



Competence Project

Developing Staff, Meeting Business Needs

**REPORT OF PILOT OF CORE REGULATORY
DEVELOPMENT NEEDS ANALYSIS TOOL &
DEVELOPMENT ACTION PACK IN LOCAL
AUTHORITIES AND HSE**

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Note that a supplement is also available on request from the project office (details below) containing a detailed summary of responses by group (LA manager / LA team member / HSE Manager / HSE Team member) and a list of development needs identified via the questionnaires.

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Part 1: Introduction

Introduction

1. This report provides a summary and analysis of feedback from the LA and HSE Pilot of the Regulators' Development Needs Analysis (DNA) system and process.
2. This Pilot was undertaken as part of the Competence Project, a programme of work to develop a competence based approach to CPD for regulators of health and safety in HSE and LAs. It is being led by the Long Term Training Needs Board, (LACAORS, CIEH, REHIS and HSE), as well as by Senior Managers from within HSE's Operations Directorates to further develop and implement within HSE. An overview of the project is contained in Annex 1.
3. The pilot followed a series of 'paper based' trials carried out early in 2008 by 12 Local Authorities and 11 operational teams in HSE. The feedback from these trials was considered and reflected in the development of the products piloted.

Objectives of the Pilot

4. The objectives of the pilot were wider than those of the trials. The pilot was designed to:
 - test the quality and appropriateness of the Regulatory Development Needs Analysis Tool
 - validate the framework as a useful benchmark of common skills and knowledge required of Regulators, and establish whether anything needs to be changed, added or removed
 - test the process of using the tool in identifying development needs in discussion between job holder and manager, e.g. practicality and usefulness as a basis for agreeing learning objectives.
 - for some specialist groups, test the concept of using the Regulators' DNA tool as part of a wider package (ie integrated with the specialist framework) to help assess development needs
 - test reaction to the web site and usability of the tool.
 - test reaction to the introduction of reflective practice and a strengthened approach to continuous professional development – both the concept and the suggested tools
 - gauge views on whether the package and approach subject to this pilot is sustainable / how to make it stick (culture change/training for use/audit arrangements, what barriers there are and how to overcome these)
 - gain insight into the scope and nature of developments needs which may emerge from use of the pilot, and how these might be addressed.

Approach

5. Following the trials, the improved (and web converted) products were piloted by over 20 LA teams and 14 HSE teams across England, Scotland and Wales. The pilot ran from April to June 2008.
6. Pilot participants (regulators and their managers) were all briefed, in their teams or as groups of teams, by members of the Project Team, prior to participation. They received information on the Project and its background, and objectives,

followed by a detailed explanation of the website and tool, and how to undertake their evaluations and development action planning.

7. A questionnaire was provided to capture their views and responses, and contact details were given for members of the project team, and the company hosting the website, as a helpline to deal with any issues or queries arising during the pilot.

How the Feedback is structured

8. The feedback was received via a questionnaire. There were 74 questionnaires returned from LAs and 53 returns from HSE.
9. The questionnaire sought participants' views on the process; the quality of the framework; the website and system; development needs identified; management culture to support the process; some LA and some specialist specific issues; and sought general views about the project and the benefits of the system and process being piloted.
10. The feedback is set out initially as **headlines (what most respondents agreed on)** in this report, together with **headline recommendations**. The headlines are followed by an **overview analysis** that sets out a broad summary of the feedback, and corresponding actions, based on the recommendations, set against the broad categories of questions provided in the questionnaire.
11. **Detailed feedback** is presented in part 3 of the report. It is presented against the individual questions pilot participants responded to. To aid interpretation, the responses have been displayed graphically, and where appropriate divided into HSE and LA regulator and manager categories.
12. **A detailed summary of comments set out by group** (HSE / LA / manager / team member) are also available in a supplement document from the Competence Project team on request. This also contains a list of the development needs identified in the questionnaires.

Part 2: Overview of Feedback and Recommendations

Headlines - What most respondents agreed on:

13. There was widespread support from LAs and HSE on the following points:
- The system and web site are of good quality and easy to use (over 96% of respondents)
 - The framework covers the common skills, knowledge and behaviours required of regulators of health and safety (86 % of respondents)
 - The questions are relevant and meaningful (72% of respondents)
 - Overall 71% of respondents identified development needs as a result of the process.
14. There was widespread agreement from LAs and HSE on the following points of concern and suggestions for change.
- Concern that managers will not embrace the RDNA process consistently, that there may not be the right management culture to support it, sufficient time will not be provided and there will not be sustained support from the top.
 - General agreement about the need for senior management commitment, consistent engagement and application by managers, time and resources to be provided, monitoring of compliance, effective briefings, guidance and implementation, flexibility to tailor to specific needs, integration with existing systems.
 - Suggestions for changes to the framework included adding more technical, industry specific knowledge, removing duplication and some areas of ambiguity in the language, and making provision for those to whom not all of the competencies are relevant. For example, a good number of LA staff felt that some of the competencies were either HSE specific or aimed at managers. Some HSE staff felt that many of the competencies were too basic, and relevant only to inexperienced staff.
 - Suggestions for changes to the system and web site were minimal, as it received over a 95% approval rating. These were about removing or extending the time-out facility, improving the quality of the email format, improving the functionality around the dialog boxes, making the indicators more prominent, incorporating the knowledge sections into the system (rather than as linked PDF tables), and adding an N/A option.
 - Response to the CPD products was mixed. Most thought it was a good idea, but many felt it may be impractical as time won't be allocated for it in practice, or people won't have the self-discipline to sustain it, or that some managers won't support it. Also, a number of LA staff thought it might duplicate rather than support existing CPD procedures.

Headlines - Recommendations:

15. The recommendations are set out in the tables below against each of the questionnaire categories. In brief, the recommendations emerging from the pilot are to:
- improve the system by increasing the number of options available to respond to the questions from three to five options (including an N/A button); making the

knowledge section part of the system, improving the functionality, eg to make dialog boxes appear immediately following selection of an option and to have use prompts included, remove/extend the time-out, improve the email format, make the indicators easier to access, remove the negative indicators and clarifying the use of Save and Submit options.

- Improving the framework by removing duplication where identified, clarifying ambiguity where identified, adding industry specific knowledge sections and recognising and emphasising that not everything will be relevant to every role at any given time, and adding an N/A option to account for this.
- Ensure the CPD products support and not duplicate any existing CPD processes, eg integrate into requirements of professional bodies.
- Accept that not all staff will embrace use of the CPD products, but seek to make these available and to encourage support of their use wherever possible.
- Develop a “solutions” section of the RNDA website to provide ideas and signposts to development activities and material against the areas of competence covered in the RNDA.
- Secure support from the top to ensure sustainability, seek to ensure the new procedures are embedded into ways of working and integrated with existing systems, produce effective launch and implementation plans, ensure Managers are provided with effective briefings, clear expectations and good guidance and instructions, develop audit procedures and encourage the process to be included in individual’s performance agreements.

Overview Analysis

16. The following tables provide an overview of feedback and recommendations against each of the questionnaire categories. A more detailed analysis of the feedback is provided in Section 2 of this paper.

Objective:	To test the RDNA Process (eg time taken to use the tool)
Summary of Feedback:	<ul style="list-style-type: none"> – The majority of the respondents took between one and two hours on the assessment. – 61% completed the assessment on their own, 24% with their line managers whilst 15% recorded doing both. – 90% had completed the process electronically, less than 4% (4 participants) completing on paper. The remainder used both techniques. – Overall respondents were content with the process, though a few were concerned about the subjectivity of the process (self assessment / manager assessment open to interpretation)
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> – Ensure a printable version of the assessment is available for those who prefer to do it off-line – Reduce inconsistency of interpretation.
Objective:	To test the quality of the Competence Framework within the RDNA tool
Summary of Feedback:	<ul style="list-style-type: none"> – 86% agreed the common regulatory skills, knowledge and behaviours were covered. – 80% found it a useful benchmark to identify development needs against. – Reservations were expressed about the need for interpretation,

	<p>and about the need for more technical knowledge to be specified.</p> <ul style="list-style-type: none"> – 72% thought the questions were meaningful and relevant, and most found the indicators helpful. – Reservations were about some of the questions being more relevant to manager roles (mainly LA response) and that more technical, sector based knowledge being required (mainly HSE) – Over half found the process led to a more productive review, some had not had time to test this and some felt it only confirmed what they knew already. – A number of respondents commented that an N/A option is required. – Several comments expressed the view that there was some duplication and that the information in the framework could be reduced. Some examples given of lack of clarity.
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> – Provide more detailed technical knowledge including industries. – Remove ambiguity in language used to describe skills where possible – Remove duplication within the framework (Behaviours Section now incorporated with Skills Section and duplication removed) – Add a 'Not applicable' Radio button in the response fields (this is particularly useful for partly authorised LA staff who can use the areas of the framework they are authorised for) – Ensure Scottish legal differences are included where relevant – Make the positive indicator link more prominent – Remove the negative indicators (to remove duplication)
Objective:	To test the quality of the Web Site and usability of the system
Summary of Feedback:	<ul style="list-style-type: none"> – Over 96% of respondents felt the system was easy to use (less than 4% felt it was not). – Problems included being timed out, functionality of the dialog boxes and the impact of an incorrect e-mail address being used in registration. – The quality of the website and the tool overall was confirmed by the majority of respondents. It was deemed 'user friendly', 'excellent', 'easy to use and navigate', 'looks good/works well', 'very professional', 'straightforward', 'well structured', 'screens well laid out and easy to follow'. – Issues raised included poor format of email reports and the need to clarify the use of the save and submit options.
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> – Ensure users can not be 'timed out' – Introduce mechanism to ensure correct entering of user's email address – Have dialogue response boxes appear immediately when radio buttons other than the default "Agree" are checked. – Ensure full compatibility with voice recognition software. – Improve quality of email / print out, including incorporating the report name. – Clarify the use of save and submit functions.

