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Health and Safety Executive Administrative Burdens Measurement Exercise

Final report

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Preface

Purpose of the report

The primary purpose of this report is to communicate the results of the Administrative Burdens Measurement Exercise (ABME) for the Health and Safety Executive (HSE). The ABME forms part of the Government's wider Administrative Burdens Reductions Project (ABRP).

The report presents the administrative costs for the regulation in scope for HSE; it explains how the measurement was carried out, any variations in the planned implementation approach and how these were handled. 'It provides a primary level of analysis of the administrative costs measured for HSE.'

As part of the reporting for the ABME standard text has been agreed and used within this report.

Use of findings in the report

The results of the ABME offer HSE the opportunity to identify how changes to its regulations or the way in which it implements them in the future can help to reduce the cost to business of understanding and complying with them, 'and the time taken by enforcement officers to enforce them. It aims to provide those involved in regulating or enforcing regulation with the ability to:

- understand the scale of the administrative costs imposed by regulation on an indicative (rather than statistically robust) basis;
- identify opportunities to reduce the overall level of the costs;
- monitor future progress in reducing the costs and conduct international benchmarking of the costs in the UK;
- integrate better regulation practices into policy making to help create culture change across government; and
- improve relationships and dialogue between those who regulate and those who are regulated.

The overall aim of the ABRP is to bring about culture change across government in the way policy is made as part of the broader better regulation agenda. The results of the ABME offer data to inform this process.

Governance of the ABME

Overall responsibility for initiating and coordinating the ABME has rested with the BRE within the Cabinet Office. The BRE's project team has been responsible for coordinating the work across departments, including the development and consistent application of the Standard Cost model (SCM). The overall management and direction of the project has been through a Project Board chaired by BRE with

representation from a number of departments¹. Departments have been responsible for the provision of information relating to the regulations in scope, the validation and sign off of data and the sign off of their respective reports. The departments' ability to challenge the validity or accuracy of the cost data was limited by the need to maintain the confidentiality of businesses. A consortium led by PricewaterhouseCoopers (PwC) and including legal experts from DLA Piper and Landwell has been responsible for implementing the project supported by the BRE and HSE.

The nature of the results

Qualities of the estimates

The measurement has been carried out in accordance with the framework and methodology set out in the SCM.

The estimates of administrative costs contained in this report are indicative and are not statistically representative. The SCM measurement adopts a pragmatic approach to provide a reasonably consistent estimate of the administrative costs on business arising from regulation.

The estimates are of administrative costs of which administrative burdens are a part. The costs of some activities that business, charities and the voluntary sector would carry out regardless of regulatory requirements (business as usual costs) may be included. Equally some costs that may be regarded as associated with the underlying policy aim rather than being purely administrative may be included. Conversely, the costs of other administrative tasks, for example requirements that come from case law, are not included as they do not fit the SCM framework which is based on information obligations arising out of regulations. Looking forward, if the Government is to ensure that effort is focused on areas that business will feel the most benefit from, it will need to consider how to take into account business as usual costs in setting targets based on the estimates generated using the SCM.

Table conventions

The tables in this report include both monetary amounts and percentages. Where numbers have been rounded, a consistent method has been used. Figures have been rounded as follows:

- All percentages as whole numbers, rounded to no decimal places (e.g. 70.4% is rounded to 70% and 70.5% is rounded to 71%).
- All financial figures are expressed in millions, to one decimal place (e.g. £13.55m is rounded to £13.6m and £13.54m is rounded to £13.5m), except for the Median, Minimum and Maximum which are expressed in thousands, with no decimal places.

Due to the rounding of numbers and percentages, not all of the tables presented in this report will add up to the total shown or 100%.

A dash in the tables indicates that a percentage cannot be evaluated.

A common set of tables have been prepared for all of the reports to which the ABME applied. In some cases, the tables included show zero values as the table content does not apply to the report in question.

Report structure

This report for HSE sets out the background and objectives of the project, including the key areas of HSE's regulation affecting the private sector, the approach and methodology used to assess the administrative costs associated with regulation, quantitative and qualitative administrative cost results for HSE and resulting conclusions.

¹ The departments and Non-Departmental Public Bodies represented on the Project Board are the Department for Trade and Industry, the Department for Transport, the Department for the Environment, Food and Rural Affairs, the Department for Communities and Local Government, the Health and Safety Executive, HM Treasury and the Cabinet Office.

The report has been prepared by PwC using a common framework and guidance developed jointly with BRE and departments. The reports share the same structure and therefore this report includes generic text which has been agreed by the Project Board chaired by BRE. The report has been signed off by departments and agreed by the BRE.

An Executive Summary is included at Section 1 which provides an overview of the whole report – repeating key points and main findings. The main body of the report commences at Section 2.

In addition to the main body of the report, a set of annexed tables provide more detailed results.

The measurement work reflected in this report was based on a snapshot of the administrative costs imposed by regulation as at May 2005. Since then, notably in May 2006, a number of changes have been made to the allocation of policy responsibilities across a number of government departments which affect departmental ownership of regulations. These changes have not been reflected in the reports but they will be reflected in departmental simplification plans.

1 Executive summary

1.1 Introduction

The Administrative Burdens Measurement Exercise (ABME) was launched by the Government in response to the Better Regulation Task Force's report, 'Regulation: Less is More' as part of the Chancellor of the Exchequer's Better Regulation Action Plan (BRAP). The aim of the ABME is to estimate the administrative costs incurred by the private sector² as a result of all regulations imposed by central government.

The project has covered all regulations in force as of May 2005 and has involved 16 government departments and their agencies including the Health and Safety Executive (HSE). A parallel project has considered the administrative costs which arise from HM Revenue & Customs' operation of the fiscal system.

The measurement work reflected in this report was based on a snapshot of the administrative costs imposed by regulation as at May 2005. Since then, notably in May 2006, a number of changes have been made to the allocation of policy responsibilities across a number of government departments which affect departmental ownership of regulations. These changes have not been reflected in the reports but they will be reflected in departmental simplification plans.

The focus of the work has been on measuring the administrative costs of regulation rather than the compliance or policy costs. These are defined as "the [recurring] costs of administrative activities that businesses are required to conduct in order to comply with the information obligations that are imposed through central government regulation³."

It is anticipated that the results of the ABME will inform the process of setting and agreeing departmental targets for year-on-year net reductions in administrative costs and burdens. In this way, the project is expected to drive improvements in productivity and, hence, economic performance. Following the Chancellor of the Exchequer's Budget in March 2006, the department is expected to prepare a detailed plan for realising such targets, as well as a more general Simplification Plan.

The Better Regulation Executive (BRE) within the Cabinet Office co-ordinated the initiative to ensure consistency across departments. Each department has been responsible for the provision of information relating to its own regulations in scope, the validation and sign off of data and the sign off of their respective reports. A consortium led by PricewaterhouseCoopers (PwC) and including legal experts from DLA Piper and Landwell has led the implementation of the project supported by the BRE and HSE.

1.2 Approach and methodology

The ABME has been based on the application of the Standard Cost Model (SCM). This provides a simplified but consistent framework for estimating the administrative costs imposed on business by central government regulation. The SCM was initially developed in the Netherlands and has also been extensively applied in Denmark.

² The private sector includes all businesses, charities and voluntary organisations.

³ Definition from the SCM Manual S3.1.4, page 15

The ABME was implemented between September 2005 and May 2006 in three phases:

- Phase 1 – Preparatory analysis: this primarily involved identifying and agreeing the regulations within the scope of the project and then breaking down these regulations into their constituent parts such that the information and data that businesses are required to provide to government were identified and classified.
- Phase 2 – Time and cost data capture and standardisation: this was concerned with collecting the data needed to calculate the total administrative costs which result from each of the requirements identified in Phase 1, including the number of organisations required to comply and unit costs per organisation. The data were collected, reviewed and assessed on a continuing basis to ensure they were credible and representative of the ‘normally efficient business’.
- Phase 3 – Calculation, data submission and reporting: this focused on processing the data collected and producing this report on the administrative costs imposed by regulations on business.

1.3 Properties of the cost estimates

The estimates of administrative costs included in this report are based on the application of the SCM which is designed to produce consistent estimates and so enable measurements to be compared and targets for reductions to be set across government. The SCM relies on deriving estimates of the standard cost of meeting each information obligation/data requirement (IO/DR) within a regulation for a ‘normally efficient business’. Given the need to manage the overall costs of data collection while providing information about a very large number of information obligations/data requirements (IO/DRs), the SCM relies on the input of a very limited number of experts and/or businesses regardless of the number of businesses affected by each IO/DR. As such, it does not produce a statistically representative measurement of costs: instead, it is a pragmatic approach to measurement that gives indicative estimates of the magnitude of costs. These estimates provide a starting point for setting reduction targets and highlighting the areas to focus upon. Moreover, the nature of the estimation process means that the greater the level of disaggregation of the cost estimates, the greater the potential margins of error surrounding the cost estimate. Nonetheless, experience from Denmark and the Netherlands demonstrates that using SCM-based estimates of administrative costs can provide a useful framework within which to focus efforts to reduce burdens.

In interpreting the results of the application of the SCM, it is important to recognise that the SCM provides an estimate of administrative costs of which administrative burdens are a part. The costs of some activities that business, charities and the voluntary sector would carry out regardless of regulatory requirements (business as usual costs) may be included. Equally some costs that may be regarded as associated with the underlying policy aim rather than being purely administrative may be included. Conversely, the costs of other administrative tasks, for example requirements that come from case law, are not included as they do not fit the SCM framework which is based on information obligations arising out of regulations. Looking forward, if the Government is to ensure that effort is focused on areas that business will feel the most benefit from, it will need to consider how to take into account business as usual costs in setting targets based on the estimates generated using the SCM.

1.4 Key regulatory areas in scope

HSE legislation applies to all businesses in the UK. In total, HSE has 111 regulations within the scope of the ABME. Some of these apply specifically to specialised industrial activities where health and safety (H&S) risks are higher, while other regulations establish generic obligations which apply to all business activities.

The ABME only relates to those regulations where information obligations have been identified. It should be noted that HSE and local authorities are also responsible for enforcing other regulations which do not have associated information obligations (as defined for the purposes of this measurement project). As these regulations do not have any information obligations associated with them, they are not considered in the ABME.

1.5 Implementation variations

In the implementation of the ABME for HSE, there were three significant variations as outlined below.

First, there were some challenges in collecting population data relevant to HSE's legislation. These included the fact that:

- some IO/DRs only apply to certain businesses depending on a very specific set of circumstances; and
- the frequency with which a particular IO/DR must be satisfied is often contingent and triggered by a specific set of circumstances, rather than being periodic (e.g. annual, monthly, etc.).
- there are difficulties in estimating populations for third party obligations, as these obligations do not involve a direct interaction with HSE.

For these reasons, important assumptions were required when compiling population estimates; where no population data were available, population 'bandings' were applied as appropriate in discussion with HSE.

Second, some IO/DRs affect only small populations. For example, under the Nuclear Installations Act 1965, prospective operators are required to secure a nuclear site licence before operating a nuclear facility. There have been no recent applications for a site licence for a new nuclear facility although some of the existing licenses have been varied or renewed to reflect changes in licensees' organisations or in the sites' area or operations. In addition there is an ongoing communication between HSE and the nuclear site licensees concerning their compliance with terms of each nuclear site licence currently in force, and this interfacing necessarily entails administrative costs to the industry. These costs will vary dramatically depending on the size and type of installation and the activities being undertaken on the site. It was not possible to quantify the totality of these costs, but for the purpose of this exercise the views of an industry Expert Panellist were drawn on to provide an estimate of the administrative burden of preparing a single license application. However, given the scope for variation, this cannot be extrapolated to the costs of licensing other sites, nor is it necessarily indicative of the annual administrative costs associated with licence compliance.

Finally, due to the potentially large variation in administrative costs incurred by businesses in complying with particular regulations and IO/DRs, a non-standard segmentation was developed to address the potentially large impact of this issue in the case of the Management of Health & Safety at Work Regulations 1999, which apply to all businesses, but where very different administrative costs are experienced by different-sized businesses operating in different industry sectors. This non-standard segmentation essentially involved targeting interviews at samples of businesses operating within the categories of 'high', 'medium' and 'low' health and safety risk environments. This allowed the business activity (which is the main driver of the cost associated with Risk Assessment activity) to be taken into account, as well as the size of the business, which in this case has less of an impact on the level of the risk assessment-related costs experienced.

1.6 Overall results

The total administrative cost for HSE is estimated at £2.87 billion.

Of this cost, 45% (approximately £1.3bn) is estimated to derive from two regulations: the Management of Health & Safety at Work Regulations 1999 and the Gas Safety (Installation and Use) Regulations 1998. In addition, the results of this exercise suggest that the top eleven regulations drive over 80% of the total estimated administrative cost on business. Higher-cost HSE regulations are mainly driven by population size rather than by a high unit cost (i.e. these regulations are associated with higher costs more because they apply to a large population rather than because the cost of meeting the individual obligations is high).

The key types of obligations identified as being associated with higher administrative costs include:

- keeping records (70% of administrative costs identified);

- providing statutory information for third parties (19% of total administrative costs), and statutory labelling for third parties (a further 2% of administrative costs identified); and
- updating emergency plans and programs (4% of administrative costs identified) and notification of activities (2% of administrative costs identified).

The majority of the administrative costs imposed on businesses as a result of H&S legislation relate to the following generic categories of requirements:

- requirements to **assess H&S risks** to employees, those not directly employed by the enterprise (e.g. contractors) and members of the public, to record significant findings and to put in place measures to control identified risks;
- **maintaining records** to demonstrate that various H&S obligations are being discharged.
- obligations to **make information concerning H&S risks available** to all those who may require this information to manage those risks appropriately; and
- applications to the HSE for **permission to undertake high-risk or hazardous activities**.

The obligation to make information concerning H&S risks available to all those who may require it includes third parties (e.g. members of the public), and costs associated with these types of obligation form a substantial part of overall H&S-related administrative costs.

1.7 Conclusions

Interpreting the costs

In interpreting the implications of the ABME it is important to understand the extent to which the costs which have been measured within the context of the ABME represent genuine administrative burdens.

Firstly, consideration needs to be given to the extent to which the activities that businesses are required to undertake in order to meet a particular IO/DR are activities which they would not otherwise perform (i.e. they are a burden).

Secondly, it is important to understand whether or not any of the administrative costs which have been measured also reflect 'policy' costs - that is costs which a business incurs in order to enable it to achieve the objectives of the regulation.

Although both of these issues have a bearing on the extent to which the costs measured by the ABME should be regarded as administrative burdens which government might seek to reduce, it is nonetheless possible to examine the implications of the ABME for the focus of future efforts to reduce costs.

Focusing simplification efforts

One of the key conclusions that emerge from the ABME is that the estimated administrative costs are concentrated in a relatively small number of regulations. Specifically, 11 out of the 111 HSE regulations included within the scope of the ABME drive over 80% of the estimated total cost. These 11 regulations are, therefore, likely to warrant close examination in the context of ongoing simplification efforts.

Options for reducing costs - implications of the ABME

Against this background, a generic framework within which to identify and consider possible options to reduce annual administrative costs can be identified. Essentially, administrative costs could theoretically be reduced by reducing the unit cost of meeting an IO/DR, and/or reducing the number of times each year that an activity needs to be performed, either by restricting the number of businesses which are subject to a particular obligation or by reducing the frequency with which the obligation is required to be met.

The ABME has highlighted a number of issues related to reducing the average unit cost of administration,

which may need to be considered in any attempts to reduce administrative costs:

- There are a small number of areas where the unit administrative costs of complying with a particular requirement are comparatively high;
- The need to keep records updated as businesses change drives 70% of the estimated administrative costs identified by the ABME;
- Provision of statutory information to third parties accounts for nearly one fifth of the estimated total administrative costs;
- The ABME has shown the importance of external costs: approximately 27% (£780m) of the estimated administrative costs are accounted for by the market in outsourced service providers; and,
- Qualitative comments collected in the course of the project suggest that smaller businesses bear a disproportionate share of the cost.

Can the number of businesses affected by regulations (or by specific requirements within those regulations) be reduced?

The largest overall administrative costs facing business as a whole tend to be associated with those regulations which apply to large populations, suggesting that a key issue for HSE to consider is the extent to which the number of businesses affected by a particular IO/DR could be reduced.

Can the frequency with which an organisation is required to meet an obligation be reduced?

