

<b>Health and Safety Executive</b>		<b>Operational Minute</b>	
		<b>OM 2007/04</b>	
<b>Cancellation Date</b>	31/03/08	<b>Open Government Status</b>	Fully Open
<b>Version No &amp; Date</b>	1: 23/03/07	<b>Author Unit/Section</b>	FOD NWHQ Planning

Target Audience:

All FOD frontline staff, including those at SCS and Band 1 level.

### **COIN WORK RECORDING 2007/08 ACTION FROM 2 APRIL 2007**

**This OM replaces OM 2006/08 and contains instructions on work recording within COIN. It includes new requirements for clocking through, and recording non-contact time, for investigation and formal enforcement activities. Note that the former 'RIDDORINV' activity has been re-titled 'INV' and that 'stress' has been removed from the inspection report form (IRF).**

**All staff should note that only time recorded against the activities and categories in this OM will contribute to FOD progress reports.**

1 This OM contains instructions on what you should record when you record your time on COIN. It does not generally deal with how to record, nor does it contain the general principles of work recording. However, those principles, which are on the FOD strategy and planning intranet site, have not changed.

#### **Major changes for 2007/08**

2 There are two important changes to COIN time recording in 2007/08:

(i) all contact time recorded against the 'INV' activity (ie, where a RIDDOR incident or a complaint has been investigated by an inspector) and 'ENFORCE' activity must be clocked through or otherwise linked to the case (where there are related cases, use only the master case). You can do this by selecting the case number through the 'reference' field in the time sheet, by directly typing the case ID into that field or by copying a line already assigned to that case;

(ii) all non-contact time associated with an investigation, including complaints investigated by an inspector, or with any formal enforcement, must also be recorded, using the 'FOD 01' business unit (BU), the 'FOD Activities' work for and the activities 'ENFORCE' or 'INV'. You do this by entering the time and case ID on the time sheet in the normal way, and selecting the 'work context' field, using the value 'OFF' (office non-contact). Select this value for all relevant non-contact time, wherever it was spent (eg in the car, at home, etc). Again, where there are related cases, use only the master case for this non-contact time recording.

You must take the actions in (i) and (ii) above for all new 'INV' and 'ENFORCE' time records relating to the 2007/08 work-year, regardless of when the

investigation or enforcement case was created. No retrospective action (ie for time records relating to 2006/07) is needed.

Note that there is no requirement to use the other values (ie elsewhere, office contact, on site) in the 'work context' field at any other time. All FOD Activities entries where this field is empty will be regarded as contact.

### Who should record their time?

3 All staff who record any intelligence against a company or site on COIN should record their time in part or in full - later paragraphs make clear who records what. 'All staff' includes:

- a) Gas, Complaints and Compliance Officers, HSAOs and WTOs;
- b) all inspectors in operational and specialist groups, CHSD, CDTU and Construction Sector;
- c) other staff carrying out frontline contact work (eg stress partners not in operational or specialist groups, Band 1s or SCS members).

4 COIN Model Office training, data handbooks and 'Quick Guides' provide information on how to record your time, including which BU to use (see <http://intranet/information/coin/guidance/timerecord.htm>). FOD staff will always use the FOD01 or FODOH BUs, other than for some work by SGs for other directorates or for ORR (separate guidance will be agreed for recording this work).

### Contact time recording - activity

5 All staff must record all contact time against the most relevant activity in the table below. No other activities may be used. Where you are recording time spent against the 'INV' activity (including time relating to complaints investigated by an inspector) or 'ENFORCE' activity you must 'clock through' or otherwise link the time with the case ID, as outlined in the COIN MO training and the COIN 'How to record your time' guide. Normally, this will be done only by inspectors, but where HSAOs formally enforce under ELCI or assist with an investigation, they will also need to 'clock through' their 'INV' or 'ENFORCE' contact time.

