contractor.

The questions, where necessary, are supplemented by brief explanations of what the assessor would expect to see. Fuller explanations are provided in the “assessment standards”, which are divided into four main areas, with 73 sub-questions and an introductory section on competent persons. The four areas cover most of the questions, albeit not with the same numbering. The standards

⁸ The Contractors Health and Safety Assessment Scheme: Assessment standards; Evaluation questionnaire; and Evaluation questionnaire for those employing fewer than five people, Contractors Health and Safety.

are split into two columns –“subject” and “legal or best practice standard” – and cover the following areas: competent persons; policy; organisation for training; consultation; arrangements (which covers accident reporting; health surveillance; manual handling; workplace; asbestos; first aid; contractors; hazardous substances; electrical safety; work equipment; display screen equipment; fire and emergency procedures; and personal protective equipment). Each area can be detailed: for example the “policy” area describes nine strands that have to be addressed, including a named director responsible for OSH, adequate resources and provision of competent advice.

The small firms questionnaire notes that the policy and arrangements need not in law be in writing, but that firms will still have to be able to demonstrate the arrangements to a potential client. Again there is emphasis on competent advice. Written evidence is, however, required for risk assessment, safe working procedure or safety method statement; sample copies of training certificates and records for all levels of employees; COSHH assessments; and assessing the competence of a subcontractor or sub-consultant.

Further points to note:

- Overall, CHAS addresses the SEC core criteria and other areas in a way that can be accessible to smaller firms.
- CHAS is among the more detailed of the schemes.
- CHAS additionally looks at specific hazards in detail.
- CHAS specifically addresses emergency arrangements.
- CHAS notes its standard questionnaire “reflects the CDM core criteria for the first stage assessment of compliance” and that the small firms questionnaire reflects the requirements of the revised CDM Regulations.
- CHAS asks applicants that have been assessed recently, or are about to be assessed, through the National House Building Council Safety Scheme, SAFEcontractor, SAFE-T-CERT, Achilles UVDB Verify and Exor Management

Services to contact it before completing the form. This is because of the possible mutual recognition of the schemes.

2.6 Making The Market Work

The ABI's Making the Market Work (MTMW)⁹ scheme sets out guidance to trade associations and trade bodies about the kind of best practice that employer liability insurers would like to see member firms adopt. It should be noted that the criteria are not directly comparable with the other schemes reviewed in this report (their target audience is different).

Even so, it is worth noting that the criteria that the ABI describes amount to around half of those set out in the SEC document. The criteria are membership of the trade association's health and safety scheme; the meeting of a recognised health and safety standard and an up-to-date policy; an assessment tool; training; and collection of statistics. As we will see below, however, the requirement to be a member of a trade association health and safety scheme by itself will cover most of the SEC core criteria.

MTMW is not an accreditation: instead it aims to send "clear signals about the specific features of health and safety practice to which [insurers] attach greatest importance". Once the ABI's assessment process is completed, it sends details of the trade association scheme to all its members that offer EL insurance. The decision whether or not to offer any discount rests with the individual insurer. Although there are some examples of firms receiving discounts, the weight of the evidence indicates that discounts are generally not being offered to significant numbers of firms. Interviews with some of the approved schemes revealed dissatisfaction with the lack of inroad made by the scheme in terms of insurers offering reduced premia. In the next sections (2.6.1 – 2.6.5) we look at seven

⁹ Making the market work: initiative for the assessment of trade association health and safety schemes, September 2003, Association of British Insurers.

schemes have been approved under MTMW (three of which are Responsible Care programmes).

2.6.1 British Printing Industry Federation

The British Printing Industry Federation's (BPIF) *Health and safety healthcheck*¹⁰ report was the first trade association scheme approved under the ABI's MTMW initiative. The BPIF has 2,500 members, 85% of which have less than 25 employees; the average size is 44 employees. Approximately 400 members have completed the scheme. The BPIF does not know how many members have seen their insurance premiums reflect completion of the healthcheck. The BPIF reports that duplication of form filling around such criteria when tendering for work "is a massive problem", and that it would "definitely" be interested in a core set of common, mutually recognized criteria.

The *healthcheck* covers 22 areas, each of which has 10 sections: general arrangements; management and communications; training; fire; electricity; control of machinery and equipment hazards; mandatory equipment testing; transport/traffic routes; COSHH, solvents and flammable materials; skin care; personal protective equipment; noise; upper limb disorders; lifting and handling; working at height; signs and signals; first aid; health surveillance; offices/studios; storage; control of contractors and visitors; and special risk assessments.

The applicant's answers generate a report, which compares the applicant with OSH legislation and industry good practice, and makes recommendations for actions. Essentially, applicants score: full marks for best practice and legal compliance; 75% for legal compliance only; and 50% for best practice only. The report ranks the issues too. The BPIF can also offer consultancy, guidance and training.

The check is annual, which theoretically allows member companies to approach

¹⁰ BPIF Health and safety healthcheck report and Introduction to the British Printing Industry Federation healthcheck, British Printing Industry Federation.

insurers showing year-on-year improvements. Yet the BPIF advises that few companies have secured reductions in premia. The BPIF has a block insurance arrangement with the Royal Sun Alliance: a score of 70% generates a 10% reduction on 10% of the overall premium. A printer can show the report at a tender stage, but there is no formal recognition of the scheme by clients.

The BPIF is clear that “the healthcheck is based purely on the answers given during the BPIF visit [and] no attempt is made to verify the answers given, similarly no assessment is made of the quality of the material”. The only exception is where the healthcheck is part of a government-funded training contract. In these cases, “essential” items are audited. The training contract aspects include a risk-banding comprising scores for eight items. Approval requires a full score on item one (general arrangements). The general arrangements comprise: OSH policy; biennial review of the policy; identification of main risks; and arrangements for controlling main risks.

The BPIF healthcheck is free to platinum members, £550 for gold and silver members, and £850 for non-members.

The BPIF scheme is comprehensive in approach but, compared with some of the schemes reviewed in this report, focuses more on specific hazards rather than general OSH management. Thus, in comparison with the SEC criteria: it does not appear to:

- require the policy to be signed by a senior director;
- cover access to competent advice;
- cover individual qualifications and experience;
- cover accident reporting or enforcement issues;
- cover cooperation and coordination; or
- cover welfare provision.

2.6.2 British Constructional Steelwork Association

The British Constructional Steelwork Association Ltd (BCSA) has an additional group called the Register of Qualified Steelwork Contractors (RQSC): national organisations such as the Highways Agency will only use steel work contractors that are on this register because they have been competence assessed. This assessment covers OSH, technical and resources.

The BCSA is currently changing its membership criteria for all members to be assessed, with routine re-assessments taking place. It intends following the *RQSC core criteria for demonstration of company competency* (draft Oct 2006 version)¹¹, which are based on the CDM core criteria. The BCSA advises that it agrees with the HSE “that far too many competency assessment schemes are on the market now and they bring little or no value to improving OSH when contractors have to spend so much time and effort completing assessments that are only slightly different from the last one they completed, and usually have to pay a fee also to a so called accreditation scheme”.

The draft *RQSC core criteria* comprise the same dozen criteria as the SEC (BCSA is a member of the SEC group). The only variations are that the wording is occasionally a little different and the two columns of SEC criteria and standards are supplemented by a third column of examples of how the standards might be met.