Administrative costs may also be reduced by changing the frequency with which an IO/DR needs to be met, e.g. the frequency with which an organisation is required to fulfil an IO/DR could potentially be reduced on the basis of an assessment of work activity risk.

Looking forward, each of the generic measures outlined above will need to be examined carefully to understand the implications on both administrative costs and policy outcomes. The key challenge for HSE, therefore, is to draw on the results of the ABME as set out in this report to identify those areas where simplification activities could deliver the most substantial savings in terms of the administrative costs incurred by businesses affected by H&S regulations, whilst at the same time maintaining and improving levels of worker protection.

2 Introduction

This report describes the work which has been undertaken in relation to the Health and Safety Executive (HSE) as part of the Administrative Burdens Measurement Exercise (ABME) which forms part of the Government's Administrative Burdens Reductions Project (ABRP).

This introductory Section is divided into three further parts:

- An explanation of the general background and objectives of the ABME and its relationship to both the ABRP and the Government's Better Regulation Action Plan (BRAP) followed by a description of the scope of the exercise, the timetable for the work and the roles and responsibilities of those involved in its delivery. A list of definitions is included within the glossary attached to the report.
- An overview of the regulations for which HSE is responsible and which have been covered by the ABME.
- A summary explanation of the approach and methodology which have been adopted.

2.1 Background

In March 2005, the report by the Better Regulation Task Force (BRTF), 'Regulation: Less is More', recommended that the Government should follow the example of the Dutch Government and use the Standard Cost Model (SCM) to measure the administrative costs caused by regulation and then to set targets for their reduction, focusing in particular on the burden.

This recommendation was readily accepted by the Government and, in May 2005, the Chancellor of the Exchequer launched the Government's Better Regulation Action Plan which included a commitment to undertake the measurement exercise. Subsequently, two related projects were launched:

- one project, led and coordinated by the Better Regulation Executive (BRE), which sits within the Cabinet Office, has assessed the administrative costs arising from the information obligations/data requirements (IO/DRs) associated with the regulations of 16 government departments; and
- a parallel project, led by HM Revenue & Customs (HMRC), has assessed the administrative costs associated with the UK fiscal system, with a particular emphasis on understanding the impact on small firms.

2.1.1 Objectives

The ABME is of strategic importance. Government ministers have stressed the potential contribution that reductions in the burden of administration can make to reducing unnecessary costs facing the private sector and so driving improvements in productivity and, hence, economic performance. HSE sees the identification and measurement of administrative costs as a necessary prelude to, and driver for, regulatory simplification, a broad term encompassing activities from consolidation and codification of regulations to simplification of guidance. The ABME offers HSE the opportunity to identify how changes to its regulations or the way in which it implements them in the future can help to reduce the cost to business of understanding and complying with them, and the time taken by enforcement officers to enforce them. If compliance rates can be increased at the same time as a result, this will deliver

improved policy benefits, for example in terms of greater worker protection. Reflecting this, the ABME aims to provide those involved in regulating or enforcing regulation with the ability to:

- understand the scale of the administrative costs imposed by regulation on an indicative (rather than statistically robust) basis;
- identify opportunities to reduce the overall level of the costs;
- monitor future progress in reducing the costs and conduct international benchmarking of the costs in the UK;
- integrate better regulation practices into policy making to help create culture change across government; and
- improve relationships and dialogue between those who regulate and those who are regulated.

Experience from both the Netherlands and Denmark suggests that there is considerable benefit in conducting a measurement exercise even before considering a burdens reduction programme. Identifying and understanding where costs stem from and areas where the costs are particularly high allows departments to adopt a more strategic approach to regulatory reform.

2.1.2 Scope and timescale

The scope of the ABME is wide. It seeks to assess the administrative costs (as opposed to the policy/compliance costs⁴) imposed on all parts of the private sector. This is taken to comprise businesses, charities and voluntary organisations⁵. The total administrative costs are calculated as the sum of the time-related costs plus the expenses incurred in procuring the necessary external goods and services.

The ABME covers all regulations in force as of May 2005 and extends to cover all Whitehall departments and their related agencies and Non-Departmental Public Bodies (NDPBs). The exceptions are the Ministry of Defence, the Foreign & Commonwealth Office, the Department for International Development and the Cabinet Office: these departments have no regulations which fall within the scope of the ABME.

The measurement work reflected in this report was based on a snapshot of the administrative costs imposed by regulation as at May 2005. Since then, notably in May 2006, a number of changes have been made to the allocation of policy responsibilities across a number of government departments which affect departmental ownership of regulations. These changes have not been reflected in the reports but they will be reflected in departmental simplification plans.

Work on the ABME has been undertaken between September 2005 and May 2006.

2.1.3 Roles and responsibilities

Overall responsibility for initiating and coordinating the ABME has rested with the BRE within the Cabinet Office. The BRE's project team has been responsible for coordinating the work across departments, including the development and consistent application of the SCM. The overall management and direction of the project has been through a Project Board chaired by BRE with representation from a number of departments. Departments have been responsible for the provision of information relating to the regulations in scope, the validation and sign-off of data and the sign-off of their respective reports.

A consortium led by PricewaterhouseCoopers (PwC) and including legal experts from DLA Piper and Landwell has been responsible for implementing the project supported by the BRE and HSE.

⁴ This was not possible for many of HSE's measurements. In many instances, it was difficult to distinguish between the administrative costs and the policy costs (costs that are associated with the desired policy outcome) therefore policy costs were also included in the measurements.

⁵ This is based on the definition of the private sector used by the Office for National Statistics for national accounts purposes.

For the duration of the project, HSE established a Reference Group to deliver these responsibilities. The group comprised officials from HSE as well as the BRE and PwC. The role of the Group has been to ensure that the work undertaken is consistent with the methodology implied by the SCM and that key decisions are recorded.

In addition, HSE created a Monitoring Group to review progress at key stages of the project. The Group comprised officials from the department, a member of the BRE's Administrative Burdens Reduction Team, several representatives from the private sector, a trade union representative and a representative of PwC.

The report has been prepared by PwC using a common framework and guidance developed jointly with BRE and departments. The reports share the same structure and therefore this report includes generic text which has been agreed by the Project Board chaired by BRE. The report has been signed off by departments and agreed with the BRE.

2.2 Overview of regulation affecting the private sector

This Section provides an overview of the regulations for which HSE is responsible and which have been covered by the ABME.

2.2.1 Scope and objectives of the department

The Health and Safety Commission (HSC) and its Executive (HSE) is a non-departmental body (a regulator) with specific statutory functions in relation to health and safety (H&S) established by the Health and Safety at Work etc Act 1974 (HSWA). The Department for Work and Pensions (DWP) sponsors HSC/E and it is ultimately accountable to the Parliamentary Under Secretary (for Work and Pensions), Lord Hunt of Kings Heath OBE.

HSC is responsible for securing the health, safety and welfare of workers and others affected by work activity. The Commission is a tripartite body comprising a Chair and nine other members nominated by employers, employees, local authorities and other organisations with interests in occupational H&S. HSC's duties include proposing new laws and standards, and providing information and advice.

2.2.2 Departmental activities

HSE advises and assists HSC in its functions to ensure that risks to people's H&S from work activities are properly controlled. It has day-to-day responsibility for:

- licensing and approving standards in particularly hazardous areas; and
- commissioning research.

In addition, working with local authorities to:

- enforcing H&S law;
- investigating accidents.

2.2.3 Related agencies and NDPBs

Certain H&S legislation in the UK is enforced by local authorities. HSE also works closely with the Environment Agency in certain instances, mostly where complex industrial installations associated with significant health, safety and environmental risks are concerned (for example: in their role as joint competent authority under major industrial accident hazard legislation.)

2.2.4 Key regulatory areas in scope

Full listings of regulations in scope are included in the tables contained in Annex A. The table below

provides an overview of HSE policy areas⁶. All businesses are subject to some form of H&S legislation (the business activities listed in the second column of the table below are the categories used by the Office of National Statistics (ONS)).

This report only relates to regulations where information obligations have been identified. It should be noted that HSE and local authorities are also responsible for enforcing other regulations which do not have associated information obligations (as defined for the purposes of this measurement project). As these regulations do not have any information obligations associated with them, they are not considered in the measurement phase of the exercise.

Table 1: Key Regulatory Areas in Scope

Policy area	Type of businesses affected
<ul style="list-style-type: none"> • Agriculture • Asbestos • Chemicals/substances • Construction • Cross industry topic-specific • Diving • Docks and harbours • Employee consultation • Explosives • GMO • H&S management • Major hazards • Mines and quarries • Nuclear • Offshore • Oil and gas • Pesticides • Pipelines • Railways • Zoos 	<ul style="list-style-type: none"> • Agriculture • Production • Construction • Motor trades • Wholesale • Retail • Hotels & catering • Transport • Post & telecom • Finance • Property & business services • Education • Health • Public admin & other services

Summary statistics relating to the regulations included within the scope of the measurement exercise can be found in Table 2 below.

⁶ These policy areas were used to facilitate the mapping and measurement of information obligations for the purposes of the measurement exercise, and should not be considered an official HSE categorisation of regulatory areas.

Table 2: Number of regulations and information obligation/data requirements

	Number of regulations (Including Approved Codes of Practice*)	Number of information obligation/data requirements (IO/DRs)
Agriculture	1	5
Asbestos	5	60
Chemicals/substances	4	56
Construction	4	37
Cross industry topic-specific	30	315
Diving	1	9
Docks and Harbours	3	52
Employee consultation	3	7
Explosives	3	19
GMO	1	33
H&S management	4	46
Major Hazards	2	32
Mines and Quarries	24	241
Nuclear	3	60
Offshore	7	77
Oil and Gas	7	53
Pesticides	2	43
Pipelines	2	18
Railways	4	35
Zoos	1	10
HSE Total	111	1,208

Footnote: Although ACoPs are not to be considered formal legislation, in the context of H&S regulation they do have a quasi-legal status in that their recommendations on how to achieve compliance with a particular regulation may be taken into account by the HSE when assessing compliance status during inspections. Compliance with the recommendations contained within an ACoP may also be an area of focus during legal proceedings. Consequently, many operators will base their compliance arrangements on the ACoP (and the IOs contained within), rather than directly on the regulatory text itself, although only the Regulation itself has formal legal status. In order to fully represent H&S-related requirements on business, ACoPs therefore also needed to be considered in the legal mapping phase of the project, due to the fact that in practice, business tends to base compliance arrangements on ACoPs, as well as on formal legislation.

2.2.5 Key linkages with other departments

During the mapping exercise, HSE identified one regulation that was owned by another department but where it had an interest. Although the Nuclear Installations Act 1965 is owned by the Department of Trade and Industry (DTI), Sections 3, 4 and 5 of the Act which relate to the granting of licenses, attachment of condition to licenses and revocation and surrender of licenses are the responsibility of HSE. HSE and DTI agreed that the administrative costs of these sections should be measured by HSE and be included in the HSE report.

In addition, HSE indicated that although it was responsible for rail safety regulations as at May 2005, responsibility would be transferred from HSE to the Office of Rail Regulation, which is overseen by DfT. It was, therefore, agreed that the related administrative costs would be included in HSE's report.

2.2.6 Origin of regulations

Table 3 describes the origin of the departmental regulations agreed to be in scope at IO/DR level according to the classification scheme outlined in the SCM Manual. There are three categories described as follows:

- Category A – obligations that are exclusively and completely a consequence of EU rules or other international obligations (i.e. the international rules describe which information businesses have to produce);
- Category B – obligations that are a consequence of EU rules and other international obligations where the purpose has been formulated in the international rules but where implementation has been left to individual Member States (i.e. the international rules requirement does not describe which information businesses have to produce); and
- Category C – obligations that are exclusively a consequence of rules formulated at national level.

The significance of the classification by origin lies in its implications for how far the department can influence directly the administrative costs and burden, especially in the short term.

Although a substantial proportion of H&S legislation in force in the UK was developed domestically, some of the more recent H&S legislation implemented in the UK has originated at EU level. In most cases, it has been transposed into domestic legislation via Statutory Instruments (SIs).

Fuller details of the classification and categories can be found in Section 3.6.

Table 3: Number of information obligation/data requirements by origin

		International, no domestic discretion (A)	International, domestic discretion (B)	Domestic (C)	Total IO/DRs
	Number of regulations*	Number of IO/DRs	Number of IO/DRs	Number of IO/DRs	
HSE Total	111	260	193	756	1,209

Footnote: The table shows the number of IO/DRs which have been measured as part of the project. In the vast majority of cases each IO has a corresponding DR which is unique: however, in a small number of cases, an IO has more than one DR each of which has been measured separately.

2.2.7 Description of the characteristics of the regulated organisations

All enterprises operating in the UK⁷ – from large organisations to sole traders, regardless of business activity - are subject to H&S legislation.

Business activity is the primary factor determining the precise set of legislative requirements which apply to a particular enterprise. The range and complexity of the H&S legislation applicable to a particular business generally varies according to the severity of the potential H&S risks involved in that particular activity – i.e. high risk activities such as offshore oil and gas exploration are generally subject to more complex, legislative requirements than comparatively lower risk activities such as office-based enterprises. Enterprise size and scale also influence the way in which H&S legislation applies to a business, for example although risk assessments are required to be carried out in all businesses under the Management of Health and Safety at Work Regulations 1999, it is not necessary to document the significant findings of these risk assessments in businesses with less than five staff.

In summary, it is the very precise characteristics of a business which determines the regulatory

⁷ It is important to note that enterprises operating in Northern Ireland are subject to separate legislation and have their own regulator equivalent to the HSE.

framework within which a business operates.

The following figure illustrates the numbers and activities of the UK-based enterprises which are subject to H&S legislation⁸.

Figure 1: United Kingdom - Number of Local Units in VAT-based Enterprises in all Industries in 2005

Agriculture	Production	Construction	Motor trades	Wholesale	Retail	Hotels & catering	Transport
138,850	159,850	198,125	78,410	125,235	279,265	152,455	74,305
Post & telecom	Finance	Property & business services	Education	Health	Public admin & other services	TOTAL	
22,490	35,180	533,010	47,560	37,215	185,620	2,067,580	

Source: Office for National Statistics - UK Business; Activity, Size and Location – 2005¹, Table A1.1

2.3 Overall approach and methodology

This Section of the report summarises the activities carried out across the project in each of the three main phases of the ABME to apply the SCM:

- Phase 1 – Preparatory analysis;
- Phase 2 – Time and cost data capture and standardisation; and
- Phase 3 – Calculation, data submission and reporting.

A more detailed description of the steps undertaken can be found in the Technical Summary paper accompanying this report.

At the end of the Section, the bespoke project management information system, ABR.net used during the project is described and any methodological variations adopted by HSE are set out.

2.3.1 Phase 1 – Preparatory analysis

Phase 1 primarily involved identifying and agreeing the regulations that affect the private sector and were within the scope of the ABME, breaking down the regulations ('mapping') into their constituent parts, categorisation of the information obligations (IOs) and data requirements (DRs) and broad identification of the sectors affected by each of the IO/DRs.

Identification of regulations in scope

For the purpose of the ABME, a **regulation** was defined as "a rule with which failure to comply would result in a business coming into conflict with the law or being ineligible for continued funding, grants and other applied for schemes"⁹. In effect, this definition covered all measures with legal force imposed by central government and other schemes operated by central government.

During September 2005, HSE submitted a list of regulations to be used as the basis of the ABME. Validation and consistency checks were performed by the BRE and PwC to ensure that the list did not include:

- duplications (a regulation appearing on the list more than once);

⁸ NB – this table also includes (a comparatively small proportion of) enterprises which are based in Northern Ireland.

⁹ A full definition of inclusions and exclusions within a regulation is defined in the Standard Cost Manual

- truncations (a single entry on the list, e.g. “One Act and 11 Statutory Instruments” when it should appear as 12 individual entries);
- omissions (regulations expected to be in scope and not on the list);
- mis-named or inappropriate regulations (e.g. the “Horse-Drawn Omnibus By-Laws”); and
- demarcation issues (regulations where the IO/DRs might fall under the ambit of more than one department).

