HSE’s engagement in health and safety award schemes

A paper by David Smeatham

Cleared by Jane Willis on 21 August 2012

Issue

1. HSE currently engages in a number of awards schemes. Our involvement in these has developed over many years and in an ad-hoc way. Media interest in one scheme earlier this year prompted a review of the extent of HSE’s involvement, with a view to developing some transparent criteria to use to decide whether HSE should endorse and/or engage in a particular scheme.

Timing

2. Routine.

Recommendation

3. SMT is invited to agree the proposed criteria outlined in this paper for:
   - Endorsing or supporting an awards scheme;
   - Assessing a company’s eligibility for an award;
   - Judging a nomination;
   - Attending awards presentations,
   and that these should be put on the intranet and drawn to the attention of staff.

Background

4. Following the Government’s communications freeze in 2010, HSE no longer financially sponsors awards. However, HSE continues to provide support and endorsement (eg use of its logo, supporting statements, non-paid promotion, members of judging panels) for third party award schemes. HSE also responds to requests from OGDs to check lists of potential winners of enterprise awards etc and advise of any concerns from a health and safety viewpoint. A list of award schemes that HSE is, or has previously been, engaged in is at Annex 1.

5. Cabinet Office guidance on sponsorship and partnership marketing identifies a number of potential benefits for engagement in these activities, including:
   - Communication with audiences who are less likely to consume traditional media;
• Reaching audience in a cost effective way;
• Promoting positive behaviour;
• Providing examples of good performance that can make it easier for employers to understand and ‘nudge’ them towards successfully managing risks themselves;
• Utilising the power of communication through trusted non-government messengers;
• Positive engagement in the corporate social responsibility agenda.

6. Additionally, from HSE’s experience, awards provide opportunities to encourage and share lessons across sectors and sometimes across industries.

7. Earlier this year one health and safety awards scheme which HSE had endorsed for several years, attracted negative press coverage because an overseas company was due to receive an award despite having had a fatal injury accident at one of its sites.

8. This prompted a review of HSE’s engagement with awards schemes with a view to developing some criteria for HSE’s future involvement to ensure fairness, transparency and consistency of approach and to protect HSE’s reputation whilst enabling HSE to continue to use awards to disseminate good health and safety management and promote sensible risk messages.

Argument

9. HSE supports the principle of other organisations promoting good health and safety practice through awards. Where HSE engages in particular awards schemes it needs to make clear that it is not endorsing each award (many may have nothing to do with health and safety at work) and/or the companies that receive them.

10. To ensure consistency of approach and to seek to protect HSE’s reputation, we suggest that HSE should not endorse or engage in any awards scheme unless:

   • It is represented on the judging panel, and
   • The scheme or awards are for UK operations only. This will allow HSE to verify performance independently using its intelligence base.

Endorsing or supporting an award scheme

11. In deciding whether HSE should endorse, provide other support or judge particular awards, the appropriate SMT member should consider the following:

   • Is the award aligned with measures that HSE is taking with an industry sector? If not, it is unlikely that the support of the award in itself will be effective.
   • Will HSE’s support of the award scheme distort the marketplace? For example, HSE would not wish its support to imply any endorsement of associated commercial products (e.g. training).
   • Is entry to the award scheme free and inclusive? HSE should not endorse or support schemes that have fees above what would be considered reasonable to cover administration costs or schemes that unreasonably exclude specific types of organisations.
• Are there any other possible reputational consequences if HSE supports the award?

**Company eligibility for an award**

12. HSE needs to be assured that any company’s receipt of an award will not affect HSE’s reputation or how we regulate a domestic company and its operations. Conversely, companies that make genuine efforts to improve health and safety should not be overly penalised by previous enforcement activity or enforcement at their poorer performing sites or projects. It is likely that corporate initiatives to improve health and safety through awards such as *Safety initiative of the year* or *Representative of the year* will be less dependent on previous performance than those related to health and safety performance associated with a particular site.

