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## HEALTH AND SAFETY COMMISSION

### Revised guidance to enforcing authorities under s18

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#### Issue

1. HSC's guidance to enforcing authorities on "making adequate arrangements for enforcement" under Section 18 of the Health and Safety at Work Act (S18 Standard) is now at the stage where it needs to receive the approval of the HSC.
2. A paper copy of the draft S18 Standard (which is intended to be an electronic document) is attached at Appendix 1. The roll-out and communications plan – under the partnership banner – is at Appendix 2.

#### Timing

3. The standard has been subject to extensive consultation over the past two years, and reflects the various comments and inputs made during that time. All parties are now content, including the LACoRS and HSE Boards. It is intended that the draft S18 Standard will be published in April 2008.

#### Recommendation

4. HSC is invited to
  - endorse and approve the draft S18 Standard;
  - issue the S18 Standard from 1st April 2008 as guidance to Local Authorities under section 18 of HSWA and as a direction to HSE when carrying out those of its functions undertaken by Field Operations Directorate (FOD);
  - set a date of 31st March 2011 for enforcing authorities to be required to comply fully with all requirements of the S18 Standard;
  - request that the HSE and Local Authority Liaison Committee (HELA) provide further advice to enforcing authorities on achieving full compliance with the requirements of the S18 Standard by 31st March 2011.
  - withdraw the current ( 2002) section 18 guidance to local authorities.

## **Background**

5. The LA and HSE Working Together programme included a review of the existing S18 guidance to support the new partnership, encourage the best use of joint resources, promote consistent enforcement and address other emerging issues such as the better regulation agenda.
6. HSE and LAs both have a duty to 'make adequate arrangements for enforcement' under section 18 of Health & Safety at Work etc Act 1974 (HSWA). HSWA requires LAs to perform this duty in accordance with guidance from Health and Safety Commission (HSC). The most recent guidance was published in 2002. HSWA also allows HSC to issue directions to HSE to comply with similar guidance under section (4) (b). The Enforcement Policy Statement (EPS) on the purpose, method and principles of enforcement is already compulsory for EAs when complying with their duties under section 18. The proposed Section 18 Standard will supplement the EPS, setting out the broader standards for EAs when complying with their duty to make 'adequate arrangements for enforcement'.
7. Work on the Standard has been undertaken as an important underpinning element of the HSE/LA partnership arrangements. It recognises that the partnership is founded on equivalent treatment of HSE and LAs as the Commission's enforcing authorities. It has therefore been written to apply to LAs and those parts of HSE's work in which it is carrying out an equivalent function i.e. Field Operations Directorate (FOD), whilst recognising their differences. The Standard supports, and is consistent with, the Enforcement Policy Statement and the standards set down by Senior Labour Inspectors' Committee (SLIC) in the Common Principles for Labour Inspection in EU Member States. The Standard will not apply in relation to the Nuclear or Hazardous Installations Directorates.
8. The new S18 Standard is based upon current HSE FOD and LA good practice and therefore HSE FOD and well organised and resourced LAs are already complying with it. It is designed to be an electronic document with active links to supporting information that can be updated as required. The S18 Standard sets out the requirements with which HSE and LA's will eventually be obliged to comply in making 'adequate arrangements for enforcement'. It will come into effect as both a HSC direction to HSE under S11(4)(b) and HSC guidance to LAs under S18(4)(b), and replace the current section 18 guidance, which will be withdrawn. However, although the Standard will have effect from 1<sup>st</sup> April 2008, it does not require immediate compliance with its requirements. Instead, it sets a limit, for both LAs and FOD, of 31<sup>st</sup> March 2011 to comply fully with the requirements of the Standard. HELA (HSE and LA Liaison Committee) will provide further advice to enforcing authorities on achieving full compliance against the requirements of the S18 Standard by 31<sup>st</sup> March 2011.
9. It is highly likely that changes to the governance of HSC and HSE will come into effect during 2008. The changes, to be made by the draft Legislative Reform (Health and Safety) Order 2008, will replace the current HSC and HSE with a new, merged Health and Safety Executive. The Order will include transitional provisions to ensure that after the merger guidance issued by HSC will continue in effect in relation to LAs as though issued by the new Executive. However HSC's directions to HSE will cease to have legal effect. It is therefore envisaged that the new Executive will make a public policy statement undertaking that in its actions in this area it will continue to work towards compliance with the Standard

by 31<sup>st</sup> March 2011, and be bound by the Standard from then on. This will create a legal obligation analogous to the effect of a Direction.. It is likely that the merger will take place shortly after the Standard has been published, and for this reason the introduction to the Standard has been worded to take account of the likely change.