The BCSA emphasises that these “are not yet another health and safety pre-qualification scheme but they will help to remove the confusion and administrative burdens associated with an array of UK pre-qualification schemes”. It adds that while clients and contractors may find the criteria “a valuable guide for Stage 1 assessment, they can still ask for further information, if necessary, to ensure health and safety on-site (for example, for specific types of work, or for Stage 2 enquiries).” The criteria, claims the BCSA, “provide clients and contractors with a clear picture of what ‘good’ looks like”. The document also

¹¹ RQSC core criteria for demonstration of company competency (draft Oct 2006 version), British Constructional Steelwork Association Ltd.

notes that should RQSC members find the criteria a “challenge”, they will be offered information, advice and support to help them meet the requirements.

2.6.3 Heating and Ventilating Contractors' Association

The Heating and Ventilating Contractors' Association (HVCA) runs a scheme¹² that comprises its own assessments as well as audits through BM Trada, which is UKAS-accredited. The scheme has, at any one time, between 1,350 and 1,450 members. (The HVCA does not have figures broken down by size of organisation.) All members are CHAS-registered. The assessment involves checklist procedures and site visits every three years, although the new CDM Regulations mean that they will in future be assessed every two years. There are two checklists and two sets of guidance – for “small” firms with fewer than five employees, and “large” companies with five or more employees. All firms have been through a first rotation of the scheme and the HVCA is two thirds through the second rotation.

Although the HVCA does not have information on how many of the companies have secured insurance discounts, it reports that the brokers it uses “do negotiate a lower premium for our members based on the comfort of our inspection”.

The HVCA advises that duplication of form filling is a problem for its members, “but registration with CHAS and membership of HVCA helps”. Asked whether the HVCA would have any interest in a core set of common, mutually recognized criteria, it advises: “We already have the criteria for contractors, which is in CDM and set by SEC. Another would be likely to confuse.”

The HVCA scheme is split into 14 areas, each setting out requirements and standards. Some of the standards are not standards in the strict sense, but elaborations or applications. For example for the 12th area – “portable electrical safety” – one requirement states: “Is there guidance to employees about what equipment constitutes portable electrical equipment”, with the standard advising only that: “This should cover sites, offices and workshops”. Some of the standards are restricted to advising “self-obvious”.

¹² : Inspection checklist – health and safety; Guidance for assessment (two separate documents for 5+ staff and less than five staff); Heating and Ventilating Contractors' Association.

The HVCA also co-developed the SEC core criteria with the ECA and is a member of the SEC Group of six construction industry trade bodies. It is therefore not surprising that the group's scheme for larger companies contains all of the SEC criteria, with one exception (see below). Points to note:

- the HVCA accident and enforcement criterion does not cover the same enforcement ground as SEC. Whereas SEC requires details of enforcement action over the previous five years and consequent actions taken by the company, the HVCA's checklist is limited to the requirement that: "If applicable, have appropriate actions been taken following enforcement action?", with the standard stating: "Is there evidence that the company has reviewed arrangements, made improvements, etc?" The guidance is silent on the issue;
- the scheme goes into far more detail than SEC, but is none the less compatible for that and remains easy to use;
- under the risk assessment criteria, there are specific entries on hazardous substances, manual handling and working at height; and
- the scheme also differs from SEC in that it has a separate section dedicated to first aid, as well as on asbestos, portable electrical safety, work equipment and fire precautions.

The HVCA inspection checklist for small firms covers much the same ground as that for large firms, albeit in a briefer form and with an emphasis on competence. The sections are:

- method for ensuring safe working;
- training;
- demonstration of identification and control of hazardous substances;
- demonstration of the competence of any sub-contractors used;
- signed and dated policy;
- access to competent advice; and
- access to competent construction advice.

2.6.4 British Furniture Manufacturers

The British Furniture Manufacturers' (BFM) *Health and safety certification* scheme¹³ has been running since March 2004, in which time 43 organisations have been certified. The requirements comprise: nomination of a director and a manager responsible for OSH (can be the same individual in smaller companies); compliance with an OSH policy; reporting on performance, such as a summary of accidents; and initial site audit by BFM Ltd's OSH consultant to evaluate against legal requirements and industry best practice). The subsequent audit report will contain an improvement plan, which will focus on the OSH management system (guidance on HSG65 is provided) and progression towards full legal compliance and industry best practice. Members must submit a six-month interim progress report. Each year a review is undertaken of continuing improvement. All scheme members receive an on-site audit biennially.

The BFM scheme most likely meets all, or nearly all, the SEC core criteria, although rather than explicitly stating the criteria, the scheme refers to HSG65 instead. It additionally comprises site audits and an evaluation, with frequent review.

2.6.5 EVH

EVH is an "umbrella" organisation covering 140 housing associations. On behalf of EVH, ACS Environmental Services Ltd has, for 13 years, assisted the associations, including the production for EVH of a "generic" *Health and safety control manual*, which is issued to every EVH member upon joining. ACS also carries out site visits and training, and audits the members against the manual. The audit is free, ie part of the EVH's membership fee. Most organisations are audited every 18–24 months, although some (particularly those with less than

¹³ Health and safety certification scheme, British Furniture Manufacturers.

five staff) may be audited less frequently. Around 100, however, are audited every calendar year.

The manual has been accepted under the ABI's Making the Market Work scheme and by Communities Scotland, which is responsible for funding issues within the social housing sector, as the sector benchmark standard. Using the manual, all organisations are required to develop a health and safety management system to enable compliance with health and safety legislation. Each organisation is expected to tailor the contents of the manual to reflect actual procedures in place and to maintain their own health and safety records.

ACS advises that: "The audit is a qualitative and quantitative assessment of the arrangements in place. The contents of each organisation's manual is checked against actual practices in place to determine whether legal issues are being addressed and whether staff are doing what is stated in the manual. This results in the identifying of legal and operational non-compliances. Recommendations are also made to develop further the management system. Thus a total number of non-compliances and recommendations are determined. A percentage score is then calculated based on the number of non-compliances identified."

It has not been possible to obtain a copy of the manual, and so the comparison with the SEC core criteria has been prepared on the basis of a contents summary and detailed responses from ACS to specific questions. The manual appears to offer a comprehensive package. It has nine sections, divided into up to 20 sub-sections. The nine sections cover issues such as: policy and organisation; buildings; people, work carried out by employees; and work carried out by external contractors. As an example of the depth of the coverage, the section on buildings covers 13 areas, including fire safety, electrical safety, workplace conditions, safety audits, gas safety and water systems.

The manual covers all 12 of the core criteria (nearly all of them fully), as well as three of the additional criteria. Points to note include:

- there is nothing specific on actions to take on dealing with enforcement activity;

- emergency provisions also extend to gas safety; and
- the manual covers all of the additional criteria in the table, except for public reporting.

ACS advises that it is not required to hold information on any effect on associations' insurance premia of successfully completing the scheme. For the same reason, it is unable to comment on whether or not duplication of health and safety form-filling is a problem for the associations, although it notes that it "may be" a problem. Nor would it have any interest, or see any benefit, in a core set of criteria because the "manual has been developed specifically for his [housing] sector".

2.7 Responsible Care

The Chemical Industries Association's Responsible Care scheme¹⁴ ranges wider than most of the schemes in this report to cover the environment and product safety. Without access to the full criteria, it is not possible to evaluate the scheme fully, but it is likely that it would fulfil all, or nearly all, of the SEC core criteria.

To display the Responsible Care symbol, organisations must, among other things, demonstrate top-level commitment to the guiding principles, follow codes and guidance, provide indicators of performance, engage in open and honest communication, cooperate in the mutual help network, encourage programme development verification, and self assess to Responsible Care management systems. The qualifying requirements require the chief executive to commit the organisation to the principles, including that the company manages all aspects of its activities so that it provides a "high level of protection for the health and safety of employees and associates, customers, and the public ...". The principles cover: policy, employee involvement (communication and training), experience sharing with other organisations, cooperative working with regulators, assessment and management of risks associated with processes, product stewardship (risk

¹⁴ Responsible care, Chemical Industries Association

assessment of products), resource conservation, stakeholder engagement (reporting on OSH performance), and documented management systems.

