

Small Business Trade Association Forum Minutes

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Small Business Trade Association Forum	
Minutes of the Meeting of the Small Business Trade Association Forum, held on 25 October 2005 in the Globe Room, Rose Court.	
<p>Present</p> <p>Judith Donovan CBE, Chairman</p> <p>British Chambers of Commerce British Coatings Federation British Wood Preserving and Damp Proofing Association British Woodworking Federation Confederation of British Industry Engineering Employer's Federation Federation of Master Builders Federation of Small Business Forum of Private Business National Farmers' Union National Hairdressers' Federation Road Haulage Association Vehicle Builders and Repairs' Association</p> <p>Apologies</p> <p>British Dental Association British Hospitality Association British International Freight Association British Retail Consortium Construction Plant Hire Association Electrical Contractors' Association Federation Of Tour Operators Hair and Beauty Industry Association Heating and Ventilating Contractors' Association Institute of Directors National Care Homes Association National Federation Of Retail Newsagents Registered Nursing Home Association Small Business Bureau</p>	<p>Officials Present</p> <p>Elizabeth Hodgkinson (Head of Cross Cutting Interventions Division)</p> <p>Debra Humphries Elizabeth Hornsby Meena Sharma</p>

1.	Introductions and apologies
1.1	Judith Donovan welcomed both existing and new members to the meeting.

	<p>A number of new members had been recruited to the Forum. Only two new organisations were able to be present at this meeting due to timing, but the level of interest in the Forum and commitment to attend later meetings was very encouraging.</p> <p>Judith pointed out that this meeting marks the Forum's first anniversary and that it had been a success. Judith spoke of how the Forum was gaining credibility within HSE and making progress in inputting common sense into HSE initiatives.</p> <p>Judith went through the apologies and asked for formal approval of the minutes from the July meeting. Minutes were approved.</p> <p>In light of the fact that the Forum is a year old, the Secretariat is in the process of planning an evaluation. No firm details are available yet, but Forum members will be contacted before the next meeting.</p>
2.	Better Regulation
2.1	<p>Teresa Quinn gave a short presentation on progress on the administrative burdens project since the previous Small Business Trade Association Forum meeting in July. HSE has completed an audit of all its legislation and made an assessment of the administrative burden of the information obligations within it (62% low burden on business; 25% medium burden; 13% high burden). Pricewaterhouse Coopers has been appointed by the Cabinet Office to carry out the second phase of the project – measuring the costs of the administrative burden.</p>
2.2	<p>A number of SBTAF members had previously provided feedback on irritants in legislation, and provided suggestions for removing or reducing administrative burdens on business. A number of themes have emerged:</p> <ul style="list-style-type: none"> • Perceived unnecessary legislation, where existing/other regulations already provide sufficient cover; • Difficulties in knowing what legislation applies to a particular organisation; • Requirements to provide information to a number of government departments; • Application of legislation to small business - whether the specific circumstances of small businesses required a different approach in law in some areas; • Apparent contradictions between legislation that could be reduced or eliminated through better co-operation between Government Departments. <p>These issues are being considered by the organisation and will feed into development of the HSC/E simplification plan. Suggestions relating to the work of other government departments will be forwarded to relevant contacts in those organisations. A draft simplification plan will be discussed by the HSC in January 2006.</p>
2.3	<p>HSE was also keen to hear the Forum views on the issue of government departments sharing data provided by business. Although a potentially useful means of reducing the burden on business, Forum members were very concerned about how data might be used or manipulated if it were shared between government departments. A number of members felt that it would be</p>

	more appropriate to provide information once through a Government wide portal, and be able to give clear instructions how the business wanted the information to be shared amongst departments
2.4	<p>Forum members reiterated that government needed to consider the cumulative burdens on business rather than looking at individual pieces of legislation, or the burdens of an individual department's legislation. Small business perception was that there was wave upon wave of regulation, most of which was not joined up and where the sponsoring department or agency had not real understanding of the practical implications of what they were requiring business to do.</p> <p>Another key issue highlighted was the importance of allowing sufficient time to implement legislation – in some industries or for some activities, the lead in times to comply with changes to regulation can be long e.g. in relation to packaging requirements, and this needed to be factored into the timing of implementation</p>
2.5	Judith Donovan asked that Forum members submit anecdotal examples of how legislation and administrative burdens affect the operation of a business and practical ideas for simplification
3	HSE's publications strategy
3.1	<p>John Lack outlined the role of HSE's Communications Delivery Service (CDS) to manage design, editing and distribution of HSE's free and priced publications including HSE copyright material. His particular role is to manage HSE's income streams from publications work.</p> <p>Firstly John outlined the arrangements put in place after the last meeting to allow Forum members to bulk order non-priced publications for their members. CDS have a list of Forum members and will allow bulk orders of non-priced publications free of charge. Forum members will receive roughly fortnightly e-mail notification from HSE of forthcoming new non-priced publications and can also place advance orders for these. Those orders will help determine the size of the print run.</p> <p>When bulk Forum orders are received, CDS will check before issue whether there is sufficient stock to meet the order, or whether a re-print is needed and if the publication about to be updated or withdrawn and will notify the Forum member making the request of the position. Judith Donovan emphasised that it is important that the primary contact with the Forum Members is through the Secretariat.</p>