Activity	What
Advice Education Promotion	All advice and publicity work promoting health, safety and welfare issues and providing training for non-HSE staff.
Complaint follow-up	Whenever a complaint is followed up by a Complaints Officer. Where an inspector investigates a complaint, the activity is recorded as 'INV'.
Enforcement	Wherever formal enforcement is taken: issuing/checking compliance with notices, taking statements and collecting evidence, attending court, tribunals etc and ensuring that matters giving rise to prosecutions have been rectified. For time recording purposes, 'enforcement' time begins when you suspect a breach of any of the RSP.
Inspection	All inspection contacts, follow-up visits and subsequent contacts to complete an inspection. For use by inspectors and where HSAOs deal with ELCI matters. See 'LASP' for inspection contacts in partnership with LAs.
Investigation	<b>All</b> investigations ( including into complaints) carried out by an inspector. Includes preparing for/attending a Coroner's Court or a fatal accident inquiry; revisits to check remedial action has been taken (unless the investigation has been broadened to become an 'inspection') and any other incidents resulting in an investigation (even though not notified under RIDDOR nor a complaint).

Activity	What
LASP	All contacts working in partnership with LAs, including interpreting and applying the Enforcing Authority Regulations or giving general advice and contacts in partnership with LAs that would normally be called 'inspections'. Do not record such contacts via the IRF, but use the activity 'LASP'. Always complete all appropriate categories.
Programme/policy development	All work related to programmes or policy, eg developing a new workstream or managing a workstream for a programme. Not to be used for delivering field work for Fit3, etc, nor the enhancing frontline delivery trials. Unlikely to be used by most field operational staff - normally for use by CHSD, CDTU or Construction Sector.

### Contact time recording - category

6 Wherever it is relevant, **for contact activities only**, any time spent discussing one or more of the categories during any of the activities (inspection, etc) should be recorded. When you use the IRF to report an inspection, the category time must not be recorded on the time sheet (as you have already captured it on the IRF), but the total inspection time must be recorded on the time sheet.

7 Note that:

- you do not need to record categories for non-contact time;
- you may use only those categories in the table below;
- only Specialist Inspectors may use those marked accordingly.

FOR USE BY ALL STAFF	
COIN description	Definition
Construction	for use only in combination with the activity 'programme/policy development', eg by staff in CHSD, CDTU or in, or working for, Construction Sector.
Asthma	Use whenever occupational asthma is relevant.
Asbestos	Use whenever asbestos is relevant.
Dermatitis	Use whenever skin disease/dermatitis is relevant.
Other respiratory disease	Use whenever any respiratory disease other than occupational asthma (eg COPD) is relevant.
Fall from height	Use whenever falls from a height are relevant.
Gas	Use for all work in connection with the Gas Safety (Installation and Use) Regulations 1998 and associated legislation.
HAVS	Use whenever HAVS is relevant.
MSD	Use whenever MSD is relevant.
Noise	Use whenever noise is relevant.
Product	All work on the initial integrity of equipment or other supply of equipment and substances.
Slips and trips	Use whenever slips and trips are relevant.
Standard	All attendance at, and preparation for, standards meetings (only use with the advice activity).
Stress	Use whenever stress is relevant.
Workplace transport	Use whenever workplace transport is relevant.
FOR SPECIALIST INSPECTOR USE ONLY	
Appointed doctor	All work relating to appointed doctors.
Carcinogens	All work relating to carcinogens.
Contributions to guidance and publications	All internal and external advice and publications.
Dosimetry	All work relating to radiation dosimetry services.
EC-related work	Any work involving EC directives, including DTI market

	surveillance work.
Independent expert opinion	Use only when appointed by the courts to give independent expert opinion, in conjunction with the activity 'ENFORCE'.
Information exchange/ knowledge management	Information exchange and management, eg National Exposure Database, portfolio holder events.
Partner and intermediary work (exc LA)	Work with stakeholders excluding LAs.
Radiation	All proactive work on radiation, excluding any work on statutory schemes such as dosimetry.
Site radiography	All work dealing with site radiography visits and notifications.
Providing training of HSE staff	All training of HSE staff.
Urgent reactive	Providing and managing the procurement of reactive support from HSL or external providers.

