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HEALTH AND SAFETY EXECUTIVE

CONSTRUCTION INDUSTRY ADVISORY COMMITTEE (CONIAC)

HSE Small site strategy

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Cleared by Philip White, Chief Inspector of Construction, on 10 March 2009

Summary

For discussion at CONIAC on 26 March 2009

This paper invites CONIAC to endorse the draft small sites strategy, which is the output from Construction Division's cross-cutting SME project. The paper also invites CONIAC to consider whether there are ways in which stakeholders could promote key messages for small sites, either independently or in partnership with HSE.

Issue

1. This paper presents the draft small sites strategy and describes HSE's plans for delivering it. The paper also seeks stakeholder support in promoting and raising awareness of key messages for the small site audience.

Timing

2. Routine, but as the strategy will shape HSE's work with small sites in the 2009/10 workyear and beyond, a decision at this meeting will enable the delivery of the strategy to begin from the start of the workyear.

Background

3. The Small sites project is one of five cross-cutting projects presented to CONIAC on 4 March 2007. The cross-cutting projects were set up to extend the reach of the Construction Programme and to enhance its effectiveness. HSC supported the cross-cutting project themes in October 2007 (paper

HSC/07/71) and at its meeting in 25 June 2007, CONIAC agreed to set up an SME WG to support HSE's Construction Division in delivering the SME cross-cutting project. The WG reported in November 2008 (paper **M3/2008/01**)

4. The objective of the SME project is 'to establish a sustainable strategy to influence SMEs in the construction industry to adopt sensible risk management principles'. This was subsequently revised to focus the work on sites where less than five people work.
5. The early work of the project consisted of an extensive fact-finding exercise to develop an understanding of the characteristics of small sites, and the reasons why this group is hard to reach. The project team used a wide range of sources from both inside HSE and also externally. External sources which were used included conversations with owners of small businesses at a SHAD, WWT regional chairs, research reports and meetings with a range of stakeholders. The project manager met WG members individually to seek views on 'small site' initiatives and influences.
6. The project team built up a picture of the characteristics of small sites. Small sites are a diverse group, where health and safety behaviours range from good performers to rogues. The list of characteristics below represents a snapshot of the target sector, and the attributes of individual firms may vary markedly from this list. All the characteristics originate from at least two sources, and the triangulation should add weight to the project team's findings.
7. Small sites are not a homogenous group but in general they:
 - Do not have a fixed workplace – sites are usually of short duration
 - Do not belong to trade associations, go on training courses or attend SHADs
 - Are busy trying to make ends meet
 - Will not look for information
 - Prefer not to read
 - Want to be told what to do
 - Avoid contact with officialdom
 - Think health and safety is common sense

- Often employ family members.
8. These characteristics make small sites difficult for HSE and major stakeholders to reach and influence. In order to gain an insight into possible ways of exploring the behaviours of small sites, HSE carried out a small-scale pilot study consisting of face-to-face interviews with small site owners and managers. The pilot informed HSE's decision to commission an extramural research project to examine the attitudes, motivations and influences which shape the behaviour of small sites. An oral update on the research findings will be presented at the meeting.
 9. The understanding of characteristics of the audience informed the development of the small sites strategy (**Annex**). The small site characteristics indicate that the delivery of the strategy should be focused on a few areas, with the aim of delivering consistent, clear messages to all small sites. The proposed topic areas for 2009/10 are:
 - preventing falls from domestic roofs during roof repair work;
 - providing toilets and washing facilities; and
 - eliminating unnecessary manual handling, and introducing simple low-cost solutions for remaining tasks.
 10. All HSE's proactive work with small sites in 2009/10 will concentrate on these topics. HSE will continue to require action on 'matters of evident concern' where these are encountered and the way we conduct our reactive work will not change. New topics will be identified for future workyears.
 11. The stakeholder consultation is in progress and responses are broadly supportive. The proposal to deal with 'rogues' by enforcement was supported by the Engineering Construction Industry Association and Construction Clients' Group. The Heating and Ventilation Contractors Association suggested the strategy should include the use and control of PPE and risk control and management, and Berkeley Group Holdings plc (representing property developers) suggested the inclusion of slips, trips and falls as a result of poor housekeeping.

Next steps

12. The small sites strategy will be delivered by inspectors and HSAOs. HSAOs will play a significant part in raising awareness of the priority topics. We plan to produce simple, pictorial information sheets specifically for the 'small site' audience to illustrate good and bad practice. HSE will promote small site messages at SHADs and other events, and WWT will continue to play an important role in reaching the target group.
13. HSE is in the process of recruiting full time appointees (FTAs) from industry. The new FTA role offers the potential of making a significant contribution to a range of issues, including the delivery of the small site strategy. It is essential to make the best use of this additional resource but details cannot be developed until the recruitment process ends in late April.
14. The findings of the extramural research should provide an insight into how we can reach this group and encourage behavioral changes. An oral update of the research findings will be given at the meeting.