10. The S18 Standard has the title “Making a Difference....” and consists of an Introduction, a broad set of principles under the headings of “Make it Happen....” “Do It Right....” “Work In Partnership ....” and “Sell the Story....” to reflect the need for the effective systems and infrastructures, consistent enforcement processes, to make the best use of joint resources and the need to promote sensible risk management respectively. Each principle is then further broken down to describe what these mean in detail. Electronic links then provide access to other supporting material including toolkits, assessment framework, links to other documents etc.

### **Argument**

11. The S18 Standard will have little practical impact on HSE or FOD. FOD’s Heads of Operations Procedures and Practices Group did not foresee problems for FOD in meeting the elements of the S18 Standard - a view confirmed when tested within FOD, and most recently endorsed by the FOD MB.

12. →  
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13. It is intended that compliance against the S18 Standard will be monitored initially through a system based on self assessment and later some sample auditing to test the robustness of the self assessments using peer challenge. This is a model that is increasingly being proposed for use in Local Government to reduce the burdens of auditing and is being developed by LACoRS amongst others. Auditing compliance using self assessment and peer challenge should be a relatively easy task for HSE as most of the evidence on compliance is held centrally and available through FOD HQ. Divisions will only need to add relevant local evidence where necessary and then only on a sample basis e.g. to confirm that local objectives are considered in delivery plans/partnership team plans. It would be an appropriate reflection of the partnership to involve LACoRS in the FOD assessment process.

14. Whilst the S18 Standard is based on current HSE, FOD and LA good practice, and therefore the resource implications for FOD should be minimal, there is a need to communicate and explain the proposed new Standard, the timetable for

working towards compliance with its requirements and how it will be used, within FOD and HSE generally.

15. The S18 Standard has been tested in a “shadow” exercise in both FOD and LAs. There are however a still a number of other pieces of work underway that will complete the suite of guidance supporting the Standard. Although not essential for publishing they provide supporting information that will help EAs meet their duty to make adequate arrangements. These include proposed changes to reporting arrangements; proposals to develop the LA prioritised planning mechanism; the development of the detail behind the Common Competency Framework; the requirements in the Regulatory Enforcement & Sanctions Bill on Primary Authority Principle and alternative sanctions; and the role of LBRO. On the last point, publication of the Standard will put us in a strong position to influence LBRO in relation to its interests in LA performance.
16. The final amendments to the Standard and its website format are currently being made although the supporting material as outlined in the paragraph above will only come on stream during 2008/09.
17. Communicating the Standard within HSE FOD and LAs is an important component of the work and a Project and Communications Plan (see Appendix 2) has been developed (see para 23 below).

### **Consultation**

18. As part of the S18 Standard's development a series of 10 GB-wide consultation workshops were held in 2005 and attended by a total of 551 LA and HSE delegates. The workshops were reported to the meeting of the Health and Safety Commission and Local Government Panel (LGP) in 2006.
19. Following a widespread consultation exercise within HSE and with LACoRS Policy Forum during autumn 2006 HELA agreed to “shadow run” the draft S18 Standard between March and September 2007 and to publish the finalised document in April 2008. Shadow running involved a number of LAs being used to test whether they met the elements within the draft Standard and a similar but simpler exercise was undertaken by parts of FOD. Generally the majority of the LAs met the main elements of the draft S18 Standard although there were a significant number who felt that they did not fully meet all the aspects. In FOD, identifying evidence of compliance was relatively straightforward and where potential deficiencies were noted (for example on targeting) it was acknowledged that further work was underway to address this.
20. The LACoRS Board, at its meeting on the 7<sup>th</sup> December gave its support to the revised arrangements and the LACoRS' Chairman has written to HSC's Chair to confirm this.
21. FOD MB received a report on the Draft S18 Standard on 11<sup>th</sup> December 2008 and had no further comments.
22. HSE Board received a report on the Draft S18 Standard on 9<sup>th</sup> January and confirmed their support for this work.

### **Presentation**

23. Communicating the Standard within FOD and LAs is an important component of the work and a Project and Communications Plan (see Appendix 2) has been developed. This sets out key people to brief including Heads of Operations, FOD Teams, Enforcement Liaison Officers and Partnership Teams as well as the wider LA community via LACoRs, CEHO Groups, Regional Partnership Forums

and County Liaison Groups. This communication will be undertaken by a variety of means including briefing notes, meetings, articles and use a variety of media for example written correspondence, professional and in-house magazines, websites etc.