Objective:	To obtain a feel for the type of development needs identified
Summary of Feedback:	<ul style="list-style-type: none"> – 71% of respondents had identified learning needs as a result of the process. – Knowledge of business and management systems featured heavily in HSE responses whilst enforcement and legal skills, noise and asbestos were commonly raised by LA respondents. – Development needs not available to be identified by the process included specific industry and topic knowledge, machinery, personal safety, specialist opinion and organisational procedures.
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> – Include more detailed industry and topic based knowledge in the Tool. – Make the knowledge section more readily available, similar to the Core and regulatory Skills
Objective:	To test the use and benefits of the development action pack and development action planning process
Summary of Feedback:	<ul style="list-style-type: none"> – A majority of the respondents had agreed learning objectives with their managers (a considerable proportion of those who had not, had failed to have a development review, principally due to time constraints of the pilot). – About a third of the respondents said they would consider trying to use the development action pack for continuous development and reflective practice. – Many agreed with principle of extending the use of learning logs and experimental learning portfolios from trainees to experienced staff but felt it was not realistic due to the time needed to do the work. It was felt that it would be more acceptable to newly qualified regulators (familiar with the techniques e.g. from Warwick or degree courses). – Of those who agreed with the principal of continuous development and reflective learning, as set out in the development action pack, three quarters felt the products were about right. (42% gave no response).
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> – Undertake further evaluation of the reasons development reviews were not undertaken. Collect examples of successful reviews to use as best practice.
Objective:	To seek views about whether the current management culture is sufficiently robust to support this process and ways to achieve this
Summary of Feedback:	<ul style="list-style-type: none"> – Many thought that only where there was a good manager /management culture would the tool be embraced. Views and suggestions included the following: – It would need strong, visible, support and leadership from (and should be promoted to) Managers, Senior Managers, Board members, Councillors, and Chief Officers. – It should be introduced with a 'carrot and stick' approach with some degree of compulsion and clearly identifiable benefits (for users and the organisations).It was suggested that LAs should 'sign up' to it and its use could be audited (e.g. using LAE1 return). HSE could link it to performance agreements, and managers trained and appraised on their use of it. – Solutions to identified development needs should be readily available and those using the tool 'must know aspirations will be satisfied'.

	<ul style="list-style-type: none"> Resources (time to undertake DNA and time/funding to meet needs identified) must be available to ensure the tool's continued use.
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> Continue to implement communication plan to further build and maintain support for the tool from Councillors, Board Members, Chief Officers, Senior Managers and Team Leaders. Ensure solutions to development needs identified by the tool are available, including resources. Educate managers in the purpose, use and need for the RDNA process, provide clear guidance and instructions, and agree proposals for monitoring and sustainability.
Objective:	The LA specific questions were aimed at exploring issues relating to use of the tool by partly authorised LA regulators, and Agency staff, and to determine whether the process fits with existing processes for development reviews and with CPD already in place
Summary of Feedback:	<ul style="list-style-type: none"> About half of the LA respondents had competence frameworks in existence; there would appear to be little consistency in these – some commented that the RDNA could complement or replace these. Half of the Team Leaders who had agency staff felt they would find the DNA Tool useful for specifying a competence requirement for them. However some felt that they have to accept agency staff of a lesser standard or offer them only limited powers. 60% of respondents practiced some form of CPD (principally for CIEH or IOSH). Most of the managers felt there would be a benefit from using the tools in the Development Action Pack, however the majority of the Technical Officers felt there would not be. The major concern was one of duplication of effort.
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> Apply the RDNA tool to partly authorised LA staff by use of the additional N/A option proposed. CIEH and REHIS to make clear that there is no duplication of requirement regarding CPD tools – existing tools and / or new RDNA tools can be used.
Objective:	The Specialist specific questions were aimed at further validating the core regulatory framework in relation to its application to discipline specialists in HSE, how existing specialist frameworks might be integrated with this, and how the RDNA development action pack and process fits with existing CPD.
Summary of Feedback:	<ul style="list-style-type: none"> None of the respondents were aware of the existence of a competence framework for their discipline; however there was awareness that they were being developed. The majority felt the regulatory core applied to their role, Three respondents said CPD was practiced in their discipline, one saying it was not sufficient for their needs and they would benefit from the Development Action Pack tools. Four (out of five) respondents identified advantages in having an agreed CPD plan or proactive DAP.
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> The Regulatory core framework should apply to Discipline Specialists, recognising that the N/A option can be used where appropriate. The Pilot confirms existing plans to develop the RDNA tool beyond the core elements to accommodate the 'specialisms' of Major Hazards and Specialist Disciplines.

	<ul style="list-style-type: none"> - Further work is required to develop the CPD aspects of the pilot to allow for its use with Major Hazards and Specialist Disciplines
Objective:	The General Views Section of the questionnaire was aimed at exploring participant's overall views of the project's aims and products, and to provide the opportunity to add further comments.
Summary of Feedback:	<ul style="list-style-type: none"> - Only one respondent (out of 125) did not agree that the aims and objectives of the project were important. The range of comments included the following: <ul style="list-style-type: none"> - Provision of resources (particularly time) to undertake the DNA will be required, and many expressed concerns that this may not be made available. - The delivery of identified training and development needs will be crucial. - It was recognised that if the DNA tool was to be linked to the process of identifying training and development needs it could also make it easier to develop and deliver training in line with the business needs at reduced cost. - Achieving the aims of the project would be helped if the tool could be honed and tailored to each area of a regulator's expertise. - For the tool to be implemented and used correctly within authorities, the correct message had to go to the authorities. - It was suggested that Universities / Colleges need to be brought on board to promote reflective practice at under-graduate level, so newly qualified officers are ready for it from the start of their careers. The IOSH and CIEH need to be involved so it can be integrated with CPD. - Some LA respondents advocated making the RDNA process mandatory. - It was recognised that the benefits would need to be understood and delivered. 'I do not think it will be sufficient to tell people that they will have to do it because the HSE Board wants it.' It has to be seen to be of some benefit to the officers taking part.
Action as a result of the feedback and Recommendations:	<ul style="list-style-type: none"> - Ensure that training and development needs identified by the DNA Tool are delivered through the development of a suite of solutions. - Consider and agree how the application of RDNA tool and process will be audited.

Part 3: Detailed Feedback

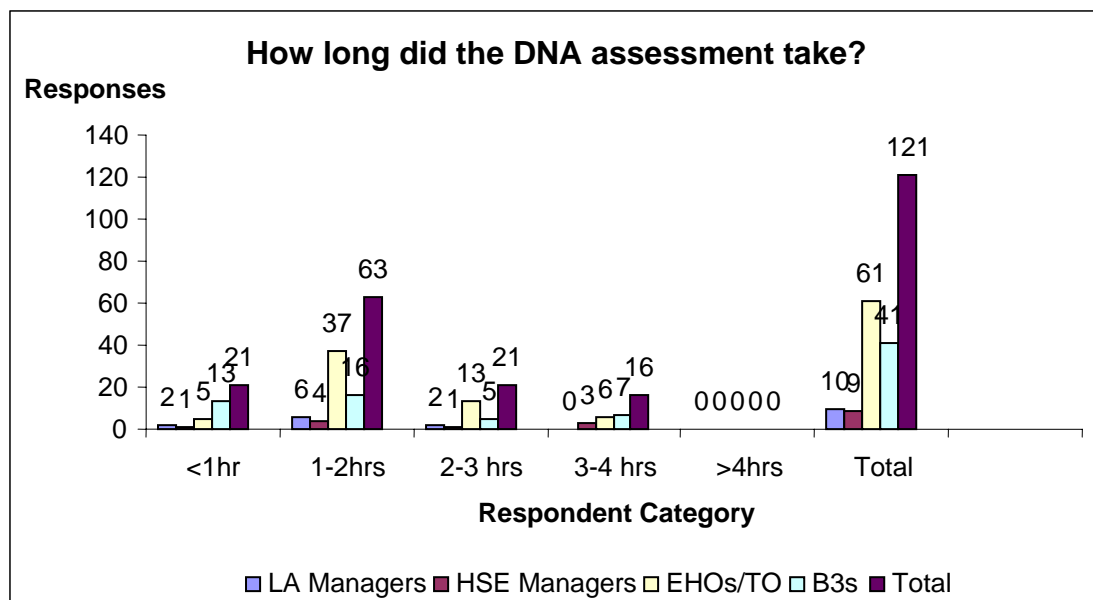
Introduction

17. The following breakdown provides analysis and commentary on the questionnaire responses, question by question. Where appropriate, figures are shown graphically. Responses are presented separately for LAs and HSE where relevant. A further breakdown of responses into officer categories are presented in Annexes 2 and 3.