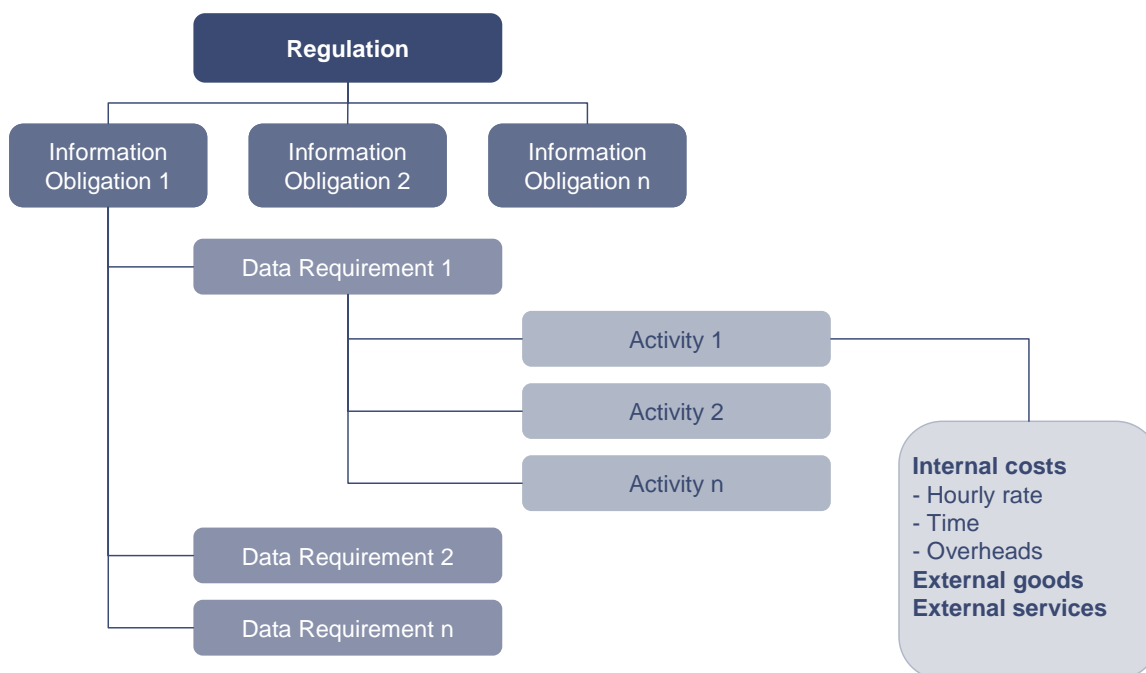
The list of regulations in scope was agreed in mid-October 2005. A full list of the regulations is provided in the spreadsheets accompanying this report.

Mapping the regulations

The SCM provides a way of breaking down a regulation into a range of manageable components the costs of which can be measured. These components are essentially items of information that businesses, as a consequence of regulation, have to collect, retain and/or submit to organisations typically within the public sector.

Each regulation was broken down (‘mapped’) into IOs and DRs (see Figure 2 below):

- An **information obligation** (IO) is a duty to procure or prepare information and subsequently make it available to a public authority or a third party, as well as a duty to facilitate the collection or preparation of information by others, e.g. by permitting and cooperating with an audit, visit or inspection. It includes regular requirements to read guidance and updated rules, for example rules which are updated annually. An IO does not necessarily require information to be sent to a public authority: it may also be directed towards third parties, such as consumers or employees. Each regulation may contain several IOs.
- Each IO consists of a range of different information or data that a business shall provide in order to be able to comply with the IO – these are the **data requirements** (DR). For example, an operator constructing a new offshore installation must submit a Safety Case (the IO) to the HSE in order to gain approval to operate the installation. The Safety Case may contain a wide range of documents and information (DRs). Each IO may contain several DRs.

Figure 2: Breakdown of a regulation

Two legal firms, Landwell and DLA Piper, undertook the legal mapping process. This involved reviewing the regulations to identify IOs and DRs, and associated ancillary data such as frequency (the number of times that a business delivers an information obligation per year) as required by the SCM. As the legal mapping progressed supplementary guidance was developed to ensure that emerging issues that were not answered by the SCM were dealt with consistently across the project.

As each regulation was mapped and reviewed, the relevant data were input into ABR.net¹⁰. Once the legal mapping was complete, the departments reviewed the regulations to validate that relevant IO/DRs had been properly identified.

The PwC mapping team undertook the process mapping which involved:

- developing 'plain English' descriptions of the IO/DRs identified by the legal team, to be used in the Phase 2 fieldwork;
- identifying the IO type largely based on the predetermined list outlined in the SCM:
 - 1 *Returns and reports* – e.g. details of pupil admissions to independent schools;
 - 2 *Applications for permission for or exemption from* – predominantly applications for licences e.g. to sell spirits;
 - 3 *Applications for authorisation* – to carry out certain activities e.g. authorisation as a sewer contractor;
 - 4 *Notification of activities* – e.g. notification to the competent authority of the transportation of a dangerous cargo;
 - 5 *Entry in a register* – e.g. application for entry in the register of trademarks;

¹⁰ A bespoke project management information system used as a repository of all data used in the ABME. See fuller description in S2.3.

- 6 *Carrying out inspections* – the business itself carrying out inspections of machinery and equipment that can represent a risk to health and safety or the environment, or monitoring the conditions for employees;
 - 7 *Applications for subsidies or grants* – e.g. a subsidy for job training;
 - 8 *Keeping commercial emergency plans and programmes updated, etc.*
 - 9 *Cooperating with audits/inspections* – informing and assisting inspectors who carry out inspections of and auditing work for a business, or who visit a business in connection with enforcement of a regulation;
 - 10 *Statutory labelling for third parties* – including labelling products or installations with consumer information, e.g. energy labelling of domestic appliances;
 - 11 *Providing statutory information for third parties* – e.g. a financial prospectus to accompany investment products;
 - 12 *Framing complaints and appeals* – submitting complaints about and (possibly later) appealing against a decision made by the authorities;
 - 13 *Keeping records e.g. records of accidents incurred by staff in the workplace;*
 - 14 *Carrying documentation e.g. cattle passports during transportation of herds;*
 - 15 *Agreeing contracts; and*
 - 16 *Requesting information.*
- grouping the DRs into logical groups suitable for interviews with businesses (see 'Implementation issues arising during Phase 1' below) – this created merged descriptions of an IO with some or all of its constituent DRs (termed IO/DR);
 - categorising the IO/DR content, for example as accounting data or personnel data;
 - identifying the Standard Industry Classification 2003 (SIC) codes that describe the sector(s) affected by the IO/DR to assist in the identification of suitable businesses to interview in Phase 2; and
 - defining the type of person likely to be responsible for complying with the IO/DR (e.g. Managing Director, Head teacher, Farmer): this information was used by the fieldwork team when contacting interviewees in Phase 2.

Departments initially provided information about the origin of each of the regulations on their lists (i.e. EU, international or domestic). It was subsequently determined, in discussion with the BRE, that it would be more appropriate to specify origin at IO/DR level. This analysis was carried out by a team at BRE and later validated with Departments during the process of agreeing datasets with PwC at the end of Phase 2.

Preparation for fieldwork

During Phase 1, the telephone and face-to-face questionnaires to be used in Phase 2 were constructed, programming was undertaken for the call centre systems and other data collection materials (e.g. Expert Panel facilitation procedures) were prepared. The interview guides, which were designed to ensure uniform and consistent data collection, were tested during pilot interviews to ensure suitable results and structured to allow interviewees to answer the questions as fully as possible.

As part of the survey preparation, PwC's International Survey Unit (ISU) built a sample database with the functionality to allow storage of contact details, unique allocation of sample to interview bundles and tracking of contact details through the system. The database was populated with information (name,

address, telephone number) drawn from the Inter Departmental Business Register (IDBR), oneSource, Dunn and Bradstreet and Sample Answers. All data were cleaned to ensure that all records were unique.

Departments submitted requests clearly articulating the rationale, for 'non-standard' segmentation where alternatives to the standard segments were required, (for example, small / micro / medium/ large business size¹¹). Appropriate non-standard segmentation was agreed where there was a prior reason for expecting significant differences in unit costs between different types of organisation. Only a small number of cases for specific segmentation were put forward by departments by the end of Phase 1.

HSE requested that a non-standard segmentation be considered for the Management of Health and Safety at Work Regulations 1999. This was deemed necessary, as business activity rather than size was considered to be the more important driver of administrative costs in this area, and the segmentation therefore needed to reflect the variation in business activity as well as size.

In addition, departments were asked to provide details of the extent to which the use of forms underpinned each IO/DR and whether e-government solutions were available and how extensively they were used with the intention of being able to understand how the estimated administrative costs varied. In the event, only limited data were available systematically across departments and this has restricted the basis for analysis.

Allocation of data collection method

An algorithm was developed which provided the initial basis for determining the data collection method to be used to collect cost data for each IO/DR in Phase 2. The approach involved three stages:

- identification of priority items to be measured through the use of Expert Panels (particularly complex or unusual IO/DRs (i.e. infrequent) and/or where the population of organisations is small);
- identification of items to be measured by telephone or face-to-face interviews; and
- re-assignment of IO/DRs to different methods to bring the proportions measured through each method in line with BRE requirements.

Implementation issues arising during Phase 1

Three key issues arose during Phase 1 that impacted on the planned approach:

- queries regarding the interpretation of IO/DRs arose during the legal mapping: these were largely resolved through the cleansing of the list of regulations and the validation process;
- the piloting of the draft telephone questionnaire clearly indicated that respondents generally found it easier to understand and provide information about their administrative activities in relation to IOs rather than DRs: this highlighted the importance of adopting a business centric approach to data collection during Phase 2 (i.e. one which reflected the business processes involved) and this reinforced the need to define IO/DRs which reflected the organisation of business processes¹²; and
- the piloting of the draft telephone questionnaire also identified that the number of questions needed to be restricted in order to retain the engagement and willingness to participate of interviewees: as a result, the 16 administrative activities identified within the SCM were grouped into seven sets of activities which enabled the interviews to be undertaken within the required timescale.

2.3.2 Phase 2 – Time and cost data capture and standardisation

Phase 2 of the project was concerned with collecting the data needed to calculate the total administrative costs which result from the regulations within the scope of the current exercise. There were three streams of activities during Phase 2:

¹¹ The size bands used are those defined by the Small Business Service

¹² This is also consistent with the experience of applying the SCM in the Netherlands

- collection of unit cost data;
- completion of the identification, or estimation, of 'quantity'; and
- validation of the standard cost and quantity data.

The collection of unit cost data

Application of the SCM involves applying activity based costing to determine the internal and external costs incurred by a 'normally efficient business' within the private sector as they fulfil each IO/DR¹³. This requires a series of calculations to be performed to establish the overall administrative costs for each IO/DR:

Administrative costs (£)	= Internal costs (£) + External costs (£)
Internal costs	= Price (£) x Quantity
	= (Wage rate (£) x Time (hours)) x (Population x Frequency)
External costs	= External services (£) + External goods (£)
External services	= Wage rate (£) x Time (hours)

Data on the time and external costs involved in meeting IO/DRs were collected as the basis for estimating unit costs using three different methods the first two of which seek the views of business stakeholders:

- Business interviews by telephone and face-to-face;
- Expert Panels; and
- Assessment.

1. Business interviews

These were telephone and face-to-face interviews with individuals from organisations in the private, voluntary or charity sectors with direct experience of fulfilling each IO/DR. Interview guides were followed to ensure uniform data collection.

Telephone interview content passed through two phases of review:

- a preparation phase where content unsuitable for telephone interviewing was weeded out and consequently passed to another measurement route. In addition, checks were made on population size and sample availability. Again, where these were inadequate, IO/DRs were passed to another measurement route; and
- an in-field review phase during which areas not achieving interviews were reviewed and corrected as appropriate or were re-routed to other measurement routes.

Both review phases had the effect of reducing the number of IO/DRs which passed through telephone interviewing although further allocation of IO/DRs and recycling through the telephone interview process boosted the total number of interviews actually achieved.

A number of initial challenges with face-to-face interviewing required practical solutions to allow the methodology to progress:

- the inclusion of highly conditional IO/DRs meant that potential interviewees were often unable to cover

¹³ See paragraph on the validation of standard cost and quantity data for an explanation of how this principle has been applied.

all the IO/DRs scheduled to be covered by the interview. Consequently conditional content was removed from the face-to-face interviewing route; and

- the time required to complete face-to-face interviews covering 6 IO/DRs often proved too great with the result that the content was reduced to 4 IO/DRs per interview.

Despite these adjustments, the number of face-to-face interviews completed fell far short of initial projections.

In the final weeks of the project, PwC conducted additional fieldwork to gain greater business input for certain IO/DRs. The results of this work were captured as face-to-face activity as the interviews were conducted following the face-to-face process rather than the scripted telephone survey although the interview itself was often carried out over the telephone (as distinct from the 'main' telephone interview process conducted by the International Survey Unit).

2. Expert Panels

Expert Panels were focus group sessions which brought together experts from both the private and public sector, generally with experience of providing and/or receiving the information associated with fulfilling different IO/DRs. Each Expert Panel typically involved two or more private-sector experts and at least one public servant. In some cases, however, panels proceeded with fewer than two private sector experts and, occasionally, with no public servant present.

Virtual Expert Panels were conducted later in the project by telephone or by e-mail and differed from Expert Panels in that only private sector experts were consulted.

3. Assessment

Assessment was originally envisaged as a means of estimating costs in a limited number of cases where cost data proved difficult to obtain from business. In the circumstances, and as noted above, the business interviews highlighted a significant proportion of cases where there were obstacles to implementing the original approach successfully and efficiently. These arose at two stages: preparing for and undertaking the business interviews. As a result, the use of Assessment was extended in agreement with the BRE and the Project Board as a pragmatic adaptation of the original implementation plan in order to ensure that all IO/DRs were covered earlier in the process of fieldwork. Consequently this meant that more IO/DRs were measured by Assessment than originally envisaged.

Assessment involved the estimation of the time and external costs involved in meeting IO/DRs by PwC staff familiar with the SCM methodology. The estimates were based on an analysis of the IO/DRs, the forms required to fulfil the IO/DRs (where available and appropriate) and the identification of administrative activities. Each Assessment was subject to review where the amount of time required exceeded 3 hours (equivalent to about £50), external goods and services were required and/or the population affected by the IO/DR was expected to be significant (over 50,000). In these instances, the Assessments were reviewed wherever possible by external business experts, PwC industry experts and/or departmental policy officials.

It is important to note, however, that Assessment has been used for those IO/DRs where:

- IO/DRs have encountered difficulties in the preparatory stage of business interviews, for example because of difficulties defining/identifying the affected organisations and limited numbers of potential interviewees;
- IO/DRs have been unsuccessful in the field despite making numerous calls to potential interviewees; and
- IO/DRs have been on the agenda for an Expert Panel but have not been covered, for example because none of the experts was comfortable providing the required data.

In practice, Assessment has largely been used for IO/DRs that are low cost and/or affect a small

population. The proportion of the administrative cost accounted for by measurements done by Assessment for HSE is less than 10 %.

Approach to estimating quantity (population)

The second element in the estimation of total administrative costs was the identification of quantity. Quantity is defined as either the number of businesses impacted by the regulation multiplied by the annual frequency of the activity undertaken to comply with the IO/DR or the annual number of transactions. During the ABME, PwC has worked with departments to identify the quantity per IO/DR. In many cases, it has been necessary to make estimates.

The process used to collect and/or estimate quantity involved:

- Definition of an appropriate information metric for each IO/DR which described the quantity to be identified (i.e. the 'number of...'). These fell into three categories:
 - sector-based e.g. number of companies of a certain type, number of people of a specified profession, number of entities;
 - third parties e.g. number of customers, number of pupils, number of employees; and
 - number of transactions e.g. number of licences, number of applications, number of products sold, number of requests for information, number of inspections.
- Existing quantity/population information provided by departments, statistical information sources from departmental/enforcement agency websites, ONS or other publicly available information were reviewed by PwC to identify available population/quantity data: the collection of readily available information sources with the required information from departments, such as annual reports or internal data sets.
- Relevant SIC (Standard Industry Classification) code data was used for sector based quantities where possible, although in practice, a large proportion of the IO/DRs were found to apply across sectors, or to groups of organisations that do not correspond to SIC codes, or have qualifying criteria attached to them which meant that SIC codes were insufficient (alone) to define population.
- The remaining information metrics were then provided to departments for the data to be identified; where necessary, an estimate of quantity based on banding was used.
- Departments checked and completed the quantity data in order to ensure that all IO/DRs contained either actual quantity data; or an informed estimate.

The work to gather quantity data highlighted extensive gaps in knowledge about the number of organisations that are affected by an IO/DR, the frequency with which they are affected, the extent of non-compliance and the use of e-government solutions. As a result, many of the numbers used in the ABME are based on departmental estimates or population 'bandings' provided by PwC. The process involved a huge effort on the part of the departments with input from many policy officials and personnel in related agencies.