3.2	<p>John moved onto the Publications Review, which started one year ago. At that time, HSE had 1700 priced publications, which has now been reduced to 600. This has been achieved mainly by making research and technical reports available free of charge.</p> <p>The emerging strategy appears to favour HSE making all the content of its current priced publications free on our website in a read-only format, and continuing to charge for hard copy versions. HSE also proposes re-organising the website so that all publications, whether priced or non-priced, are all in the same area of the site. HSE's direction is to make the website the primary means of access to HSE information. All HSE publications are covered by Crown copyright. Non-priced publications can be freely reproduced for own use. Any other use of HSE material requires the permission of the Controller, Office of Public Sector Information (formerly known as HMSO).</p>
3.3	<p>There was a consensus among Forum members that provision of information via the website alone was insufficient. There was scepticism from Forum members about how often small businesses use the internet. The standard of IT equipment in small firms is in general very poor. Many small firms keep computers simply for doing their accounts and printing off invoices. They tend not to upgrade them as they are worried about them being stolen. Small business owners and managers are extremely busy and need information presented to them in a very simple, accessible format. They have no spare time and give no priority to searching HSE's website.</p>
3.4	<p>Forum members felt that guidance was often written for audiences with a fairly high level of literacy, rather than making it more widely accessible to all levels of literacy. The messages have to be simple, short and sharp and campaigns should be aimed at practical examples. Several Forum members raised the fact that business likes Approved Codes of Practice (ACOPs) because they clearly lay out what one needs to do to comply with the law.</p> <p>There was specific concern that ACOPS had not produced in relation to the revisions to Construction Design & Management Regulations and the new Working at Height directive; HSE seems to be moving away from producing ACOPs, which is regarded by business as unhelpful. John said that he would feed this view into strategic development of the Publications Review and raise the specific issues of CDM and Working at Height ACOPS in the relevant quarters. Judith was asked to raise the matter through the Commission and asked John to see whether whatever was currently in existence on Working at Heights could be pulled together into some form of guidance.</p>
3.5	<p>A combination of old hardware and the use of dial-up rather than broadband connections results in access to HSE's website and downloadable guidance being painfully slow. Accessing information via the web takes a lot of power, sophisticated software systems such as Adobe Acrobat and a colour printer. One suggestion endorsed by the Forum was that HSE should review its most popular downloadable publications and produce a 'web lite' version with simplified graphics that would be more easily printed off. HSE 'tools' should not be included in the publications but accessed via a hyperlink.</p> <p>John asked Forum members to consider if they would like to contribute to a 'usability review' being undertaken of the HSE website. He would arrange for details to be sent to forum members through the Secretariat. Judith encouraged</p>

	members to participate as this provides them with a direct opportunity to influence how HSE presents its information.
3.6	The Forum raised the issue that HSE videos are generally of good quality and manage to get across the language barrier with clear and precise presentation and practical examples of what to do; however they can be very expensive with some costing as much as £100. Obviously HSE needs to recoup its costs but it should look at alternative ways of using videos / DVDs and how to make them accessible. John Lack agreed to take this issue away and look into it.
4	Revision of 'Essentials'
4.1	Peter Mullins outlined 'Essentials' as HSE's key small and medium business publication dealing with all the main health and safety issues which businesses encounter. It was launched in 1992 and was an early attempt to provide 'accessible' guidance. It hasn't been extensively revised until now and the revision will reduce the over-emphasis on traditional manufacturing and machinery safety and include much more on health issues. The projected price for the new version is £10.95. Peter handed out some proofs of the planned pages. Copies of existing publication were also available for Forum members to examine.
4.2	John Lack suggested that if Forum members were able to identify and place bulk orders for their members, then possibly a bulk advance price could be negotiated
4.3	The new introduction to the book will highlight how to do a risk assessment. The method of identifying the greatest risks and where most attention needs to be paid will be through a numerical risk identification table. This will be an optional process for more sophisticated business who want more than a guide to key risks.
4.4	Peter asked for feedback from Forum members on the range of contents and on whether the 'where to start' approach (outlined in slides 9, 10 and 11) is appropriate for the size of business targeted by Essentials.
4.5	Forum members commented positively on the light, breezy approach of the proof pages. There was suggestion that that the small and micro market must not be excluded by pricing. There should be an emphasis on Plain English. It was suggested that the price of £10.95 will be a barrier because it is too high for most small businesses.
4.6	Other members felt that for accessibility, Essentials should incorporate a checklist approach with questions relating to the risk assessment process such as 'have you identified all hazards?' and 'have you done a risk assessment?' There was favourable mention of the approach in INDG 259 where there was a space down the side of each risk topic either for an assessment to be recorded or at least for the name of the person charged with risk assessment or indexing to where the risk assessments are kept.
4.7	Some members highlighted the difficulty of dealing with comparative risk. HSE needs to find a way of helping business to identify their priority risks. Peter volunteered that he was considering including data on injury / ill-health statistics which could be used as a basis for risk identification.
4.8	Another point raised was about the clarity of terms used. The contents list currently refers to Musculo-skeletal disorders and VDUs, although this was not the intended final text. This is jargon that is a turn off for small business. Another point raised was why there were not specific topic headings on COSHH and Manual Handling. Peter said that 'COSHH' would be given a title like 'Harmful' or 'Dangerous' substances', one suggestion currently being

