

## HEALTH AND SAFETY SUBMISSIONS FOR NICK BROWN

### General

This guidance is designed to help you write a submission that is clear, contains the relevant information and obtains the decisions that you need. It reflects new working arrangements following the move to DWP sponsorship and Nick Brown's preferred way of working. Using this guidance will ensure that HSE maintains its high reputation and gets the most from the relationship with DWP and ministers. We have agreed handling arrangements with HSSD as follows:

- Routine submissions that do not involve wider political considerations will be submitted direct to ministers by HSE, copied to HSSD;
- Those involving wider political issues and that require co-ordination with other departments will be handled jointly, usually by HSE with support and input from HSSD;
- Issues that relate to key parts of the DWP agenda or to fees and appointments and will be handled by HSSD with support from HSE.

### Timing

Ministers have asked if we could keep the number of submissions requiring overnight or urgent clearance down to those which are unavoidable. This is important to enable Ministers to manage the competing demands of their Departmental, Parliamentary and Constituency roles. It is also crucial to allow them the opportunity to comment on submissions where another Minister has lead responsibility.

Nick Brown requires two weeks to consider and clear submissions. Any submissions from HSE which need HSSD input should be cleared at the appropriate level within HSE three weeks before a decision is needed. This will give HSSD one week to consider the submission and Nick Brown the standard two weeks.

If a decision is needed in a shorter timescale you should contact the Secretariat who will alert the private office and negotiate a deadline that is convenient to the Minister's diary. The number of submissions with shorter timescales should be kept to a minimum. A two/three week deadline must be the norm.

The Secretariat and HSSD prepare a **forward look** for all submissions to help manage the flow of business. This is updated fortnightly. You must ensure that all submissions are included on this at the earliest stage. Always prepare your submission following discussion with the Secretariat about when it should arrive with Ministers so that it does not come as a surprise. HSE directors should ensure that the forward look is as up to date as possible.

## **Style**

Submissions should be kept short, aim for two or three pages at a maximum, although if there is a particularly complicated issue this may not always be possible. If this is the case, please include the detail in annexes.

Ministers have asked us to follow a standard DWP "house style" for submissions. Examples are available from the Secretariat. This includes:

- a brief summary in a box at the top of the submission, straight after the title;
- the first heading should be issue/recommendation - explaining what they are being asked to do and why you are sending it;
- followed by timing - which as set out above should normally allow 2 weeks for a submission; if you need a quicker turn around you should explain why.
- at the end of the submission (following whatever sections are necessary to set out the background/options/arguments) you should include a paragraph on clearance, setting out who the submission has been cleared by (Band 0 level) and whether any financial proposals have been cleared with PEFD or legal issues with the Solicitor's office. Also, if applicable, whether the recommendations have been agreed with other Government Departments.
- Ministers expect that submissions will be short and to the point (aim for 2-3 pages as a maximum). As a rough guide, all the key points required to make the decision should be on the first two or three sides of the submission. Where a longer submission is required, please include the detail in Annexes (e.g. for tables, charts, detailed argument about options).
- Copy all submissions to other Ministers and the Special Advisers, as well as to the Permanent Secretary. Copy to all key stakeholders, but if the list is long put non-Private Office recipients on a separate sheet. The Secretariat can advise and maintain an up to date list – see "copy lists" below.

## **Other issues to consider**

The following checklist should help you ensure that any relevant headings below are also including in each submission.

- Handling and presentation. All submissions containing and section on handling and presentation must be cleared with the HSE Press Office. Ministers will want to know how will the policy be explained and presented and key messages and audiences. They also need to know about previous coverage and media reaction what reaction is likely in the future. The HSE Press Office will liaise as appropriate with the DWP Press Office.

- How do the proposals fit into wider government policy - remember, the government's strategy goes far wider than HSE or DWP. HSSD can advise on whether wider issues need to be taken into account.
- Impact on key groups e.g. businesses, workers, individuals and families, taxpayers, and others such as charities, voluntary organisations who will be directly or indirectly affected; and others who may be involved in delivery (local authorities, etc.)
- Views of other key parties - for example other Government Departments - and public attitudes/or the views of key interest groups such as organisations representing businesses and workers.
- Financial impact - what are the costs and savings; any revenue effects (NICs, tax) and the impact over time as well as immediate. Do we need to seek the agreement of HMT?
- Legal issues - what legislation is needed? Is there a risk of legal challenge? What about Europe, ECJ, ECHR?
- Operational implications: who will be implementing, how quickly and at what cost? Might other items have to be dropped?
- Effects on minority groups: How will the proposal affect the Department's PSA targets? E.g. the target to increase employment rates for disadvantaged groups.

### **Copy lists**

All submissions should be copied to all Ministers, Mark Dempsey (Secretariat), Sian Lewis (HSE Press Office), DWP press office (Cathy Spence), James Kelly, Special Adviser, and to the permanent secretary.

The Secretariat has a full and up to date list of copy addressees in DWP, and can advise on any other aspect of preparing and handling material for ministers.