

| Health and Safety Executive Board Paper |                 | HSE/07/111  |             |
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## HEALTH AND SAFETY EXECUTIVE

The HSE Board

### Fine Tuning Review

### Update on improving HSE's sources of intelligence for targeting

Paper by Eleri James

Cleared by Sandra Caldwell on 24 October 2007

#### Issue

1. To provide an update on the Fine Tuning work stream to examine how HSE's intelligence sources for targeting can be improved.

#### Timing

2. Routine

#### Recommendation

3. The Board is asked to:
  - i. endorse the approach to the work as set out in paragraphs 8 to 12;
  - ii. endorse the Action Plan at Annex 2; and
  - iii. note the progress made to date as set out in paragraphs 14 to 25.

#### Background

4. The Fine Tuning Report found that:
  - a. there is a pressing need for better intelligence ("25-30% visits wasted due to poor targeting"; "30% mailshots returned "not known"");
  - b. current sources do not contain the information we need on duty-holder performance etc.
  - c. COIN is currently of limited value in this respect;
  - d. RIDDOR intelligence has reduced since introduction of ICC;
  - e. the quality of sector intelligence is diminishing; CoSAS under utilized;
  - f. LA partnership provides some opportunities;
  - g. we need better co-ordination between various interventions to avoid repeat visits;
  - h. outreach to poor performers and "hard to reach" is not succeeding.
5. Additionally, the BRE audit found that our risk-based approach breaks down locally, with a mismatch between HQ objectives and the field's ability to target their activities effectively to meet them. They observed that, if anything, we do too few inspections rather than too many in terms of Hampton, but argued strongly that we lack the capacity at the corporate level to know if we are "doing the right ones".

6. Initially, the Board commissioned OPSD to lead on this work, but subsequently agreed that the scope of the work would first be reviewed and refined within FOD. A FOD led project has since been initiated to establish the available means to acquire better intelligence on businesses and target audiences; using a multi-disciplinary team, including a LA representative.
7. The Outline Project Brief has already been shared with Board members. A copy is attached at Annex 1 for ease of reference.

### **Argument**

8. Taking forward this project has highlighted the need to distinguish between the targeting and intelligence which informs our plans (the Macro level) and the targeting and intelligence we need at local level to deliver those plans (the Micro level).

#### Targeting and Intelligence which informs our plans (the Macro level)

9. In addition to the segmentation work, there are a number of projects and initiatives already underway across HSE to tackle the targeting and intelligence needs at this level. As an example, at the request of the HSE Statistics Steering Group, CoSAS recently undertook a review of its customers' needs for statistics and it identified some 18 potential improvement themes. Progressing four of these themes will significantly benefit this project and they are:-

- a. To identify employers reliably and consistently across databases (COIN, ICC etc)
- b. To record small but key extra information (to support targeting)
- c. To model the number of accident reports, then sift companies by comparison of actual number with those expected
- d. To explore the value of indicators (across OGDs) of business management (to support targeting companies).

10. Defining the work that needs to be done is being drawn up and, if applicable, this project will offer its support (as well as explore opportunities for engaging HSL's assistance).

#### Targeting and Intelligence we need at local level to deliver those plans (the Micro level)

11. There are a number of initiatives underway across FOD to look at ways of improving our targeting and intelligence needs at local level. These involve examining how we can make better use of the intelligence we already have, exploring opportunities for obtaining information from other regulators and supplementing these with information from commercial sources in order to get a much richer mix of premises to visit.
12. The approach to the work seeks to capture the experience from these initiatives and pilots, evaluate their effectiveness, deliver and implement solutions as opportunities arise, while in parallel invest in longer term solutions.

### **Action Plan**

13. The Action Plan at Annex 2 has been developed to recognise that there are specific actions which the project team can take forward, at the Macro and Micro level, but also recognises that there are other projects, initiatives and services across FOD, HSE and Government-wide which are also seeking to improve our

targeting and intelligence sources. The planning, monitoring and outputs from these existing work streams will be aligned with, and captured by, this project.

## **Where are we now?**

### *Project Team*

14. The Project Team is now fully resourced and has been up and running since mid September.

### *Governance*

15. The cross-HSE nature of this project has been reflected in the governance arrangements. Project Board membership has been drawn from FOD, CoSAS, Sectors and Local Authorities. We will be sharing our findings with HID so that they have the opportunity to pick up any benefits to them from this project.

