

Royal Society for the Prevention of Accidents

'Acting together':

RoSPA's contribution to the debate about future HSE strategy

RoSPA welcomes the opportunity to contribute to the debate about HSE's future strategy, reiterating many of the ideas and themes which it has raised in previous similar consultations and also putting forward new ideas.

RoSPA welcomes particularly the title of the consultation, '*Acting together*'. The strategy should be seen however not as one for HSE alone but for UKPLC as a whole. Good health and safety is not just good business, it's everyone's business 24/7 - and everyone has to be prepared to play their part, whether at work, on the road, at home, at school or at leisure.

Government needs to back the strategy with adequate resources but the overall approach needs to be one that seeks to better mobilise, exploit and coordinate existing health and safety assets, both within and beyond the UK.

Acting together

The idea therefore that better UK health and safety performance requires a united national effort, is absolutely crucial. Safety is not just the job of safety people or health and safety authorities. Everyone has a role to play. The role of leaders like HSE is to help each organisation and person to understand this and to help them play their part effectively. So the development of HSE's strategy and the development of the health and safety strategy of each of the key players who contribute to its delivery, go hand-in-hand.

This idea however requires HSE to project a comprehensive view of the UK health and safety system as a whole, with itself as a prime mover but not as the system's pivotal centre. Rather, HSE needs to place enterprise and the world of work at the centre of 'the system' and show how all the various promoters and supporters of better health and safety empower and enable the key health and safety players inside organisations, starting at the top with senior leadership and moving downwards and outwards through real worker involvement in decision making and engagement with business partners.

Rather than just being a regulator and enforcer, HSE needs to see itself (and be seen) as a facilitative development agency for the UK H&S system as a whole. HSE needs to build on the experience of its Small Business Trade Association Forum (SBTAF) and establish a new national Health Safety Stakeholder Forum to act as a guide and adviser and to link all parts of the system together in a common performance improvement effort.

It needs to be accepted that, notwithstanding the need for justice in the wake of accidents and health damage caused through work, HSE cannot inspect and enforce their way to better health and safety performance. Exemplary sentencing is important but ultimately education and advice are key - and thus a major part of HSE's resource must be devoted, not just to maintaining and developing its own resources - such as its excellent website - but in mobilising and empowering all other health safety educators in collaborative consortia, alliances, fora and so on.

And 'acting together' in this context goes beyond the health and safety community. HSE needs to work together more closely with many other key themes and leads within Government. Examples include: helping to promote work related road safety (the biggest cause of work time deaths and serious injuries); promoting transfer of workplace health and safety knowledge and skills to help workers stay safe outside work (3-4 more injuries to workers occur outside working hours); supporting the health safety development of apprentices; using the workplace to promote wider health education; working with ACAS on agendas such as absence management and employee involvement and cooperation. If it is to reinvent and reposition itself, HSE needs to show its relevance to helping other parts of Government and the wider community to tackle other key business and community agendas.

There is a massive national social and business case for better health and safety (particularly health in its widest sense), based not just cost saving to employers and the NHS but on using the sensible safety agenda to developing a culture of safety and cooperation at all levels in society. Just like the leaders of our most successful businesses, Government must recognise the centrality of good health and safety to the success of our Society, whether at work, rest and play and it must be prepared to back the strategy with suitable and sufficient funding, recognising the massive 'spend-to-save' potential of good health and safety performance.

So Government too must 'act together' with HSE to enable better health and safety to happen. HSE needs to exploit legitimate areas for income generation through service delivery in the UK and abroad but not where such delivery competes unfairly with existing, established health safety service providers or where it introduces unacceptable conflicts of interest into the regulator/duty holder relationship.

Tackling ill health

This is fundamental. Accident reduction remains a key focus in sectors such as construction, agriculture, forestry and waste but the balance of effort must shift towards tackling work related health damage, particularly long latency conditions associated with persistent and sustained exposure to low-level, harmful contaminants in the workplace.

The key to tackling the health damage challenge is a major redoubling of effort to raise awareness of health hazards at work. Electronic media hold great promise here but face-to-face engagement is key too. RoSPA commends the campaign, '*Health risks at work: do you know yours*', led by Safety Groups UK (SGUK) and the '*No time to lose*' campaign led by IOSH. There needs to be a campaign planning and coordination hub that links the awareness raising efforts of organisations such as SGUK, IOSH, BOHS, the TUC, British Lung Foundation and many others.

Each sector of the economy needs a high-level 'health risks champion' - and HSE needs to work with other players at the grass roots too to help develop local and sector level health champions.

The aim has to be to create zero tolerance of workplace exposures that are harmful to health.

In this context, the right to a 'clean air working environment for all' is fundamental. All sectors need to commit to this, with time-based targets for exposure reduction and eventual elimination of dust.

On asbestos there needs to be a national survey of the state of response to duty to manage with a national asbestos alliance to help develop a clear, safe national management/removal/disposal policy with time based targets.

There need to be new NHS based/led services that can help employers and employees to develop action plans to tackle stress/mental health issues and MSDs, the latter encompassing ergonomic advice and early access to physiotherapy.

Action on workplace health hazards also provides a basis for workplace health education (weight loss, diabetes, smoking cessation, exercise, alcohol, mental health). HSE needs to cooperate with public health bodies such as PHE to promote this approach while also persuading such bodies to expand their remit into occupational health risks awareness raising. HSE needs to work with Local Authorities to help them similarly to carry key health protection messages to local businesses.