### **Financial/Resource Implications for HSE**

24. The S18 Standard is based on current HSE, FOD and LA good practice and the resource implications for FOD in complying with the Standard will be small.
25. There will be a legal requirement on all Enforcing Authorities, FOD and LAs, to work towards compliance with the requirements of the S18 Standard between 1<sup>st</sup> April 2008 and 31<sup>st</sup> March 2011, and to comply with the requirements by the end of the 3 year timetable. They will thus need to be able to provide evidence, using a process of self assessment and peer challenge. This is a model that is increasingly being proposed for use in Local Government to reduce the burdens of auditing and is being developed by LACoRS amongst others. Currently LAs are expected to undertake an audit of their management of health and safety enforcement against S18 Guidance every 5 years and it is intended to maintain this level of frequency for all EAs although the use of self assessment will make the process simpler.
26. An assessment of FOD against the S18 Standard would consist of three elements. A centralised mapping of existing supporting evidence e.g. FOD Summary Delivery Plan; HR's Managing Performance information etc. This will be undertaken by LAU. This exercise will also pick up on other relevant information from other programmes and initiatives e.g. enforcement programme, regulatory decision making assessments and other management information findings. The second element, to confirm the assumption that centralised systems operate at Divisional level, would consist of a sample self assessment against a checklist within Divisions e.g. to confirm that Divisional Business Delivery Plans have taken note of local objectives. Any gaps that these two elements highlight would need an action plan to be put in place to correct any deficiencies. The third element will be a peer challenge to review whether the process is robust and effective using LACoRS as an external critical friend.
27. There is a need to communicate the proposed new Standard within FOD and HSE generally. This is part of the overall S18 project and will be delivered using normal communication routes for example planned meetings of HoOPS, PMs and Divisional meetings to deliver appropriate information and articles in HSE media including LAU newsletter, HSE/HELEX websites etc.
28. The total costs for undertaking a 1 in 5 year assessment of compliance, are £5000. These have been agreed with PFPD.

### **Action**

29. HSC is invited to
  - endorse and approve the draft S18 Standard;
  - issue the S18 Standard from 1st April 2008 as guidance to Local Authorities under section 18 of HSWA and as a direction to HSE when carrying out those of its functions under taken by Field Operations Directorate;
  - set a date of 31st March 2011 for enforcing authorities to be required to comply fully with all requirements of the S18 Standard;

- request that the HSE and Local Authority Liaison Committee (HELAL) provide further advice to enforcing authorities on achieving full compliance with the requirements of the S18 Standard by 31st March 2011.
  - withdraw the current ( 2002) section 18 guidance to local authorities.
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Appendix 1 – 18 Standard

Health and Safety Commission

***Making a difference.....***

**The Standard for  
Health and Safety Enforcing Authorities**

**Draft January 2008**

# Introduction

The Health and Safety Executive (HSE) and Local Authorities (LAs) are the principal Enforcing Authorities (EAs) for Health and Safety at Work etc Act 1974 (HSWA) in Great Britain.

The primary purpose of the HSWA is to control risks from work activities. The role of the EAs is to ensure that duty holders manage and control these risks and thus prevent harm to employees and to the public.

HSE and LAs both have a duty to 'make adequate arrangements for enforcement' under Section 18 of HSWA. In complying with their duties under section 18, EAs are required to follow the HSC Enforcement Policy Statement (EPS) on the purpose, method and principles of enforcement.

The Section 18 Standard adds to the EPS, setting out the broader requirements for EAs when complying with their duty to make 'adequate arrangements for enforcement'. It applies to LAs and to HSE when carrying out its functions undertaken by Field Operations Directorate (FOD). **EAs are legally required, from 1<sup>st</sup> April 2008, to work towards compliance with the principles and standards set out in the following pages. From 31<sup>st</sup> March 2011, compliance is mandatory.** The Annex sets out in more detail the legal status of the Standard. Like the EPS, it acts both as a HSC direction to HSE under S11(4)(b) and as HSC guidance to LAs under S18(4)(b). The document meets the relevant regulator requirements of the Department for Business Enterprise & Regulatory Reform's Regulators' Compliance Code and supports, and is consistent with, the standards set down by Senior Labour Inspectors' Committee (SLIC) in the Common Principles for Labour Inspection in EU Member States."