Analysis of Feedback

Questionnaire Category: Process

Q. 1 How long did you spend on the Assessment?



- The majority of respondents undertook the assessment in 1 -2 hours, with a relatively small number taking more than 3 hours.

Q. 2 Did you do the assessment alone or with your Manager/Team Member?

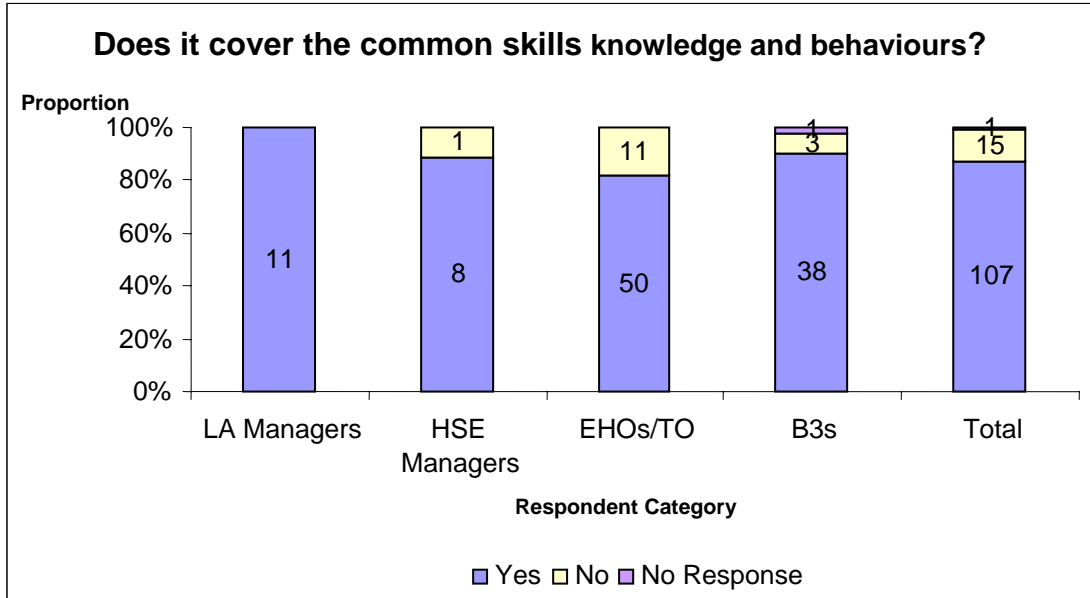
- 61% of respondents undertook the assessment on their own, with 24% doing it with their managers. 15% said they did both.

Q. 3 Did you conduct the assessment using the web based tool, or did you do it on paper?

- 90% of respondents undertook the assessment online, only 4 respondents did it on paper whilst 7% used both formats.
- Overall respondents were content with the process, though there were a few concerns about the degree of subjectivity in the process.

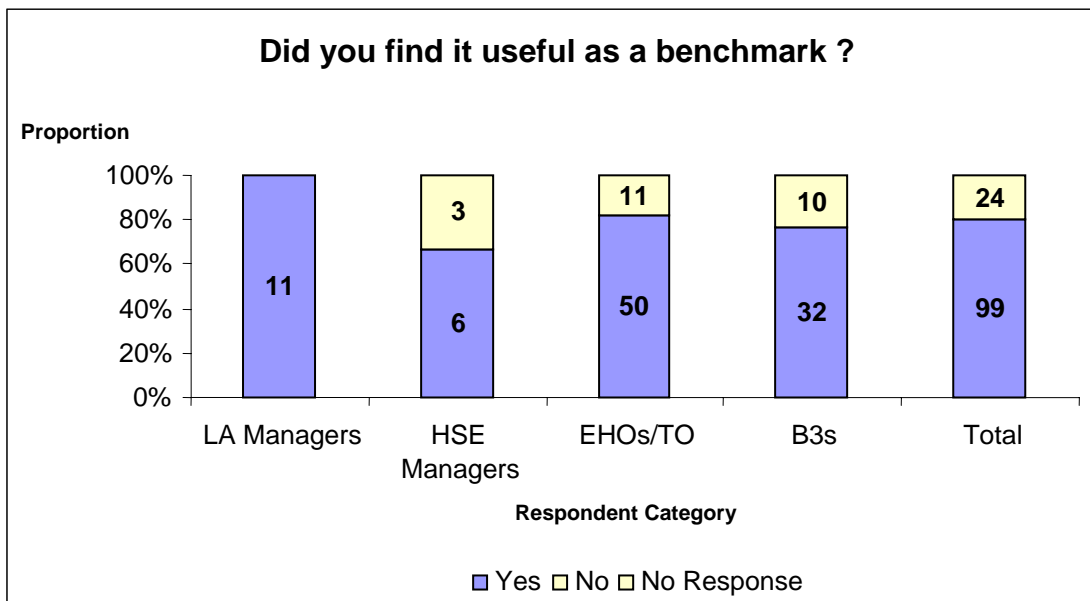
Questionnaire Category: Quality of the Framework

Q. 4 Do you think it covers the common skills, knowledge and behaviours required of regulators of H&S?



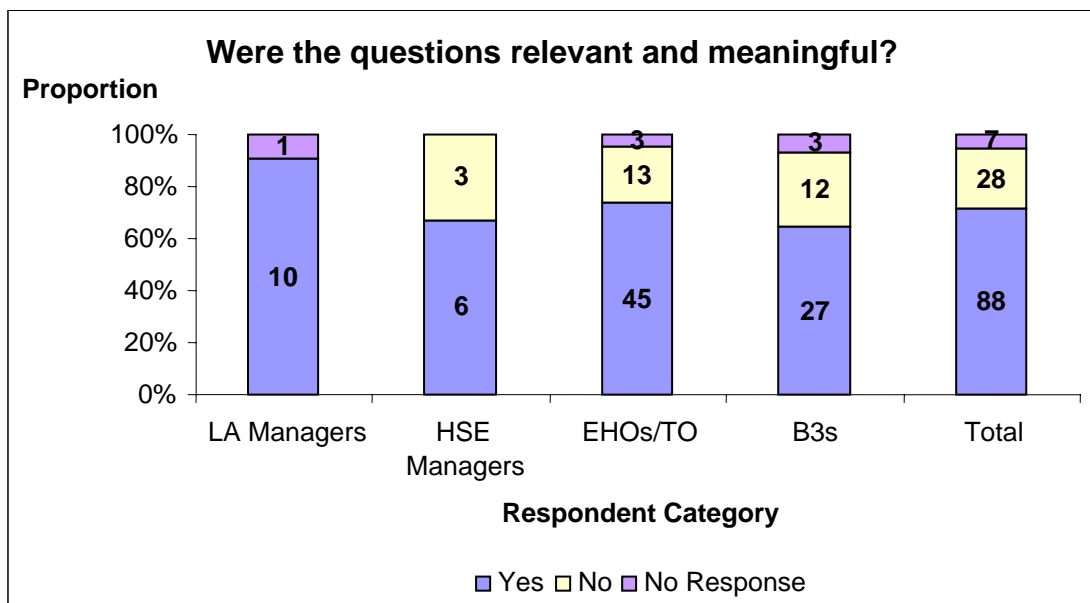
- Over 86% of the respondents felt that the framework covered the common skills, knowledge and behaviours required of regulators of health and safety. 12% felt that it did not. These included some HSE Specialist Discipline Inspectors who felt it did not cover skills for technical forensic investigation and giving specialist evidence/opinion in court.

Q. 5 Did you find it useful as a benchmark to identify development needs against?



- Overall, 80% of respondents found the DNA Tool was a useful benchmark, the comments received are summarised below.
- HSE Views:** - Those who felt the framework was a useful benchmark felt that it provided a good prompt for discussion and was structured well. The indicators were felt to be very useful.
- Those who felt it was not suggested it was too general or 'simplistic'. It was felt that it was not sufficiently relevant for specialists. Some felt their needs were technical rather than general with some industry weaknesses not identified. Two respondents suggested it was not of value for inspectors with more than 8 years experience.
- LA Views:** - Those who felt the framework was a useful benchmark felt that it highlighted areas of inexperience, very useful for inexperienced staff, that it helped identify weaknesses and opportunities and was good as a reference. Phrases such as 'extremely useful' and 'it made me think' were used. Its potential use across the whole country was welcomed.
- Those who felt it was less, or not useful as a benchmark expressed concerns about the subjectivity of the process, duplication within the framework, a good number felt the framework was aimed at managers, and a few thought it was aimed at staff with more advanced knowledge (ie the bar was set too high).