2.7.1 Chemical Business Association

The Chemical Business Association (formerly, the British Chemical Distributors' and Traders' Association until 2006) has been running a Responsible Care (RC) programme since 1993¹⁵. RC requires continuous improvement in health, safety and environmental performance. The programme is regularly updated, most recently to enhance the security elements (the August 2007 draft examined for this report was due to go live later in 2007). The programme is similar to the CIA's Responsible Care programme (the CBA licenses the logo from the CIA, which has to be satisfied with the integrity of the CBA programme). The CBA scheme is less complicated in terms of environmental aspects than that run by the CIA because the CBA is concerned with distribution of chemicals, whereas the CIA scheme involves manufacturers (and therefore has more requirements on environmental impact). This report looks at the CBA's RC programme in detail because most of the findings can be applied to the suite of RC programmes, which are highly developed schemes.

The CBA's RC programme complies with the International Council of Chemical Trading Association (ICCTA) programme. In 1998, the CBA made a commitment to RC a condition of membership initially for new members; in 2002, the CBA made it a condition for all full and candidate members. Third-party verification will become a condition of membership by the end of 2009. The CBA currently has 126 members, 8% of which are not SMEs (8% are micro, 38% small and 46% medium-sized enterprises).

The RC application process for candidate members involves:

¹⁵ Responsible care, Chemical Business Association, www.chemical.org.uk/responsible_care.asp, email: cba@chemical.org.uk, tel: 01270 258200.

- the CEO giving a signed commitment to eight guiding principles, and appointing an RC coordinator, who must attend a CBA workshop;
- completion of the self-assessment questionnaire (SAQ);
- preparation of a three-year improvement plan; and
- preparation of Indices of Performance (IoP) for the previous calendar year.

Applicants become candidate members for 12 months, during which time they prepare the paperwork for the application. Sometimes, the CBA's RC coordinator will visit a company for half or one day: this experience allows a company "to get it right the first time", making the process much easier thereafter. The application process and the visit is "free" (ie part of the CBA membership fee). Following acceptance by the CBA's RC committee, members must complete and return a SAQ and improvement plan to the CBA in October each year and an IoP return in the following first quarter. Members are expected to use the results of both to amend their three-year improvement plans, which should "roll" on an annual basis. The IoPs are confidential and published by the CBA in an amalgamated and anonymous format.

The eight guiding principles to which the chief executive commits, and the SAQ (54 questions), cover the same eight guiding principles:

- conformity with legal requirements, codes of practice and guidance;
- management of risk, including assessment (in relation to employees, contractors, customers, the public and the environment);
- policies and documentation consistent with RC;
- provision of health, safety and environment information to contractors, customers, statutory bodies and the public;
- information, instruction and training for employees;
- establish and maintain emergency response systems;
- ongoing improvements to OSHE systems; and

- community interaction about concerns.

The benchmarking IoPs cover:

- fatalities and reportable injuries (RIDDOR major injuries and over-three-day injuries and totals of days lost as a result);
- lost time accidents (the number of one- to three-day injuries and the total days lost);
- dangerous occurrences (non-transport);
- transport incidents;
- waste disposal; and
- convictions and enforcement notices.

The CBA advises that the SAQ is a “camera shot” on the state of the company on joining. While it uses a percentage scoring system, this is to measure improvement over the years. There is no minimum score that would act as a bar for entry to the CBA. Further: “It is to be noted that it is anti-competitive to set high criteria for entry to an association or a programme of this type.” The CBA’s position is similar on IoPs: “Fatalities are dealt sympathetically with a view that the company has a lot to learn and it is better they are in a programme with access to advice rather than struggling on their own.” A fatality does, however, prevent entry to the annual RC awards – effectively for two years.

Validation and insurance

The CBA notes that stakeholders are “now beginning to ask for tangible proof that the programme is working effectively” in companies. The CBA therefore helped to develop with the European chemical manufacturers and other chemical distributors the European Single Assessment Document (ESAD) for chemical distributors. First launched in 1999, this Safety and Quality Assessment System (SQAS) has been updated to ESAD II, which asks 213 questions, and the CBA is encouraging all its members to have independent third-party assessment of their RC activities. The CBA advises that the management system of ESAD II follows

closely its members' modular three-year improvement plan. As of October 2007, 15 CBA members had taken, or were taking, ESAD II:¹⁶ from the end of 2009, ESAD 11 will be required for CBA membership. The ESAD assessment and report is paid for, and owned by, the member. The CBA also considers other equivalent verification systems.

The Association of British Insurers (ABI) rates the RC programme as a well-established system of risk management. The ABI has distributed an on-line summary of its RC assessment to its 400 member companies, and the CBA advises its members to bring the ABI's assessment to the notice of their insurers. A substantial number of CBA members obtain their insurance through brokers who are affiliate members of CBA, two of whom persuaded insurers to take on CBA members when the insurance market was tight around three years ago. The CBA believes that the ABI seems to have lost interest in Making the Market Work, due partly to the current cycle of the insurance market.

The CBA RC website advises that insurers take RC compliance into account when calculating premiums – particularly in respect of members applying independent third-party verification: “Good progress has been made with the ABI, and the CBA RC Programme is both recognised and provides a useful starting point for negotiations by being able to use statistics for the whole industry when discussing the areas of concern with our smaller members.” In addition: “Commercial proposals are available that offer free assessment to the ESAD II in return for a long-term competitive insurance contract.” The CBA does not, however, collect statistics on reductions in insurance premiums. The CBA advises that: “There are anti-competitive overtones in this area as insurance premiums represent a substantial cost to members.”

Core criteria

The issue of duplicate pre-qualification assessments is less of a problem for CBA members (and other Responsible care programme participants), than for most of the other schemes that we have looked at. The CBA advises that its programme

¹⁶ www.sqas.org.be.

fulfils the requirements of many leading suppliers for distributors to comply with RC. There is, unsurprisingly, mutual recognition of RC between the CIA and the CBA and, in addition, a Code of Conduct that all CBA and CIA members must sign that requires reporting of suspicious and illegal manufacture and sales of chemicals and drugs precursors. But, says the CBA, there are still issues with retailers after “scares” (dyes, explosives from ammonium nitrate), when people panic and invent sometimes knee jerk reactive compliance schemes.

The CBA also notes the “Government’s Better Regulation Task Force has decided that there are more cost-effective ways of enforcing legislation than by repetitive visits from inspectors of the HSE and the Environment Agency. Negotiations are at an early stage but there is every indication that some form of reward will be given to companies who can demonstrate their commitment to RC and the consistent achievement of best practice.”

Against the 12 core criteria presented in this report, the CBA’s RC programme explicitly satisfies eight, and is likely implicitly to require most or all of the remainder because the first category of the SAQ questions and principles requires compliance with all legal requirements, codes of practice and guidance. Specific points to note about the CBA RC programme are that:

- there is nothing explicit on access to competent advice. The CBA advises, however, that it runs a competent expert technical help desk that is free of charge to members and particularly those who have a query about technical and regulatory requirements. Biannual meetings explain and review the latest and forthcoming legislation and act as a forum for interchange of ideas on RC;
- the requirement on a company to provide injury information extends to non-RIDDOR injuries but not to incidents that do not result in injuries or time off;
- there are requirements in terms of sub-contractors (but not in terms of monitoring); and

- there are no explicit requirements about welfare provision or coordination and cooperation with other employers (although the latter are obviously more related to the construction sector, from where the core criteria emerged).