The standard recognises that "partnership is the way HSE and LAs do business" and reflects the following Statement of Intent agreed between the HSC, HSE and LA representative bodies:

*'LAs and HSE, working jointly and in partnership locally, regionally and nationally, to a common set of goals and standards, committed to focusing resources on agreed health and safety priorities. The aim is to minimise harm to those in the workplace or those affected by workplace activities, and contribute to the health and safety and well-being of the local community'*

The e-links shown within this document form essential support to the standard and are intended to provide up to date guidance and information to EAs on their legal duties.

The following pages set out for Enforcing Authorities:

- the **principles** on which the standard is based
- the **standard** in detail

# Principles for Enforcing Authorities

## □ To “make it happen” every EA shall .....

- set out their commitment priorities and planned interventions. [MIH1]
- put into place the capacity, management infrastructure, performance management and information systems required to deliver an effective service and to comply with their statutory duties. [MIH2]
- operate systems to train, appoint, authorise, monitor, and maintain a competent inspectorate. [MIH3]

## □ To “do it right” every EA shall .....

- use interventions, including enforcement action, in accordance with their enforcement policy and within the principles of proportionality, accountability, consistency, transparency and targeting. [DIR1]

## □ To “work together” every EA shall .....

- work within their own organisation, in partnership with other EAs and with other regulators and stakeholders to make best use of joint resources and to maximise their impact on local, regional and national priorities. [WT1]
- actively contribute to liaison, policy and governance arrangements at a local, regional and national level. [WT2]

## To “sell the story” every EA shall .....

- promote sensible risk management .[STS1]

# The Standard for Enforcing Authorities

## **make it happen** *systems & infrastructure*

**Every EA shall set out their commitment, priorities and planned interventions. [MIH1]**

This means:

### **Commitment** <sup>MIH 1.0</sup>

EAs shall make a clear statement, endorsed by senior management, on their commitment to improving health and safety outcomes.

### **Priorities and Planning** <sup>MIH1.1</sup>

Every EA shall set out its priorities and plan of interventions for the current year. These should take into account:

- HSC's priorities
- national & regional priorities, targets and plans
- locally derived objectives
- relevant guidance and policies.

### **Targeting Interventions** <sup>MIH1.2</sup>

EAs shall target their interventions:

- to maximise their impact in improving health and safety outcomes
- on securing action by duty holders to manage and control the health and safety risks of their work activities
- on the duty holders who are best placed to control the risks whether they be employers or others
- on other organisations and stakeholders that can influence risk reduction
- on activities that give rise to serious risks or where the hazards are least well controlled
- to stop those that seek economic advantage from non-compliance (e.g. rogue traders)
- in accordance with national guidance on interventions and priority programmes
- in accordance with local, regional and national programmes

*e-link*

**Every EA shall put into place the capacity, management infrastructure, performance management and information systems required to deliver an effective service and to comply with their statutory duties. [MIH2]**

This means:

### **Capacity** <sup>MIH2.0</sup>

EAs shall have the managerial, operational, administrative and political resources, both staff and infrastructure, to contribute to improving health and safety outcomes. The capacity required is dependent on a variety of factors that includes industry type, staff competence and the range and type of interventions undertaken.

EAs shall assess whether there is sufficient capacity within the EA to undertake their statutory duties.

Every EA shall have sufficient capacity to:-

- make adequate arrangements for enforcement in accordance with their enforcement policy
- develop, deliver and monitor their planned interventions
- enable effective working between HSE and LAs and with other regulators and stakeholders.

EAs shall seek opportunities to enhance their capacity e.g.

- working across geographical areas (e.g. delivering County wide services)
- delivery of common services (e.g. accident investigations)
- utilisation of resources, systems and expertise from other organisations to provide services (e.g. delivery of publicity material or use of another regulator's inspectorate )
- adopting best practice

### **Management Infrastructure** <sup>MIH2.1</sup>

Every EA shall have an effective management infrastructure in place for developing, delivering, monitoring and reviewing their interventions.

This will include:-

- management reporting arrangements
- systems of control from management to operational and administrative staff
- routes for communication throughout the organisation and between operational & administrative staff and with policy & decision makers
- definitions of work roles and responsibilities for delivering effective services
- arrangements to support, supervise and coach staff to retain and develop their experience & competence

## **Performance Management** <sup>MIH2.2</sup>

Every EA shall have systems in place to measure, evaluate and report its performance in achieving its planned interventions, policies, targets and outcomes.