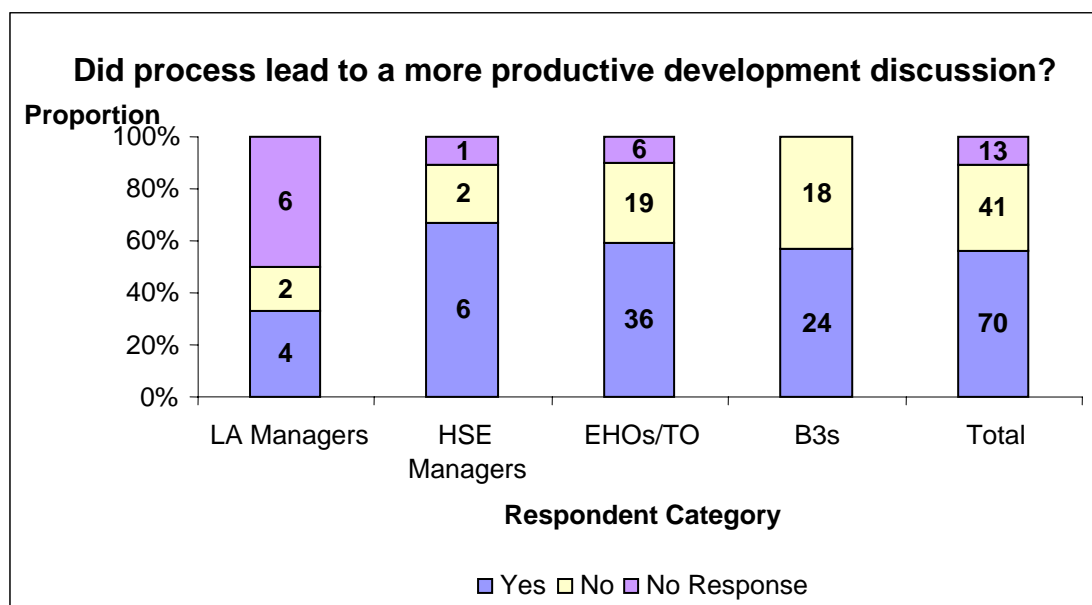
Q. 6 Did you feel the questions were relevant and meaningful to you?



- Overall, 72% of respondents found the questions relevant and meaningful, 22% did not. (6% gave no response). The comments received are summarised below.
- HSE views:-** Those who felt the questions were relevant and sufficiently meaningful included comments such as 'the questions were logical and provoked appropriate thought and were sensibly phrased'. The indicators were welcomed, as the questions alone would be too broad and without sufficient benchmark. Some felt the questions could be improved with expansion of topics for sectors and industry. It was pointed out that some questions needed to recognise Scottish differences e.g. no PACE and it was felt by some that not all the questions were relevant, eg to those not working in a Partnership Team.

- Those who felt the questions were not relevant and sufficiently meaningful suggested that they were too generic and not role specific (specialists). Again it was suggested that it was 'technical knowledge needed not common'. The language used 'NVQ speak' was questioned by one respondent who felt they were difficult to interpret. One felt 'some questions were for the management'.
- LAs Views:** - Those who responded positively confirmed that the questions were meaningful and mostly relevant and included comments such as 'I liked the format and found it challenging but could get used to it'. It was recognised that some questions were not applicable to all. Some, whilst responding positively, felt the questions were 'subjective', 'could have been more direct', were 'vague' and allowed differences in interpretation.
- The majority of those responding negatively felt that some of the questions were aimed more at managers as opposed to enforcers (6 respondents). They felt some questions (particularly those involving management) were not relevant. There were some comments about the questions being too numerous, too broad, too specific and that there was some duplication in the framework.

Q. 7 Did you feel that the development discussion you had with your Manager/Team Leader was more productive as a result of having used the assessment tool?



- Overall 57 % of respondents felt the process led to a more productive review, 33% responded negatively, however nearly half of these responded negatively because they had not had time to discuss their development need with their line managers. (10% did not respond to the question). The comments are summarised below.
- HSE views:** - 60% of HSE respondents felt their development discussions benefited from using the tool. Many felt it provided a focussed or targeted approach – a framework. Comments included: 'It gives a corporate benchmark beyond B2 idiosyncrasy', 'It identified more than a list of courses- which has tended in the past with some managers'. One team member who had had 'little technical experience outside Fit3' felt 'it helped identify key issues and MECs'. One respondent stated 'It was the most structured and useful review that I have ever had in HSE'. It provided discussions on topics that would not have taken

place without the tool, 'it covered core elements of my job in a logical way and highlighted areas for development. The traditional current review system would not have done this'. Nearly half of the respondents who said their development discussions had not benefited from using the tool had done so because they had not had the discussions with their manager within the time available to feedback from the pilot.

- The remaining 40% who did not think the RDNA improved the development assessment process felt that it covered areas that would have come up at annual review anyway, or it did not identify any areas that had not been identified already, e.g. 'The exercise just confirmed what I knew about my development needs'. Again some specialists responded negatively because it did not cover the areas they required.
- **LA views:** - 65% of respondents felt their development discussions benefited from using the tool because it provided focus and structure to discussions. Comments included: 'The tool surpassed the multifarious models/frameworks previously obtained from other sources', and 'the extremely useful nature of the tool meant that discussion was well structured and promoted valuable discussion'.
- More than half the respondents, who responded negatively, had not had discussions with their line managers due to time constraints. A small number said it did not add to existing systems, whilst one said their manager wanted training needs identified in terms of specific courses to send inspectors on.

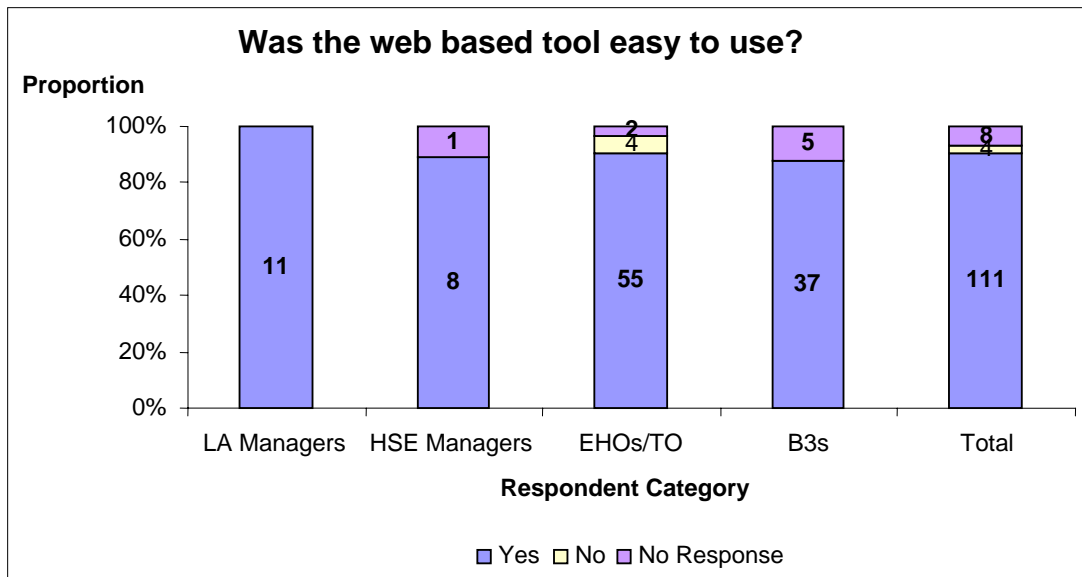
Q. 8 What, if anything, do you think is missing from the framework?

HSE views: - 18 respondents provided comments. The majority of comments related to lack of industry or sector knowledge and advanced technical guidance. Violence and Aggression and 'latex issues' were two specific examples given. Specific Scottish knowledge was also cited as being missing.

LAs views: - 18 respondents provided comments. Several suggested the knowledge section should be a section in its own right. Some wanted strict guidance on technical knowledge and 'technical specifics' and technical competence in more detail. It was suggested that technical competencies for managers and administrators could be added. One respondent suggested a scale for competence level another dividing skills and knowledge into essential/desirable components.

Questionnaire Category: System and Web site

Q. 9 Did you find the web based tool easy to use?



96% of respondents felt the web tool was easy to use, less than 4% felt it was not.