### *FOD Specific Intelligence Initiatives*

16. We are extending the Regional Intelligence Officer role to all FOD Divisions to build on the work that has been done by the Regional Intelligence Officer trial in the South West. Developing this network also allows us to better evaluate potential solutions and provides us with an opportunity to identify specific regional needs (e.g. in devolved administrations and in specific sectors) where one size does not necessarily fit all. The network also provides us with an opportunity to strengthen the relationship between the Regional Intelligence Officer, the 'desk officer' within CoSAS and their equivalents within ONS. A workshop is planned for November to promote the information sources for which HSE already has contracts and arrangements in place; to identify opportunities to pilot solutions to help deliver the remainder of the 2007/08 plan; to share the emerging requirements for intelligence to deliver the 2008/09 plan and to initiate the work to develop an Intelligence Strategy.
17. We have identified a possible gap in the Complaints Handling procedure. When a complaint has been dealt with by letter or a telephone call (i.e. by a Complaints Officer) and the business is new to FOD, these businesses are not currently subject to the 'New to FOD' procedure which is carried out by HSAOs. We are in discussion with the procedure owner on how best to plug this gap.
18. We are also investigating how to make best use of information which is legally required from duty-holders e.g. Adverse Insurance Reports, F10s etc.

### *Corporate Intelligence*

19. A method of improving the currency of duty-holder data on COIN has been identified and is currently being evaluated by OPSD. The proposal offers an opportunity to minimise the number of 'wasted' visits made where COIN is used as the intelligence source.

### *External Sources of Intelligence*

20. Some Programme Managers already draw on intelligence from other regulators. Whilst these regulators may not be relevant to other sectors, we need to explore how we can extend these opportunities. For the PSP programme, the CoSAS input to analysing this data has been highly praised and we need to establish whether other programmes would similarly benefit.
21. There is a pressing need to look at extending (or possibly supplementing) HSE's existing contractual arrangements for commercial sources of business data. We need to evaluate whether we have the best and most current source; is it

available to the appropriate staff and does it provide the best value for money. This requirement has been discussed and will be taken forward in consultation with BSD and CDS.

22. A substantial number of Local Authority information sources have been identified and are currently being evaluated. We will be discussing how the sources of most benefit to HSE can be shared through discussions with LAU and LACORS. We will also take onboard any lessons learned and any data sharing opportunities that arise from the Healthy Workplace Milton Keynes project.
23. A separate paper will be presented to the Board in December on the topic of 'rogue traders' and 'hard to find' businesses which will include proposals for proactively engaging with other regulators, such as the Police to identify these potential targets. In the interim, we are exploring obtaining access to data collected by a joint DTI/Trading Standards initiative called 'Rip off tip off' which encourages the public to report 'rogue' builders etc.
24. Consultation with Legal Advisers Office, regarding the opportunities to acquire data held by other regulators and government bodies, suggests that whilst the executive arm of government strongly supports the need for data sharing, whether a particular public authority can share data depends on what (statutory or perhaps in some cases, common law) powers it has to share data. Does it have the necessary "vires" to make the disclosure in question? We understand, from correspondence between the Better Regulation Executive and the Information Commissioner, that data on businesses is not subject to the Data Protection Act but this does not necessarily mean that the sharing of information on businesses is allowed. It must be lawful to do so. We will need to consider these legal issues for each potential opportunity that arises and deal with each on a case-by case basis.
25. There are no barriers to acquiring data that is already in the public domain **in agreement with the provider and subject to the terms and conditions of use and any associated charging mechanisms.** It is unlawful to create lists, create and update our own databases, from these sources without the suppliers' consent.

### **Consultation**

26. Discussions have been held with staff in FOD, HID, COSAS, Policy Group, RPD and Legal Advisers Office. Further consultation will be necessary to take forward the work.

### **Presentation**

27. No presentational implications.

### **Costs and Benefits**

28. None specifically related to this update.

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

29. None specifically related to this update. The financial/resource implications of any proposals/solutions that emerge will be subject to further consultation.

### **Environmental Implications**

30. None.

## **Other Implications**

31. None.

## **Action**

32. The Board is asked to endorse the approach to the work and the action plan at Annex 2 and to note progress on the Fine Tuning recommendations to improve HSE's intelligence sources for targeting.