These systems shall include:-

- regular review of activity by managers and policy makers on progress and performance against work plans, performance indicators, milestones and targets.
- published standards for service and performance
- regular reporting of the EAs performance

## **Information Systems** <sup>MIH2.3</sup>

EAs shall have systems that enable them to:

- monitor and review progress towards local, regional and national policies, priorities, targets and plans
- monitor their activity including type of interventions, complaints, enforcement and other performance indicators
- inform policy and direct operational activity
- collate and analyse current data
- secure the benefits from the compatibility of data collection and data management systems
- manage and record information for regular statistical returns
- interface and upload information with the HELA Extranet
- share data with other organisations and within their own organisation to minimise information requests to businesses
- involve businesses in vetting data requirements and form design
- record accurate information about premises including assessments of the hazard and risk of the activities taking place in order to support the prioritisation of interventions

*e-link*

**Every EA shall operate systems to train, appoint, authorise, monitor, and maintain a competent inspectorate. [MIH3]**

This means:

## **Competent Inspectorate** <sup>MIH3.0</sup>

Competence is the ability to undertake responsibilities and perform activities to a recognised standard.

EAs shall have documented policy and procedures that state:-

- the system for the appointment and authorisation of staff engaged in health and safety enforcement duties (including staff from other regulators)
- the standards of competence required for staff who carry out and staff who support, health and safety enforcement (including the staff of other regulators)
- the arrangements to ensure that health and safety enforcement staff (including the staff of other regulators) attain and maintain their competence

*e-link*

# do it right

## Enforcement Policy

Every EA shall use interventions, including enforcement action, in accordance with their policy and within the principles of proportionality, accountability, consistency, transparency and targeting. [DIR1]

This means:

### Enforcement policy <sup>DIR1.0</sup>

EAs shall:

- have an enforcement policy that follows the HSC Enforcement Policy Statement
- review their enforcement policy from time to time in consultation with their stakeholders (including partners, other EAs, employers, employees and their representatives)
- ensure that the enforcement policy is formally endorsed by the enforcing authority
- make the enforcement policy available to the public and to duty holders

EAs shall follow the HSC Enforcement Policy Statement and include the following in their enforcement policy:

- the purpose and method of enforcement
- the principles of proportionality, targeting, consistency, transparency and accountability
- the management of investigations, prosecutions and work related deaths

### Enforcement decisions <sup>DIR 1.1</sup>

EAs shall ensure that:

- enforcement decisions are taken in accordance with their enforcement policy
- arrangements are in place to monitor and review decisions that have departed from normal procedure
- the appropriate enforcement models ( e.g. Enforcement Management Model) are applied consistently to enforcement decisions
- they follow relevant guidance and direction where appropriate before taking enforcement action

### Complaints <sup>DIR1.3</sup>

EAs shall provide:

- procedures for dealing with complaints against the EA that are accessible to business, the public, employees and other interested parties.

*e-link*

# work together

## *partnership*

**Every EA shall work within their own organisation, in partnership with other EAs and with other regulators and stakeholders, to make best use of joint resources and to maximise their impact on local, regional and national priorities. [WT1]**

*This means:*

### **Work in partnership**<sup>WT1.0</sup>

EAs shall seek opportunities to work within their own organisations and with other regulators and stakeholders to develop:

- priorities, targets, interventions and service delivery methods
- joint planning, joint work programmes and joint training
- the most effective use of resources and funding
- cross administrative boundary working
- advice and guidance
- publicity, campaigns and communications
- best practice
- coordinated enforcement activity
- sharing intelligence, data and information
- consistency and effectiveness
- new services
- the response to reactive demands
- the best outcomes
- the delivery of justice
- safer, stronger and healthier communities

### **Governance**<sup>WT1.1</sup>

EAs shall have arrangements in place to ensure:

- their views are represented within liaison, policy and governance groups at local, regional and national levels
- they provide information to politicians, senior managers and practitioners on the decisions of such groups and on their work as regulators

*e-link*

**sell the story**  
*promoting sensible risk management*

**Every EA shall promote sensible risk management. [STS1]**

This means:

**Sensible Risk Management** <sup>STS1.0</sup>

EAs shall promote the principles of sensible risk management including:

- ensuring that workers and citizens are properly protected
- providing overall benefit to society by balancing benefits and risks, with a focus on controlling real risks – both those which arise more often and those with serious consequences
- enabling innovation and learning not stifling them
- ensuring that those who create risks manage them responsibly and understand that failure to manage real risks responsibly is likely to lead to robust action
- enabling individuals to understand that as well as the right to protection, they also have to exercise personal responsibility

*e-link*

## **Annex: legal status of the Standard and timetable for its application**

Like the EPS, the Section 18 Standard applies to all LAs and to HSE in relation to the enforcement activities of its Field Operations Directorate (FOD).