### **Non-contact time recording - activity**

- 8 All non-contact time associated with:
- a RIDDOR investigation or a complaint investigated by an inspector (ie wherever the associated contact time is recorded as 'INV', but not including any time spent on complaint follow-up by administrative staff), or
  - formal enforcement (ie wherever the associated contact time is recorded as 'ENFORCE', except where it is recorded by GOs)

must be recorded and must be associated with the case, in the same way as contact time. Where HSAOs formally enforce under ELCI or assist with an investigation, they will also need to record their non-contact time and associate it with the case. Where there are related cases, eg where there are multiple dutyholders, all this time must be recorded against the master case.

The actions in this paragraph are not relevant to any time spent by COs/GOs on complaint follow-up or time spent by GOs recorded against 'INV' or 'ENFORCE'.

### **Aggregating time**

9 Contact time may be aggregated over a day or a week (against the specific case when 'clocking through') where the activity, and category are the same. This is relevant especially (i) to inspections where the category time has been captured on the IRF and (ii) to short contacts where we are unlikely ever to contact the dutyholder again and so there is no benefit in creating a new COIN company record. Where several investigation or enforcement contacts have taken place in the day or week, all relevant to the same case, then the investigation or enforcement time records can be aggregated against that case.

10 Similarly, non-contact time linked to investigation or enforcement cases may be aggregated over a day or week against the specific case, using the 'INV' or 'ENF' activity and the 'office non-contact' work context. You would aggregate in this way when you do several separate pieces of office work relating to the same investigation or enforcement case in the same day or week.

### **Recording 'overhead' time**

11 All work recording staff except Gas and Complaints Officers must record the time they spend on the overheads defined in the table below.

Activity	What
Other frontline	All planning for interventions, except annual operational planning and the limited planning for single, one-off, small scale interventions. Includes initial and continuing planning work associated with major investigations and major interventions with multi-site duty holders, eg as part of LOPP and FOILE initiatives and planning for SHADs. In addition, work with the media (including drafting press releases, interviews, preparing articles, etc), open government issues and official correspondence. NB: refining the inspection approach in contact with a dutyholder, including planning, continuing reviews and responses to notable events, is recorded as inspection contact.
Training	Time spent on, and preparing for, training activities as a recipient or contributor. Includes: (i) all formal training courses, conferences, seminars, tutorials and meetings for training purposes; (ii) training-related activities, eg allocated study time, pre-course preparation, briefings/debriefings and special tutorials; (iii) tutoring and guiding activities by managers for new visiting staff, eg time spent reviewing reports for training purposes; (iv) all time spent by B4s on joint visits with B3s; (v) other training activities not included above and (vi) time spent travelling to and from any training activity. Unaccompanied contacts by trainees should be recorded as contacts using the appropriate activity and categories.
Travel	The actual time spent travelling to, from and between contacts. When work is done during a journey the time should be divided between travel time and the work done.
Leave	Leave includes annual, sick, paid maternity and special paid leave, public/privilege holidays and unauthorised absences. It does not include unpaid special leave, unpaid maternity leave and TOIL and these should not be recorded. Where staff are on extended paid maternity or sick leave, managers should arrange a weekly summary showing five days of leave to be input.
Admin	This is the balance of your time after accounting for all other activities. It will include time spent writing reports, etc - <b>other than those relating to RIDDOR and complaint investigation and enforcement</b> . Must be entered directly – it is not calculated by COIN.

## Keywords

12 FOD have agreed to use a reduced number of keywords in 2007/08, to help identify the valuable intelligence that you gather on particular issues. The keywords in the table below must be entered **as the first word into the case or SO 'notes summary' field**, as in 2006/07, when the circumstances require it. Whenever a keyword is used, the notes details must explain its relevance - what did you discuss that was relevant and what was the outcome?