## **FINE TUNING: TAKING FORWARD THE WORK ON IMPROVING INTELLIGENCE AND TARGETING**

### **Statement of the issues:**

This is a priority topic for FOD. Better intelligence brings better targeting, that is, it reduces sub-optimal effort, and therefore potentially achieves better impact and outcomes. The Fine Tuning review found:

- there is a pressing need for better intelligence (“25-30% visits wasted due to poor targeting”; “30% mailshots returned “not known””)
- current sources do not contain the information we need on duty-holder performance etc
- COIN is currently of limited value in this respect
- RIDDOR intelligence has reduced since introduction of ICC
- the quality of sector intelligence is diminishing; CoSAS underutilised
- LA partnership provides some opportunities
- staff are unaware of any HSE “marketing strategy”
- there is a need to revive work on segmentation (Oct Board paper)
- we need better co-ordination between various interventions to avoid repeat visits
- outreach to poor performers and “hard to reach” is not succeeding.

### **Initial (national) work:**

- a project to establish the available means to better populate HSE’s databases on current businesses and target audiences - a multi-disciplinary team, including a LA representative. Initially the Board commissioned OPSD to lead this work, but subsequently it has been agreed that the scope for the project will first be reviewed and refined within the FOD FT work (action Phil Scott and Wendy Rimmer);
- a project to better segment HSE’s approaches to duty holders, including taking forward the recommendations in the Board Paper “Segmenting HSE’s approach to duty holders” and the attitudinal research sponsored by Communications Directorate – a multi-disciplinary team, including a LA representative, led by Sandra Caldwell, Jane Willis and Colin Douglas to report to the Board at its October Meeting.

### **Initial FOD trials:**

- fine tuning of Partnership and Comms Teams (ESE)
- developing a regional intelligence officer post (WSW)
- better use of HSAOs (ESE).

## **Definitions:**

**“Intelligence” (in the FT context) means information about duty-holders, either individually or sectorally, and about regulated activities, which enables FOD and its staff to “target” its work.**

**“Targeting” means deciding, on the basis of relevant intelligence, whether, when and how FOD should intervene in order to carry out its functions effectively and efficiently.**

**The intelligence which is likely to be of relevance includes information about the nature, size and location of businesses; their ownership and management; activities, processes, and hazards; the use or presence of substances; standards of control; management competence; the record of incidents, complaints and past enforcement; and information from other regulators or bodies from which inferences about H&S performance may be drawn.**

## **Scope:**

**The scope of this work relates to the efficient direction of FOD’s resources to those activities and topics which are priorities for HSC/E; it does not include the analysis needed to identify those priorities.**

## **Objectives:**

**The overall objective of better targeting is to ensure that FOD’s resources are used effectively, that is, they are directed to making appropriate interventions with duty-holders which will produce the greatest impact on H&S standards.**

The more detailed objectives/activities for this work are set out below. They are constructed to provide an appropriate sequence of actions needed to discharge the high-level objective above, but are now presented in two tranches. The first of these is aimed at ensuring that we make the best of what we currently have and do, and conduct the analysis needed to decide what further work is necessary, practicable, and affordable.

There are two “how” requirements which apply to both tranches:

- engaging with staff and utilising their knowledge, experience and ideas;
- keeping track of, and ensuring co-ordination with, the national work and specific FOD trials outlined above, and communicating appropriately.

### **TRANCH 1 – BY APRIL 2008**

- ensuring that all staff understand the contribution that intelligence and targeting make to the efficient and effective conduct of our business;
- coming to a view about the current state of intelligence in FOD and identifying what avenues are open for potential improvement;

- deciding what use to make of information which is legally required from duty-holders;
- investigating and deciding what further work will have the greatest cost-benefit payoff in improving intelligence, recognising that pursuing better intelligence is an open-ended task, and that all information decays and requires resources to obtain and maintain.

#### TRANCH 2 – TIMING AND DETAIL DEPENDENT ON THE OUTCOME OF TRANCH 1, NATIONAL WORK, AND SPECIFIC TRIALS

- exploring the availability of commercial sources of information, its costs and benefits;
- devising a tool-box of techniques for applying available intelligence to targeting duty-holders;
- clarifying and then supporting the roles and responsibilities of visiting staff in collecting and maintaining in-house intelligence, applying it in their work, and in obtaining and using relevant intelligence from other sources;
- keeping in touch with, and contributing to, discussions with other regulators, particularly LAs, in relation to the possibility of sharing information and databases.