The S18 Standard sets out the requirements with which HSE and LA's will eventually be obliged to comply in making 'adequate arrangements for enforcement'. It has been given legal effect both as a HSC direction to HSE under section (4)(b) of the Health and Safety at Work Act 1974 (HSWA) and as HSC guidance to LAs under section 18(4)(b) of HSWA (section 18 guidance). HSWA requires LAs to perform their duties as enforcing authorities in accordance with Section 18 guidance and requires HSE to give effect to any directions issued to it by the HSC. However, although the Standard will have effect from 1<sup>st</sup> April 2008, it does not require immediate full compliance with its requirements. Instead, both LAs and FOD are required:

- from 1<sup>st</sup> April 2008, to work towards compliance with the requirements of the Standard, and
- from 31<sup>st</sup> March 2011, to comply fully with all the requirements of the Standard.

Following the expected merger of HSC and HSE, the Standard will remain in effect and EAs will continue to be legally obliged to work towards compliance with its requirements, and to comply fully by March 2011. In relation to LAs, it will continue in force as section 18 guidance as though issued by the new Executive; in relation to HSE, the new Executive will publicly undertake to comply.

## Appendix 2

# Draft Project Plan/Communication Plan

## Context

1. Section 18 (S18) of the Health and Safety at Work etc Act 1974 (HSWA) requires HSE and LAs to make adequate arrangements for the enforcement of the relevant statutory provisions. It also requires LAs to perform this duty in accordance with such guidance as the HSC may give them. This guidance is commonly known as “S 18 Guidance” and has been the primary means for HSC to describe what constitutes LA’s adequate arrangements for enforcement. In addition HSE is required to give effect to any direction given to it by the HSC under Section 11 (4) (b) HSWA.
2. The HSC/E and LAs have recognised that it was necessary to examine and adapt as necessary the frameworks which currently underpin the relationship between HSC, HSE and LAs and to properly reflect the status of HSE and LAs as partners. To help achieve this S18 Guidance has been re-branded as a Standard and re-drafted so that it applies to LAs and HSE’s FOD. It is also designed to support the developing partnership, address an emerging range of issues e.g. the Hampton Review, the Local Better Regulation Office, best use of joint resources and the equivalent status of LAs and HSE, etc. and be flexible enough to respond to future change.
3. The latest version of the S18 Standard is a result of various LA and HSE consultations. It is intended to be a living electronic document accessed via HELEX with active links to other supporting information e.g. tool kits, useful documents and other supporting material. Some of this supporting material is still in development e.g. the common competency framework.
4. The Standard is to be published by April 2008. The aim is for all enforcing authorities to make adequate arrangements for enforcement as defined by the Standard by the end of 2011.
5. This project /communication plan sets out the key tasks and timings to:
  - to ensure the Standard is shared with appropriate target audiences on a timely basis and by the most effective means, using clear and consistent language and terms.
  - ensure the Standard continues to be developed in a coordinated way;
  - persuade the various target audiences of the need to comply with the common Standard
6. The table below sets out the target groups for this plan and the key messages for each group.

<b>Target Audience:</b>	<b>FOD MB</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ support the proposal for the Standard</li> <li>▪ recognise the relevance and benefit of this work to FOD, LAs and the wider HSE/LA Partnership</li> </ul>
<b>How and When:</b>	<ul style="list-style-type: none"> <li>▪ paper to FOD MB 10/12/07</li> <li>▪ report on progress 01/04/09</li> </ul>
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ that the Standard applies to LAs/FOD</li> <li>▪ key points of Standard</li> <li>▪ the process</li> <li>▪ FOD MB's role</li> <li>▪ FOD role as exemplar</li> <li>▪ the limited implications for FOD in terms of: <ul style="list-style-type: none"> <li>○ auditing compliance</li> <li>○ changes to current practices</li> <li>○ support needed for LAs</li> <li>○ timescale for full compliance</li> </ul> </li> <li>▪ what success will look like</li> </ul>	
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ paper to FOD MB 10/12/07</li> <li>▪ report on progress 01/04/09</li> </ul>	
<b>Target Audience:</b>	<b>HSE Board</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ support the proposal for the Standard</li> <li>▪ recognise the relevance and benefit of this work to FOD, LAs and the wider HSE/LA Partnership</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ paper to HSE Board 11/01/07</li> <li>▪ report on progress 01/04/09</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ the Board's role</li> <li>▪ key points of Standard</li> <li>▪ how the compliance of FOD be audited and reported</li> </ul>	