Keyword	For use:
backs7	for all proactive activities (inspection and advice/education/promotion) contributing to the Backs campaign in early 2008.
migrant7	any work resulting from the work instruction on temporary and migrant working SIM 01/2007/04.
mec7	whenever a matter of evident concern has been dealt with. See also para 18.
mgs	all work relating to MGS2 and 3, including HQ interventions, supply chain audits, pallet networks, road haulage, s6 visits to trailer manufacturers and the workplace transport targeted communications campaign.
msa	whenever systems for managing sickness absence or return to work are discussed.
cleaning7	all central intervention, advisory and seminar work with cleaners, whether cleaning companies or in-house cleaners.

## Notes details

13 In all cases, the note details must include: the date, location, who you contacted, about what and the action you took. You should include the names of

the safety and/or employee representatives you saw and record how you passed the action required to those responsible for health and safety (eg via Instant Visit Report or letter, etc).

14 Do not record unnecessary detail (eg on process) that will not be of value (eg to help ensure consistency) at any future intervention, nor information on standards that will be available from the IRF data.

15 In some cases a telephone conversation with a dutyholder/intermediary can be recorded, using the appropriate activity (except inspection, but see below) and categories, if it:

- a) replaces the need for a visit;
- b) includes advice on a specific health and safety issue;
- c) results in valuable information being obtained on, eg, an investigation or complaint follow-up.

16 Note that:

- a telephone conversation alone will never be an inspection intervention, except in the case of requests for asbestos or radiography waivers which are accompanied by documentation;
- letters sent or received must not be recorded as contact, except by GOs following-up complaints or RIDDOR events, where letters sent may be recorded against the appropriate contact activity.

### **Scores of 3 or 4 on the IRF**

17 Where you record a score of 3 or 4 on the IRF you must record the action taken, and the reason for taking that action, on the inspection SO - exactly as in 2006/07. You must record the outcome on a new SO, created for the revisit, or against the case where formal enforcement action has been taken. You will only need to leave the initiating SO open to record the outcome where you are checking progress by letter or telephone.

### **Matters of evident concern (MEC)**

18 Wherever you deal with an MEC you must use the keyword 'mec7' and record:

- what the MEC concerned;
- which responsible person within the dutyholder company you saw;
- what action you took.

Where you did not take formal enforcement action you must record the reasons why. NB it is expected that all MECs raised should normally either result in a notice or prosecution (in line with EMM requirements) or referral to another enforcing authority (eg for general fire precautions).

### **Fairgrounds**

19 All activity and category time for NFIT should be recorded against FODFMU25. You must always 'clock through' (etc) for this work. Do not record

any 'other frontline', travel, training or admin time against this PG. Remember to record fairground 'INV' and 'ENFORCE' non-contact time, as in para 8.

### **Joint visits (JVs)**

- 20 All those taking part in JVs should record their visit in COIN. Where:
- a) a B3 JVs with a B4 for training purposes (including assessments for the NVQ, etc) the B3 should record the time against activity and category in the usual way, and the B4 should record all the time as training;
  - b) the JV is for true joint inspections and investigations (eg with SG staff, where two B3s visit or other cases where both staff contribute equally to the intervention), one inspector should write-up the visit (using the IRF where appropriate) and record his/her activity time on the time sheet (clocking through, etc, where the JV is for investigation or formal enforcement purposes). All other staff should record their activity and category time direct to their time sheet (again, clocking through, etc, where the JV is for investigation or formal enforcement purposes);
  - c) the JV is for management purposes (eg B3 JVs with line manager), the person being line managed should record their time against activity and category in the usual way and the line manager should record their time against BU 'FODOH', work for 'FOD Overhead' and activity 'admin'.

### **Recording Safety (and Health) Awareness Days (SADs/SHADs)**

21 Each division (including CD) should now have a generic customer/site record for all SHADs carried out within the division. The record should be called 'FODXYZSHADS', with the address at the divisional office. A single case for each SHAD should be raised against this record with category 'Partnership/stakeholder', type 'Advice/Education/Promotion' and detail 'N/A', with categories completed on the time sheet as appropriate. Participant lists can be attached (if necessary). If it is important to record that a particular company attended the event, a note can be added to the company or (if very specific) site record. To conserve resource, this should be done only exceptionally.