Q. 10 Did you have any problems using the web based tool?

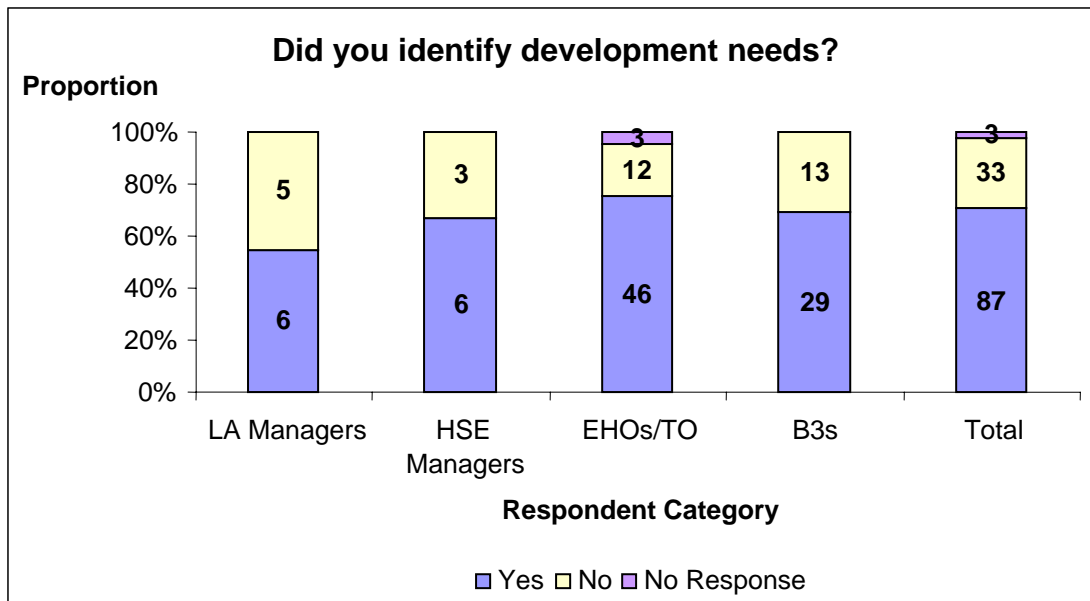
- Relatively few problems were encountered using the tool. Those commented on included the sessions being timed out, not being able to go back and edit the assessment once submitted, and problems associated with entering the wrong email address. Two respondents felt it would be better if you were able to open multiple pages or have links opening and closing directly from the page.
- Several respondents suggested the comments boxes should open when you click on the unsure or disagree buttons. Several suggested that the indicators should appear at the top of, or more prominently on the screen, as they were not obvious unless you scrolled down. One manager wished to see more clarity about saving assessments for different team members
- Some minor issues were noted about how the system applies voice recognition.

Q. 11 Please comment on the quality of the pilot web site (including the links – Q12)?

- The overwhelming majority of comments received were positive about the quality of the website and tool. It was deemed ‘user friendly’, ‘excellent’, ‘easy to use and navigate’, ‘looks good/works well’, ‘very professional’, ‘straightforward’, ‘well structured’, ‘screens well laid out and easy to follow’.
- The comments raising issues included poor quality of email print out, should be able to see whole page and should be able to print out all questions. Suggestions also included incorporating the report name into the email, and improving the save and submit options’ navigation.
- Those who had used the links to topic pages found these very useful

Questionnaire Category: Development Needs identified

Q. 13 Did you identify any development needs as a result of the assessment?



- Overall 71% of respondents identified development needs as a result of the process. 23% said they did not, and 2% did not respond. Many felt it was lack of experience that was being identified.
- HSE views:** A broad range of skills and knowledge requirements were identified as a result of the process, no particular topic stood out, although knowledge of businesses and management systems for health and safety appeared in responses more than most.
- LAs views:** As with HSE respondents, a broad range of skills and knowledge requirements were identified from throughout the tools modules. Enforcement or legal skills were commonly raised as were topics such as asbestos and noise.

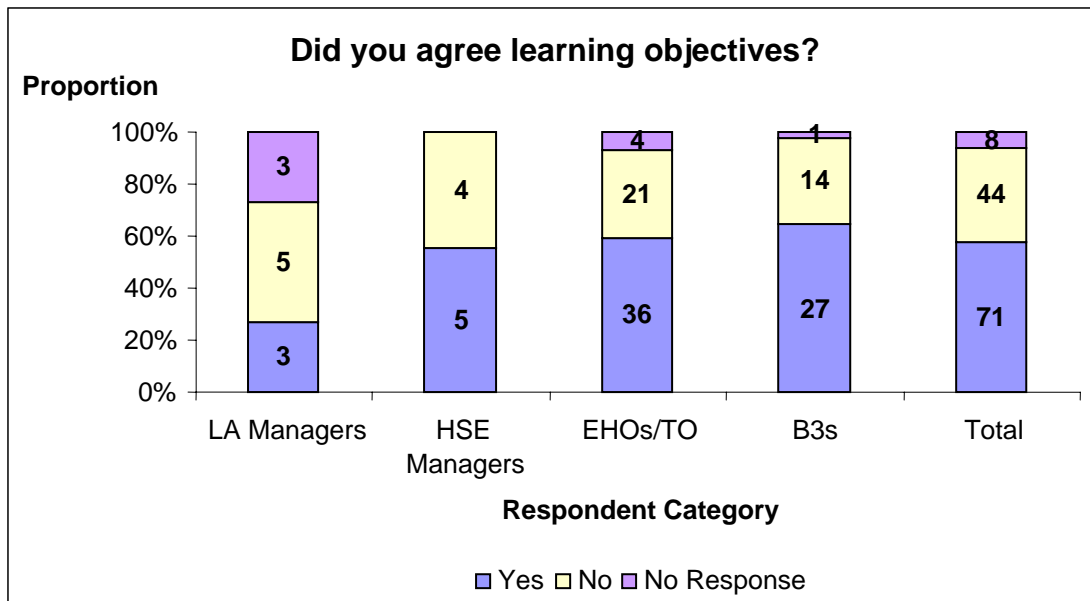
(Note that the collection of needs identified gathered via the pilot will be made available separately to the Project Board members to provide a flavour of needs identified through the process and to help inform learning and development planning considerations).

Q. 14 Do you consider that you have a number of development needs which have not been picked up as part of the assessment?

- 21 respondents (18%) felt that they had development need not identified by the process. Of these, 8 felt that more detailed industry or topic knowledge was required. In addition, personal safety, specialist opinion, machinery safety, time management, dealing with the media, auditor training and organisational procedures were highlighted.

Questionnaire Category: Development Tools and CPD Process

Q. 15 Did you agree learning objectives with you manager/team member?



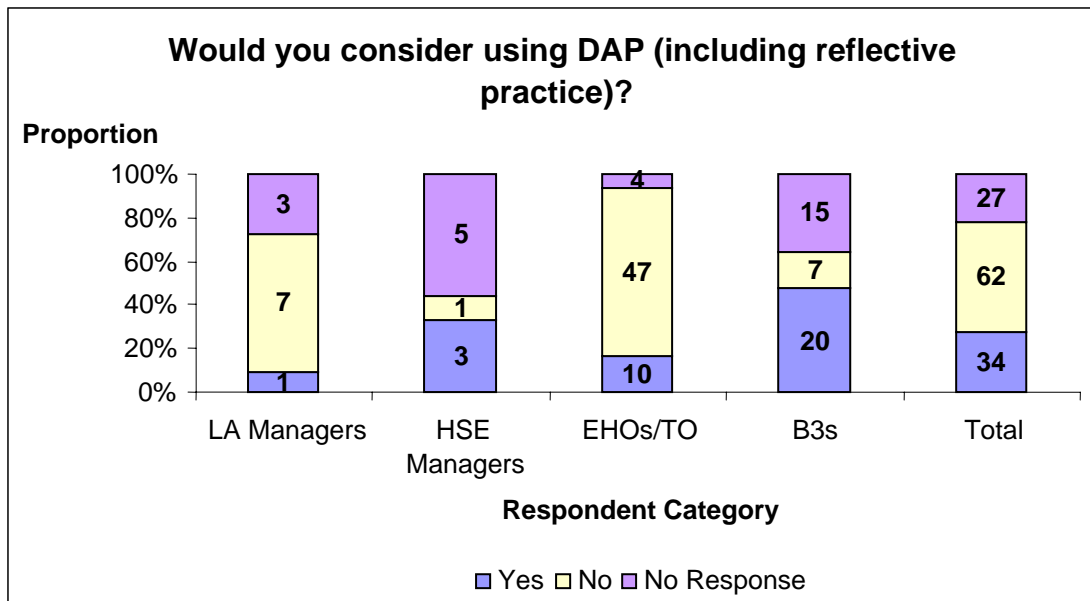
- 58% of all respondents agreed learning objectives with their managers, 36% did not and 7% did not respond to the question. Whilst no comments were attributed to this section of the questionnaire it is worth noting, from question 7, that a significant number of participants in the survey did not have development discussions with their line managers and this is likely to be reflected in the numbers not agreeing learning objectives.

