

Health and Safety Executive Board Paper		HSE/06/70	
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## HEALTH AND SAFETY EXECUTIVE

### The HSE Board

#### Incident reporting policy in HSE

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#### Issue

1. To determine HSE's policy on the corporate reporting of health and safety statistics for those working within our business but not employed by HSE.

#### Timing

2. For discussion at the meeting.

#### Recommendation

3. That the Board notes the options for corporate reporting of incidents as set out in paragraphs 12 – 23, and supports the recommendations to adopt option 2 as HSE's new policy in this area;

#### Background

4. At its May 2006 meeting the Board considered how it monitored accidents and ill health suffered by contractors working for HSE where there was no legal requirement to report the accidents to us as their client under RIDDOR. To assist it in making a decision on the adequacy of current arrangements and the need to overhaul these procedures, the Board asked to be supplied with additional information. This paper provides that information.
5. The existing procedures are reviewed and two alternative approaches are considered. The relative merits of each approach are set out with a view to establishing the procedures that will best enable HSE to meet its commitment to take an exemplary approach to the management of health and safety.

6. The Board recently endorsed their commitment to exemplary performance in their introduction to the Intranet pages “Your health and safety”, stating
- “Exemplary performance in H&S management means having in place effective management arrangements that ensure the well being of our staff, and minimise the losses (financial and to our reputation) to our business from ill health and injury. It requires that we search out, adopt and update best practice relevant to and proportionate to the risks we and our staff face, and that we follow our own guidance for relevant activities.”

## Argument

8. There is no intention to alter the current policy on the reporting of accidents to HSE employees. The current policy (in summary) requires the gathering of information about
- All injury accidents including those associated with official travel
  - Any health issue believed to have been caused or made worse by work
  - All near misses with potential to cause harm
9. HSE employs a number of contracting organisations to work on its premises. Chief amongst these are IT contractors (Logica CMG) and facilities management contractors (Carillion, BAPL, ICB). These contractors all employ sub contractors who also work at HSE premises. Knowledge of the health and safety outcomes for all these contractors is necessary to establish if HSE is doing all it could to ensure everyone who works within its business is fully protected. Only by understanding how its contractors are performing can HSE act as an intelligent client and influence the performance of its contractors. By extension this will reduce the risks to which HSEs own staff are exposed as a result of contractor behaviour.
10. To meet its commitment to exemplary performance HSE must at least achieve the standards it recommends others to adopt. Prior to 2001, HSG 65 and BS 8800 set these standards. Both documents recommended that effective management of health and safety could only be achieved by gathering more data than that obtained simply through the recording and review of RIDDOR reportable information<sup>1</sup>.
11. In 2001 HSE emphasised this need in its guidance to the top 350 companies (available on the Internet<sup>2</sup>). Since then HSE has been further encouraging others to implement schemes to gather more detailed information through various routes including
- The CHaSPI tool; this recommends (based on research findings<sup>3</sup>) calculating contractor, as well as employee, injury and ill health rates
  - FOD’s large organisation intervention strategy
  - HID’s risk control strategy 7 – selection and management of contractors.
12. HSE can proceed in one of three ways.

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<sup>1</sup> p 59 of HSG 65 & p 56 – 59 of BS 8800: 2004

<sup>2</sup> <http://www.hse.gov.uk/corporateresponsibility/performance.htm>

<sup>3</sup> See ‘The development of a health and safety management index for use by business, investors, employees, the regulator and other stakeholders’, research report 217 at <http://www.hse.gov.uk/research/rrpdf/rr217.pdf>

13. **Option 1:** Our current approach. Gather and report information about HSE staff and RIDDOR reportable incidents involving contractor staff where there is a direct HSE involvement. Contractors who work closely with us over a long period e.g. REFIT report RIDDOR incidents to us. This approach excludes RIDDOR incidents that happen to contractors carrying out work that benefits HSE where there is less of a direct HSE involvement. Currently there is no guarantee that HSE would find out about such incidents.
14. The advantages of maintaining this approach are there are no change costs as this procedure is currently in place. Our current published corporate health and safety performance data is gathered on this basis.
15. The disadvantages are it does not meet the requirements we encourage others to achieve (e.g. CHaSPI); it leaves HSE open to criticisms of not practicing what it preaches, so undermining our credibility; it falls below the standards of an exemplary organisation; and staff will remain confused about when they should seek to record and report RIDDOR information from contractors.
16. Crucially HSE misses the opportunity to act as an intelligent client and improve the health and safety behaviour of its contractors and by extension the conditions of its own staff. Similarly it would be wrong (and potentially embarrassing) if a serious incident were to occur on HSE premises that HSE could have prevented, but did not due to an unclear incident reporting policy.
17. **Option 2:** Monitor and report upon all incidents relevant to HSE's health and safety system whilst distinguishing between those that are statutorily reportable and those that are not.
18. Incidents relevant to HSE's health and safety management system include
- Person/s affected working as an employee/s, contractor/s of HSE or a third party/ies on premises used by HSE
- AND/OR
- HSE could reasonably have prevented the incident occurring OR is directly able to help prevent a recurrence.
- It does not include
- Reportable incidents that occur to a contractor where there is no involvement of HSE, its staff or premises.
  - Reportable incidents where HSE staff are not at work.
19. The advantages of this approach are that it demonstrates our intentions to achieve exemplary performance and is consistent with the approach advocated within CHaSPI. It should provide us with data to identify and improve our corporate performance and be more effective in influencing the management of health and safety within the organisations with whom we contract. All parts of HSE will gather and report information on a consistent basis.
20. The disadvantages are small resource costs associated with collecting and analysing data and a change in the basis on which we publish figures to show our corporate

health and safety performance. If this option is adopted the data we publish may possibly show a worsening performance compared to the year prior to the change.

21. **Option 3:** Adopt the monitoring and reporting standards published on HSE's website under Corporate Responsibility – public reporting of health and safety performance. This effectively limits public reporting to RIDDOR information about direct employees.
22. The advantages of this approach are simplicity and that it masks any deficiencies we may have in the way we influence the health and safety performance of our contractors.
23. The disadvantage is it is not best, or exemplary, practice. It gives us no assistance in improving the health and safety performance of our wider business or any fore warning of potential serious incidents that we could be in a position as client to influence.

### **Consultation**

24. The relevant sections of this paper have been reviewed by parts of the Business Involvement Strategic Enabling Programme. The point they make is that although there is not explicit guidance about the issue of RIDDOR recording for corporate presentation purposes, they would consider that a conscientious employer would keep such data and make it available.

### **Presentation**

25. The Board may wish to consider the external communication of an internal policy and the impact adoption of this policy may have on our reported health and safety performance.

### **Action**

26. If the Board adopts option 2 the revised procedure can be applied retrospectively to the whole of 2006/7 as to date there have been no RIDDORs that would be affected by this change.