The validation of standard cost and quantity data

The consistency of the standard cost and quantity data generated was examined and assessed on a continuing basis in agreement with departments.

In order to ensure the credibility of the cost measures overall and, specifically, to maximise the likelihood that the standard costs would generally reflect those of a 'normally efficient business', there was a presumption that:

- the cost estimates would be derived through direct engagement with business, charities and the voluntary sector;

- efforts to achieve the appropriate cost measurements would be focused on those IO/DRs which were expected to be the most costly; and
- any outlying cost measurements would be removed from the estimation process.

Subsequently, three complementary methods were used to validate the estimated standard costs:

- The data underwent a continuous quality assurance process: since the bulk of the administrative costs were found to be concentrated in relatively few IO/DRs, this process focused on those measurements which affect the IO/DRs with the largest total costs, unit costs or quantities. The aim of the process was to identify and address those quantities or costs that appear potentially anomalous.
- The unit cost estimates were subject to an agreed set of standardisation tests intended to identify any measures that should be excluded because they do not reflect the normally efficient business. This process involved analysing the evidence collected during fieldwork iteratively at two levels:
 - comparison between at least two (and possibly three) business measures gathered for any individual IO/DR; and
 - comparison between IO/DRs with similar characteristics (e.g. the same IO type, linked to the same regulations, or involving provision of similar data).
- Departments were provided with sets of draft results and given the opportunity to raise challenges against them on various grounds, such as the use of Assessment, the appropriateness of the quantity used and the consistency of the fieldwork based measures. These challenges had to be based on a set of agreed criteria. Where a measurement was questioned, PwC worked with departments and the BRE to resolve any issues. This included providing details of the underlying measurements where required whilst ensuring that the identity of respondents remained confidential.

Together, the three validation processes highlighted a number of issues:

- The need for non-standard segmentation: in some cases, the initial calculations highlighted the importance of ensuring that the measurements used reflect differences in unit costs between different segments of the affected population.
- The treatment of external costs: many of the highest costs were found to be driven by large external costs. As a result, the most important external costs were reviewed to ensure that they were both in scope and included in the calculation on an appropriate basis. In some cases, this required software and capital costs to be amortised. In other cases, it required costs to be excluded from the calculation altogether because they were out of scope.
- Inconsistencies between the measurement of quantity and the basis of the cost estimate: in some cases, the quantity and cost estimates were not consistent with one another (e.g. per transaction vs. per year) in which case either the quantities were adjusted or new measurements obtained.
- Allocation of costs to IO/DRs: in a number of cases the costs of meeting different but closely related IO/DRs were double-counted (this was sometimes due to the structure of the regulations and their consequent mapping into IO/DRs). In many of these cases new measurements were obtained or the mapping of the IO/DRs refined.
- Duplication of the IO/DRs: whilst reviewing the draft results, departments identified instances where IO/DRs were covered more than once in the calculations. In these instances, the mapping of the IO/DRs was amended.

Implementation issues arising during Phase 2

Three key issues arose during Phase 2 that impacted on the planned approach:

- It proved difficult to achieve measurement data through business interviews and Expert Panels across

all the IO/DRs identified during the mapping: this was largely resolved by extending the use of Assessment, especially as it related to those IO/DRs which were expected to give rise to relatively small costs, to ensure that all IO/DRs were effectively covered.

- Fewer population and frequency data were readily available than had been anticipated: as a result, an agreed approach to estimating the missing data was developed and implemented in conjunction with departments.
- Fewer measurements of the administrative cost of particular IO/DRs were collected than envisaged within the SCM: as a consequence, the methods used to establish whether or not the standard cost estimates were those of a 'normally efficient business' were extended to include manual review as well as statistically based analysis.

2.3.3 Phase 3 – Calculation, data submission and reporting

Phase 3 of the project focused on processing the data collected in Phases 1 and 2 and the production of reports on the administrative costs imposed by the department's regulations on business.

Computation

In order to calculate the internal costs associated with meeting particular IO/DRs, a value was assigned to the time spent by different types of staff (including volunteers) working within the private sector based on data from the Annual Survey of Hours and Earnings (ASHE) collected by the Office for National Statistics. A common framework was used to categorise the different occupational types (identified in Phase 2 through data collection) involved in performing the activities, and a standard value of time was derived for each of the categories based on the median hourly wage rate (excluding overtime) across the United Kingdom in 2005. Further details of this process are provided in the Technical Summary document provided as an annex to this report.

The estimates of administrative costs were then generated using the validated data held on ABR.net to identify unit and total costs per regulation and IO/DRs.

Several iterations of the data set were produced during Phase 2 and provided to departments.

Interpretation of cost data

The estimates of administrative costs included in this report are based on the application of the SCM which is designed to produce consistent estimates and so enable measurements to be compared and targets for reductions to be set across government. The SCM relies on deriving estimates of the standard cost of meeting each IO/DR within a regulation for a 'normally efficient business'. Given the need to manage the overall costs of data collection while providing information about a very large number of IO/DRs, the SCM relies on the input of a limited number of experts and/or businesses. As such, it does not produce a statistically representative measurement of costs: instead, it is a pragmatic approach to measurement that gives an indicative estimate of the magnitude of costs which provide a starting point for setting reduction targets and highlighting the areas to focus upon.

In interpreting the cost estimates, it is important to recognise the implications of the three processes which have been applied to ensure that the cost estimates reflect those which are expected to be incurred by a 'normally efficient business'. Nevertheless, despite these processes, the nature of the SCM means that the cost estimates will inevitably be subject to significant margins of error, especially where they are based on small numbers of individual measurements. These concerns are likely to be most significant where:

- the number of external measurements which underpin the cost estimates is small;
- Assessment has been used without any external review, rather than stakeholder driven estimates, to determine the standard cost;
- unit costs vary significantly in practice between different segments, but the need for segmentation has

not been identified by the department; and

- the activities which drive the costs are closely linked to those required to meet other, related or similar IO/DRs in which case there is the potential for double counting of costs.

Finally, in interpreting the results of the application of the SCM, it is important to recognise that the SCM provides an estimate of administrative costs, of which administrative burdens are a part. The costs of some activities that business, charities and the voluntary sector would carry out regardless of regulatory requirements (business as usual costs) may be included. Equally some costs that may be regarded as associated with the underlying policy aim rather than being purely administrative may also be included. It is potentially difficult to distinguish between the administrative costs and policy costs – that is, whether or not any of the activities which generate the administrative costs measured by the ABME are also required in order to realise the desired policy outcome. Conversely, the costs of other administrative tasks, for example requirements that come from case law, are not included as they do not fit the SCM framework which is based on information obligations arising out of regulations. Looking forward, if the Government is to ensure that effort is focused on areas that business will feel the most benefit from, it will need to consider how to take into account business as usual costs in setting targets based on the estimates generated using the SCM.

Preparation of final reports

Following sign-off of the data by departments, PwC prepared departmental reports for approval by the departments and BRE.

The Phase 3 reports present the results of the ABME and give a detailed account of the method used and primary analysis of the data for each department.

Implementation issues arising during Phase 3

One key issue arose during Phase 3 that impacted on the planned approach. This related to the availability of robust and reliable data upon which to base an analysis of the estimated administrative costs by organisation size over and above that implied by the specific segmentation defined with departments. Such an analysis depended on being able to determine:

- how the unit cost of meeting each IO/DR varies by organisation size; and
- the number of times organisations of different size are required to fulfil an IO/DR each year.

The available evidence is, however, limited for two reasons:

- the nature of the SCM means that only a very limited number of measurements of unit costs have been collected for each IO/DR with the result that, except in the very few instances where segmentation was applied on the basis of organisation size and additional measures collected, there is no reliable empirical basis for determining any variations in unit costs by organisation size: the SCM effectively deals with this issue by determining a single average unit cost across all organisations; and
- departments' knowledge of the number of organisations impacted by an IO/DR is limited and their knowledge of the size distribution of organisations is even more limited, especially where there is an element of contingency involved in the IO/DR and/or the affected sectors are difficult to define: this means that critical assumptions would need to be made to bridge the gap in order to derive even indicative estimates of the administrative cost breakdown by organisation size.

In conclusion, therefore, the limitations of the available data mean that the results of any attempt to allocate costs by organisation size across all of the IO/DRs, not just those where segmentation has been implemented, would need to be interpreted with very great caution since it is evident that they are critically dependent on the assumptions that are made. For this reason, no such analysis is presented in the report although, for those departments where segmentation has been applied, these results are discussed separately.

2.3.4 The data repository

A bespoke project management information system, ABR.net, was used as the repository of all the data used in this project. Areas of functionality of the system were developed as the project progressed and included:

- input interface / tool for mapping of regulations into IOs and DRs, for categorisation of IOs and DRs;
- input of quantity and cost data;
- processing of IO/DRs through an algorithm for allocation to the most appropriate fieldwork methodology;
- administration of face-to-face interview and expert panels – allowing dates, locations and responsibility to be assigned to specific fieldworkers;
- capture and management of cost and quantity data;
- reporting of progress with mapping, validation and input of results;
- interface with the International Survey Unit for transmission of IO/DRs data allocated to telephone and face-to-face interviews and receipt of telephone interview results and business interview recruitment results (for face-to-face interviews).

2.3.5 Implementation variations by department

For HSE the following three variations in the planned approach are noted:

Identifying quantity/population data

There were some challenges in collecting population data relevant to HSE's legislation, which meant that it was difficult to secure accurate estimates of quantity for some IO/DRs:

- A particular IO/DR may or may not apply to business depending on a very specific set of circumstances, i.e. the precise characteristics of the activity which a business carries out will establish whether or not the business must comply with a specific IO/DR. Therefore, it is generally not possible to assume that all businesses in a particular sector are required to comply with a particular IO/DR, as the requirement may depend on its individual circumstances, for example the scale of the operation or a use of a particular technology. Precise details of a business activity may, therefore, be required in order to compile accurate population data.
- The frequency with which a particular IO/DR must be complied with is commonly contingent; triggered by a specific event or set of circumstances within a business rather than being periodic (e.g. annual, monthly, etc.). This adds additional complexity to computation of quantity as the population cannot be calculated simply by multiplying the number of businesses affected by the frequency.
- Obtaining quantity data where third party IOs are concerned presents significant practical difficulties as meeting this type of IO does not involve any direct interaction with the HSE – therefore there is no practical way for the HSE to obtain this data, and the quantity must be estimated by reference to statistics concerning the number of UK workplaces.

For the reasons outlined above, significant assumptions were required to be made when compiling population estimates. In a substantial number of cases, no population data were available and no obvious basis existed by which a reasonable estimate might have been derived. In these cases, the population 'bandings' developed by the ABME population team were applied as appropriate in discussion with HSE.

IO/DRs affecting small populations

Under the Nuclear Installations Act 1965, prospective operators are required to secure a nuclear site licence before operating a nuclear facility. There have been no recent new applications for a nuclear site

licence, although the industry and HSE Nuclear Installations Inspectorate advised that there is ongoing communication between HSE and the nuclear site licensees concerning the terms of many nuclear site licences currently in force. This interface imposes appreciable administrative costs on the industry¹⁴. In addition, it proved difficult to secure appropriate advice from the industry on the scale of administrative costs. The views of an expert panellist from the industry were drawn on to generate an estimate of the actual administrative cost burden incurred by the industry on an annual basis.

Non-standard segments

To address the potentially wide variation in administrative cost experienced by businesses which are engaged in different activities complying with the same IO/DR, it was agreed that a detailed non-standard segmentation would be required for certain IO/DRs such as the risk assessment requirement under the Management of Health and Safety at Work Regulations 1999. This non-standard segmentation was designed to ensure that different business activities were included in the sample, as business activity, rather than enterprise size, is the primary driver of risk assessment-related administrative cost. The segmentation involved targeting data gathering through telephone/ face-to-face interviews at samples of businesses operating within the categories of 'high', 'medium' and 'low' H&S risk environments.

This allows the business activity (which is the main driver for the level of Risk Assessment cost) to be taken into account, as well as the size of the business, which has less of an impact on the level of the risk assessment-related cost experienced – i.e. a small business engaged in a relatively high-risk activity may have a larger risk assessment-related administrative cost than a large business engaged in a lower-risk activity (e.g. office work). A summary of how this non-standard segmentation model was constructed follows:

- Population data for different categories of industry H&S risk, and enterprise size were sourced from the Office for National Statistics (ONS¹⁵). This included enterprises based in Northern Ireland, however the impact of their inclusion is considered negligible.
- Time and external cost estimates for High, Medium and Low Risk sectors and Micro/Small-Medium and Large size enterprises were obtained from H&S professionals at (i) a major offshore oil and gas company, (ii) an industry association representing construction and mechanical/electrical contractors and a manufacturing industry association, and (iii) a professional services organisation, (representing High, Medium, and Low-Risk sectors respectively) and extrapolated/interpolated across industry risk and enterprise-size segments.
- In order to facilitate this detailed segmentation, the individual IO/DRs imposed by the MHSW Regulations 1999 were 'rolled up' into a combined obligation to 'produce and update risk assessments and risk management arrangements'.

¹⁴ There are 39 nuclear-licensed operating in the UK, each of which will have a different level of annual administrative activity ongoing in respect of the license conditions. It is important to note also that any administrative cost attaching to the licensing regime will vary depending on site specific characteristics (e.g. precise nature of activity, age of installation, depth of operator experience, relative degree of risk etc.).

¹⁵ (UK Business; Activity, Size and Location – 2005', *Table A1.1 United Kingdom - Number Of Local Units in Vat-Based Enterprises in all Industries in 2005*; UK Business: Activity, Size and Location – 2005', *Table A5.3 United Kingdom - Number And Percentage of Local Units in Vat-Based Enterprises in all Industries in 2005 - Standard Industrial Classification (UKSIC(2003)) by Employment Size Band*

3 Administrative costs on business

3.1 Introduction

This part of the report contains the main results from the ABME for HSE and consists of:

- an overview of the total administrative costs on business;
- an analysis of the most costly regulations;
- a breakdown of administrative costs by IO/DR type and by administrative activity;
- an analysis of the administrative costs broken down between obligations to third parties and non-third parties and between internal time costs (including overheads) and external purchases of goods and services;
- administrative costs by origin of regulation;
- administrative costs by organisation size;
- a discussion of the significance of the distinction between administrative cost and administrative burden; and
- a discussion of the other, qualitative findings to emerge from the fieldwork.

3.2 Overview

The total administrative cost for the department is estimated at £2.87 billion.

Table 4: Administrative costs – overview

	Total administrative costs	
	£ (million)	% of department total
HSE Total	£2,869.6	100%

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

The administrative costs imposed on businesses as a result of H&S legislation relate to the following generic categories of requirements:

- Requirements to **assess H&S risks** to employees, those not directly employed by the enterprise (e.g. contractors) and members of the public; to record significant findings; and to put in place measures to control identified risks. Administrative costs associated with this sort of obligation would include the time taken to perform the risk assessment and document findings and control measures (see note on administrative costs vs. policy/compliance costs in Section 3.9).

- **Maintaining records** to demonstrate that various H&S obligations are being discharged. For example, under the Lifting Operations & Lifting Equipment Regulations 1998, the requirement to maintain a record of the safety checks of the equipment. The administrative cost in this case relates to the time and cost of carrying out the check (the policy cost) and the management time required keeping and updating records.
- Obligations to **make information concerning H&S risks available** to all those who may require this information to manage and control those risks appropriately (information to third party). An example of this type of requirement would be the obligation to provide a safety data sheet to users of certain hazardous substances under the Chemical (Hazard Information and Packaging for Supply) Regulations 2002. Administrative costs in this area relate to the resources required to develop and maintain the relevant data and the cost of ensuring that this information is disseminated appropriately (e.g. via information leaflets etc.). In many industry sectors, administrative costs connected to H&S legislation requirements are increasingly associated with the use of external consultants or contracting companies as businesses seek to maximise efficiency by concentrating resources on 'core' activities and outsourcing 'non-core' activities. An example of this is the requirement to display a poster in the workplace which provides H&S-related information to employees (Health and Safety Information for Employees Regulations 1989). This obligation is now commonly addressed by facilities management companies as part of an overall contract to manage office facilities.
- Applications to the HSE for **permission to undertake high-risk or hazardous activities**, for example the requirement to secure approval from the HSE to operate an offshore installation under the Offshore Installations (Safety Case Regulations 1992). These types of information obligations tend to involve the generation of large volumes of data which the applicant uses to demonstrate effective risk management, and support the case for authorisation of the activity in question. Administrative costs associated with this type of IO/DR include the management time involved in collating large amounts of data and also the use of external specialists.