## Fine Tuning – Targeting and Intelligence – Action Plan

### Workstreams to be taken forward by the Targeting and Intelligence Project Team

| Project/<br>Initiative/<br>Service<br>Reference | Title/Description   | Action   | Date             |
|---|---|--|------------------|
|   |   |  |                  |
| TI19  | Set up Project Governance arrangements                                | Agree Project Board membership and set up first Project Board meeting  | Sept/Oct 07      |
| TI20/TI21                                       | Develop Project Documentation   | Develop draft PID and submit to PB for approval  | Oct 07           |
| TI1   | Develop a Regional Intelligence Officer Role                          | We need to capture and catalogue the activity, systems and procedures that are current in place across ALL FOD Divisions; the sources of intelligence/information (e.g. commercial) that are currently being used, the use of existing sources of information e.g. F10, AIRs etc; the benefits or otherwise of these (i.e. what works and what doesn't) and any lessons learned. | Oct 07           |
|   |   | We have Board agreement to expand the SW Regional Intelligence Officer trial to all FOD Divisions for the remainder of this financial year. We will take the opportunity to strengthen the Intelligence Officer network, share best practice and build on current relationships with CoSAS, LAs etc.   | Oct 07 to Mar 08 |
| TI6   | Complaints as Intelligence  | There is a suggestion that we do very little with complaints that go unselected for 'follow-up' or investigation and that we lose intelligence that could usefully inform future interventions. Of those who make use of this intelligence for targeting purposes, we need to measure the value/benefit of the information and in what circumstances it is useful.               | Oct 07           |
|   |   | Implement best practice across all FOD Divisions   | Nov 07 to Mar 08 |
| TI2/3   | Obtain and share information/intelligence from/with Local Authorities | Explore opportunities for sharing LA data.   | Oct 07           |
|   |   | Propose solutions  | Dec 07           |
|   |   | Implement solutions  | Mar 08           |

| Project/<br>Initiative/<br>Service<br>Reference | Title/Description                      | Action   | Date    |
|---|--|--|---------|
| T17   | Liaison with Trading Standards         | Information on the Intranet suggests that the last time the list of Trading Standards Liaison Inspectors was updated was in October 2003. Need to establish whether this role has disappeared, should be resurrected, been overtaken by events and whether there is a missed opportunity to share information on product safety etc.   | Nov 07  |
| T17   | Liaison with OGDs                      | To investigate whether there are opportunities for greater sharing of information with OGDs through existing MoUs.   | Dec 07  |
| T18   | Construction Programme 2008 and beyond | There will be a change of focus in 2008/09 to concentrate on SMEs. We need to understand the early thinking behind these proposals and how the intelligence will be gathered to support the 2008 and beyond intervention activity for this <b>and other Programmes</b> . We also need to explore how we can make more use of our established relationships with key stakeholders.  | Dec 07  |
| T116  | ICC Data Quality                       | There is a fair amount of criticism of the quality of data captured at the ICC e.g. incorrect SIC etc. Some feedback from Divisions has recently been sought from BSD and we need to establish what is being proactively done with this information. There is also criticism that the data is not easy to obtain, to identify trends, poor performers etc – particularly for those incidents which are not taken forward to investigation. The re-tendering of the contract may be a barrier to short term improvements but, as a minimum, we must try and influence the DQ arrangements in the next contract. | Dec 07  |
| T117  | x-Government Business Register         | To represent HSE on the x-Government Working Group.  | Sept 07 |

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| T118 | Intelligence elsewhere in HSE    | CDS receive a copy of the 'New Business Start up' list from Experian. HSE Books has over £1.1m registered customers, of which 400,000 employ less than 100 staff. BSD 4 also handle FOI requests from which further sources of intelligence may be found. We need to explore whether there are opportunities to make use of some or all of this information. | Dec 07 |
| T123 | Develop an Intelligence Strategy | Work with Divisional/Regional Intelligence Officers to develop an Intelligence Strategy.   | Mar 08 |