	considered for manual handling and VDUs was a general heading of 'Aches and pains'.
4.9	<p>Members appreciated that within the timescale for publication of Essentials it would probably be impossible to include environmental information which is often dealt with alongside health and safety; however it was suggested that Essentials could signpost other sources of information on non-HSE, health and safety related topics including other government departments and possibly trade association / small business websites.</p> <p>Elizabeth Hodgkinson suggested that even if the Essentials timescale did not have time for the inclusion of environmental information, HSE should look at incorporating it in free leaflet IND259 which had a longer revision timescale. Secretariat will take this up in conjunction with the policy section and CDS.</p> <p>Also raised was how Essentials would incorporate future changes to legislation. Peter responded that Essentials is future proofed for legislative changes in the next twelve months.</p>
5	Members' opportunity to raise 'hot' topics
5.1	Approved codes of practice had already been dealt with during Publications discussion.
5.2	The issue of guidance on falls from height was dealt with outside meeting by an HSE specialist.
6	Influencing small business
6.1	HSE is keen to ensure that it is engaging with small business in the most effective way. Debra MacLeod (Small Business Team) outlined the array of options open to HSE to try to influence the attitude and behaviour of small businesses as set out in the annotated agenda. This ranges from written communications to more innovative activities such as the Northallerton multi-agency, 'safer town' pilot.
6.2	There was a general consensus that the list of activities in the annotated agenda provided a good summary of options available and there were no obvious gaps that should be considered as a priority.
6.3	Debra asked for the members of the Forum to feed back after the meeting where they felt the priorities should lie in terms of activity and effort, and help in identifying good practice small business case studies that set out the business benefits of health and safety.
7	Forward Look
7.1	<p>A list of topics that the HSC will discuss in the next three months was included in the annotated agenda. Members were asked to flag up to Secretariat those items where they would be interested in having presented to them or discussing.</p> <p>It was suggested that the list did not clearly outline for members what the topic included; for example, Enforcement Policy Statement Update will include the new enforcement initiatives under Hampton. More detail is required from the Secretariat.</p>
8	AOB
	The next meeting will take place on Tuesday 17 th January.
9	Meeting Round Up
	Judith pointed out that the dates of the future meetings were in their briefing

	<p>packs and that she hoped all could attend future meetings.</p> <p>Because the Forum won't meet again until January, Judith wished all Forum members a Happy Christmas.</p>
Actions:	<p>Chairman to:</p> <ul style="list-style-type: none"> • Take up the matter of not producing ACOPs up with the Commission. <p>Forum to:</p> <ul style="list-style-type: none"> • Send Secretariat details of irritant pieces of legislation, and give examples of how they impact on small business. • Consider if they would like to contribute to a 'usability review' being undertaken of the HSE website. Details will be sent to Forum members through the Secretariat. • Feedback on the range of contents and on whether the 'where to start' approach (outlined in slides 9, 10 and 11) is appropriate for the size of business targeted by Essentials • Feedback where they felt HSE's priorities should lie in terms of activity and effort • Help in identifying good practice small business case studies that set out the business benefits of health and safety. • Identify their preferred topics for inclusion on future agendas after receiving the revised 'Forward Look' from Secretariat <p>Communications Deliver Team to:</p> <ul style="list-style-type: none"> • Send details of the HSE website usability review to Forum members through the Secretariat. • See what information currently exists on Working At Height Regulations and consider whether it could be produced as guidance • Consider whether its most popular downloadable publications could be produced in a 'web lite' version with simplified graphics that would be more easily printed off. • Consider alternative ways of using videos / DVDs and how to make them accessible. <p>Secretariat to:</p> <ul style="list-style-type: none"> • Issue a separate email to Forum members detailing what is required for clarification purposes. • Send members details of HSE's website' usability review' • Reissue instructions on how Forum members can access bulk orders of non-priced publications free of charge. • Forward replies from members on the contents/format of Essentials to Peter Mullins. • Forward any details on legislative burdens to Better Regulation team • Provide more detail on the issues detailed in the Forward Look so that Members can clearly understand whether they have small business implications. • Arrange an addition to the Forum page on the website so that it contains a list of organisations represented on the Forum.

Secretariat contacts:

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Documents circulated with these Minutes

- Teresa Quinn's update on Better Regulation and summary of Member feedback received so far
- Peter Mullins presentation on the review of 'Essentials' and proposed list of contents for the publication