In terms of additional criteria required by other schemes, the CBA's RC programme:

- contains detailed requirements on emergencies on and off-site, although it has nothing specific on first aid (because, advises the CBA, this is covered by Regulations);
- does not ask explicitly about young workers or health surveillance;
- involves reporting to the CBA on OSH performance, but does not explicitly require public reporting, although one of the eight guiding principles concerns the local community, which is likely implicitly to involve reporting to the public.

RC is recognised within the chemical sector and is a detailed and sector-specific scheme, meaning that it is not clear how it would benefit from a core-criteria approach. In any case, the CBA advises that it does not contemplate pre-qualification criteria because it "is against the philosophy and attitude of RC, which welcomes every new member "as they are and their improvement is at the core of the RC ethic. RC is not an exclusive club." Further: "Significant pre-qualification criteria could be interpreted as anti-competitive behaviour and any organisation that uses this route needs to seek proper legal advice. CBA distances itself from this approach."

2.7.2 British Coatings Federation

Coatings care is a voluntary, worldwide umbrella programme for the paint and printing ink manufacturing industries. It "offers participating companies the opportunity to pursue a common, effective management approach for their health, safety and environmental programmes and advises them how to achieve high standards by self assessment and by measurement of improved performance." The programme is administered under the auspices of the

International Paint and Printing Ink Council (IPPIC), by the Coatings Care Industry Stewardship Committee (CCIS).

Coatings Care¹⁷ is fully compatible with the chemical industry's other RC programmes (see above). A memorandum of understanding between the British Coatings Federation (the BCF is the sole trade association for the manufacturers and suppliers of paints, coatings and printing inks in the UK, representing 90% of the industry) and the CIA ensures mutual recognition. As such, this report will not look at Coatings Care in detail, and it should be noted that many of the above observations, and the correlations with the core criteria, of the CBA also apply to Coatings Care, although there are some differences, notably the use of third-party verification.

The BCF advises that it wants to involve not only its member companies but also its customers, suppliers and contractors. The scheme was assessed by the ABI Making the Market Work panel in October 2003. The panel "felt that the key weakness with the programme was that it did not include a formal third party audit of performance, either by the association itself or peer review. All things considered, however, the Coatings Care programme appears to ABI to be a useful risk management tool and BCF should encourage its members to use it."

The scheme asks chief executives to appoint a company coordinator who: manages, coordinates and implements the BCF programme within the company; advises the chief executive and senior management; oversees company participation in the BCF survey of performance indicators; and ensures that self assessments are carried out in accordance with BCF codes and guidance. The BCF provides support for induction, training and meeting of coordinators.

All national Coatings Care programmes, including that of BCF, must be based on a policy statement agreed by the IPPIC: "Participating associations will support, develop and communicate a Coatings Care programme that may be utilised by member companies to protect worker and community health and safety as well as the environment. Such a programme shall:

¹⁷ www.coatings.org.uk/

- promote efforts to protect employees, customers, the public and the environment;
- provide relevant information on the safe use and disposal of industry products and make such information available to the public on request;
- make protection of health, safety and the environment an early and integral part of the organisational planning process;
- comply with all legal requirements which affect operations and products;
- be responsive to community concerns; and
- assist governments in the development of equitable and attainable standards."

Participants must participate in the annual survey of performance indicators and self assess their management practices. There are seven indicators, including safety and incidents (which includes fire and dangerous occurrences), managements systems and communication. A collated, anonymised report is circulated to all members. Around 70% of members, representing 85% of the market, have committed to the scheme.

Accompanying codes of practice, which were developed to align with HSG65 and international standards, cover "four key areas of management responsibility": manufacturing, transport and distribution, product stewardship, and community responsibility. These variously cover occupational health and safety, operations and process safety, risk management, emergency response, and health, safety and environmental education and information.

Each code and related guidance is supported by self-assessment questionnaires, which enable sites and companies to carry out regular self-evaluation of their systems and performance. The BCF advises that: "No formal verification is currently envisaged, but the introduction of good practices and systems means that companies will be well placed to apply for certification to external standards if they so wish."

2.8 Vinci

The information supplied by Vinci plc for this report is based around a document sent by Norwest Holst (a Vinci company) to potential contractors prior to interview for a specific contract or to being placed on preferred list of contractors: *Health, safety and the protection of the environment: a guide for sub-contractors working with Norwest Holst*¹⁸. The “compliance matrix” requires evidence in a dozen areas comprising 25 sub-sections, each of which can be answered yes or no, with a chance to “comment”. The content of the matrix is risk-management, rather than specific hazards, based. The assessors use the matrix as a checklist at the pre-selection interview. Norwest advises that: “Companies that cannot produce satisfactory evidence in relation to the matters covered by this document will be judged not to be competent for health and safety purposes.”

Vinci advises that the interviews are conducted by a quantity surveyor and the project manager. Work performance is scored too. The service is free. CHAS-registered companies still have to undergo the process; nor is there mutual recognition with other schemes. The decision as to whether another Vinci company accepts the report is left to the individual company.

The document notes that most medium and larger contractors should already have systems that are already fully legally compliant (and therefore with Norwest Holst’s requirements). Smaller contractors, it notes, may find it a useful source of guidance.

The 12 evidence areas cover: a health, safety and environment policy that comprises a general statement, the organisation and the arrangements; method statements; risk assessment; environmental protection; qualifications, training and experience; the contract health and safety plan (auditing against OHSAS 18001); site rules and communication to employees; health and safety file; competent advice; accident performance; and enforcement action .

The compliance matrix explicitly covers all the SEC criteria, except for workforce

¹⁸ Health, safety and the protection of the environment: a guide for sub-contractors working with Norwest Holst, Vinci.

involvement. In terms of additional criteria, it does not ask about emergency, fire and fire-aid arrangements.

The document is simple to follow and written in accessible language. For example, the requirements in terms of organisation for OSH states: "This part of the policy should spell out the health, safety and perhaps environmental protection, responsibilities of the persons in the organisation, starting with those at the top. Because health, safety and the protection of the environment are the responsibility of management you will not score well if the document places this responsibility onto the health and safety adviser; neither will we be impressed by a document which clearly belongs to another organisation. All the documents referred to in this guide must be a true reflection of your company and no one else's."

2.9 Safecontractor

Safecontractor is a third-party OSH accreditation scheme of contractors' OSH documentation that is run by National Britannia (an OSH and environmental risk management company). Accredited contractors become members and are listed on a register that is web accessible, with full audit details available to the client. Accreditation, advises Safecontractor, will avoid contractors having to complete "numerous client specific health and safety questionnaires".

Safecontractor has 9,500 accredited contractors (members), comprising:

- 15% with fewer than five employees;
- 20% with 15–30 employees;
- 50% with 30–250 employees; and
- 15% with more than 250 employees.

Safecontractor aims to increase membership to 20,000 by 2009. National Britannia also operates on behalf of Carillion Facilities Services and Regional Building a supply chain pre-qualification "SAF" system with approximately 6,000

contractors. Safecontractor believes that this more bespoke tailored service will increase in prevalence, with the core standards being transferable between sectors, but still having client-specific standards and administration requirements. Safecontractor covers 130 activities, with the bulk of its members in facilities and property management. It does not list many major construction companies among its members or clients.