13. Where possible, companies likely to receive an award should be checked using operational information provided by HSE’s Operational Information and Intelligence Team. Additionally, where necessary, the relevant FOD or HID Division should be consulted if the initial search raises a concern.

- Note 1: these checks are not necessary for all nominations, but only for those likely to receive an award.
- Note 2: It is anticipated that this checking will be tied to Fee for Intervention in the future as HSE will have a record of material breach which encompasses both formal and informal enforcement.

14. The following considerations should be taken into account when judging entries:

- Is there any ongoing formal enforcement activity (i.e., prosecutions or Improvement Notices) that may be jeopardised if the company receives an award? This is likely to impact more on nominees from specific sites where potential enforcement may occur.
- Are there any ongoing serious incidents or complaint investigations? Again, these are likely to be associated with a particular site rather than against the organisation itself.
- Would the nominee’s recent enforcement history (e.g., previous 12 months) discredit HSE or the awards? If the nominee’s previous health and safety performance has been poor, their case for an award needs to clearly demonstrate a commitment to, and delivery of, improved health and safety.
- For multinational organisations, is there any evidence of poor performance abroad? If so, the HSE lead will need to make a judgement regarding the potential for this to impact negatively on the reputation of HSE or to discredit the award.

We suggest that where a judge has answered ‘yes’ to any of the questions above then they should discuss the nominees with their SCS member.

15. ONR will handle all awards nominations from the nuclear industry.
Judging a nomination

16. We suggest the following considerations should apply to all health and safety award judging:

- Is there a clear link between the activity in the nomination and improved health and safety?
- Does the nominee’s case represent a proportionate approach to managing health and safety?
- Does the nominee’s case unreasonably exclude particular individuals?

Attending awards

17. Attendance at awards ceremonies may be subject to the principles and policy of acceptance of gifts and hospitality. Those attending awards are asked to contact HSE Press Office before attending any event where journalists may be present. This will help attendees discuss any potential risks and establish lines to take.

Consultation

18. Communications Directorate; DCE’s Office; OPSTD; HID; FOD (including Construction Division); CCID; ONR.

Financial/Resource implications for HSE

19. HSE provides no financial sponsorship to any awards schemes. Other resource costs will involve the time of HSE staff involved in judging particular awards; these will be met from D/D budgets.
Annex 1 List of HSE’s current and previous engagement in awards schemes

HSE are currently engaged in the following awards:

- Live Wire Awards (promotion and judging);
- CIA Process Safety Leadership Awards (Judging);
- Oil and Gas UK Safety Awards;
- Energy Industry Awards;
- Gas Industry Awards;
- British Safety Council Awards;
- SHP / IOSH Awards;
- RoSPA – Occupational Health and Safety Awards;
- EU Agency for Safety and Health Good Practice Awards;
- Construction News Awards;
- National House-building Council's Health and Safety Awards;
- British Construction industry Awards (advisor);
- Renewable UK/Crown Estate Health & Safety Award 2012;
- IOSH Food Group 'H&S Award';
- 'Pledge' awards (ceramics and heavy clay industries);
- Royal Mail Awards (although the ceremony did not take place);
- IOSH Small Business Innovation award.

In addition, HSE provides vetting for cross departmental initiatives such as Enterprise Awards and the Prime Ministers Awards.

HSE has previously supported the following:

- Sustainable Communities Awards;
- CIOB Construction Manager of the Year Awards;
- National Business Awards;
- Asian Business Awards;
- MJ Achievement Awards;
- Healthcare People Management Association (HPMA) Excellence Award;
- Migrant Worker Award Sponsorship;
- Landra Awards;
- HSE Small Firm Improvement Award;
- Working Well Together Awards;
- Mineral Products Association Awards;
- HPMA Awards;
- Business in the Community (BiTC);
- Unum Healthy Workplaces Award;
- LGC Annual Awards;
- Farmers Weekly Diversification Award DH.