<b>Target Audience:</b>	<b>HSC</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ endorse the Standard</li> <li>▪ recognise the relevance and benefit of this work to FOD, LAs and the wider HSE/LA Partnership</li> <li>▪ make direction to FOD under HSWA Section 11 (b)</li> <li>▪ give guidance to LAs under HSWA Section 18 (x)</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ paper to HSC 22/02/08</li> <li>▪ report on progress 01/04/09</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ the Commission's role</li> <li>▪ key points of Standard</li> <li>▪ role in delivering consistent enforcement</li> <li>▪ how compliance of LAs/FOD will be audited and reported</li> </ul>	
<b>Target Audience:</b>	<b>HELA</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ oversee Project and Communications Plan</li> <li>▪ commend Standard to Members, CEOs, LA Senior Managers and practitioners</li> <li>▪ continue to be involved in development of supporting material etc</li> <li>▪ oversee monitoring of compliance and development of auditing process</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ project/Communications Plan to Joint Chairs and other members xx/11/07</li> <li>▪ update Paper 05/03/08</li> <li>▪ regular 6 monthly reports on progress</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ progress to date</li> <li>▪ role in delivering partnership</li> <li>▪ role in delivering consistent enforcement</li> </ul>	
<b>Target audience:</b>	<b>LACoRS Board</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ Endorse the Standard</li> <li>▪ recognise the relevance and benefit of this work to the wider HSE/LA Partnership</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ reported to LACoRS' Board ?/12/07</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ key points of Standard</li> <li>▪ how it fits in to other LA agendas</li> </ul>	

<b>Target Audience:</b>	<b>Local Government Panel</b>
<b>Want them to:</b>	Be aware
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>below the line agenda item at their next meeting/Letter from HSC following their Feb 08 meeting</li> </ul>	
<b>Key Messages:</b>	
<ul style="list-style-type: none"> <li>role in development of partnership working</li> <li>role in consistent enforcement</li> </ul>	
<b>Target Audience:</b>	<b>LACoRS Policy Forum</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>support proposal</li> <li>take key messages back to County Liaison Groups</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>briefing note for Policy Forum Members</li> <li>report to 05/02/08 meeting of Policy Forum</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>progress to date</li> <li>plan for implementation</li> </ul>	
<b>Target Audience:</b>	<b>LAs - Regional Partnership Forums</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>be aware</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>provide Partnership Managers and Enforcement Liaison officers with briefing note</li> <li>Partnership Manager's raise at their Forum meetings</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>be aware</li> <li>build compliance in to their plans</li> </ul>	
<b>Target Audience:</b>	<b>LAs - County Liaison Groups</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>be aware</li> <li>build compliance in to their CLG plans</li> <li>take back and spread messages to individual LAs/EHPs</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>briefing note from LACoRS Policy Forum</li> <li>messages contained in briefing note reinforced by Partnership Managers and Enforcement Liaison Officers at CLG meetings</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>key components of Standard</li> <li>timetable</li> <li>expectations in terms of compliance</li> </ul>	

<b>Target Audience:</b>	<b>LAs – Members, CEOs, Heads of Service</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ be aware</li> <li>▪ make their services compliant with Standard</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ tailored letter/briefing note from LACoRS, Joint Chairs of HELA (and/or HSC?) after HSC meeting</li> <li>▪ include draft report for taking to relevant committees</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ the key components of Standard</li> <li>▪ the benefits of compliance to LA agenda</li> <li>▪ timetable</li> <li>▪ expectations on compliance</li> </ul>	
<b>Target Audience:</b>	<b>FOD – Head of Operations</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ be aware</li> <li>▪ ensure their services compliant with Standard</li> <li>▪ encourage B2's to communicate through Group Meetings</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ Follow up workshop/briefing note – after the FOD MB meeting</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ The key components of Standard</li> <li>▪ Expectations on HoOPS</li> </ul>	
<b>Target Audience:</b>	<b>Partnership Managers</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>• use influence to encourage LAs to comply with Standard</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ Briefing note for Partnership Managers (01/08)</li> <li>▪ Reinforce at Partnership Manager's meetings (01/08, 02/08, 03/08)</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ expectations on PMs and partnership teams to encourage LAs to comply</li> </ul>	
<b>Target Audience:</b>	<b>FOD - Enforcement Liaison Officers</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ be aware of Standard applying to LAs and FOD</li> <li>▪ use influence to encourage LAs/FOD to comply with Standard</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ FOD MB briefing of 10/12/07 Board meeting</li> <li>▪ tailored briefing note to ELOs 02/08 Group meetings</li> <li>▪ Intranet/Express</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ key points from Standard</li> <li>▪ expectations on ELOs to encourage LAs to comply</li> </ul>	