This review of Safecontractor reflects nine documents supplied by the scheme, including applicant questionnaires, the *Charter Standards* and a client list. The process requires an applicant contractor to complete a questionnaire, and select the work activities for which it wants accreditation, ie the accreditation is not necessarily for everything a company does. The 130 activities include contract catering, water quality testing, general building maintenance, roofing, scaffolding and even high-level Christmas decorations. There are seven cost bands depending on the number of employees, ranging from annual subscriptions of £123 for a sole trader to £622 for firms with more than 250 employees. Upon accreditation, the subscription falls to between £99 and £499.

The application is assessed by an OSH auditor, who will be qualified to at least Tech IOSH levels and up to and including Chartered Members of IOSH. Assessors will also have a range of specialisms, including consultancy, construction, engineering and environmental.

The assessor telephones the applicant and explain the evidence it will need to submit; Safecontractor advises that it is at this point that most applicants appreciate what they need to do to acquire accreditation for each work activity and limit the areas for which they are seeking accreditation to those that they can prove they manage safely.

Certification is against the *Charter Standards*, which relate to the questionnaires: applicants must satisfy each standard, although there is a small amount of leeway for small firms in terms of the type of evidence they must submit. The standards cover: client specific requirements (if a contractor is linked to a client), although this does not affect accreditation; insurance; OSH policy (statement of

intent, organisation and arrangements); communication and consultation with employees; implementation, audits and review; staff training; emergency procedures; equipment; PPE; first aid, accident reporting, statistics and accident investigation; hazardous substances; manual handling; risk assessments; OSH adviser; prosecutions and statutory notices; and “activity specific information requirements” for higher risk categories of contractors.

The auditing is desktop-based, although an onsite audit may be carried out at the request of a client (for a fee). Assessors are also helped by an internal professional guidance note – unseen for this review – setting the professional standards and procedures to be followed by the assessors. A Safecontractor Forum – comprising Safecontractor staff, clients and contractors – reviews the standards and internal guidance.

Upon accreditation, the contractor receives a certificate and a schedule that identifies the scope of accreditation, including the work activities included in the assessment. The certificate and schedule expire after 12 months. Contractors complete an annual review form, which is then assessed. Safecontractor emphasises that accreditation “does not mean that the contractor complies with all relevant legislation and for all time” and that contractors must address OSH on a continuing basis.

During the application and auditing, applicants are supported by a telephone helpline, guidance notes, technical information, training, consultancy and special help for companies with fewer than five employees. In addition to certification, membership brings OSH support, employment and commercial advice, an electronic newsletter, discounted advertising rates and a press release of the certification. Safecontractor has an insurance scheme with a broker that offers reduced liability insurance premiums. Safecontractor cites discounts of up to 40%, along with a “guaranteed” renewal discount (subject to certain criteria). In practice, the discounts are secured mostly in the mid-range firms, with fewer reductions at the smaller end of the spectrum.

Unsuccessful applicants are sent a report recommending mandatory and advisory actions. An assessment remains active until successful, and Safecontractor advises that: "The assessment process is intended to support and encourage the contractor throughout the process."

Questionnaires

The *Safecontractor questionnaire* asks 21 sets of questions, many of which have several sub-questions. A first part of the questionnaire asks general details about the company, although this does not form part of the appraisal. The issues include size and turnover, trade unions and some environmental factors.

Accreditation is based on the second part of the questionnaire and supporting documentation. This asks the contractor for details of: its insurance; which direct labour services it provides; OSH policy; responsibility for OSH (and qualifications); arrangements; communication and consultation with employees; audit and review; training; external source of competent advice; accidents in the previous 12 months (RIDDOR categories and non-injuries), enforcement notices and prosecutions; assessment of sub-contractors and sub-consultants; qualifications and experience of assessors; and management of sub-contractors. Part two also contains a checklist explaining that information will be required covering risk assessments, method statements, PPE, COSHH, manual handling, work equipment, welfare arrangements, first-aid and accident reporting, public safety, emergencies and fires, and asbestos.

There is also a *Questionnaire for companies with less than five employees*. This covers similar ground to the main questionnaire and, together with the policy, asks for: general details, including insurance, sub-contractors and sub-consultants used, and which direct labour services it provides. The OSH section offers applicants the options of either adopting the Safecontractor OSH policy or providing its own information. The policy covers: the company's own arrangements; communication with staff; the person responsible for OSH (including attendance at a training course or relevant experience); OSH training for all staff; OSH arrangements (method statements for high-risk activities, site

procedures and instruction, welfare provision, work equipment, PPE, hazardous substances, first-aid and accident reporting, fire safety, manual handling and protecting the public); enforcement notices and prosecutions over the previous five years; sub-contractors' OSH performance and assessment procedures; risk assessments; and commitment to improving OSH.

If a contractor does not use the model policy, it must explain its OSH arrangements through 15 questions. These ask for the same information that is contained in the policy but additionally ask about client cooperation and external competent OSH advice. The questionnaire also contains advice on how to carry out a risk assessment, examples of risk assessments and a pro-forma, based on the MHSW Regulations and HSE advice.

SEC criteria

The Safecontractor scheme is among the most detailed and specific examined for this report. Its questionnaires and standards cover all 12 of the SEC core criteria. In terms of the additional criteria required by some schemes, Safecontractor covers emergency, fire and first aid in detail. It does not, however, ask specifically about young workers and health surveillance (although these would be covered by risk assessment and COSHH), or public reporting of OSH performance. Nor is a site visit part of the accreditation.

Safecontractor advises that its member contractors face some duplication of assessment schemes, but not a significant amount: it has a reciprocal recognition agreement with CHAS, and many of its contractors will work for four or five organisations on its client list. Safecontractor is also part of the "Safety schemes in procurement – competence forum" (see below). A principal difference from CHAS is that Safecontractor accredits contractors for specific activities, rather than the organisation as a whole.

2.10 Achilles

The Achilles group aims to create communities of organisations with a common supply chain, and then to standardise supplier sourcing. Achilles supports 16 communities globally, comprising 500 “buying” organisations in the public, utilities, construction, oil and gas, transport, mining and pharmaceutical sectors. The 500 includes the companies such as BP, Shell, and Balfour Beatty, and Achilles has also prepared pre-qualification schemes for the likes of the Nigerian oil and gas industry. Altogether, Achilles registers 30,000 pre-qualified suppliers and contractors.

The pre-qualification schemes operating in the UK are: *First Point Assessment* (includes the Dutch oil and gas industry), which “eliminates costly duplication in pre-qualifying suppliers” (2,400 suppliers and 70 purchasers registered); *Link-up suppliers and buyers services*, a UK rail industry supplier registration and qualification database scheme (80 rail organisations and 3,500 registered suppliers and contractors. Of these, 1,000 are also participating in the *Proof* scheme, which provides a common auditing process for suppliers of safety-critical produces and services); *SourceSelect*, a supplier management system used by the UK pharmaceutical industry to source and prequalify current and potential suppliers (covering 200 suppliers and two purchasers – Eli Lilly and GE Pharmaceuticals); and the Utilities Vendor Database (UVDB), which is reviewed in this report as an example of what Achilles offers. *SourceSelect* and UVDB also use *Verify*(see below), which is equivalent to *Proof*.

UVDB

In the UK utilities sector, Achilles offers UVDB and Verify¹⁹. Achilles claims that: “The UVDB registration and pre-qualification system is used by all major UK utilities to source suppliers and contractors.” UVDB also operates as a qualification system for the purposes of the EC utility Directive. Achilles launched

¹⁹ www.achilles.com/Group/findrelevantservices.htm?FindRegion=UK; www.achilles.com/NR/rdonlyres/92CD99CC-9762-4793-9867-77EBABDD47F3/0/UVDBandVerifyBrochure.pdf; and www.achilles.com/NR/rdonlyres/BA50D870-E3C1-4A27-A8FE-A4F5B216D3B2/0/UVDBCodeGuidev8.pdf.