Q. 16 Have you developed an action plan as a result of the process? If not, do you intend to?

- 28% of all respondents had developed an action plan, 54% had not. There were a limited number of comments provided, but these suggested that of those who had not developed an action plan some were waiting until it was a requirement, some just did not have the time and for some it was a work in progress. Others were still waiting for there discussions with their line managers.

Q. 17 Have you tried using the tools for continuous development and reflective learning in the Development Action Pack? If not would you consider doing so?

- 60% of respondents had not tried using the tools for continuous development, 28% had. It is worth noting here that the low result here was expected, given the time constraints within the pilot, and arrangements have been made to follow progress with a sample of participants to obtain a better feel for the potential use, benefits and sustainability of the CPD tools.



- 28% of respondents said they would consider trying the use of the tools for continuous development and reflective practice. 50% said they would not, 22% did not respond to the question. Only 15% of respondents had tried using the tools for continuous development and reflective learning. As noted above, this low figure was anticipated given the timescales available for the pilot, and a follow up will take place.

Q. 19 If you agree with the principle of continuous development and reflective learning as set out in the DAP, do you think the products are right?

- Of the 73 participants responding to this question, 75% felt the product were about right, whilst 25% did not
- HSE views:** - There was a mixed response to this question; some felt the products as produced were right, others felt they were just not required. One agreed with the principles of CPD but felt the DNA Tool did not help. The issue of not enough industrial content was raised again here.
- LAs:** - Of those who commented several felt it was a good concept and the product was right. Some agreed with the principle but had yet to use learning logs. There was concern about workload and some felt this was an issue that would prevent the idea being taken up. It was also pointed out that it was not good/necessary for LAs who already had systems in place.

Questionnaire Category: Management culture, capability and capacity

Q. 21 What do you think could be done to make this work, and be of benefit to you and colleagues within your organisation?

There was a broad range of responses to this question and the responses, summarised below, are divided between HSE managers and regulators and LA team leaders and regulators.

HSE Managers:

- **Need for solutions:** If regulators, with their managers are identifying needs then the appropriate solutions to meeting those needs should be available. If they are not then completing the exercise has no value.
- **Need for simplicity:** Whilst the tool may improve consistency of approach to development needs, even good managers will consider some of the tools such as the learning logs as burdensome. Managers may not need to carry out the assessment in parallel to the Inspector (this will save time).
- **Need for Manager training:** Managers should be better trained and supported.
- **Need for Senior Management Commitment and incentives/monitoring to apply the process:** The use of the tool and its products needs visible senior management commitment with associated carrots and sticks. The action taken needs reviewing, perhaps the tool could be incorporated into e-HR and have the same checks imposed as for Performance Agreements.
- **Need for Management Discretion:** These should be available as tools for managers to use. Pressure to use them should be greater when someone is developing but voluntary after a prescribed period. The core behaviours component could be used only where inspectors demonstrate significant problems.

LA Managers:

- **Need for simplicity and good guidance:** In terms of the structure of the tool itself, it was felt that the framework needs to be an easy to navigate tool, with supporting information to guide officers through it but not so much information that it becomes onerous and can appear overly complex. (This is what would put people off using it.)
- **Need for consistent and required sign up:** Where there was a good management culture in LAs the Team Leaders felt the Authority would embrace this method of maintaining officer competency. 'It would be incorporated into our existing PADR system'. One respondent said 'I am keen to roll out the assessment to all as soon as possible, esp. the food team where it will be really useful, given their smaller sector of enforcement and their lower levels of access to H&S training/CPD'. However it was recognised this may not be the case elsewhere. One suggestion for solving this was for the process to be made compulsory and something each LA has to sign up/commit to, then form part of the audit.
- **Need to deliver the benefits:** It was seen as vital that it was not just a paperwork exercise, but the information obtained helped to develop both individual and service delivery.

- **Need for flexibility and integration into existing procedures:** Several respondents felt it was important that the tool was kept as a framework with the flexibility to make it fit into existing arrangements. 'Ultimately the products need to be fully incorporated into existing processes of in house appraisal or personal development schemes and business/work planning arrangements and not seen as an add on programme that brings additional work to existing arrangements'. It was felt, by one, that to embed it in their authority, it needed to be seen as a wider tool and cover other work areas.
- **Link to staff appraisal systems:** It was also suggested that all Councils should have a staff appraisal scheme in place and so this Tool should be an integral component in an inspector's professional development. The job specification for Technical Officers is biased to those having an IOSH or equal membership which also drives some form of CPD training demand. The Tool (the Core Regulatory Skills section) provides an essential element in determining the competence of an inspector and so directly feeds into their level of authorisation. It is essential to have this as competence is likely to be tested in any court or tribunal hearing.

HSE Regulators:

- **Need for management engagement:** In order to make it work, managers have to be involved fully. It was suggested that adequate training and appraisals of line managers should take place, and their performance agreements include the use of the tool. HSE needs to 'manage the manager'.
- **Commitment from the top:** There was a need for the support and commitment for the process from senior management and the resources to allow it to happen, including the delivery of solutions. 'Band 1s and 0s have to be fully committed and provide time and resources for development needs'. Senior managers should also monitor the implementation. More time should be given to managers to draw up the plans.
- **Need to make CPD a requirement:** Band 3s suggested they should have development objectives and reflective practice in their performance agreements, and this should be included in their performance review. Random audit of the process would also help. They suggested that time in their work plan should be included for the process, and then they couldn't say they had no time to complete it.
- **Effective implementation:** There must be proper implementation of the process – 'it should not just appear as a new feature on the internet.

LA Regulators

- **Need for time and resources to be made available:** The majority of respondents gave positive suggestions for making the tool and its processes work. However some felt it was too bureaucratic (or an extra burden) – and because of under resourcing – some believed that resources would never be available to implement it. One felt that it would need verification (ie not self assessment) to work. Others suggested that time should be given to enable it to be used (or reduce the time it takes to complete).
- **Need to integrate into existing systems:** It was noted that it could be more effective if used as part of the appraisal process. Several felt it would work, only if it was fully incorporated into existing systems and not added on. One suggested that a choice should be given, to use the tool (as a whole) or use it to benchmark

existing systems – because of the extreme variations between size, function and resources for LAs makes a one size fits all difficult.

- **Need to make CPD a requirement:** The positive suggestions included having the tool set up and approved into compulsory CPD requirements to be incorporated into the organisations procedures. It was suggested by several respondents that compliance should be audited (& enforced), e.g. using the LAE1 return, or inter authority audits. It was also suggested that ‘recognised qualifications could be fed into companies’ own career grade matrix’
- **Need for the solutions to be delivered:** Several felt that providing solutions for any development needs identified would help ensure the tool was used – ‘must know aspirations will be satisfied’. However, lack of promotion opportunity could be a barrier.
- **Need to convince all of the benefits, including commitment from the top:** It was agreed that there must be commitment from all levels, with backing from managers and staff. Individuals need convincing of the benefit. It should be promoted to Councillors and Chief Officers.

Questionnaire Category: LA Specific Questions

Q. 22 How might the Regulator’s DNA Tool be used to determine the levels of Authorisation for EHO/Ps or Technical Officers?

- The question resulted in a broad range of responses from ‘I don’t think it could be’ to ‘need to agree framework but would be very useful’. It was pointed out that some managers were fully authorised – but lacking in some areas and LAs were ‘short in some aspects’.
- In general the feeling was that the DNA Tool, as piloted, could help but could not in itself be used to determine levels. ‘There has to be a different set of standards for each’. It was felt that it was better than dependence on qualifications alone, and could be used – with specific areas being signed off as competent. ‘Could be used to evidence process but not be all and end all of decision’ and ‘limited powers could be given in light of the development needs identified’.
- Its use for determining competencies was confirmed by several respondents, it was recognised that there was a need to describe levels of competence and the tool allowed for this, but formal levels would have to be set out. Some felt that the tool was subjective and not detailed enough – being too general to provide a true representation of knowledge and understanding. The self assessment methodology was also questioned with several suggesting that the process, if leading to authorisation, would require senior manager verification. ‘Paper exercise is not enough to determine authorisation.’ Concern was also raised about managers’ confidence in using the tool and relying on self assessment.
- It appears from the response that the tool could be used to determine, or influence, level of authorisation, but would require further work on format and linkage to existing LA systems. Links to job specifications, or setting bars in career grade matrices would assist.

Q. 23 Do you have a competence framework in your authority which covers you role? If so how does it differ? Would you be prepared to share it with the project team?