3.3 Most costly regulations

Table 5 lists the 11 most costly regulations for HSE which give rise to approximately 80% of the estimated total administrative cost.

Table 5: Top 11 regulations by total administrative costs

Regulation	Total administrative cost	
	£ (million)	% of department total
Management of Health & Safety at Work Regulations 1999	£923.0	32%
Gas Safety (Installation and Use) Regulations 1998	£386.3	13%
Lifting Operations & Lifting Equipment Regulations 1998	£200.6	7%
Control of Substances Hazardous to Health Regulations 2002	£171.4	6%
Manual Handling Operations Regulations 1992	£166.0	6%
Health and Safety at Work etc Act 1974	£122.6	4%
Control of Asbestos at Work Regulations 2002	£121.2	4%
Safety Representatives and Safety Committees Regulations 1977	£75.8	3%
Construction (Design and Management) Regulations 1994	£71.7	2%
Provision & Use of Work Equipment Regulations 1998	£49.0	2%
Dangerous Substances and Explosive Atmospheres Regulations 2002	£48.3	2%
Top 11 Total	£2,335.7	81%
HSE Total	£2,869.6	100%

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

The higher cost HSE regulations tend to be those which affect large populations, even though the unit cost of meeting the particular obligation may be relatively low. This is illustrated, for example, by the highest cost IO/DR for HSE which is within the Management of Health and Safety at Work Regulations 1999 and which imposes an obligation *inter alia* to assess risks and document significant findings. In enterprises where H&S risks are comparatively low, this administrative activity may not be very costly or time consuming but, because the requirement applies to all businesses, the total cost across business as a whole is much higher compared to obligations required by other legislation which in themselves are extremely time consuming/costly but apply to a much smaller number of enterprises. An example of an obligation that affects a smaller population but imposes a higher unit cost is the requirement to submit a safety report to the appropriate authority under the Control of Major Accident Hazards Regulations 1999. Compilation of the safety report may be very costly compared to other H&S obligations, however this requirement only applies to around 350 installations in the UK and is not a yearly requirement, so the overall cost associated with this IO/DR is comparatively less than that associated with a 'low cost' IO/DR which applies across all businesses.

The total cost of the majority of the high cost IO/DRs is largely driven by the quantity, due to either large populations (number of businesses affected) or a high frequency of transactions, or a combination of both. In the case of the Gas Safety (Installation and Use) Regulations 1998, where the requirement to keep a record of gas appliance inspections is one of the highest cost HSE IO/DRs, the overall cost is much higher due to the very large number of rented properties connected to a gas supply (estimated at approximately 4 million) which may be subject to inspection under this requirement each year. However, the unit cost of meeting the requirement (which includes the cost of checking the appliance) as measured by the SCM is relatively small (less than £100).

Table 6 shows the distribution of administrative cost by IO/DRs within the 11 most costly HSE regulations. The wide distribution of administrative costs reflects the issue of significant variation in the costs experienced by different sizes and types of businesses, as discussed further in Section 4.

Table 6: The distribution of administrative cost by IO/DRs within the top 11 regulations

Regulation	Total administrative cost by regulation	Distribution of administrative cost £ ('000)			Number of IO/DRs
	£ (million)	Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Management of Health & Safety at Work Regulations 1999	£923.0	£184,599	£461,497	£738,396	22
Gas Safety (Installation and Use) Regulations 1998	£386.3	£0	£19	£360,972	22
Lifting Operations & Lifting Equipment Regulations 1998	£200.6	£1	£91	£199,695	7
Control of Substances Hazardous to Health Regulations 2002	£171.4	£0	£6	£59,072	44
Manual Handling Operations Regulations 1992	£166.0	£15,961	£83,000	£150,039	2
Health and Safety at Work etc Act 1974	£122.6	£0	£455	£66,175	15
Control of Asbestos at Work Regulations 2002	£121.2	£2	£176	£94,615	27

Regulation	Total administrative cost by regulation	Distribution of administrative cost £ ('000)			Number of IO/DRs
	£ (million)	Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Safety Representatives and Safety Committees Regulations 1977	£75.8	£82	£17,550	£58,142	3
Construction (Design and Management) Regulations 1994	£71.7	£0	£3,112	£14,005	23
Provision & Use of Work equipment Regulations 1998	£49.0	£0	£3,241	£15,527	11
Dangerous Substances and Explosive Atmospheres Regulations 2002	£48.3	£148	£285	£37,905	10
Top 11 regulations	£2,335.7	£0	£183	£738,396	186
HSE Total	£2,869.6	£0	£6	£738,396	1,209

Footnote: The minimum cost IO/DR is derived after excluding all those IO/DRs defined within Phase 1 where the administrative costs have been measured as part of a group of related IO/DRs.

Footnote: The median is the 'middle value' in a list or series of numbers. When the totals of the list are odd, the median is the middle entry in the list after sorting the list into increasing order. When the totals of the list are even, the median is equal to the sum of the two middle (after sorting the list into increasing order) numbers divided by two.

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

For HSE as a whole, Figure 3 below shows the cumulative distribution of the estimated administrative cost by IO/DR. It shows that 80% of the estimated administrative cost arises from the 23 most costly IO/DRs but only 1% of the cost derives from the 1,014 least costly IO/DRs.

Figure 3: HSE - Cumulative distribution of estimated administrative cost

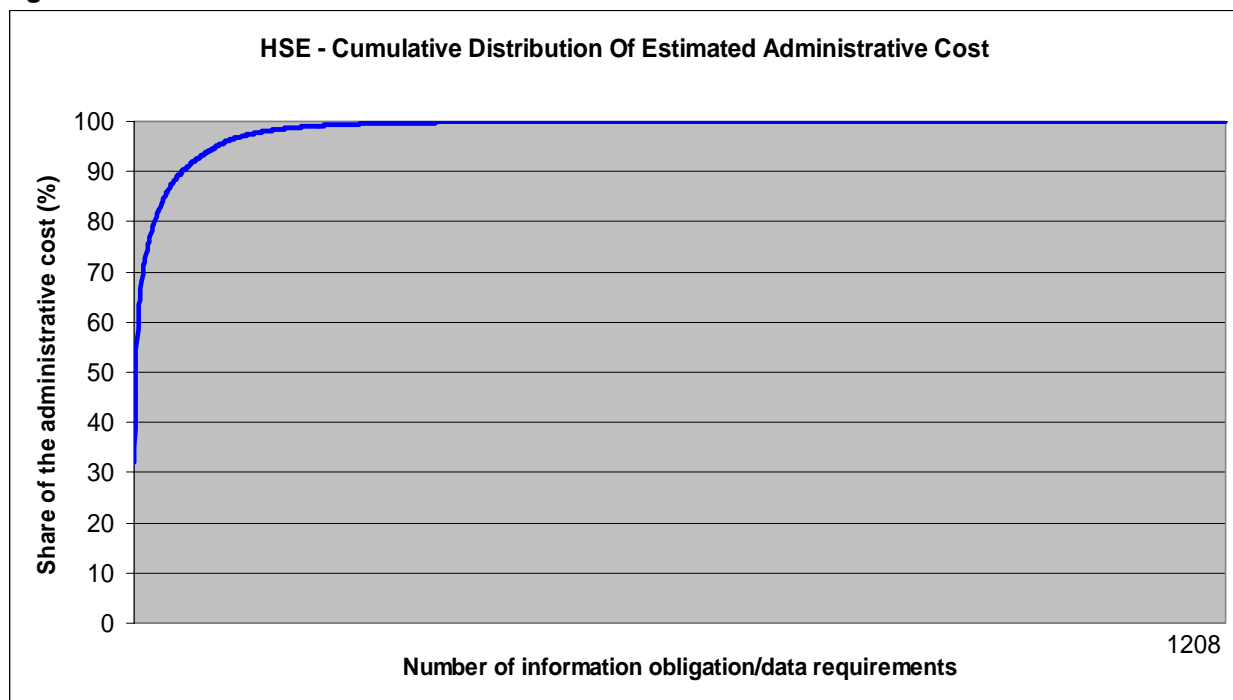
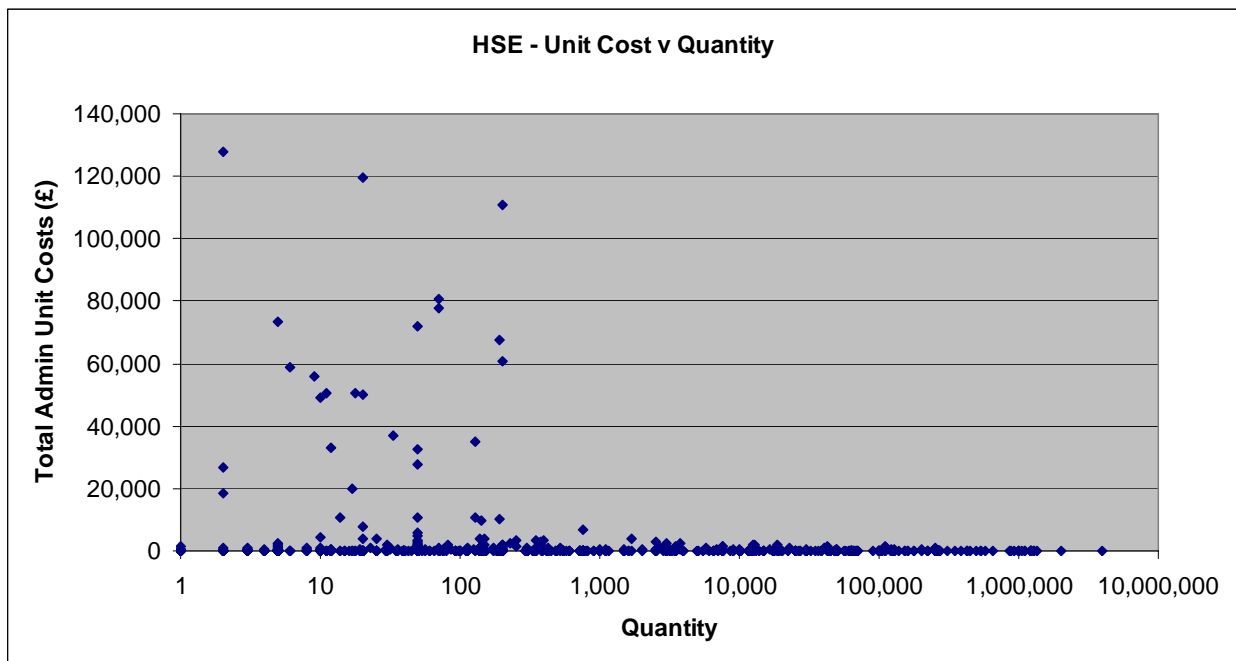


Figure 4 below, also for the department as a whole, shows the distribution of the unit cost and quantity associated with each IO/DR. It shows that:

- a large proportion of IO/DRs tend to have low unit costs and high quantities (e.g. keeping a record of gas appliance inspections under the Gas Safety (Installation and Use) Regulations 1998 where estimated administrative costs are less than £100 per transaction, but the quantity involved is approximately 4 million; and
- a smaller number of IO/DRs have high unit costs and low quantities – these scatter points relate to IO/DRs administrative costs estimates relevant to high-risk industries, e.g. COMAH-regulated /offshore installations, where unit costs tend to be high (approximately £100,000 per transaction in the case of one IO/DR established by the Offshore Installations (Prevention of Fire and Explosion and Emergency Response Regulations 1995) but populations low, in this case, 200.

Figure 4: HSE - Unit Cost v Quantity



3.4 Administrative costs by IO type and by administrative activity

During Phase 1, each IO/DR was classified using a standard list of 16 IO types, for example applications for authorisation or complying with inspections. A full list of IO types and their definitions can be found in Section 2.3.1. Table 7 provides a breakdown of the total number of IO/DRs in each of the 16 categories and the total administrative cost associated with each IO type.

The IO types in Table 7 have been listed in order of the total cost by IO type, with the highest % shown first.

The most salient feature of this analysis is the estimated proportion of administrative cost which is associated with record-keeping activities, however some of the high costing record-keeping IOs also include checking machinery, air monitoring, etc. Maintaining an ability to demonstrate (e.g. to an HSE inspector) that appropriate compliance arrangements are in place is a key element of H&S compliance activity. Administrative costs in this area are likely to be increased due to the constant changes which modern businesses typically undergo – each time changes are made to the business activity, compliance arrangements and associated records may need to be updated. For example, even in a lower risk, ‘office-based’ sectors, a move to a new building may be accompanied by a requirement to update the risk assessments which are required to be carried out under the MHSW 1999 Regulations. Administrative

cost estimates relating to the provision of information to third-parties also form a relatively high proportion of the total, as the requirement to provide information concerning H&S risks to anyone affected by a work activity is also a key facet of H&S regulation. These costs are discussed in more detail in Section 3.5 below.

Table 7: Total administrative costs by IO type

IO type	Number of IO/DRs		Total cost	
	Number of IO/DRs	% of total number of IO/DRs	Total cost by IO type £ (million)	% of total department cost
Keeping records	338	28%	£2,010.6	70%
Providing statutory information for third parties	373	31%	£557.7	19%
Updating commercial emergency plans & programmes	29	2%	£122.0	4%
Statutory labelling for the third parties	48	4%	£51.6	2%
Notification of activities	218	18%	£45.1	2%
Carrying out inspections of...	31	3%	£39.2	1%
Applications for authorisation	45	4%	£20.5	1%
Returns and reports	66	5%	£11.2	0%*
Cooperating with audits/inspections of...	25	2%	£7.1	0%*
Applications for permission for or exemption from...	30	2%	£3.9	0%*
Entry in a register	2	0%	£0.5	0%*
Carrying documentation	4	0%	£0.2	0%*
Agreeing contracts	0	0%	£0.0	0%
Applications for subsidies or grants for...	0	0%	£0.0	0%
Framing complaints and appeals	0	0%	£0.0	0%
Other	0	0%	£0.0	0%
Requesting information	0	0%	£0.0	0%
Total	1,209	100%	£2,869.6	100%

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Footnote: Items marked with an asterisk reflect a percentage that, due to rounding conventions, appears as 0%. In reality the percentage is between 0% and 1% of department cost.]*

Table 8 below provides a summary of the administrative costs broken down between internal time costs and external costs of goods and services. The internal costs are the staff time taken to carry out each administrative activity (i.e. the number of hours / minutes spent on an administrative activity) multiplied by the hourly pay for the appropriate occupation group that performs the activity with overheads added. Overheads are those costs that relate to fixed administration costs, such as expenses for premises (rent or building depreciation), telephone, heating, electricity, IT equipment, etc. These are calculated by

applying a standard percentage mark-up (30% of the time based costs¹⁶). External costs relate to the purchase of goods or services purchased specifically to fulfil the requirements of a regulation.

As discussed in Section 3.1, there is an increasing tendency for business to outsource those business processes which are viewed as 'non-core' activities to professional service providers and contractors. This is reflected in the relatively high (27%) proportion of administrative costs which are accounted for by the use of external contractors. It was evident during the ABME that outsourcing of H&S-related obligations to external service providers is increasingly a feature of modern management practice, and this approach was regularly reflected in the responses obtained from business. As use of external service partners increases, the immediate implication is that businesses are spending less internal time meeting the IO/DRs associated with HSE legislation. The impact on overall administrative costs, however, is much harder to define, and will depend on the balance between the costs associated with the service partner's profit margins and the savings created via operational efficiencies delivered by professionals experienced in matters of H&S legislative compliance.

Table 8: Summary administrative costs showing internal time, overheads and external costs

Activity	Total	
	£ (million)	% of total department cost
Internal time costs	£1,604.4	56%
Overheads	£481.3	17%
External Costs	£783.9	27%
Total administrative costs	£2,869.6	100%

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

In collecting information about the time taken to complete obligations, the overall time taken was broken down between seven groups of administrative activities based on those identified within the SCM. These apply to each of the 16 IO types. They include, for example, familiarisation with the data requirements and holding meetings.

Table 9 below provides a breakdown of the internal administrative cost estimates incurred, by SCM-defined categories of administrative activity. As would be expected in the context of a regulatory framework which requires businesses to demonstrate various compliance arrangements, the majority of administrative costs (over 70%) incurred are associated with putting together and submitting information in a required format. In some cases, some of the costs which have been measured under the SCM may be regarded as costs associated with achieving the desired policy outcome. It is interesting to note, however, that approximately 12% of estimated administrative costs are associated with familiarisation requirements. Table 9 shows the total internal time costs for each activity type.