Argument

15. The small sites strategy does not stand alone – it will make a significant contribution to delivering the new HSE strategy goal of customising support for SMEs.
16. HSE cannot expect to facilitate the necessary improvements in health and safety on small sites by working in isolation. The SME WG's report to CONIAC (M3/2008/01) identified a large number of stakeholder initiatives aimed at small sites. The development of an increased understanding of the characteristics of small sites suggests that messages for this audience need to be consistent and clear to avoid confusion, which may lead to inaction. HSE would welcome the support and participation of stakeholders in promoting the 'small site messages' as without this, we cannot hope to bring about significant sustained improvements. Ideally any stakeholder-led initiatives would align with HSE's proposed topic areas (paragraph 9), but if stakeholders decide to take forward work on other priorities, it is important that this takes account of the characteristics of small sites (paragraph 7).

Consultation

17. The draft small sites strategy has been agreed by the Construction Programme Board, and subject to consultation within HSE. It has been circulated to a number of stakeholders for comment, including the SME WG and the 'construction' members of HSE's Small Business Trade Association Forum (SBTAF).

Financial/Resource Implications for HSE

18. There are no additional resource implications associated with implementing the small sites strategy.

Action

19. CONIAC is invited to:
- endorse the Small sites strategy;
 - discuss how members can participate in work to encourage improvements in health and safety on small sites;
 - inform secretariat of their plans for work with small sites to bring about improved standards of health and safety.

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SMALL SITES STRATEGY

This strategy applies to small firms on small sites (those where less than five people work). It applies to contractors but does not apply to those with other responsibilities e.g. clients.

Our Goal is:

- To reduce the incidence of fatalities, injury and ill health arising from work on small construction sites (employing five or less). We will ensure basic minimum standards in respect of health, safety and welfare.

We will do this by:

- Delivering our messages by focusing on specific topics. In 2009/10 we will focus on domestic roof repair work, manual handling and the provision of welfare facilities. We will use the full range of intervention techniques to deliver our messages;
- Improving existing links with stakeholders and developing new links to promote joined-up working to ensure those who come into contact with small sites deliver a coherent message;
- Encouraging larger companies to influence small firms working as subcontractors on larger sites.
- Ensuring that all our communications with small firms, whether oral or written, are suitable for the 'small site' audience and we will produce clear, simple and practical information on how small sites can improve their health and safety performance.

The strategy applies nationally, and will be delivered through Construction Division's Operational Plan. It applies to our proactive work – the way we conduct our reactive work will not change. Work on competence will be taken forward as a longer term workstream alongside the priorities for 2009/10. There will be occasions when other topics are a priority for small sites work, but these will be kept to a minimum so as not to detract from our aim of delivering simple consistent messages.

During the development of the strategy we looked at the ways small sites work, the pressures on those who manage or control them and the factors which influence the managers and workforce. We found that people who work on small sites are unlikely to seek information so we need to actively promote and distribute our messages and information.

The work of HSAOs and Compliance Officers will be vital in delivering the strategy. Advisory visits to small sites will focus on positive messages of what good practice looks like. We will prepare information sheets specifically for small sites. The first of these will cover domestic roof repair work, the elimination of manual handling and the provision of welfare facilities.

Inspection will continue to be important, and at visits to small sites, inspectors should concentrate on domestic roof repair work, manual handling and welfare facilities. Serious risks and matters of evident concern will be dealt with in accordance with the Divisions standard procedures.

Much of our current educational and promotional work typically targets those who are interested and aware of health and safety. It is important for us to continue to engage with the 'interested and aware' but we need to draw in those who are ignorant but who would be interested if informed. We do not plan to carry out any educational and promotional work with 'rogues', (unless individual firms or stakeholder groups specifically request it) as anecdotal evidence suggests these approaches do not change the behaviour of this group.

We will continue to work through Working Well Together groups and with other stakeholders to deliver 'small sites' initiatives to encourage small firms on small sites to adopt good practice and to move towards sensible risk management. We will seek to secure stakeholders' support and buy-in to our small site work, with the aim of asking them to promote our three 'small site' priorities throughout 2009/10.

The strategy will remain in place until 2012/13, although the topics on which our 'small sites' work will focus will change as work progresses. We will evaluate the first year's delivery and will identify new topics on which 'small sites' work will be focussed for the 2010/11 workyear.