Managing risk well

It is widely accepted that HSE needs to use its slender resources available for proactive work to concentrate on those businesses and sectors with the highest risks and the worst health and safety management records. Businesses which have effective health and safety management systems and culture (characterised by clear director leadership and strong workforce involvement – attested to by independent audit) need to be ‘put on trust’ to manage their affairs without HSE intervention (unless there is an accident or a complaint).

Such businesses also need to be encouraged and empowered to assure good standards throughout their supply chain partners through the provision of support and use of suitable assurance regimes. Care must be taken however to ensure that these are effective and do not lead to over-bureaucratisation and proliferation of ‘blue tape’. RoSPA feels that, following in the steps of the HSE ‘Myth Busters’ panel, every business that imposes a health and safety requirement on another should have provision for such requirements to be subject to independent appeal where it is thought they may be disproportionate or indeed, inadequate.

Following incidents, HSE also need to use their enforcement powers, where appropriate, to require failing businesses to use nominated competent external experts to undertake investigations and to supervise health safety management audit and change programmes, sharing the results with HSE. RoSPA continues to argue that greater use should be made of remediation alongside suspended sentences to ensure that businesses found guilty of

particular health and safety offences deal with underlying weaknesses in their approach to health and safety management. There also needs to be a new HSE led focus on improving organisational readiness to investigate and learn from accidents and incidents.

More effective risk management can ultimately only be better assured through higher standards of risk literacy. This means ensuring that education about hazards, risks and choosing sensible controls - or safety measures - has to be a 'spiral thread' that is woven into education in schools and colleges, permeates the development of apprentices and is a clear feature in the education of future managers. Business schools particularly need to be re-challenged to include effective coverage of health and safety risk in their syllabi – including in MBA courses.

If health and safety needs to be seen nationally part of public health - and also at the business level as part of business risks management - then it needs to stretch beyond the prevention of harms during working hours and embrace 24/7 safety. People of working age experience three to four times as many A&E level injuries outside working hours as they do in the workplace, accounting for 10 per cent of all lost time. HSE needs to encourage employers to develop 24/7 safety programmes – that is the extension and transfer of occupational health and safety knowledge and skills to help workers and their families to stay safe outside the workplace (<http://www.rospa.com/occupational-safety/our-projects/24-7>). This can include, for example: inclusion of off-the-job safety scenarios within routine health and safety training; a regular focus on off-the-job (OTJ) accidents in daily safety briefings and communications; and bringing in outside safety experts into the workplace as part of overall safety and health education and wellness programmes. The business case for 24/7 safety rests not just on reduction in lost staff time but improved morale and encouraging stronger, more joined up safety culture.

Supporting small employers

Being small does not mean 'low risk' but it can mean lacking the resources - including time, money and expertise - needed to be able to manage the same health and safety challenges faced by large organisations to tackle the same problems.

Regulatory simplification and simpler electronically guidance can help but the key to raising standards in smaller and medium size enterprises (SMES) is the provision of external face-to-face help.

The external 'help systems' which exist to support SMES in all other respects, need to be expanded and re-tuned to enable them to help SMEs tackle health and safety issues as well.

HSE, working with and through its partners, needs to establish programmes to help develop the health and safety strategies and support services of all: trade associations; trade unions; local Chambers of Commerce; Local Authorities; universities; major clients and contractors; local safety groups and so on.

This vision should be include a competent 'health and safety champion' in every such organisation and a series of national programmes of 'sharing and comparing' in the development of initiatives such as: enhancement of supply chain models; common simplified health and safety pre-qualification and health and safety 'passporting'; estates excellence initiatives; and so on.

HSE also needs to work on the idea of a simple 'two sides of A4' 'Health Safety Action Plan' for SMEs as an alternative to health and safety policy statements and written risk assessments.

Keeping pace with change

Anticipating and adapting to change means not just keeping abreast of evidence about new hazards, risks and solutions, nor indeed understanding and adapting to organisational and structural changes in the economy – it must also mean being alive to changes in social and political attitudes towards health and safety risk itself and being sufficiently fleet-of-foot to adapt creatively in response.

If health and safety wants to survive and prosper and attract enthusiastic support from the partners which it needs to support its agenda, it has not only to continue to demonstrate its relevance but show how it can deliver value into other players' agendas. For this reason there has to be a bigger vision for health and safety at work, which extends beyond minimalistic legal compliance and connects with other national policy agendas which relate to security, prosperity and social development.

HSE also need to remain alive to the threats and opportunities which are associated with globalization and global trends from increased international trade, inward investment, migration and even climate change.

HSE also has a role in helping to build health and safety into the UK's overseas development efforts.

Sharing our success

RoSPA believes passionately in the need to exploit more creatively and effectively the massive knowledge and expertise that lies within the wider UK health and safety system – particularly the expertise that lies within higher performing businesses. HSE's role is to help facilitate its release and direction to parts of the system which could benefit from it.

Building on RoSPA's success in running 'Higher Performers' fora in Scotland and in other areas, HSE needs to establish new approaches to sharing and comparing health safety solutions, creating new collaborations and using intelligent, Internet-based technologies.

HSE should follow RoSPA's lead in encouraging more businesses to enter awards schemes such as the 60 year old RoSPA Occupational Health and Safety Awards which not only recognise and celebrate performance improvement but provide a growing base of organisations willing and able to share good practices.

Under the umbrella of a new Health and Safety Stakeholder Council, HSE needs to establish a strategic action group to help develop: business-to-business learning; buddying; case study development and dissemination; health safety exchanges; open days; twinning of health and safety committees; health safety internships; and many other similar innovations designed to spread knowledge skills and understanding from 'higher performers' to businesses which can benefit from such support.

20th January 2016