Table 9: Internal time costs by standard activity type

Activity	Total	
	£ (million)	% of total internal time cost
Gathering and assessing relevant information / figures	£837.0	52%
Reporting (including written descriptions, copying, filing, distributing or submitting info / reports)	£254.2	16%
Familiarisation with requirements	£184.9	12%
Inspections	£140.6	9%

¹⁶ This standard percentage mark-up (30%) is the level of overhead generally used when calculating costs in regulatory impact assessments.

Activity	Total	
	£ (million)	% of total internal time cost
Holding meetings	£87.5	5%
Preparing figures (including calculating, presenting, checking and correcting)	£70.5	4%
Making Settlements or Payments	£29.8	2%
Total internal time costs	£1,604.4	100%

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

In addition, during Phase 1, each IO/DR was flagged according to whether or not it involved form-filling activities where it was possible to identify this. A variety of approaches were used to establish whether or not standard forms were used: where a regulation specifically identified that a standard form must be used; forms sourced and supplied by HSE and where forms were identified through internet research by a dedicated PwC team. In practice, however, it was probably not possible to identify all standard forms, especially where regulations are implemented at regional or local levels. Overall, the percentage of IO/DRs flagged as involving form-filling within HSE is 7%, however, it seems likely that this figure understates the actual level of form-filling activity.

3.5 Administrative costs by third party/non-third party and internal/ external categories

This Section provides a breakdown of administrative costs between third party and non-third party obligations. Third party obligations are those that are owed exclusively to third parties (i.e. to individuals or organisations that are not public sector bodies, for example employees or customers). Non-third party obligations are those that are owed totally or partially to government departments or agencies (including law enforcement, local government, emergency services, courts etc).

Table 10 below shows how this cost breaks down between those IO/DRs which are considered to be third party and those which are non-third party. Almost 70% of HSE obligations (approximately £2bn) are non-third party.

As discussed in Section 3.1 above, the generic requirement to provide information concerning H&S risks to all those who might need it is a key feature of H&S regulation. This requirement to provide information to employees, contractors, customers, emergency services, members of the public etc., as well as directly to HSE means that the proportion of cost associated with information obligations which are categorised as 'third party' is comparatively high at 31% (see Table 10 below).

Third party IO/DRs associated with higher administrative costs include:

- providing employees with manual handling operations information (Manual Handling Operations Regulations 1992) - estimated administrative costs of £150m;
- compiling information on procedures, emergency arrangements and ensuring that warning and communication systems are made available to the relevant accident and emergency services and displayed at the workplace if appropriate (Control of Asbestos at Work Regulations 2002) - estimated administrative costs of £95m;
- maintaining records to demonstrate that any person (employee or not) who carries out work for the employer has suitable and sufficient information, instruction and training (Control of Substances Hazardous to Health Regulations 2002) - estimated administrative costs of £59m;
- providing information to safety representatives to enable them to fulfil their functions (Safety

Representatives and Safety Committees Regulations 1977) - estimated administrative costs of £58m; and

- providing sufficient information as is necessary to ensure, so far as is reasonably practicable, the H&S of employees at work Health and Safety at Work etc Act 1974 – estimated administrative costs of £46m.

Table 10: Administrative costs- breakdown by third party/non-third party and internal/ external categories¹⁷

	Third party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
HSE Total	79%	21%	£895.2	70%	30%	£1,974.4	73%	27%	£2,869.6

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

3.6 Administrative costs by origin

Table 11 provides an analysis of the estimated administrative costs of the department's regulations broken down by the origin of the regulation. In particular, the table distinguishes three broad categories of obligation:

- Category A – obligations that are exclusively and completely a consequence of EU rules or other international obligations (i.e. the international rules describe which information businesses have to produce);
- Category B – obligations that are a consequence of EU rules and other international obligations where the purpose has been formulated in the international rules but where implementation has been left to individual Member States (i.e. the international rules do not describe which information businesses have to produce); and
- Category C – obligations that are exclusively a consequence of rules formulated at national level.

Furthermore, in Table 12, for Categories A and B, a distinction is made between regulations which derive from an EU Directive, and EU Regulation and other international rules.

The significance of the classification by origin lies in its implications for how far the department can influence directly the administrative costs and burden, especially in the short term.

Although a relatively mature H&S legislative framework existed in the UK prior to EU accession, the regulatory framework in the UK has been increasingly influenced by legislation promulgated at EU level. This influence is illustrated in Table 11 below.

¹⁷ A third party is any other person or organisation that is not a public sector body, for example employees, consumers, parents and other stakeholders. For the purposes of the definition, a public sector body is a government department or agency (including law enforcement, local government, emergency services etc), a court, a government funded school or other educational institution. Where an IO/DR refers specifically to an inspector but does not clarify who the inspector might be, it is deemed to refer to a public sector body. For the purpose of distinguishing third party and non-third party administrative costs, an obligation to a third party arises only if it is exclusively owed to third parties (e.g. parents). Therefore, there are some obligations that apply to third parties that are not flagged as such because they also apply to public sector bodies.

Table 11: Administrative costs by origin

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total £ (million)
	£ (million)	% of Reporting unit total	£ (million)	% of Reporting unit total	£ (million)	% of Reporting unit total	
HSE Total	£1,512.0	53%	£432.9	15%	£924.7	32%	£2,869.6

Note: % shares sum to 100 for each row not column

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Table 12: Administrative costs by sub category by origin

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other international £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other international £ (million)	% for type B	% for type C
HSE Total	£0.2	£1,511.4	£0.4	53%	£0.0	£431.8	£1.1	15%	32%

Note: The percentage shown is the proportion of the admin cost for type A, B and C as a proportion of the admin cost for the reporting unit / department overall i.e. by row.

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Table 13 shows the percentage origin for the top 11 regulations in the department. The most salient feature of this analysis is that four out of five of the most costly regulations have IO/DRs that are 80-100% international with no domestic discretion in implementation.

Table 13: Percentage administrative cost by origin for the top 11 regulations

Regulation	Total administrative cost		% Cost by origin		
	£ (million)	% of department total	A	B	C
Management of Health & Safety at Work Regulations 1999	£923.0	32%	80%	20%	0%
Gas Safety (Installation and Use) Regulations 1998	£386.3	13%	0%	0%	100%
Lifting Operations & Lifting Equipment Regulations 1998	£200.6	7%	100%	0%	0%
Control of Substances Hazardous to Health Regulations 2002	£171.4	6%	99%	1%	0%
Manual Handling Operations Regulations 1992	£166.0	6%	90%	10%	0%
Health and Safety at Work etc Act 1974	£122.6	4%	0%	0%	100%
Control of Asbestos at Work Regulations 2002	£121.2	4%	0%	96%	4%
Safety Representatives and Safety Committees Regulations 1977	£75.8	3%	0%	0%	100%
Construction (Design and Management) Regulations 1994	£71.7	2%	39%	56%	6%
Provision & Use of Work equipment Regulations 1998	£49.0	2%	72%	0%	27%
Dangerous Substances and Explosive Atmospheres Regulations 2002	£48.3	2%	100%	0%	0%
Top 11 Total	£2,335.7	81%	59%	15%	26%
HSE Total	£2,869.6	100%	53%	15%	32%

Note: % cost by origin is by regulation i.e. by row

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Footnote: A detailed non-standard segmentation was applied in order to estimate administrative costs associated with the Management of Health & Safety at Work Regulations 1999 (See Section 2.3.5 for further details). Due to the fact that individual IOs within these Regulations were 'rolled-up' into a generic/combined IO to facilitate the segmentation, it was not possible to allocate the various IOs across different Origin categories in the same way as for the other Regulations in the table above. Discussions between BRE and HSE resulted in an agreement that 80% of the administrative costs associated with the MHSW Regulations 1999 should be considered as Origin Category A, with the remaining 20% to be considered as Origin Category B.

3.7 Administrative cost vs. administrative burden

This project has focused on deriving an estimate of the administrative costs incurred by businesses as they comply with the IO/DRs within the department's regulations. As the SCM recognises, not all of these costs represent an administrative burden (that is they reflect the cost of those administrative activities that businesses sustain simply because it is a requirement of regulation). Thus, the administrative costs will include some element of cost which a business might expect to incur regardless of whether a regulation exists. This has important implications for the interpretation of the measurements resulting from the application of the SCM.

As part of the businesses interviews, respondents were asked about the processes they used to fulfil each IO/DR and for their views as to whether or not they would undertake the activities anyway for their own business purposes or in order to meet other obligations arising from government regulation.

Responses to questioning on the extent to which a business would undertake activities anyway regardless of H&S regulatory requirements, suggested that:

- 17% (81 respondents) would prepare data to a large extent anyway;
- 31% (151 respondents) indicated that they would prepare data to some extent; and,
- 52% (255 businesses) indicated that they would not prepare data if the IO/DR did not exist.

Whilst these responses need to be treated with some caution, for example because the interviews covered only a proportion of the IO/DRs which are within scope of the exercise, they do provide an insight into the extent to which the costs which have been measured represent an administrative burden, rather than the 'business as usual' costs.

3.8 Other findings

Besides the quantitative information used to underpin the estimates of administrative costs, the business interviews undertaken both over the telephone and face-to-face have been used to obtain insights into businesses' understanding of the purpose of regulation and their views on how easy (or difficult) they find it to meet the administrative obligations which arise from the department's regulations and more generally on regulation. In interpreting these responses, it is important to recognise that the interviews do not cover all of the obligations which have been measured as part of the exercise since two other approaches to measurement have been used, Expert Panel and Assessment. As a consequence, the responses may be affected by unknown biases.

As well as the quantitative information collected during Phase 2, the telephone interviews also provided some qualitative information as interviewees were asked to provide some comments on the obligations they were considering. In total 173 free text comments were recorded from the telephone interviews conducted on the department's regulations, which covered roughly 14% of IO/DRs within the scope of the project. It is important to note that many of the comments received did not necessarily relate to 'administrative' cost/burden issues, but rather to the entirety of the regulatory requirements, as requested by the interviewer.

This Section provides a brief summary of those comments.

After the interviews were completed the comments were coded to provide a summary of the themes covered. The figure below provides a breakdown of the themes and the number of comments received in each theme.

Regulations which prompted most comments from respondents included (in order of decreasing number of comments)

- Management of Health & Safety at Work Regulations 1999;
- Chemical (Hazard Information and Packaging for Supply) Regulations 2002;
- Notification of New Substances Regulations 1993;
- Biocidal Products Regulations 2001;
- Control of Substances Hazardous to Health Regulations 2002;
- Gas Safety (Installation and Use) Regulations 1998;
- Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals; and
- Control of Major Accident Hazards Regulations 1999.

Management of Health & Safety at Work Regulations 1999

Key issues raised include disproportionate impact on smaller businesses; the separation of risk assessment requirements is considered to be needless; and a lack of guidance on how to conduct appropriate risk assessments.

Chemical (Hazard Information and Packaging for Supply) Regulations 2002

Key issues raised include a lack of an industry-specific approach, which is considered unhelpful; disproportionate impact on small businesses resulting in business closures, and loss of access to the EU market in the case of one business; cost of regulation generally not considered commensurate with the risks posed by regulated substances; additional 'hidden' cost associated with requirement to convey changes up the supply chain; overlapping of different regulatory requirements.

Notification of New Substances Regulations 1993

Key issues raised include 'movement of goalposts' – shifting compliance requirements; over complexity; excessive cost without concomitant benefit; costs affecting global market competitiveness; lack of understanding on the part of the regulator; disproportionate impact on small businesses.

Control of Substances Hazardous to Health Regulations 2002

Perception of excessive complexity, use of overly 'technical' language, lack of a 'level playing field' when comparing the requirements of the COSHH regime with that of other EU regulatory regimes, and disproportionate impact on smaller businesses.

Gas Safety (Installation and Use) Regulations 1998

Perception of unnecessary 'red-tape', complaint that CORGI gas engineers are operating as a 'private monopoly' and dictating prices. Lack of clarity over requirements and regular changes creating uncertainty. Disproportionate impact on smaller landlords.

Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals

Regulations not perceived to be commensurate with the level of risk actually involved. Excessive strain on small businesses. Business seen as a 'cash cow' for the Government.

Control of Major Accident Hazards Regulations 1999

Perception of disproportionate impact on relatively simple operations. One company reportedly took over a year with a full-time person involved to meet the COMAH Regulations requirements. Perceived lack of a level playing field vis-à-vis the level of compliance effort required in the UK compared to other EU countries.

This Section provides a summary of comments made under three headings.

- interviewees' awareness of their responsibilities;
- the key irritation factors raised by business; and
- the opportunities identified by business for reducing the administrative burden.

Awareness of responsibilities

A good level of awareness of responsibilities was apparent in the responses successfully obtained from business, with no evidence that respondents were unaware of the requirements of H&S legislation which were relevant to their enterprise. On the contrary, it was apparent from the responses that a level of understanding existed which provided a sufficient basis for detailed judgements to be made. However, it

is important to bear in mind that the analysis may exclude businesses which failed to provide a knowledgeable response when contacted. In addition, it is likely that there are a limited number of people within any organisation who have a detailed knowledge of H&S legislation requirements.

Key irritation factors raised by business

Interviewees voiced a number of concerns about the demands regulations impose on them and the issues they have with regulation.

Volume of regulation

The main areas of complaint raised were with the volume of regulation and the extent of the administrative activities required of businesses to understand and fulfil the obligations. These were seen as difficult and time consuming, with some respondents indicating that they were now obliged to retain external support to assist them in dealing with requirements. Other commentators felt that the volume of legislation created contradictory requirements in certain instances, and pointed out that increasing the volume of legislation merely leads to lowered levels of compliance.

Complexity of regulation

The complexity of regulation was also an area for dissatisfaction identified by respondents. Several businesses commented on their difficulty in understanding the requirements of regulation. There was a noticeable demand for more use of 'layman's terms' in regulatory frameworks. The COSHH regulations were singled out in one response as being particularly complex. Understandably perhaps, smaller businesses appear to struggle more with issues relating to legislative complexity.

Duplication of information provision

Some businesses reported what they considered to be a large degree of unnecessary repetition as they had to provide similar information multiple times (one respondent commenting on the operation of the Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 indicated that every time the required information was submitted additional requests for this information were made 4-5 times a year by different Government agencies). One respondent interviewed who was responsible for the management of a top-tier COMAH site, indicated that because the gas storage facility at the site was connected to the main gas pipeline network, it was also covered by gas safety regulations. This operator was, therefore, obliged to submit similar information to two different regulatory divisions.

Changes in regulation requirements

Another important irritation factor was with the changes made in regulatory requirements, and the time taken to remain abreast and implement these changes appropriately (results of the ABME suggest that 12% of the total administrative costs for HSE relate to 'familiarisation with requirements'). One respondent pointed out that every time regulations were changed, they were obliged to inform their supply chain, which added to the administrative cost associated with regulatory changes.

Opportunities identified by business for reducing the administrative burden

Interviewees generally felt that the administrative cost associated with regulation could be reduced - the main suggestions provided by respondents to improve the efficiency of regulatory processes included:

- increased application of IT-based solutions;
- improved communication of legal requirements 'in layman's terms' (e.g. via newsletter etc.);
- rationalisation of regulations (e.g. Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999); combination of discrete risk assessment requirements into one generic risk assessment requirement;
- improved co-ordination between different authorities so that information only needs to be collected in one format;

- regulatory charges to be assessed on turnover rather than number of employees; and
- refocus resources on inspection rather than paperwork.

It is important to note that many respondents accepted the need for regulation and were aware of the benefits of a robust regulatory framework. Some respondents confirmed that the introduction of new regulations had acted as a driver for business risk reduction. Other respondents were happy to comply with legislation as long as it had been drafted with sufficient input from industry, rather than just being a 'knee-jerk' reaction to a specific issue.

4 Conclusions

This final Section of the report draws together the key conclusions which arise from the work that has been undertaken as part of the ABME. Specifically, the Section seeks to highlight those aspects of regulation which are likely to be most important in reducing the burden of regulation. In developing the conclusions, it has been important to take account of the department's existing initiatives in this area as well as the policy context within which the work has been undertaken. For example, the HSE has already prepared a draft simplification plan working closely with its stakeholders. The conclusions have been developed recognising the Chancellor of the Exchequer's commitment in his Budget statement in March 2006 that government departments will publish detailed targets for the reduction of these burdens and ensure that these are reflected in the simplification plan.