Verify five years later in 2001 (see below). Eighty organisations use UVDB and *Verify*, and there are 5,250 registered suppliers and contractors. The total of 80 comprises 45 utility companies, including subsidiaries, registered on UVDB (of which 26 are also registered on *Verify*), as well as 35 major contractors registered on *Verify* as “patron members”.

Achilles advises that “through the completion of the single online UVDB questionnaire, suppliers can pre-qualify for work with over 50 utility companies and their partners” (30 of the 80 above do not have full access to the system). The questionnaire looks at 16 areas, including health and safety (as well as areas such as the environment, quality assurance, taxation and social and ethical).

There are three levels of UVDB services: standard, showcase and notice. All enable pre-qualification, but the showcase level also allows differentiation between companies and personalised profiles, and the highest notice level additionally provides daily notifications of contract opportunities.

Verify

Achilles advises that while some utilities use UVDB as a registration tool only – because they have their own in-house system – “the momentum of *Verify* as a prerequisite for entry on to a supplier list is now increasing especially due to the fact it encapsulates the assessment of the full range of organisations ... from very small companies up to multi-nationals”.

“*Verify*” is a “standardised safety, health, environment and quality assessment [SHEQ] for suppliers and buyers, which is “is applicable for contracts where a high operational risk is present”. Before embarking on *Verify*, companies must first complete the desktop-based UVDB registration in order to establish what companies “actually do” and what the “scope of service is”. *Verify* was established to share the process of supplier verification and assessment through a common industry approach and has now been adopted by 22 utility companies and over 35 major contractors. There are now over 1,250 key service providers and contractors registered on the scheme.

Verify comprises a two-stage process, in which an Achilles assessor first audits a questionnaire on a supplier's in-house SHEQ systems, with the score benchmarked against the average of contractors registered for the scheme. The paper-based assessment covers a company's management systems and site performance. The assessor then makes an on-site visit to assess the application of the systems – how they are communicated and implemented and their effectiveness. The reports are used by the utilities companies and by the suppliers as a guide to improvements. The reports offer demonstrable compliance to SHEQ requirements, independent assessment and benchmarking, and industry-specific assessments.

There are four Verify categories: B2, B1, A and patron membership. They involve three types of assessment, which are based on their size and type of activity (breakdown by size of participating organisations is not currently available):

- “B2” and “B1” companies cover significant service or maintenance work. B2 involves an annual visit from a Verify assessor and a biennial assessment of the management systems. Scoring is against set criteria and benchmarked against the industry average. The management assessment can be either by questionnaire or during the audit.
- “B1” is similar to B2, but assessments focus on companies with less than 20 employees, and registering companies must be nominated by a utility or patron member.
- “A” applies to companies supplying products, goods or low-risk services. It involves a paper-based assessment of the SHEQ management systems, and a short questionnaire covering areas applicable to the particular type of organisation.
- Patron membership enables major contractors to assess their own supply chain in the same way as utilities subscribers. Registration requires B2 membership.

Core criteria

From conversations with Achilles, a review of publicly available documentation and analysis of the questionnaires, it is clear that Achilles – which is one of the most detailed and exacting of schemes reviewed in this report – meets all 12 SEC core criteria, as well as most of the additional criteria, with the exception of public reporting (although even this is addressed in part through CSR questions). It is not clear, however, whether a core set of criteria would be of use to Achilles, nor whether contractors that participate in Achilles experience duplication problems when tendering elsewhere.

2.11 OHSAS 18001

OHSAS 18001, a new version of which was published in July 2007, now refers to itself as a “standard”²⁰, rather than the “specification” of 1999. The introduction states that: “There is an important distinction between this OHSAS standard, which describes the requirements for an organisation’s OSH management system and can be used for certification/registration and/or self-declaration of an organisation’s OSH management system, and a non-certifiable guideline intended to provide generic assistance to an organisation for establishing, implementing or improving an OH&S management system.”

The standard is applicable to organisations that wish to demonstrate conformity with the OHSAS standard by:

- making a self-determination and self-declaration; or
- seeking confirmation of its conformance by parties having an interest in the organisation, such as customers; or
- seeking confirmation of its self-declaration by a party external to the organization, or
- seeking certification/registration of its OSH management system by an external

²⁰ Occupational health and safety management systems – requirements, Occupational Health and Safety Assessment Series (OHSAS) standard, BS OHSAS 18001:2007, ISBN 978 0 580 59404 5, July 2007.

organisation.

OHSAS 18001 contains requirements relating to:

- policy;
- planning (hazard identification, risk assessment and determining controls);
- implementation and operation (including resources; appointment of a senior manager responsible for OSH; competence, training and awareness; communication, participation, consultation and, representation; and emergency preparedness);
- checking (performance monitoring and measurement, incident investigation and internal audit).

OSHAS 18001 covers at least 10 of the 12 SEC criteria, albeit in a form that is not particularly appropriate to SMEs, whatever the protestations to the contrary of the standard. Of the other two, it is not clear from the documentation examined whether it addresses individual qualifications and experience for specific tasks (although this could be covered by the training requirements), and welfare provisions.

2.12 Business Link

Although this does not sit naturally with the other schemes, the guidance from Business Link is worth noting because it may provide a good opportunity to reach SMEs via a non-OSH specialist. The Business Link scheme²¹ covers – fully or partially – most of the core criteria. It does so under eight headings: setting a policy; organising staff; planning; measuring performance; learning from experience; assessing risks; action plan; and prioritising. The criteria not covered are: access to competent help; cooperation and coordination with other employers; and welfare facilities.

²¹ Information briefing from Business Link: Steps to managing health and safety, Business Link.

3. CONCLUSIONS AND ISSUES FOR DISCUSSION

There are now many – it is commonly argued too many – prequalification and related schemes in existence. The RoSPA NOSHC initiative should take account of other initiatives to encourage mutual recognition of pre-qualification schemes and to develop common criteria. It should be acknowledged, however, that while there is some statistical evidence of duplication (CHAS, for example, has some information), the evidence of duplication is mostly anecdotal (albeit strongly voiced by companies and trade associations), and the Inquiry might want to call for a proper assessment of the extent of duplication.

There is already a significant (though not universal) mutual recognition in construction, while the chemical industry has the Responsible Care programmes. In addition to the SEC criteria, CHAS, Safecontractor, the HSE and others are helping develop the “Safety schemes in procurement – competence forum” (which aims beyond the construction sector), while David Bryant (WHC) has produced criteria for WHC that are cognisant of other schemes. The forum’s terms of reference (September 2007) are to “advise and influence clients on acceptable interpretation and appropriateness of health and safety competency standards in UK schemes particularly relating to the Construction (Design and Management) Regulations 2007 and the “core criteria”. The aims of the forum include: elimination of unwanted health and safety bureaucracy in procurement; promotion of the CDM competency core criteria standards in non-construction works; helping clients and contractors to achieve value for money by avoiding needless duplication; and provide confidence in first stage safety competency assessments through a consistent, reliable, and quality-controlled standard of vetting.

A significant majority of the schemes examined in this report share common ground, linked usually to an approach related to the MHSW Regulations or HSG65. These schemes are often shaped, or supplemented, by questions related to their sector or particular needs. Many of these supplementary

questions are hazard-based – even here, many of the hazards are common to different sectors.