### **Projects to be aligned with, and captured, by the T&I Project**

| <b>Project/<br/>Initiative/<br/>Service<br/>Reference</b> | <b>Title/Description</b>   | <b>Project/Service<br/>Lead</b>                                |
|---|--|--|
| T11   | <p><b><u>Develop a Regional Intelligence Officer Role</u></b></p> <p><b>Wales and South West Trial</b> - To improve local intelligence bases and build manageable local stakeholder partnerships to encourage sharing of information, intelligence and support, to include capture of non-registered higher risk duty holders co-ordinated by a Regional Intelligence Officer (RIO).</p> <p><b>Yorkshire and North East Trial</b> – One of the outcomes of the Intelligence Workshop Trials in YNE has been the development of a 'Project Proposal' for operational Band 2 Inspectors to complete for a new, local, targeted intervention plan. The 'Project Proposal' is submitted and approved/not approved by the Head of Operations. If approved, any intelligence required to help identify relevant duty holders/companies etc to deliver the project's objectives is gathered by the Band 4 External Relations Officer.</p> | <p>Vicky Clark<br/>FOD SW</p> <p>Jim Fairbrass<br/>FOD YNE</p> |
| T12   | <p><b><u>Better use of HSAOs - ESE Trial</u></b> - To significantly up the strike rate to around 15-20 visits per HSAO per day by putting duty holders in face to face contact with HSE/LA staff – raising the profile of HSE/LA work and signposting organisations to information to help them comply/manage risks in priority areas.</p>   | <p>David Bryant<br/>FOD ESE</p>                                |
| T13   | <p><b><u>Fine Tuning of Partnership and Communications Teams</u></b> - To run a trial Promotion and Intelligence gathering project to determine whether HSAO staff can deliver improvements in the quality of intelligence available to target visits, and raise the profile of HSE/LA priorities for 2007/08. Identify, test and implement best practice in the identification of businesses, poor performers, and other targets through work with local authorities, stakeholders and other frontline activity. Establish trial roles at Band 5 level to manage information and intelligence, and identify approaches for improving targeting of interventions.</p>  | <p>David Bryant<br/>FOD ESE</p>                                |

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| T14  | <b>Work Scheduling Trial</b> - To reduce the current levels of “wasted” visits and increase operational productivity through effective scheduling of inspections by visiting officers attached to Proactive groups.  | Dave Allen,<br>FOD YNE        |
| T15  | <b>Fit 3 – FOD Intelligence Recording and Retrieval – 2008 and beyond</b> - To address the current difficulties Programme Managers have in relation to retrieving information about FOD's contribution to their projects. The intelligence currently recorded by FOD and received by the Programmes does not meet their needs in several respects, including the inability to identify reliably (or at all) (i) the resources devoted to entire programmes (e.g. PSP); (ii) the resources devoted to individual workstreams; (iii) relevant intelligence on particular issues, whether progress with planned work, emerging issues, or even highlights/lowlights; (iv) specific areas of interest such as the issues which lead to inspectors scoring 3s or 4s on the IRF.   | Mike Sebastian<br>FOD NWHQ    |
| T19  | <b>Random Inspection Project</b> - Develop a methodology for selecting a sample of 2,000 premises in the manufacturing and construction sectors for inspection in 2008/09.   | Simon Warne,<br>CoSAS         |
| T110 | <b>Review of Customer Needs for Statistics 2007</b> - To improve how we identify poorer performing organisations through better recording of them and their (injury) record through modelling to filter organisations to come within (or out of) scope of selection for contact; to identify groupings (industries, occupations, other) for priority effort; to improve our understanding of injury and ill health trends and the impact of HSE/LA interventions; to make statistics and statisticians more accessible. Themes applicable to the T&I Project include:-<br><ul style="list-style-type: none"> <li>➤ Identify employers reliably and consistently across databases (COIN, ICC etc)</li> <li>➤ Record small but key extra information (to support targeting)</li> <li>➤ Model the number of accident reports, then sift companies by comparison of actual number with those expected.</li> <li>➤ Explore value of indicators (across OGDs) of business management (to support targeting companies)</li> </ul> | Graham Stevens,<br>CoSAS      |
| T111 | <b>Developing the Desk Officer Role</b> - To provide a single point of contact within CoSAS to support FOD Divisions in all their statistical needs.   | Kate Sweeney,<br>CoSAS        |
| T112 | <b>Vulnerable Workers (Including Migrant)</b> - To develop better channels of communications with workers, develop advice for employers, target inspection and enforcement activity and work more closely with other government departments.   | Jeremy Bevan,<br>PG           |
| T113 | <b>COIN Data Quality</b> - Proposals for changes to the COIN data quality checking procedures are under development.   | Clare McNicholas,<br>OPSD DIS |
| T114 | <b>Managing Health &amp; Safety / Safety culture</b> - To review & refresh the principles of, and approaches to, managing businesses for successful H&S performance.   | Robin Cowley,<br>OPSD OSU     |

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|------|---|---------------------------|
| T115 | <b><u>Large employer initiative</u></b> – To support delivery of large employer activities in HSE (e.g. LOPP, FOILE etc) and carry out a pilot exercise to reorganise COIN records (in terms of organisational structure and associated intervention activity) for 9 large companies. | Mike Calcutt,<br>OPSD OSU |
| T122 | <b><u>F10 electronic notifications project</u></b> - To develop and implement an end-to-end solution that enables F10 notifications to be completed, transferred and populated directly into the existing F10 database with the minimum of manual intervention.                       | Eleri James<br>FOD NWHQ   |