HID Targeting & Prioritisation

HID Principles for Prioritising Major Hazard Inspections

Purpose

This document sets out HID’s principles for prioritising major hazard inspections and developing intervention plans in support of the [HID Regulatory Model](#).

Scope

HID regulates a range of major hazard industries: offshore oil & gas, COMAH establishments, licensed explosive sites, gas distribution networks, pipelines, biological agent facilities and mines.

The [HID Regulatory Model](#) describes inspection as the regulatory process by which HID inspectors:

- Confirm, through sampling, that duty holders\(^1\) have properly focused their risk management efforts on major accident hazards.
- Confirm that where duty holders are subject to a permissioning regime, the basis of the demonstration remains valid and that the duty holder can show they are effectively controlling risks.
- Take proportionate action, including enforcement, to ensure that duty holders make improvements where there is evidence of significant shortfalls or failures in the way they have implemented control measures.

HID’s Major Hazard Inspection Programme

Properly prioritising inspections is a high priority for HID in ensuring it delivers its major hazard strategy whilst supporting businesses to grow.

Therefore HID aims to ensure its regulatory activity is proportionate to the risks to people (and to the environment in respect of the COMAH regulatory regime), taking into account the duty holder’s performance in controlling risks. This means that HID will inspect higher hazard sites\(^2\) with poorer performance more frequently and in greater depth than lower hazard, well-managed sites.

HSE’s policy is to conduct inspections in accordance with the [Enforcement Policy Statement](#), applying the principles of the [Enforcement Management Model](#) to regulatory decision making.

HID will develop its major hazard inspection programme to deliver the priorities set out in sector strategies to secure compliance. The programme will ensure HID meets its core principles of:

- Going to the right places.
- Doing the right things.
- Finishing what we start.
- Leaving a clean record of what we have done.

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1 Duty holder includes operator, employer, owner and similar terms used in legislation.
2 Site includes installations, establishments and similar terms.
HID Site Prioritisation Methodology

HID will prioritise which sites we inspect and in what order based on inherent hazards, duty holder performance on a range of topics and other intelligence.

Inherent Hazard

HID will assign an inherent hazard score to major hazard sites. The score is a numerical representation of the hazards inherent to that site, and comprises a number of elements. It is evidence based, objective and derived from certain ‘unchanging’ features about the site and population at risk.

The inherent hazard elements that make up the site’s inherent hazard score are bespoke to each major hazard regime. Each major hazard regime will publish its methodology for determining inherent hazard.

Duty Holder Performance

HID will assess duty holder performance on a range of factors. These include:

- The degree of compliance at inspection on topics covering technical standards, major hazard risk control systems and cross cutting issues such as leadership, competence and workforce engagement.
- The extent of non-compliance issues raised.
- Enforcement history, including enforcement notices and prosecutions.
- Incident data such as RIDDOR reports.
- Issues identified during permissioning activity such as safety case and safety report assessment, licensing and other notification activity.
- The duty holder’s own performance information, such as major hazard safety performance indicators.
- The effectiveness of an operator’s third party verification arrangements.

HID will score duty holder performance on the range of inspection topics. The performance score reflects the duty holder’s degree of compliance on that issue, is based on the EMM risk gap and expressed as a numerical value as described shown below.
Performance scores of 30, 40, 50 or 60 against individual inspection topics are evidence of a risk gap in the duty holder’s preventative or mitigation barriers. HID will consider the nature and extent of the risk gap, including the underlying causes, in judging the duty holder’s overall performance.

Performance Score Benchmarks

HID will score performance on inspection topics on criteria outlined in relevant benchmarks. These include topic inspection guides and established guidance such as published HSE or authoritative industry guides. HID will ensure duty holders are clear on the benchmarks used.

When will HID Score Performance?

HID will score performance on topics following an inspection or investigation when it has sufficient evidence to make a sound judgement on regulatory compliance against the relevant benchmark and consideration against the EMM.

HID will not re-rate on the same topic until:

- The next inspection on the same inspection topic, or
- Following issues of non-compliance, the inspector is satisfied that the duty holder has made the required improvements and there is evidence that these will lead to sustained compliance.

Sharing Performance Scores

Inspectors will inform duty holders of their performance scores at the earliest opportunity. This may be verbally initially but then confirmed by letter, in the inspection report, in the annual intervention plan or at the duty holder annual review meetings.

Ultimately HID will publish industry wide performance scores.
Other Intelligence

HID will use other intelligence in addition to inherent hazard and performance information when prioritising the sites to inspect in an annual programme. These other issues split broadly into those that are duty holder specific and wider considerations.

Duty holder specific issues include the:

- Time since the last site intervention.
- Background of the duty holder, such as whether it is a new entrant into the sector.
- Role the duty holder plays in their sector, for example as a member of a trade association or industry body.

Wider considerations include:

- Issues of national importance, for example in support of Government policy.
- Emerging industry issues, for example following lessons from major incidents.

Intervention Planning

The site prioritisation methodology model will be used as part of the annual intervention planning round in deciding where HID plans to commit inspection resources. Each major hazard regime will use the methodology to prioritise site inspections, target poor performance and determine the depth and frequency of inspection.

HID will use the methodology to categorise sites into priority inspection bands such as definitely inspect or inspect if resources are available. Some sites may not be prioritised for inspection within the planning round and in this case will only be visited in response to an incident or concern raised by, for example, an employee or member of the public.

Intervention Plans

Where HID identifies sites for inspection, it will develop site intervention plans. In addition, HID will develop multi-site plans for companies who operate more than one site and where this will maximise its effectiveness and efficiency.

HID will share intervention plans with duty holders at the start of the year.

HID will publish the arrangements for developing and sharing intervention plans.