4.1 Interpreting the costs

A key step in interpreting the implications of the ABME is to understand the extent to which the costs which have been measured within the context of the ABME represent genuine administrative burdens. There are two key issues.

First, consideration needs to be given to the extent to which the activities that businesses are required to undertake in order to meet a particular IO/DR are activities which they would not otherwise perform (i.e. they are a burden). It is true that some of the activities would be conducted anyway as part of a sound business approach to risk management regardless of regulatory requirements, especially in those industries which face higher risks.

Second, attention needs to be given to whether or not any of the administrative costs which have been measured also reflect 'policy' costs, meaning costs which a business incurs in order to enable it to achieve the objectives of the regulation, for example, inspecting machinery to ensure safe operation. These costs will be balanced against their benefits.

Although both of these issues have a bearing on the extent to which the costs measured by the ABME should be regarded as administrative burdens which government might seek to reduce, it is nonetheless possible to examine the implications of the ABME for the focus of future efforts to reduce costs.

4.2 Focusing simplification efforts

One of the key conclusions that emerge from the ABME is that the estimated administrative costs are concentrated in a relatively small number of regulations. Specifically, 11 out of the 111 HSE regulations included within the scope of the ABME drive over 80% of the estimated total cost. These 11 regulations are, therefore, likely to warrant close examination in the context of ongoing simplification efforts. The most costly IO/DRs are generally associated with those obligations which are fundamental tenets of H&S regulation in the UK. This means they are primarily concerned with identifying, assessing and managing risk, demonstrating effective risk control and maintaining and disseminating information concerning risks to individuals who may require it.

4.3 Options for reducing costs - implications of the ABME

Against this background, a generic framework within which to identify and consider possible options to reduce annual administrative costs can be identified. Essentially, this framework implies that costs can

potentially be reduced by focusing on identifying initiatives which will reduce overall administrative costs by:

- reducing the unit cost of meeting an IO/DR, either by reducing the staff time required or easing the need for input from external suppliers of goods or services; and/or
- reducing the number of times each year that an activity needs to be performed for example by reducing the frequency with which the obligation is required to be met.

The remainder of the Section examines the implications of the evidence from the ABME for each of the options.

4.3.1 Are there ways in which the unit administrative cost of meeting each IO/DR can be reduced?

The ABME has highlighted a number of issues related to reducing the average unit cost of administration.

First, there are a small number of areas where the unit administrative costs of complying with a particular requirement are comparatively high. In some of them, business has already embraced IT solutions to reduce the administrative cost associated with H&S legislative compliance. It has been suggested that more extensive use of IT based solutions could help to improve the efficiency of the interface between the regulator (HSE) and business, and so reduce the (average) associated administrative cost. Possible mechanisms include a web-based 'virtual' data room managed by HSE, where regulated organisations could access their data securely to provide notifications of relevant changes. Alternatively, the introduction of secure, web-based data management systems might offer longer term cost-saving opportunities to both business and HSE itself. It would also facilitate dialogue between HSE and regulated organisations. As well as providing online examples of the type of information required, HSE could review draft applications/notifications etc. online, remotely and provide feedback to the application to improve the speed of decision-making.

Second, the need to keep records drives 70% of the estimated administrative costs identified by the ABME. A key driver of the costs is the need to update records as businesses change, e.g. where a business wishes to undertake new business activities, new risk assessments may have to be developed accordingly. This suggests that there may be scope to reduce costs by making it easier for businesses to use some of the many IT solutions currently available for electronic record-keeping and document management and to facilitate the communication of changes. This suggests that scope exists to evaluate options, for example devoting some sections of HSE's website to providing information on more efficient approaches to record-keeping. Further work would be needed to gauge the potential of such schemes.

Third, the provision of statutory information to third parties accounts for nearly one third of the estimated total administrative costs. Since this is a basic tenet of H&S legislation in the UK, it may offer limited scope for change and, therefore, cost reduction. For example, it may be difficult to reduce requirements such as product safety labelling/re-labelling (e.g. Safety Data Sheets) especially where industrial packaging/printing processes would need to be re-programmed. On the other hand, reducing administrative costs in other areas is likely to require businesses to identify more innovative ways to reduce the costs associated with communicating information to third parties. For example, online communication tools (e-mail distribution lists/e-newsletters etc.) are increasingly used as a cheap and effective way of communicating information concerning H&S risks. In some areas, however, the scope may be limited.

Fourth, the ABME has shown the importance of external costs: approximately 27% (£780m) of the estimated administrative costs are accounted for by external service providers (see Table 8). Business appears to be increasingly adopting 'outsourcing' models, which may increase direct administrative costs (associated with service-provider margins), although this will generally be balanced by efficiency savings and improved competitiveness as a result of an increased ability to focus on 'core' business processes.

Finally, the qualitative comments collected in the course of the project suggest that smaller businesses bear a disproportionate share of the cost. In part, this is seen as a reflection of the difficulty in designing legislation in a way that ensures that the administrative cost imposed on any individual business is

proportionate to the level of H&S risk attaching to that business. Many comments from interviewed respondents indicate a perception that there is a 'disproportionate cost' on smaller businesses involving lower risk activities.

4.3.2 Can the number of businesses affected by regulations (or by specific requirements within those regulations) be reduced?

The largest overall administrative costs facing business as a whole tend to be associated with those regulations which apply to large populations, even if the individual IO/DRs within the regulations are not particularly onerous. This implies that a key issue for HSE to consider is the extent to which the number of businesses affected by a particular IO/DR could be reduced in any way. Some existing legislation already considers such an approach to better match costs to H&S risks, for example businesses with less than five staff are not required to document the risk assessments which they are obliged to carry out under the Management of Health and Safety at Work Regulations 1999. A key question, therefore, is whether or not scope exists to extend the application of this 'sliding-scale' approach where other regulations are concerned. However, it is recognised that this approach could add to the complicated nature of the regulations and increase the complexity for businesses in complying with them.

4.3.3 Can the frequency with which an organisation is required to meet an obligation be reduced?

Administrative costs might also be reduced by changing the frequency with which an IO/DR needs to be met. For example, the frequency with which an organisation is required to fulfil an IO/DR could theoretically be altered on the basis of previous H&S performance, so rather than all organisations being required to submit a return on an annual basis, those businesses which can establish a proven track record of sound H&S performance could be permitted to submit a return on a bi-annual basis. Similarly, given the importance of the costs linked to keeping records, consideration could be given to how frequently businesses should be required to update its records, and notify the regulator.

4.3.4 Looking Forward

The estimates used in the SCM are indicative. They are based on discussions with a small number of businesses comparative to the total number of businesses affected; as such the results cannot state the precise burden on business or indeed the exact solutions for reducing the burden. However, the ABME has identified the most burdensome regulations on business and the drivers that create the burden, which gives HSE a good starting point to focus on key areas to reduce burdens. HSE will need to examine carefully all the high cost information obligations to understand the implications on both administrative costs and policy outcomes. These costs will need to be balanced against the benefits realised by the information obligations. The key challenge for HSE, therefore, is to draw on the results of the ABME as set out in this report to identify those areas where simplification activities could deliver the most substantial savings in terms of a net reduction in administrative costs and a real, tangible decrease in regulatory burdens that matter most to stakeholders, whilst at the same time maintaining and improving levels of worker protection.

5 Glossary

Generic abbreviations

Abbreviation	Definition
ASHE	Annual Survey of Hours and Earnings
ABME	Administrative Burdens Measurement Exercise
ABRP	Administrative Burdens Reduction Project
ABR.net	A bespoke project management information system used as a repository of all data used in the ABME
BRAP	Better Regulation Action Plan
BRE	Better Regulation Executive
BRTF	Better Regulation Task Force
BRU	Better Regulation Unit
DCTL	Department Contractor Team Leader
DR	Data Requirement
EU	European Union
HMRC	Her Majesty's Revenue and Customs
IDBR	Inter Departmental Business Register
IO	Information Obligation
ISU	International Survey Unit
NDPBs	Non-Departmental Public Bodies
ONS	Office of National Statistics
PwC	PricewaterhouseCoopers LLP
Reg	Regulation
SCM	Standard Cost Model
SDL	Senior Departmental Lead
SE	Single European Company Regulation
SI	Statutory Instrument
SIC	Standard Industrial Classification

Department abbreviations

Abbreviation	Definition
CAWR	Control of Asbestos at Work Regulations
COMAH	Control of Major Accident Hazards
DfT	Department for Transport
GMO	Genetically modified organisms
H&S	Health and safety
HSC	Health and Safety Commission
HSE	Health & Safety Executive
HSWA	Health and Safety at Work Act
MHSW	Management of Health and Safety at Work Regulations 1999
NIA	Nuclear Installations Act
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
SMEs	Small and Medium-Sized Enterprises

Definitions

Each of the technical terms used within the reports to Departments is defined below for ease of reference, based on the definitions set out within the SCM.

Technical term	Definition
Administrative costs	<p>The costs of the administrative activities that a business incurs when it complies with the information obligations that are imposed through central government regulation.</p> <p>The total unit administrative costs are made up of:</p> <ul style="list-style-type: none"> • Internal time costs required to complete task (Wages x Time) • Overhead costs (calculated as a percentage of internal time costs) • External services • External goods <p>The total unit administrative costs are multiplied by the quantity to derive the total administrative costs.</p> <p>Elements which are not captured within administrative costs are:</p> <ul style="list-style-type: none"> • One-off costs – only recurring costs are included • Training costs (these are assumed to be included within overhead costs) <p>Also see internal services definition.</p>
Administrative burden	<p>That part of the administrative costs that a business sustains only because it has to comply with regulation.</p> <p>The administrative burden is thus a subset of the administrative costs that a business will incur when complying with a regulation (i.e. it excludes 'business as usual' costs').</p>
Baseline	<p>The measure of administrative costs against which the Government will set targets for departments for administrative burden reduction. It is not part of the Administrative Burdens Measurement Exercise and has not been identified as part of this project.</p>
Business	<p>An organisation in any sector of the economy, with the exception of the public sections of public administration and public services as defined by the Office for National Statistics for National Accounts purposes. This definition, therefore, includes business, charities and the voluntary sector.</p>
Compliant business	<p>One which meets all of its regulatory obligations specifically around the provision of information to government and third parties.</p>
Compulsory regulation	<p>Those regulations that businesses have to follow in order to comply with relevant legislation or because there is in effect clear government backing. They contrast with voluntary regulations.</p>
Continuous	<p>The frequency of an information obligation where activity is ongoing throughout the year. For example if the information obligation is "to put labels on jam jars" then it is continuous with no specified frequency.</p>
Contingent requirements	<p>Those which only impose a burden in the event of a particular event occurring: the passage of time alone will not give rise to a contingent requirement.</p>
Data Requirement (DR)	<p>Each information obligation consists of a number of pieces of different information or data that a business shall provide in order to be able to comply with the information obligation.</p>
Demarcation	<p>The process whereby 'ownership' of the information obligations within a regulation which is shared by two or more departments is agreed with the aim of minimising double counting.</p>
European Union Regulation	<p>European Union (EU) Regulations are directly applicable in all Member States of the EU. For this reason they constitute the most powerful or influential form of EU law.</p> <p>Because regulations have direct effect, the individual countries do not need to pass local laws to bring them into effect, and indeed any local laws contrary to the regulation are overruled, as EU Law is supreme over the laws of the Member States. Member States therefore have to legislate in the light of, and consistently with the requirements of, EU Regulations.</p>

Technical term	Definition
European Union Directive	<p>A directive, on the other hand, is only applicable in the Member States when the objectives it contains have been transposed into national law. This is the minimum member states may implement more than directed by the EU in order to fully implement the directive.</p> <p>A European Union (formerly European Economic Community (EEC) / European Community (EC)) legal instruction, binding on all Member States but which must be implemented through national legislation within a prescribed time-scale.</p>
E-government solutions	<p>For a growing number of information obligations electronic solutions are made available to the businesses whereby they are able to report the required information, apply for subsidy or permits etc via the internet. An electronic solution is understood to mean that the businesses are able to send in the required information via electronic communication. A form that the businesses can download from a homepage and which subsequently has to be printed out and submitted by letter or fax, is thus not an electronic solution.</p>
External time cost	<p>In some cases businesses outsource administrative activities to service providers outside the business. These provider groups are called external service providers.</p> <p>Things which are measured are:</p> <ul style="list-style-type: none"> • Number of hours/minutes spent on administrative activity: • Hourly rate for various external service providers that perform administrative activities.
External goods & services	<p>This refers to the purchase of any goods or services from external suppliers in order to prepare and provide information for an Information obligation, for example postage, printing, software, technical equipment/machinery or professional services.</p>
Familiarisation with requirements	<p>Familiarisation is one of the seven groups of administrative activities. It includes the time required by a business to familiarise itself with the rules for a given information obligation.</p>
First time costs	<p>The costs associated with complying with regulations as part of starting a business or with particular requirements for those businesses complying with regulations for the first time. These costs are included in the calculations.</p>
Form filling	<p>Any standardised way of meeting an information obligation, for example, this could include electronic forms, paper forms, online forms or contact with a call centre.</p>
Frequency	<p>The number of times a business fulfils a data requirement per year.</p>
Gathering and assessing relevant information/ figures	<p>Gathering and assessing relevant information/ figures is one of the seven groups of administrative activities. It includes the retrieval of relevant figures and information needed to comply with a given information obligation and the assessment of which figures and information are necessary for the public authorities to accept the report.</p>
Government	<p>Government for this measurement is defined to include all bodies that are principally controlled and financed by central government i.e. all executive agencies, next steps agencies, non-departmental public bodies, regulators and arms-length bodies for which departments have to account to Parliament as well as government institutions which operate abroad, such as embassies. It also includes local government insofar as it acts to implement and enforce the policy of central government.</p>
Holding meetings	<p>Holding meetings is one of the seven groups of administrative activities. It includes meetings held internally between the various personnel groups involved in complying with the information obligation and meetings held in cases where compliance with the information obligation requires meetings with an auditor, lawyer or the like.</p>
Information Obligation (IO)	<p>A duty to procure or prepare information and subsequently make it available to a public authority, as well as a duty to facilitate the collection or preparation of information by others, e.g. by permitting and cooperating with an audit, visit or inspection. It includes regular requirements to read guidance on an information obligation and updated rules. A business cannot decline without coming into conflict with the law or being ineligible for continued funding, grants and other applied for schemes.</p>

Technical term	Definition
Inspections	Co-operating with inspections is one of the seven groups of administrative activities. It includes the costs incurred by a business which must assist external inspectors when they carry out their inspection at the business, and those incurred in complying with corrections resulting from inspection by public authorities.
Internal time & cost	The number of hours and minutes spent by a business on the administrative activities required to meet an information obligation, valued using the average hourly pay for each of the relevant occupational groups that perform the various administrative activities. The relevant occupation groups are the employee groups within the businesses that perform the administrative activities. Internal hourly pay is based on occupation groups with their hourly pay from the Office for National Statistics Annual Survey of Hours and Earnings (ASHE).
Making settlements or payments	Making settlements is one of the seven groups of administrative activities. It includes the payment of charges and the like.
Normally efficient business	A normally efficient business is one within the affected group that handles their administrative tasks neither better nor worse than may be reasonably expected.
One-off costs	The costs that are only sustained once in connection with the businesses adapting to a new or amended legislation/regulation. This does not include the costs that a business may have in relation to complying with existing regulations for the first time (see First time costs above).
One-off frequency	A once in a lifetime obligation or one-time requirement triggered by an event
Origin of regulation	In order to provide an overview of where responsibility for regulation rests, the information obligations have been classified in three main categories based on their origin: <ol style="list-style-type: none"> 1. Information obligations that are exclusively and completely a consequence of EU rules and other international obligations - the international rules describe which information businesses have to produce; 2. Information obligations that are a consequence of EU rules and other international obligations. The purpose will be formulated in the international rules, while implementation (including formulation of the specific data requirements) will be left to the member states. The international rules do not describe which information a business has to produce. 3. Data requirements that are exclusively a consequence of rules formulated at national level.
Overhead	Costs in addition to direct pay costs for individual employees, including: <ul style="list-style-type: none"> ▪ Fixed administration costs such as expenses for premises (rent or building depreciation), telephone, heating, electricity, IT equipment etc; ▪ Absence owing to illness; and ▪ Employers' National Insurance Contributions.
Preparing figures	Preparing figures is one of the seven groups of administrative activities. It includes: <ul style="list-style-type: none"> • Calculation - performing the relevant calculations needed for the public authorities to accept the report; • Presentation of figures in tables or the like; • Checking the calculated figures, e.g. by reconciliation with other data; and • Correction if the business's own checks reveal errors in the calculations.
Population	How many businesses are affected by any particular information obligation or data requirement.
Quantity	The size of the population of businesses affected multiplied by the frequency that the activity must be completed each year. It is stated annually and represents either (i) the actual number of transactions e.g. number of licence applications submitted p.a. or (ii) the estimated number of transactions derived as the sector population multiplied by frequency e.g. number of farmers x 4 (representing quarterly returns).

