

Health and Safety Executive Northern Ireland's Draft Corporate Plan 2018-2023

IOSH response to HSENI's consultation on its draft plan



Submission

28.06.18



Introduction

The Institution of Occupational Safety and Health (IOSH) is the Chartered body for OSH professionals with around 48,000 members in over 130 countries.

We welcome this opportunity to contribute to this important consultation by the Health and Safety Executive for Northern Ireland (HSENI) on its draft [Corporate Plan 2018-2023](#). This response has been compiled using the views of members of the IOSH Northern Ireland Branch, which has around 650 members.

In the response that follows, we provide a summary IOSH position, our responses to the consultation questions, references and information about IOSH.

Summary IOSH position

1. IOSH welcomes the HSENI Corporate Plan's focus on collaboration and would like more action in this area, suggesting 'sector ambassadors' and specialist collaborative working relations with employers and OSH professionals to share good practice.
2. To achieve the socioeconomic benefits of good OSH management, IOSH believes there must be effective, adequately resourced regulation. So, we regret the proposed reduction in planned inspections / advisory visits (1,000 fewer per year than previous plan) and urge that this is reconsidered. We would also encourage HSENI to bid for additional resources.
3. We encourage greater prioritisation of occupational health issues, including a possible HSENI campaign focusing on early detection of problems and action to address them. Such a campaign should include estimated failure costs to employers to help further incentivise prevention.
4. We urge HSENI to promote the use of IOSH's free *No Time to Lose* resources on occupational cancer prevention and to engage in greater cross-Government collaboration, such as via Local Authority and Land Property Services.
5. We advocate more focus on the agriculture sector and assistance for small firms, including promotion of the small business resource packs.
6. IOSH was pleased to co-found the Workplace Health Leadership Group (NI) and believe that its *Workplace Health Leadership Group Strategic Plan 2017-22* can help support this important work.

IOSH responses to the consultation questions

1. What are your views on proposed key outcomes over the period of the Corporate Plan? Are they achievable by working collectively?

IOSH has concerns that there will be insufficient resources to achieve the key proposed outcomes, through no fault of the HSENI team. Budget constraints will impact regulator outputs and associated outcomes. Some members also believe that the improvement targets need to be further strengthened. Certain high-risk sectors such as agriculture and construction have failed to improve sufficiently and will require further training and media campaigns, but unfortunately, the budget does not allow for this. Given that we believe the socioeconomic benefits of good OSH management will far outweigh the further savings being sought, we would encourage appropriate bids for additional regulator resources. The Corporate Plan 2018-2023 focuses strongly on working in collaboration.¹ IOSH welcomes this and would like to see guidelines on how the arrangements and organisation of this will be delivered. There are 14 sectors and priority areas outlined within the Corporate Plan, some of which present major challenges. So, for example, it would be helpful to know: how many site visits per sector are planned and how stakeholders can assist.

As a key element of success depends on partnering with other regulators and stakeholders, ideally, they should be provided with collaboration guidelines. A memorandum of understanding or core commitment statement could be a good way of ensuring all stakeholders are working in harmony with the same goals and outcomes in mind. It may also be worth considering assigning a 'sector ambassador' and a sub-group for each sector who can report back to HSENI on a quarterly basis. We have also made further suggestions around collaboration in our answer to Q.6 below.

The Corporate Plan outlines three key proposed outcomes, mainly focusing on reducing serious and fatal accidents as well as reducing over three-day accidents. IOSH would like to also see targets for reducing exposures to occupational health hazards, including work-related carcinogens and psychosocial risk. We welcome HSENI's stated aim of ensuring awareness and enforcement action related to tackling occupational lung disease, occupational cancer, mental health at work and musculoskeletal disorders. IOSH was very pleased to co-found the Workplace Health Leadership Group (NI) and believe that its [Workplace Health Leadership Group Strategic Plan 2017-22](#) can help support this important work.²

2. What are your views on the document's proposal to achieve a better balance between Occupational Health and Safety?

IOSH notes that the overall strategy identifies three overlapping themes with the first being on safety and the second on occupational ill health. As well as injuries, occupational ill health blights people's lives and harms families and businesses, constituting 68% of the £351 million annual cost of OSH failure to the Northern Ireland economy.² Given the recognition that tackling the human, economic and societal toll of occupational ill health is a major challenge (and the view that we have previously shouted safety,

but whispered health), we suggest that ill health should be considered as the first priority, while still working assiduously to improve safety.

We also advocate that more assistance should be provided to duty holders who struggle to pick out the occupational health requirements threaded throughout the various regulations, to help small firms to comply.

3. What are your views on the new focus on the most ‘Serious’ issues as defined in the document?

IOSH would like the Corporate Plan to outline how it will measure / monitor whether there has been a reduction in exposures to serious health hazards, in order to prevent serious long-latency diseases, such as occupational cancers and chronic obstructive pulmonary disease (as listed in Annex 2).

4. Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?

Lower risk companies and non-profit organisations may rarely experience the more severe consequences of work related illness and injury and may feel they do not always need formal health and safety arrangements. We suggest that uptake of the ‘small business packs’ available for them is more actively promoted and we support proportionality from inspectors for lower-risk enterprises.

5. What are your views on the new HSENI Values?

IOSH believes that the new HSENI values are positive operating principles, cover a broad base and are well-considered and inclusive.