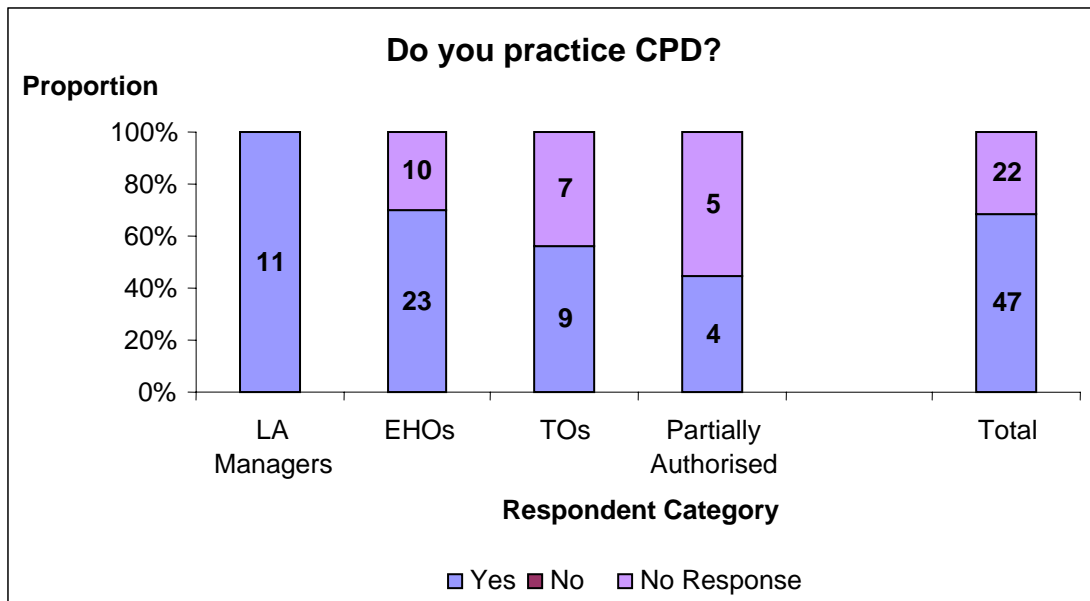
- 28 LA respondents said they have a competence framework and 23 said they did not.

- Some of those who did not have a competence framework described how their competencies were assessed, e.g. 'Competency is determined by number of years qualified, post qualification experience and management audits'. 'Only highly trained and extensively experience staff are granted authorisation. Competence is embraced in staff appraisal discussions'. Others used 'career grading' with qualifications, discussion with managers and verification by senior managers moving officers over bars. 'The [name] currently has a career grade matrix but the bars are comparatively broad; for example on gaining my diploma in Environmental Health I moved over a bar and 6 months later I moved again because I had been doing the job for 3 years.'
- Of those who did have a competence framework several were happy to share it with the project. 'A competence framework had been produced, borrowed from other sources, but never made public to the team or in any way trialled (yes, prepared to share it)' and 'A simple matrix indicating where I feel an officer sits in relation to the general standards of competence. And what level of powers they would be authorised with. I could share it, but it is only very simple!!.' 'We have a basic template competence framework that was worked on as part of the [name] Liaison Group's work programme of developing policies and procedures. So although not specific to [name] it was a framework that had the potential to be adopted, although i cannot confirm if any LA's have adopted it. It relates more directly to appropriate qualification and level of experience and links through to an appropriate level of authorisation. I would be happy to share this with the project team'. 'The competence scheme we follow is based on practical functions of a health and safety enforcer, ie fit3 areas, serving notices, inspecting particular types of premises such as warehouses, hotels, etc. This is supported by joint visits, shadowing and leading, audited visits, and peer reviews, in a documented logbook - copy attached with this'

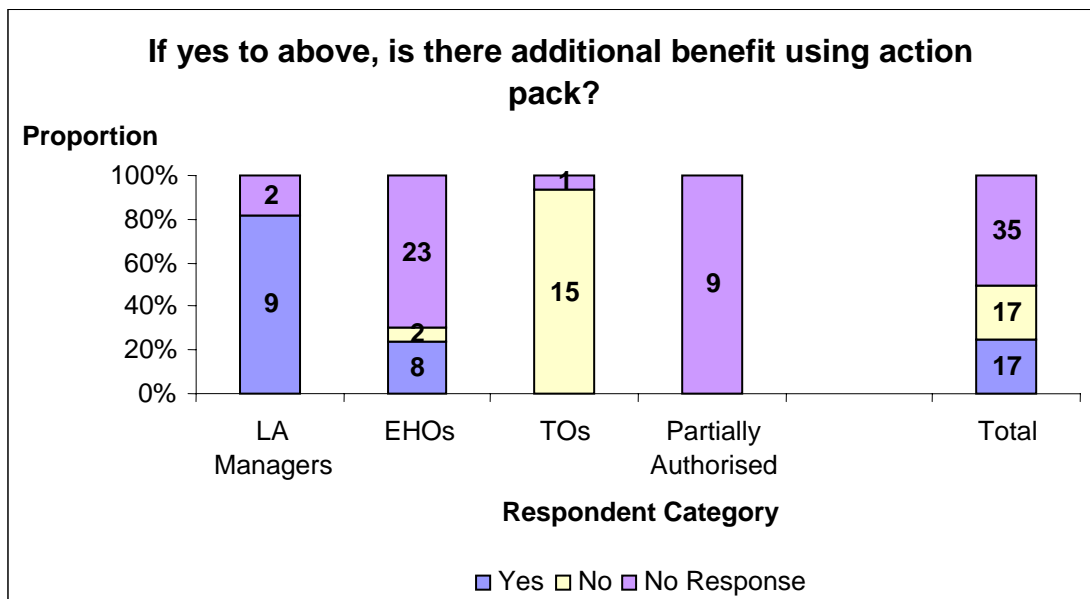
Q. 24 Does your authority use Agency staff to regulate health and safety? If so would the DNA too be useful?

- 17 Team Leaders said their LA uses Agency staff, and 14 said they did not. Of the 17 who do, 9 said they would find the DNA tool useful in specifying a competence requirement, the remainder did not indicate if they would or would not. It was pointed out that in some circumstances, LAs may have to expect a lesser standard or offer only limited powers (authorisation) due to the contractors available at any point in time.
- Of the comments received, of note were: Concern about using self assessment, and therefore relying on the integrity of the agency worker. Another felt a slimmed down version would be useful.
- A Team Leader responded that an Agency staff member had been asked to complete the DNA. They felt if the toolkit use was more widespread and accepted (i.e. officially launched) they would expect any health and safety contractor to demonstrate their competence via the toolkit.

Q. 25 Do you practice CPD? If so is this sufficient for your (and the business') needs? Would there be benefit to you in using any of the tools provided in the DAP?



- 47 LA respondents said they practiced CPD and, no one said they did not. There were 22 nil responses. Of the respondents 80% of the managers felt there would be additional benefit from using the tools in the Development Action Pack, although over 90% of the TOs felt there would not be (works well at present), and 70% of the EHO's failed to respond to the question.



- Many of the respondents were participating in CPD for CIEH or CMIOSH and the issue of potential for duplication was raised. One felt that participation in the CIEH CPD meant having a training budget to go on some courses – but it did not mean you learnt anything! Another said they ‘practice two institutions already, and capture information sufficiently but there may be opportunity to use the tools in the DAP to demonstrate activity.’ ‘if it provides evidence such as CPD certificates then yes’. It was pointed out that it would be useful to have an ‘enforcers’ scheme’ to demonstrate consistency to duty holders.

- Those who liked the tools said that learning logs and reflective practice would be very useful, that it was efficient, and liked the idea of using them with update training.
- Finally one respondent said. 'This DNA tool offers the possibility of developing a practitioner based demand for training that would complement what is already on offer. I think the DNA needs to go beyond being 'of benefit' in the area of CPD - it needs to be part of CPD. In this respect, it could be vital to H&S specialists in HSE and local government, and supportive of those EHOs who are multi-disciplined (they will always be with us and need all the help they can get).'

Questionnaire Category: MH and Discipline Specialists

Qs 26 – 29: Existing Frameworks? Existing CPD? Application of the Core?

- Of the limited number of HSE major Hazards and Discipline Specialists involved in the pilot, none identified the existence of a competence framework, (however there was awareness that these were being developed).
- The majority of discipline inspectors felt the regulatory core applied to their role, whilst some identified elements that did not apply to their current role, e.g. pursuing partnerships and initiating projects. One commented that their role was not providing a 'safe environment' but dealing with aspects of safety.
- Three respondents said CPD was practiced in their discipline, one saying it was not sufficient for their needs and they would benefit from the Development Action Pack tools. Four (out of five) respondents identified advantages in having an agreed CPD plan or proactive DAP.

Questionnaire Category - General views

Q30 : Do you think the aims and objectives of the project are important?