<b>Target Audience:</b>	<b>FOD Inspectors/LA Buddies</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ be aware</li> <li>▪ comply with the principles of the Standard</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ FOD MB briefing of 10/12/07 Board meeting</li> <li>▪ Via ELOs/PMs</li> <li>▪ Group meetings</li> <li>▪ Intranet</li> <li>▪ Express</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ expectation of FOD inspectors/LA Buddies</li> </ul>	
<b>Target Audience:</b>	<b>LAU/LACoRS</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ Use influence to communicate with other groups</li> <li>▪ Build into own LAU/LACoRS workplan</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ discuss at regular LAU/LACoRS Meetings</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ key element of partnership program</li> </ul>	
<b>Target Audience:</b>	<b>LA - Inspectors</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ be aware</li> <li>▪ comply with the principles of the Standard</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ Partnership Managers</li> <li>▪ Members/CEO/Heads of Service trickle down</li> <li>▪ County Liaison Group meetings</li> <li>▪ FOD buddy inspectors</li> <li>▪ LAU newsletter (01/08, 02/08, 03/08)</li> <li>▪ LACoRS Briefings (01/08, 02/08, 03/08)</li> <li>▪ HELEX (03/08)</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ expectation on LA Inspectors</li> </ul>	
<b>Target Audience:</b>	<b>HSE – other groups</b>
<b>Want them to:</b>	<ul style="list-style-type: none"> <li>▪ be aware of progress</li> <li>▪ be involved with further development</li> </ul>
<b>How and When:</b>	
<ul style="list-style-type: none"> <li>▪ individual contact to key groups following FOD MB</li> </ul>	
<b>Key messages:</b>	
<ul style="list-style-type: none"> <li>▪ progress to date</li> <li>▪ timetable</li> <li>▪ need for further work</li> </ul>	

7. The table below sets out the activities planned to deliver the key messages

## **Project/Communications Plan**

### **Committee Reports**

#### **LACoRS Board**

Paper to December meeting

#### **FOD MB**

Draft Paper by 04/12/07

Agree by correspondence?

FOD MB Meeting 10/01/08?

#### **HSE Board**

Draft Paper by 17/12/07

Agreement with HSE Board Member (JMc?) by 24/12/07

Paper to Peter Buckley by 02/01/08

HSE Board Meeting 09/01/08

#### **HSC**

Draft HSC paper by 17/12/07

½ page synopsis by 07/01/08

Papers to DCE/CE by 21/01/08

Paper to Secretariat by 29/01/08

Chair's Briefing 04/02/08

Pre-meeting 05/02/08

HSC Meeting 12/02/08

#### **Policy Forum**

Paper to February Meeting

#### **HELA**

Paper to March Meeting

#### **Local Government Panel**

Agenda item for next meeting?

### **Other Activities**

#### **Briefing Notes**

FOD MB Meeting Note (01/08)

LACoRS Policy Forum for County Liaison Groups (02/08)

LACoRS for Members/CEOs (02/08)

LACoRS for Heads of Service (02/08)

Partnership Managers (01/08)

Enforcement Liaison Officers (01/08)  
FOD - Head of Operations (01/08)

#### **Websites**

Helix (03/08)  
LACoRS (03/08)  
HSE (03/08)

#### **Letters**

HSC to LGP (02/03)  
HSC, HELA, LACoRS to Members, CEOs and Heads of Service  
(02/03)

#### **Briefing Meetings**

Head of Operations (01/08)  
Partnership Managers (01/08 +)  
County Liaison Groups (01/08+)  
Regional Partnership For a (01/08+)  
CEHO Groups 01/08+

#### **Articles**

Express  
CIEH publications  
LAU Newsletter (01,02,03/08)

#### **Complete Standard**

##### **Toolkits 1 (12/07)**

*Commitment*  
*Priorities and Plans*  
*Targeting*  
*Enforcement Policy*  
*Work in Partnership*

##### **Audit Procedure (01/08)**

##### **Edit Standard (12/07+)**