

## SHORT IMPACT ASSESSMENT TEMPLATE

<p><b>Description of the intervention:</b></p>	<p>EU member states have submitted accident statistics to the EU statistical authority, Eurostat, for many years under an informal gentleman's agreement. This arrangement is now being replaced with legal requirements.</p> <p>Regulation (EC) No 1338/2008 has already established a general requirement to collect and provide statistics. The next stage in the process is the introduction by the European Commission of an implementing regulation that will define the exact nature of the data that the member states will need to submit (the European Statistics of Accidents at Work (ESAW) implementing regulation). It is the impact of this implementing regulation that is being addressed in this assessment.</p> <p>A proposed draft of the regulation will go to the European Statistical Service (ESS) Committee in November 2010 as part of a comitology process.</p>
<p><b>Objectives:</b></p>	<p>Whilst the Office of National Statistics (ONS) represent the UK at the ESS Committee, they have asked HSE to undertake the negotiations regarding this regulation. During these negotiations the key objective has been to ensure that the UK is not required to collect any new data as a consequence of the regulation. By achieving this objective the only additional costs to the UK will be the minimal costs involved in further analysis of existing data to produce outputs that can meet our obligations under the new regulation.</p>
<p><b>Calculation of costs:</b></p>	<p>The proposed implementing regulation includes two requirements that will necessitate the provision of data that has not been supplied previously. These are as follows:</p> <ul style="list-style-type: none"> <li>(i) the provision of data on road traffic accidents that occur during working time.</li> <li>(ii) the provision of data on the length of absences following work-related accidents i.e. days lost.</li> </ul> <p>During the negotiations the Eurostat Secretariat and other member states have come to understand that case-by-case data covering these two points is not available within the UK. This has led to an agreement that these gaps in our case-by-case data can be filled by providing estimates derived from survey data. Therefore the only costs that the UK will incur will be the time spent by HSE analysts developing methodology for generating estimates from the Labour Force Survey.</p> <p>These HSE staff costs have been calculated as one third of a Band 4 (Civil Service HEO) and one fifth of a Band 2 (Civil Service Grade 7) for one year. These are one-off costs since once the methodology has been developed it can be reused in subsequent years.</p> <p>Band 4 costs = <math>1/3 \times 61,575^* = \text{£}20,525</math>  Band 2 costs = <math>1/5 \times 92,353^* = \text{£}18,471</math></p>

\* Source: Yearly full economic cost of the relevant category of staff, from Global Ready Reckoner 2009-2010 (TRIM reference: 2009/190158)

	<p>Once the methodology is developed, the time required to use it to generate the necessary data is judged to be insignificant, as this process would be run alongside others. We will therefore not estimate any costs for this.</p> <p>It can therefore be estimated that the total overall cost will be approximately £39k</p>
<b>Impact on industry (including any effect on the Admin Burdens Baseline):</b>	There will be no impact on industry, as businesses will not incur any costs due to these regulations.
<b>Benefits (quantified where possible):</b>	The estimates provided will give new insights into accident data. In particular, HSE will obtain more knowledge on the relative contribution of road traffic accidents to the overall burden of accidents during working time. The benefit of this knowledge cannot be quantified but it will assist in the formulation of policy.
<b>Risks / Potential Indirect effects</b>	As part of, initially, the Simplification Programme and now the One-In, One-Out Programme, HSE has been considering removing the requirement for businesses to report over-3-day (O3D) injuries under RIDDOR. Legal advice is that such plans would run contrary to the existing framework regulation (EC) No 1338/2008, which requires the reporting of all accidents leading to an absence of more than 3 days. In other words, it is legislation that is already in place that provides the main constraint on deregulation. What is now proposed will, therefore, not constrain the options for revising RIDDOR any further than they are already. Indeed, if anything, the proposed implementing regulation will reinforce the basis of a legal interpretation of Regulation (EC) No 1338/2008 that is helpful to UK interests. It will do this by providing confirmation that where case-by-case data is not available, survey data can be used to fill gaps in the data coverage.
<b>Consultation:</b>	This approach has been discussed with HSE's Chief Economist and the Policy Capability Team.
<b>Chief Economist's comments:</b>	I am satisfied that the costs and benefits have been described accurately and that appropriate analysis has been used to assess the impact (including indirect effects) of this implementing regulation.
<b>Recommendation:</b>	That based on proportionality, a full impact assessment is not produced.

**Signed:**...Alan Spence.....  
**HSE's Chief Economist**

**Date:** ...5 August 2010.....