### **Recording HSAO visits**

22 HSAO visits should be recorded via a case, raised against category 'Partnership/stakeholder', type 'Advice/Education/Promotion' and detail 'N/A'. The case summary should contain the company name and nature of intervention, eg 'New to FOD' etc. The case description should give details of the intervention. The detail of the visit should be recorded as a note in the usual way. There is no longer any requirement for HSAOs to record a 'standard' rating for issues such as welfare, health, etc when carrying out a 'New to FOD' visit.

### **Recording on COIN by Litigation Officers (LOs)**

23 LOs should not record their time on COIN. All LOs should already be keeping a more detailed and separate record of their time for court cost purposes, as outlined in their work procedures and training.

## Using proformas to record/report on our work

24 For certain aspects of our proactive work (eg safe interventions and waste) we will use proformas - as in previous years - to provide detailed feedback to programmes etc. These proformas do not replace the need to record the activity and category time we spend on this work: this should be recorded as instructed above.

## Reporting on our stress work

25 The following changes have been agreed to how we record our stress work in 2007/08, ie that described under project PSP1 in SIM 07/2007/05 "Public Services Programme (PSP) work in the Public Sector 2007 - 2008":

- a) the stress risk compliance indicators have been removed from the IRF for 2007/08. You will therefore need to record the time you spend on stress on the timesheet, using the appropriate activity and the stress category;
- b) to ensure ready availability of the intelligence gathered during these interventions, you should create a case in the usual way, selecting Category 'inspection', Type 'programme' and Detail 'PSP1', and record a brief narrative, again as normal, and
- c) complete the proforma provided by the Public Services programme with the intelligence gathered during planned stress-related interventions and save it as an attachment to the COIN case record, using "PSP1" (no quotation marks) in the document title (to distinguish this attachment from any others).

## Reporting on our CLASP work

26 SIM 07/2007/04 "Asbestos in CLASP and other system buildings" outlines the reporting arrangements. Complete the proforma forming annex 5 of the SIM as required and save it as an attachment to the COIN case record. **Notify the sector by e-mail (Janet Price, Chelmsford) of the COIN case ID as soon as the work is done.**

27 Heads of Operations are asked to provide an overall summary of the completed work in October 2007 including:

- an estimate of the resources used;
- the number and type of duty holders dealt with;
- the number of site visits made;
- a summary of resulting enforcement action;
- overall assessment of the adequacy of duty holders' actions, and
- any comments on the approach as a whole.

## Recording work by Gas Officers

28 A number of activities by GOs can be recorded where the information is of value to HSE. These activities should be recorded against FODFMU26 and include interventions by telephone, letter or fax. Note that:

- a) when you raise a record on behalf of an inspector for reportable fatal gas incidents you should set up the customer record in the name of the householder or tenant;
- b) information about other gas incidents or complaints where there is no dutyholder, or the dutyholder cannot be traced, are not of value;
- c) enquiries made solely to identify name/address of dutyholder(s) are not interventions.

29 Record:

- a) as 'COMPFUP' or 'INV' (as appropriate) enquiries made to confirm that a current and valid gas safety certificate exists for appliance(s) under a landlord's control;
- b) as 'COMPFUP' or 'INV' (as appropriate) enquiries with CORGI to determine whether the installer is registered and/or possesses the necessary competencies for the gas work undertaken;
- c) as 'COMPFUP' or 'INV' (as appropriate) enquiries made to gather further details of the incident from notifier/police/dutyholder or of coroner/hospital in order to ascertain cause of death/exposure levels;
- d) as 'ENFORCE' warning letters issued and sent to registered or unregistered installers, which effectively close a case down;
- e) as 'ADVICE' all advice given to occupiers, eg on what to do if they have a gas leak or on how to identify CORGI installers and ensure they are properly qualified, or to a landlord on the application of the Gas Safety (Installation and Use) Regulations.