6. Please provide additional comments or feedback on the proposed Corporate Plan

6.1 Inspections

The Corporate Plan 2018-2023 states that at least 25,000 inspections and advisory visits will take place over the five years (an average of 5,000 per year). When compared to the [Corporate Plan 2011-2015](#),³ this equates to a reduction of 1,000 per year, which we believe is regrettable and would urge is reconsidered. It would also be helpful to have further information, for example:

- Number of inspections / visits per sector per year
- Methods for stakeholder involvement

It is hoped that well-targeted, delivered and communicated inspections and advisory visits will support increased OSH compliance and reduce work-related injury and ill health.

6.2 Agriculture

There are concerns that farm accidents are under-reported and that farmers may use plant that has not been subject to statutory inspections and may not be safe. So, it is encouraging to note that the HSENI have included educating, informing and enforcing as key priorities for this sector.

Appreciating the challenges within agriculture and that many farmers are struggling due to financial difficulties, ageing workforce, isolation, uncertainty and poor weather conditions, there needs to be more focus on tackling the serious health and safety risks they face. It is felt that attention to health and safety training and enforcement within construction has led to some improvement in that sector and that increased focus within agriculture could also yield benefits.

6.3 Occupational cancer

IOSH would like to see HSENI promote the free resources from IOSH's [*No Time to Lose*](#) campaign on preventing occupational cancers.⁴ Our resources cover reducing exposure to Diesel Engine Exhaust Emissions, Solar radiation, Silica dust and Asbestos.

We would also advocate more publicity regarding deaths from occupational diseases such as occupational cancer, to help focus attention and resources. Asbestos awareness can help promote prevention and protect tradespeople, their clients and members of the public from harmful exposures. So, we are particularly keen to raise awareness in the building trades (including self-employed and one-person operations) to help protect them and the wider community.

We would like more cross-Government collaboration on this, for example, we suggest Local Authority (Building Control) and perhaps Land and Property Services (annual rates notification) could help communicate the prevention message and distribute literature, such as the IOSH *No Time to Lose* campaign materials.

6.4 Members have also suggested:

- HSENI could consider establishing specialist collaborative working relationships with employers, to share good practice at all levels, including periodic seminars.
- An industrial sectors group of OSH professionals, HSENI inspectors and knowledgeable senior managers could devise a strategy to help achieve the targets through collaboration. This could extend to having a network of special interest groups to examine specific issues.
- HSENI could lead an occupational health related campaign, assisting employers to focus on early detection of health issues. Employers may be willing to share materials.
- To incentivise more preventive action, the average cost to employers of a case of work-related ill health, reportable injury, workplace fatality and minor injury, could be highlighted.
- HSENI could usefully include in the 'Product Safety' section an outline of how it will seek to ensure compliance with the EU Construction Products Regulation, CE marking and appropriate application of BS EN 1090 (structural steel).

References

1. Health and Safety Executive Northern Ireland (2018), *Corporate Plan 2018-2023*. Belfast, HSENI. Retrieved from <http://www.hseni.gov.uk/sites/hseni.gov.uk/files/consultations/%5Bcurrent-domain%3Amachine-name%5D/hseni-draft-corporate-plan-2018-2023.pdf>
2. Workplace Health Leadership Group Northern Ireland (2017), *Workplace Health Leadership Group Strategic Plan 2017-22*. Belfast, WHLGNI. Retrieved from <http://www.hseni.gov.uk/sites/hseni.gov.uk/files/workplace-health-leadership-group-strategic-plan-2017-2022.pdf>
3. Health and Safety Executive Northern Ireland (2011), *Corporate Plan 2011-2015*. Belfast, HSENI. Retrieved from <http://www.hseni.gov.uk/sites/hseni.gov.uk/files/publications/%5Bcurrent-domain%3Amachine-name%5D/hsen-corporate-plan-2011-2015.pdf>
4. Institution of Occupational Safety and Health (2018), *No Time to Lose* (campaign website). Wigston, IOSH. Retrieved from <http://www.notimetolose.org.uk>

About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with around 48,000 members in over 130 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity, and an ILO international NGO. The IOSH vision is

“A safe and healthy world of work”

The Institution steers the profession, providing impartial, authoritative, free guidance. Regularly consulted by Government and other bodies, IOSH is the founding member to UK, European and International professional body networks. IOSH has an active research and development fund and programme, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. IOSH publishes an international peer-reviewed journal of academic papers twice a year titled Policy and practice in health and safety. We have also developed a unique UK resource providing free access to a health and safety research database, as well other free on-line tools and guides, including resources for business start-ups.

IOSH has 41 Branches worldwide, including the Caribbean, Hong Kong, Isle of Man, Oman, Qatar, the Republic of Ireland, Singapore and UAE, 18 special interest groups covering aviation and aerospace; broadcasting and telecommunications; construction; consultancy; education; environment and waste management; financial services; fire risk management; food and drink industries; hazardous industries; health and social care; offshore; public services; railway; retail and distribution; rural industries; sports grounds and events; and theatre.

IOSH members work at both strategic and operational levels across all employment sectors. IOSH accredited trainers deliver health and safety awareness training to all levels of the workforce from shop floor to managers and directors, through a professional training network of over 2,000 organisations. We issue around 180,000 certificates per year.

For more about IOSH, our members and our work please visit our website at www.iosh.com. Our new five-year strategy can be viewed at www.ioshwork2022.com and our resources specifically tailored for business can be found here www.iosh.co.uk/ioshmeansbusiness.

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