- 78% of respondents agreed that the aims and objectives of the project were important, only one respondent (out of 125) did not agree. Of the positive responses, the following quotes provide an indication of the reasons for such a positive response.
- **From HSE** comments included:
 - ❑ 'Yes, because currently there isn't a system for identifying learning needs specific to our role in a consistent way'
 - ❑ 'I agree that the aims and objectives of this project are important in that improvements are needed in consistently identifying and ensuring competence of regulatory inspectors within HSE and between HSE and LAs'
 - ❑ 'HSE must be able to demonstrate a robust system for evaluating performance, identifying and meeting training needs in order to continue to be a world-class organisation'
 - ❑ 'A really positive tool that made me realise that I have numerous skills in my role which is not always recognised. I really hope the organisation adopts the tool and that more people benefit from it.'
 - ❑ 'Yes – it is easy to become focussed upon delivery and forgot the need to remain current. This is one way the HSE can help to keep staff competent and legitimising and prioritising the process will assist those who feel they do not have the time or support to stay competent.'
- **From LAs:**

- ❑ 'Consistency is required throughout all authorities in their officers and if consistency is achieved then information is delivered to the businesses with no confusion. Also businesses will feel that there is no ambiguity with the information they receive from one area to another'
- ❑ 'Professionals need to be disciplined in their development and a good structure / framework is most valuable in taking a focused approach. When I think of the 20 years I spent floundering about trying to achieve CPD - especially in a rural authority - this type of structure would have been a 'life saver' for me!'
- ❑ 'The project certainly provides a very focused approach to identifying development needs and assessing a competence level. It is an excellent tool for long term maintenance and development of competence which through using the logical approach and supportive information allows for improved planning and development.'
- ❑ 'It meets sec 18 objectives and provides an excellent consistent approach between officers. From a managers point of view it is an excellent tool to identify team strengths and utilise internal resources to the benefit of the whole team.'

Q30 (cont) : What else could be done to help achieve the project aims?

- Many of the general comments recognised that we need and should have continual development. It was seen as vital in a fast-changing world and it was good that individuals would be given greater control of their own on-going development and more scope in identifying what they need to do to develop their own careers. The following is a summary of the responses to the above question. It does not include suggestions to improve the content or the practical functioning of the tool as these are covered elsewhere.

HSE:

- **Need to provide the resources (particularly time) to undertake the DNA** was recognised as being vital. It was suggested that links to performance agreements (and hence the High Performance Award system) might help. A system and arrangements for peer review could also help evaluation of performance and promulgation of lessons to be learned. Such a process may help trigger personal reflection.
- **The need to ensure development needs can be met:** It was felt that identifying development needs and not dealing with them in a timely fashion would be a backward step. It was suggested that identified 'training needs' could be met by HSE centrally. It would also be helpful to see if changes can be made to HSE's arrangements for bidding and training. At present bids are made some time before work plans are finalised, and sometime after/before development reviews. Often development needs reflect the work plan, and additional needs are identified after bids have been made. In the past training effort has been wasted and we need to waste less of what is becoming a scarce resource.
- **Making the process a requirement:** It was felt that a key to achieving the project aims was to ensure this process is mandatory for all and that there is a system of checking compliance with this. It would also need public support and approval from the board and HSE's managers.
- **Tailoring the tool to add the specific knowledge requirements:** Achieving the aims of the project would be helped if the tool could be honed and tailored to each area of expertise – eg: HID, Construction etc – it would ensure consistency in knowledge and give a formal record of what was needed - important for managers to know and help prioritise these needs.

LAs

- **Need for commitment from the top:** To help achieve the project aims it was felt that for the tool to be implemented and used correctly within authorities, the correct message had to go to the authorities. LA managers and Council leaders need to be aware of the value of professional officers. In pressing for more resources for H&S there is the probability that a national framework will have more weight with Councillors etc and assist in making a case for increased resources where needed. In general, increased publicity for and benefits of the project was seen as important.
- **Need for time and resource to be provided:** Several respondents felt the aims of the project would be difficult to achieve due to time resource constraints.
- **Need to integrate CPD processes and avoid any duplication:** It was suggested that Universities / Colleges need to be brought on board to promote reflective practice at under-graduate level, so newly qualified officers are ready for it from the start of their careers. 'The IOSH and CIEH need to be involved so it can be integrated with CPD ... otherwise it will be a struggle to get it off the ground'.
- **Need to make the process a requirement:** The mandatory approach to undertaking the DNA was put forward by some with suggestions to make it part of HSC guidance – 'Is it not yet part of the S18 Standard?' Another suggestion was it might be worth looking at some sort of 'kite mark' standard for H&S enforcing offices in line with the scheme. An alternative suggestion was to look at a range of qualification options that can compliment an officer's development and skills.
- **The need to ensure effective solutions are provided:** 'Staff will want to know how the aspirations which will come through in the DNA will be satisfied. Many will be willing to continuously improve but will be thwarted by the lack of adequate training courses/ materials/ availability so providing solutions to training needs with this kit will be very helpful'.
- **Demonstrating the benefits:** 'I do not think it will be sufficient to tell people that they will have to do it because the HSE Board wants it.' Benefits were recognised in economies of scale and a more diverse range of solutions. Comments included: 'As training seems to be led by what courses are available rather than being based on necessarily what is required, the arrangement of good, low cost training, perhaps county-wide, in respect of the development needs identified was seen to have potential'. Another perspective was agreement with the principle there was need for consistent application coupled with a range of traditional training courses but mentoring and coaching was felt to have been undervalued so needs to be added to the traditional CPD mix.

Annex 1: Project Overview

Aim: The project was commissioned to improve the approach of the regulators of health and safety (ie the LAs and HSE) to specifying, ensuring and maintaining consistent and professional standards of competence of regulatory staff in line with business need, efficiently and effectively

Objectives: Key objectives of the project are:

- i. putting in place a process, tools and supporting procedures and materials to encourage, and better enable, staff and their managers to identify and address development needs against a consistent standard and supporting structure;
- ii. promoting and demonstrating a consistent approach to regulation across HSE Directorates, and across HSE and LAs, by identifying a core regulatory framework of competencies which apply to all regulators;
- iii. getting more from the investment HSE and LAs make in training and development activities by targeting and prioritising it more effectively, delivering it more efficiently, and making best use of it by ensuring it is consolidated and a CPD approach is adopted to promote and help achieve continuous learning (eg beyond early years training).

Outputs: To help achieve these objectives, project outputs will include:

- i. a web based Development Needs Analysis (DNA) tool to support individual development needs identification against agreed benchmarks,
- ii. as part of the above, the identification of:
 - a common regulatory competency framework applying to all frontline regulators across OG and LAs,
 - trialled and piloted tools and materials for staff and managers to support the project's objectives, the introduction of learning logs to encourage reflective practice as part of continuous development, review of training provision and materials in line with analysis of needs, and the processes, procedures and guidance required to embed and maintain a strengthened approach to CPD, training needs analysis and training and development planning.

Outcomes and Benefits Summary: Expected outcomes and benefits include:

- i. an improved process for identifying T&D needs in line with business priorities and individuals' aspirations for progression (managed appropriately) – resulting in better planning and more relevant and timely provision, and in greater benefits and value from the investment we make in development;
- ii. more consistent standards of regulation across HSE, clarified expectations and assurance to staff about what is expected;
- iii. a cultural shift towards staff and managers placing more importance on, and taking greater control of their (and their teams') on-going development;
- iv. assurance that competence is maintained in line with business need, and that (at organisational level) professionalism via a competence based approach can be demonstrated externally; and
- v. assurance and demonstration of consistency in support of better regulation objectives, supporting arrangements for S18 compliance, and interchange between HSE and LA inspectors.

Beneficiaries will include:

Staff:

- As well as providing a mechanism by which their professional competence can be demonstrated, a well designed and utilised competence framework provides clear expectations, a mechanism for staff to self-check against these and understand their own development needs and for their managers to validate this analysis.
- The provision of tools and techniques to help staff to identify, address, plan for, monitor, consolidate and get the most learning from development activities will be of huge benefit to them personally, as well as to the business.
- See benefits to managers below – these will have a positive benefit to staff.

Managers:

- A clearer picture of specific skills or knowledge gaps captured through individual development needs identification, based on clearer standards and expectations, and a more structured approach to development planning, will enable managers to be smarter about how to address development needs – eg though supported work allocation, JVs, shadowing, guidance and coaching, (as opposed to a default blanket approach of a standard (and sometimes ill-fitting) formal course.
- The greater clarity provided by the approach will also help managers to manage team competence/capacity issues, link development planning and prioritising with work planning, and manage authorisation.
- The approach will be re-enforced by the development tools which will offer an opportunity to better align and tailor L&D provision with and to specific needs, and to overcome any tendencies for L&D to be determined by individuals' preference rather than business need.
- It will provide managers with the means to support a more robust development planning process, reducing any mismatch between supply and demand (as top down provision is based on bottom up planning), which in turn will increase timely provision of relevant L&D.

The Organisations/Regulator

Organisationally, there are several benefits, including:

- business strategic and risk management benefits in having assurance that staff are skilled and supported to carry out their roles effectively, and developed to support a learning organisation;
- reputational benefits in being able to demonstrate a competence standard which is consistent across the thematic regulator (and recognisably similar to those of other regulators); and
- financial benefits in getting more bangs from our T&D investment buck (ie – efficiency gains from an enhanced ability to deliver exactly what is needed when it is needed, no more and no less, and from consistency offering greater opportunities to share resources. A more diverse range of better planned, targeted, prioritised, and consolidated development activities will benefit in both efficiency and effectiveness terms).