Nearly all of the sets of criteria examined cover most – and in some cases all, or nearly all – the dozen SEC criteria. It would therefore make sense to use the SEC criteria as the nucleus of any umbrella scheme, or indeed of a new set of criteria (the latter being probably the last thing that is needed). There are, however, significant issues of approach that NOSHC will need to address, which the report raises immediately below in terms of “general issues” (section 3.1) and specific issues around the individual criteria (section 3.2).

3.1 General issues

- While the starting point for most schemes is OSH management, a minority focus on specific hazards, while others adopt a hybrid approach. One hurdle here is that research and anecdotal evidence indicate that smaller firms prefer specific risk-based information. What should any agreed approach be? Is there a need to have specific sections on the main hazards, for example manual handling? Or could these be handled in a set of industry-specific additional criteria?
- Following from the above points, could a core criteria scheme have an application beyond the equivalent of a stage one assessment, or could it be expanded into stage two?
- Some systems are tick-box-based; others are more narrative-based. Is there a preference, or can both co-exist in a system of mutual recognition?
- Linked to the above, some systems require an appraiser to make a judgment, whereas others lean more towards the mere presence of the criterion, although most involve an element of both in varying degrees. Does a common set of criteria require a common or consistent method of determining compliance?
- One of the most significant differences between the schemes is how they assess the submissions. Some require only a minimum of supporting evidence; others require full documentation. Some carry out a desk-top assessment; others

require third-party verification and even on-site visits. The British Furniture Manufacturers' scheme, for example, requires initial and biennial on-site audits, while third-party verification will become a condition of membership of the Chemical Business Association RC scheme by the end of 2009, but is not an element of Coatings Care, even though it is also an RC scheme. The ABI's assessments of schemes under Making the Market Work were critical of those that did not involve third-party verification. The Inquiry will need to determine the extent to which a core set of criteria would be acceptable to the proponents of each of these various approaches.

- The schemes reviewed require differing time periods and degrees of information for reassessment. These are usually annual or biennial, and the information can range from a confirmation that everything is as it was to a complete new assessment. Any decision on core criteria would need to take reassessment criteria into account.
- The initial and continuing fees for the schemes vary considerably. What would be a reasonable fee and, indeed, is it a legitimate or fruitful issue for the Inquiry to consider?
- There is a belief among some scheme operators that other schemes ask for too much information, and that the requests are more to do with justifying fees and existence, rather than a serious attempt to obtain essential information. Trade associations might consider asking some of the schemes why they ask for certain information, particularly where SMEs are concerned.
- There needs to be consideration of whether different sets of core criteria are needed for micro and small firms.
- Some of the schemes contain wording to the effect that an applicant "must comply with all relevant legislation". It is questionable how helpful this is to many companies, particularly those at the smaller end.
- In trying to find information on the schemes under the ABI's Making the Market Work initiative, interesting issues arose. Several of the contacts listed for the

MTMW trade groups supplied for this report did not appear to know of the scheme, or that their certification schemes were approved under MTMW; one was emphatic that some of the schemes on the list were not approved for MTMW purposes. Of those that were aware, several expressed doubts as to the value of the scheme. All were desirous of an approval scheme that would deliver reduced insurance premia, but most said that this did not happen in practice: the reasons included the beliefs that MTMW was not working, that the ABI had lost interest in the scheme, and that employers liability insurance formed too small a proportion of an overall insurance premium to make any premium reduction notable or practicable. Although MTMW might still prove a useful vehicle, not least because of its potential penetration, it would appear to be in need of a new start.

- Some criteria refer to employees only; others to workers. Does this matter in practice? Should there be consistency and, if so, how?
- The schemes offer varying degrees of assistance to organisations that fall short of the required standards. This ranges from referring to a source of help to offering paid consultancy.
- This leads into the huge area of what is competent advice – an area that the Inquiry will need to address at some stage in the 18-month inquiry period. Further, the wider the criteria covered by the schemes, the greater the competences required.
- The consideration of core criteria is, as we noted in the introduction, part of a wider political drive for “better regulation”. The Better Regulation Executive made a “call for evidence” on 16 November 2007. Consultation will close at the end of January 2008, with the BRE reporting to ministers in spring 2008. RoSPA’s NOSHC should consider submitting evidence based around its findings on pre-qualification and core criteria.

3.2 Separating “core” and stage 2 criteria

There are also differences in the different criteria that schemes variously use:

- Some schemes include all emergency issues under a single criterion; others have separate criteria on first aid, fire and emergency arrangements. SEC is unusual in not having a specific criterion for emergency and first-aid arrangements and it would seem desirable – in terms of achieving a consensus and the real needs of SMEs and their clients – that an explicit criterion or criteria be included.
- The SEC Core Criteria include health arrangements and safety arrangements in the same criterion, unlike some of the other schemes that this report looks at. Given that SMEs have used Workplace Health Connect for safety issues, even though it was intended to deal with health, it is probably desirable that a single criterion covers health and safety issues, but this is a point that at least merits further consideration.
- Should core criteria specifically cover absence management in order both to highlight the benefits to SMEs of appropriate health and safety management, and to tie the criteria to the government’s increasingly integrated approach in this area? The evidence considered by the Inquiry to date would indicate that absence management would be a core criterion too far but, again, it is an issue that should be further considered.
- Should there be an explicit criterion on work arrangements when away from the employer’s site? Again, this is likely to be more appropriate as an additional, stage 2 criterion.
- Some schemes do not ask any, or adequate, questions about enforcement action; the main arguments against such a criterion is that the information serves little purpose, that it is generally irrelevant more most SMEs and is often a matter of chance (for example, whether an SME has received a visit from an inspector, or whether an incident has resulted in a serious injury). Others, however, argue that the presence of such information can be an indication of an SME’s approach

to health and safety, and offer some legitimacy to the SME's claims (it can also be easily verified). Whether or not enforcement should be a core criterion is an issue that needs further debate. If it is to be included, consideration needs to be given to whether the criterion should specify a time period, as well as what action the criterion should cover, for example, improvement notices, prosecutions, penalties? At the very least, any inclusion of a core criterion on enforcement should address what the SME had done following the action.

- The SEC criteria for individual qualifications and experience for the task are seldom articulated so explicitly in the other schemes examined, although it is arguable that most of these schemes check this through alternative routes. Given the need to keep a core set as concise as possible, and the presence of a criterion on training and information arrangements, is a separate heading on qualifications necessary?
- Few of the other schemes examined beyond SEC allow welfare facilities the status of a separate criterion. Of those that mention welfare facilities, most include them in a wider section. Does "welfare" merit a separate status, particularly away from the construction arena? Further, is it possible to frame a general question on welfare facilities that would elicit a useful response from different sectors?
- Although most of the schemes cover the same core issues, they frequently require a varying degree of information on the same area. For example, some will treat machinery as one of several significant risks, whereas others will devote a whole criterion to machinery. These differences are sometimes due to the different purposes and sectors of the schemes, although there does not always seem to be an obvious explanation. A common set of core criteria would need to accommodate such variations, possibly by moving more specific criteria to a stage 2 assessment.
- Few OSH schemes expand, or link, to the environment (which is not to say that the environment might not be covered elsewhere in the schemes). There are exceptions, though, including CHAS (in draft form) and, to a more limited extent,

Constructionline (which is covered in the first report of the NOSHC inquiry, but not this report). Given the difficulties of persuading SMEs to focus on health and safety, any consideration of the environment might be better left to stage 2 assessments.

- Few OSH schemes explicitly cover product safety. Should this issue be included in core criteria? Again, the indications are that it may better housed in stage 2.
- Responsible Care schemes aside, none of the schemes ask about whether an organisation reports publicly on OSH. Given this has been a long-time RoSPA priority, should this issue be included in core criteria? The fact that so few schemes seek this information would argue against its inclusion in core criteria, although it should be considered for stage 2 criteria.
- The overarching question linked to many of the points above is to what extent can some of these criteria be grouped into a stage 2 assessment, thereby leaving as small, but critical, a core as possible?

APPENDICE 1: CRITERIA MATRIX

	SEC	WHC	LSC	HSPI	CHAS	MTMW	BPIF
SEC CORE CRITERIA							
Policy and responsibilities – signed by MD – 5+ employees – set out management responsibilities	1	1	1		1	4	1
Arrangements for ensuring OSH measures – how company will discharge duties – communication with workforce	2	1, 2	1,2	?	4	4	1
Ready access to competent advice – preferably within company – general and specific, on site	3	7	9	?	1		
Training and information arrangements – skills and understanding – refresher training – applies at all levels	4	5	4	?	2,	4	3
Individual qualifications and experience – for assigned task unless supervised	5	5?	?4,9		24		
Monitoring, audit and review – system in place	6	7	9		4	4	?
Workforce involvement – means of consulting workforce	7	5	9	?	3		2?
Accident reporting, enforcement, investigation – RIDDOR records (three years) – a review system for non-RIDDOR incidents – enforcement action (five years) – records of response to all of above	8	4?	3	4	4,	4	
Sub-contractors and consultants (scs) – arrangements for appointing competent scs – scs' arrangements for appointing scs – arrangements for monitoring scs performance	9	7	?9	?	4		21
Risk assessment (r/a) – procedures for r/a – procedures for safe system of work, if necessary – includes occupational health	10	2,3	2	?	4	4	1
Cooperation and coordination – show achievement in practice – show involvement in drawing up safe systems	11	7			4		
Welfare provision – show facilities are in place before work begins	12	6	8		4		
Additional criteria							
Emergency, fire and first aid		4	3,7		4		4,17
Young workers		2	10				
On-site visit/audit		4	4				?
Public reporting on OSH							
Health surveillance		7	9		4		18

Notes on the table above:

A number means that the scheme contains a criterion, with the number referring to the criterion's scheme number.

4 means that the scheme contains a criterion, but that it is not numbered.

? means that the scheme may contain this criterion or part of a criterion, but that there is no explicit reference to it.

A blank space means that there is no explicit requirement in the scheme for the criterion, or that a reference is insufficient (it may still be implicit).

G65 means that the scheme advises that members have to conform to HSG65, ie it is likely that the scheme will require this criterion but it is not possible to verify this.

SEC: *Core criteria for assessing contractor safety*, SEC Group.

WHC: *WHC draft benchmark standards, Workplace Health Connect (north east)*.

LSC: *Standards for health and safety*, Learning and Skills Council, February 2006.

HSPi: *Health and Safety Performance Index / SME Indicator*, Business Link/HSE.

CHAS: *The Contractors Health and Safety Assessment Scheme: Assessment standards; Evaluation questionnaire*; and *Evaluation questionnaire for those employing fewer than five people*, Contractors Health and Safety.

MTMW: *Making the market work: initiative for the assessment of trade association health and safety schemes*, September 2003, Association of British Insurers. This entry is not directly comparable in all aspects as it is aimed at trade associations

BPIF: *BPIF Health and safety healthcheck report and Introduction to the British Printing Industry Federation healthcheck*, British Printing Industry Federation.

RQSC: *RQSC core criteria for demonstration of company competency* (draft Oct 2006 version), British Constructional Steelwork Association Ltd.

HVCA: *Inspection checklist – health and safety; Guidance for assessment* (two separate documents for 5+ staff and less than five staff); Heating and Ventilating Contractors' Association.

BFM: *Health and safety certification scheme*, British Furniture Manufacturers.

EVH: *Health and safety control manual*, ACS Environmental Services Ltd (on behalf of EVH – housing associations).

RC: *Responsible care*, Chemical Industries Association

CBA: *Responsible Care*, Chemical Business Association.

BCF: *Coatings Care*, British Coatings Federation,

V: *Health, safety and the protection of the environment: a guide for sub-contractors working with Norwest Holst, Vinci*.

SC: *Safecontractor Charter Standards and questionnaires*.

A: *UDBV Verify*, Achilles.

OHSAS: *Occupational health and safety management systems – requirements*, Occupational Health and Safety Assessment Series (OHSAS) standard, BS OHSAS 18001:2007, ISBN 978 0 580 59404 5, July 2007.

BL: *Information briefing from Business Link: Steps to managing health and safety*, Business Link.

APPENDICE 2. THE RoSPA NOSH INQUIRY TERMS OF REFERENCE

The terms of reference for RoSPA's National Occupational Safety and Health Committee (NOSH) Inquiry are:

- to identify and evaluate good practice, barriers and missed opportunities associated with current work by intermediaries aimed at promoting, developing and sustaining effective OSH management in small firms (less than 50 employees); and
- to make recommendations for action.

NOSH asked the mapping stage to look at:

- what is going on?
- to what extent does the activity reach SMEs?
- who are the gatekeepers?
- what is the quality of advice, services etc?

The mapping stage was reported on in April 2007.²² This second report is part of the main stage of the Inquiry, which is scheduled to take a further 12–18 months, and involves an Inquiry by NOSH members that will:

- seek written and oral evidence from intermediaries and other stakeholders;
- review the evidence base concerning OSH in small firms;
- consider the efficacy of current sources of information and advice;
- consider international experience; and
- focus on options for improving communications, the provision of competent OSH advice and services to SMEs and approaches to monitoring performance.

NOSH indicated that it would like, in the second stage, to look at issues such as:

- excessive bureaucracy, for example in pre-tender OSH assessment;
- duplication of effort;
- poor selling of the OSH message, failing to appreciate SME problems and motivations;
- inappropriate consultancy advice;
- poor advice leading to inappropriate "risk aversion";

²² "RoSPA NOSH Inquiry into OSH assistance to SMEs: a map", Howard Fidderman, 12 April 2007, www.rospa.com/occupationsafety/sme/map.pdf.

- inappropriate training courses for SMEs; and
- applying large firms models to small firms.

NOSHC hopes that the Inquiry might allow:

- sharing good practice in engaging SMEs on OSH;
- the case for mutual recognition of OSH assessments by different actors;
- sharing good practice in innovative approaches to training;
- mutual signposting promotion of useful services and networks;
- developing SME interest in the wider work and well being agenda;
- building OSH into other business development and support processes; and
- identification of opportunities for networking, benchmarking and joint working.

APPENDICE 3: POTENTIAL FOR REACHING SMEs

This appendice is awaiting information from many of the organisations covered in this report. The potential such schemes and organisations offer, however, is illustrated by the following outreach examples:

Workplace Health Connect: 2,902 adviser visits to SMEs between February 2006 and May 2007.

Business Link: assisted 492,000 businesses in 2004 and 172,000 pre-starts (nb about any business issue, not necessarily health and safety).

Norwich Union: 600,000 SME policy holders.

Federation of Small Businesses: 200,000 members.

Electrical Contractors' Association: access to 2,500 SMEs and micro-firms.

CHAS: 17,346 registered contractors and 200 members (clients).

Safecontractor: 9,500 accredited contractors.

Achilles registers 500 "buying organisations" and 30,000 pre-qualified suppliers and contractors.

BPIF: 2,500 members (at an average of 44 employees)

HVCA: the scheme has, at any one time, between 1,350 and 1,450 members.

BFM scheme: 43 certified organisations.

CBA: 126 members.

EVH: 140 housing associations.

British Safety Industry Federation: 160 members and access to 160 trade associations.

LSC: placements in one million businesses a year.