Technical term	Definition
Rare contingent requirement	Rare and contingent requirements arise where it is agreed that the actual/expected frequency with which an obligation is faced is so low that it should not be considered part of the recurring administrative costs.
Recurring costs	The administrative costs that a business constantly incurs when complying with the information obligations arising from regulation. They may be costs that arise at regular intervals, e.g. returns to Companies House. They can also be costs that arise at irregular intervals e.g. if there is an application for an export subsidy or planning permission. They may also be an administrative task that an individual business only undertakes on one occasion, e.g. in connection with business registration or upon application for authorisation.
Regulation	<p>A regulation is defined as a rule with which failure to comply would result in a business coming into conflict with the law or being ineligible for continued funding, grants and other applied for schemes. It can be summarised as all measures with legal force imposed by central government and other schemes operated by central government, including:</p> <ul style="list-style-type: none"> • Directly applicable EU Regulations; • Directly applicable sections of Acts of Parliament; • Statutory Instruments; • Rules, orders, schemes, regulations etc. made under statutory powers by Ministers or agencies; • Licences and permits issued under central Government authority; • Codes of Practice with statutory force; • Guidance with statutory force; • Codes of Practice/Guidance/Self-Regulation/Industry Agreements with Government backing, e.g. "Approved Codes of Practice"; and • Bye-laws made by central Government. <p>It excludes:</p> <ul style="list-style-type: none"> • Codes of Practice/Guidance without government backing; • Voluntary agreements between businesses including self-regulation/industry agreements with no government backing; • Obligations arising from local government measures where these are not concerned with implementing central government policy; and • Obligations arising from the Common Law (e.g. of an employer to his employees).
Regular	One possible frequency of an information obligation. For example, an information obligation which occurs within a period of a year at a specified interval this would be classed as regular (e.g. every six months, three times per year or annually).
Reporting Unit	<p>A series of Reporting Units have been defined for this report as the basic unit of analysis. They are groups of policy areas where:</p> <ul style="list-style-type: none"> • the number of regulations owned by the Unit is at least 30; and • the number of information obligations/data requirements is more than 150.
Reporting	Reporting is one of the seven groups of administrative activities. It includes preparing written descriptions, copying, filing, distribution or submitting info/reports, e.g. the directors' report in the Financial Statements Act.
Segmentation	Segmentation ensures measurements reflect differing cost/resource structures in businesses and the incidence of particular regulations. It is also needed to allow specific areas of interest to be analysed. Standard segmentation reflects the four size bands for businesses defined by the Small Business Service.
Standard Cost Model	The Standard Cost Model (SCM) provides a framework and methodology for measuring administrative costs.
SIC Code	The SIC Code refers to a four or five digit code defined on the basis of the Office for National Statistic's Standard Industry Classification which is used to classify/describe the industry sector of organisations required to meet an information obligation.

Technical term	Definition
Third parties	Third party refers to another person/s or organisation that is not a public sector body. Examples of third party bodies include parents, employees, consumers and stakeholders. Even where an information obligation does not specify a third party but stipulates the requirement for protocols/guidance etc to be in place, it can be interpreted that the obligation is owed to a third party.
Voluntary regulation	Voluntary actions fall within the scope of the SCM; examples include applying for licences, support schemes, grant schemes, etc.

Annex A: Administrative costs by Department

This annex presents the detailed results of the ABME for HSE. In particular, the annex contains the analysis of the estimates of administrative costs for each of the agreed reporting units¹⁸ as well as for the department as a whole where there are no reporting units.

The estimates of administrative costs included in this report are based on the application of the SCM which is designed to produce consistent estimates and so enable measurements to be compared and targets for reductions to be set across government. For practical reasons, the SCM relies on the input of a very limited number of experts and/or businesses regardless of the number of businesses affected by each IO/DR. As such, it does not produce a statistically representative measurement of costs: instead, it is a pragmatic approach to measurement that gives indicative estimates of the magnitude of costs. These estimates provide a starting point for setting reduction targets and highlighting the areas to focus upon. Moreover, the nature of the estimation process means that the greater the level of disaggregation of the cost estimates, the greater the potential margins of error surrounding the cost estimate.

Table 14 provides an overview of the regulations for which HSE is at least partly responsible that link to other regulations and where demarcation has been agreed between departments.

Table 14: Demarcation of regulations

Regulation/Information Obligations/Data Requirement	Demarcation description	Total cost (after demarcation) £ (million)	Total cost (before demarcation) £ (million)
Nuclear Installations Act 1965	The Nuclear Installations Act 1965 is jointly 'owned' between the Department of Trade and Industry and the Health and Safety Executive. Those IOs considered to fall under HSE's remit impose obligations for businesses regulated under Nuclear Site Licenses for which HSE are responsible for enforcing.	£3.1	£3.1

Footnote: The costs shown in this table are indicative estimates only – refer to caveats detailed in Section 1.5 above.

Footnote: The cost before demarcation is the sum of the admin costs of all the IO/DRs in the regulation regardless of which department/agency 'owns' the IO/DR. The cost after demarcation is the sum of (only) the admin costs of those IO/DRs which are owned by the department/agency covered by the report.

The tables below present the results for the department for which measurement has been done.

The tables show regulations within the department as follows:

¹⁸ A Reporting unit is a group of related policy areas/regulations where the number of IO/DRs is large enough to support a more detailed analysis of the results.

- total administrative cost (see Table 15);
- the distribution of administrative costs (see Table 16); and
- third party/non-third party and internal/ external costs (see Table 17).

The regulations have been listed in order of the total administrative cost, with the highest cost regulation shown first.

Table 15: Regulations by total administrative costs

Regulation	Total administrative cost	
	£ (million)	% of department total
Management of Health & Safety at Work Regulations 1999	£923.0	32%
Gas Safety (Installation and Use) Regulations 1998	£386.3	13%
Lifting Operations & Lifting Equipment Regulations 1998	£200.6	7%
Control of Substances Hazardous to Health Regulations 2002	£171.4	6%
Manual Handling Operations Regulations 1992	£166.0	6%
Health and Safety at Work etc Act 1974	£122.6	4%
Control of Asbestos at Work Regulations 2002	£121.2	4%
Safety Representatives and Safety Committees Regulations 1977	£75.8	3%
Construction (Design and Management) Regulations 1994	£71.7	2%
Provision & Use of Work equipment Regulations 1998	£49.0	2%
Dangerous Substances and Explosive Atmospheres Regulations 2002	£48.3	2%
Ionising Radiation Regulations 1999	£43.0	2%
Offshore Installations (Prevention of Fire and Explosion and Emergency response) Regulations 1995	£38.3	1%
Chemical (Hazard Information and Packaging for Supply) Regulations 2002	£36.1	1%
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	£34.4	1%
Workplace (Health, Safety and Welfare) Regulations 1992	£33.7	1%
Health and Safety Information for Employees Regulations 1989	£33.5	1%
Pressure Systems Safety Regulations 2000	£28.4	1%
Health and Safety (Consultation with Employees) Regulations 1996	£22.9	1%
Noise at Work Regulations 1989	£22.6	1%
Control of Substances Hazardous to Health (Fifth edition) Approved Code of Practice and guidance	£19.9	1%
Quarries Regulations 1999	£17.4	1%
Dangerous Substances in Harbour Areas Regulations 1987	£14.5	1%
Approved Code of Practice to Confined Spaces Regulations	£14.2	0%
Offshore Installations (Safety Case) Regulations 1992	£13.5	0%
Offices, Shops and Railway Premises Act 1963	£12.5	0%
Factories Act 1961	£12.4	0%

Regulation	Total administrative cost	
	£ (million)	% of department total
Borehole Sites and Operations Regulations 1995	£11.2	0%
Control of Major Accident Hazards Regulations 1999	£10.4	0%
Biocidal Products Regulations 2001	£8.7	0%
Construction (Health, Safety and Welfare) Regulations 1996	£7.4	0%
Health & Safety (First Aid) Regulations 1982	£7.2	0%
Code of practice - Rider Operated Lift Trucks: Operator Training	£6.6	0%
Docks Regulations 1988	£6.4	0%
Health and Safety (Display Screen Equipment) Regulations 1992	£6.1	0%
Legionnaires' disease The control of legionella bacteria in water systems Approved Code of Practice and Guidance	£5.5	0%
Petroleum (Consolidation) Act 1928	£5.2	0%
Work with asbestos insulation, asbestos coating and asbestos insulating board (Fourth edition)	£5.0	0%
Safety of Pressure Systems: Pressure Systems Safety code of practice	£4.8	0%
Health and Safety (Safety Signs and Signals) Regulations 1996	£4.8	0%
Control of Substances Hazardous to Health in the production of pottery	£3.8	0%
Gas Safety (Management) Regulations 1996	£3.6	0%
Control of Explosives Regulations 1991	£3.6	0%
Control of Lead at Work Regulations 2002	£3.2	0%
Nuclear Installations Act 1965	£3.1	0%
Unloading Petrol from Road Tankers, Dangerous Substances and Explosive Atmospheres regulations 2002	£3.0	0%
Construction (Head Protection) Regulations 1989	£2.5	0%
Offshore Installations and Wells (Design and Construction, etc) Regulations 1996	£2.2	0%
Standards of Training in Safe Gas Installation - code of practice	£2.2	0%
Notification of New Substances Regulations 1993	£2.0	0%
Control of Lead at Work (3rd edition) Approved Code of Practice & Guidance	£2.0	0%
Railways (Safety Case) Regulations 2000	£1.8	0%
Work at Height Regulations 2005	£1.7	0%
Diving at Work Regulations 1997	£1.5	0%
Radiation (Emergency Preparedness and Public Information) Regulations 2001	£1.0	0%
Fire Certificates (Special Premises) Regulations 1976	£0.9	0%
Pipelines Safety Regulations 1996	£0.8	0%
Safety in the installation and use of gas systems and appliances - Gas Safety (Installation and Use) Regulations 1998	£0.8	0%

Regulation	Total administrative cost	
	£ (million)	% of department total
Zoos- Safety, Health and Welfare Standards for employers and persons at Work	£0.7	0%
Mines Miscellaneous Health And Safety Provisions Regulations 1995	£0.7	0%
Management of Asbestos in non-domestic premises Regulation 4 of the Control of Asbestos at Work Regulations 2002	£0.6	0%
Mines (Medical Examinations) 1964	£0.6	0%
Genetically Modified Organisms (Contained Use) Regulations 2000	£0.6	0%
Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995	£0.5	0%
Compressed Air Regulations 1996	£0.5	0%
Manufacture and Storage of Explosives Regulations 2005	£0.4	0%
Freight Containers (Safety Convention) Regulations 1984	£0.4	0%
Management and Administration of Safety and Health at Mines Regulations 1993	£0.4	0%
Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999	£0.3	0%
Mines (Shafts and Winding) Regulations 1993	£0.3	0%
Gas Safety (Rights of Entry) Regulations 1996	£0.2	0%
Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals	£0.2	0%
Escape and Rescue from Mines Regulations 1995	£0.2	0%
Control of Substances Hazardous to Health (Amendment) Regulations 2004	£0.2	0%
Mines And Quarries (Tips) Regulations 1971	£0.1	0%
Railways and Other Transport Systems (Approval of Works, Plant and Equipment) Regulations 1994	£0.1	0%
Offshore installations (Safety Representatives and Safety Committees) Regulations 1989	£0.1	0%
Level Crossings Regulations 1997	£0.1	0%
Mines (Safety of Exit) Regulations 1988	£0.1	0%
Personal Protective Equipment at Work Regulations 1992	£0.1	0%
Construction (General Provisions) Regulations 1961	£0.1	0%
Dangerous Substances (Notification and Marking of Sites) Regulations 1990	£0.0	0%
Mines And Quarries Act 1954 (1954 C. 70)	£0.0	0%
Mines (Control of Ground Movement) Regulations 1999	£0.0	0%
Council Regulation (EEC) No 793/93 on the evaluation and control of the risks of existing substances	£0.0	0%
Asbestos (Licensing) Regulations 1983	£0.0	0%
Coal Mines (Cardox and Hydrox) Regulations 1956	£0.0	0%

Regulation	Total administrative cost	
	£ (million)	% of department total
Electricity at Work Regulations 1989	£0.0	0%
Coal and Other Mines (Ventilation) Order 1956	£0.0	0%
Coal Mines (Precautions against Inflammable Dust) Order 1956	£0.0	0%
Notification of Installations Handling Hazardous Substances Regulations 1982	£0.0	0%
Mines And Quarries (Tips) Act 1969 (1969 C. 10)	£0.0	0%
Coal and Other Mines (Locomotives) Order 1956	£0.0	0%
Miscellaneous Mines (Explosives) Regulations 1959	£0.0	0%
Submarine Pipe-lines (Inspectors etc.) Regulations 1977	£0.0	0%
Notification of Cooling Towers and Evaporative Condensers Regulations 1992	£0.0	0%
Biocidal Products (Amendment) Regulations 2003	£0.0	0%
Agriculture (Tractor Cabs) Regulations 1974	£0.0	0%
Work with asbestos which does not normally require a licence (Fourth edition)	£0.0	0%
Coal and Other Safety -Lamp Mines (Explosives) Regulations 1993	£0.0	0%
Mines (Precautions against Inrushes) Regulations 1979	£0.0	0%
Coal and Other Mines (Shafts, Outlets and Roads) Regulations 1960	£0.0	0%
Placing on the Market and Supervision of Transfers of Explosives Regulations 1993	£0.0	0%
Offshore Installations (Logbooks and Registration of Death) Regulations 1972	£0.0	0%
Coal and Other Mines (Fire and Rescue) Order 1956	£0.0	0%
Railways (Safety Critical Work) Regulations 1994	£0.0	0%
Coal and Other Mines (Horses) Order 1956	£0.0	0%
Coal and Other Mines (Safety-Lamps and Lighting) Order 1956	£0.0	0%
Coal Mines (Firedamp Drainage) Regulations 1960	£0.0	0%
Coal Mines (Owners Operating Rules) Regulations 1993	£0.0	0%
Dangerous Substances and Explosive Atmospheres, Approved Code of Practice	£0.0	0%
HSE Total	£2,869.6	100%

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Footnote: Certain ACoPs seek only to clarify the information obligations of the regulations, and any administrative costs which may be associated with an ACoP is already captured in the parent regulation. Therefore zero values for administrative costs have been entered for certain ACoPs.

Table 16: The distribution of administrative costs by IO/DR by regulation

Regulation	Total administrative cost per regulation £ (million)	Distribution of administrative cost £ ('000)			Number of IO/DRs
		Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Management of Health & Safety at Work Regulations 1999	£923.0	£184,599	£461,497	£738,396	22
Gas Safety (Installation and Use) Regulations 1998	£386.3	£0	£19	£360,972	22
Lifting Operations & Lifting Equipment Regulations 1998	£200.6	£1	£91	£199,695	7
Control of Substances Hazardous to Health Regulations 2002	£171.4	£0	£6	£59,072	44
Manual Handling Operations Regulations 1992	£166.0	£15,961	£83,000	£150,039	2
Health and Safety at Work etc Act 1974	£122.6	£0	£455	£66,175	15
Control of Asbestos at Work Regulations 2002	£121.2	£2	£176	£94,615	27
Safety Representatives and Safety Committees Regulations 1977	£75.8	£82	£17,550	£58,142	3
Construction (Design and Management) Regulations 1994	£71.7	£0	£3,112	£14,005	23
Provision & Use of Work equipment Regulations 1998	£49.0	£0	£3,241	£15,527	11
Dangerous Substances and Explosive Atmospheres Regulations 2002	£48.3	£148	£285	£37,905	10
Ionising Radiation Regulations 1999	£43.0	£0	£11	£27,821	58
Offshore Installations (Prevention of Fire and Explosion and Emergency response) Regulations 1995	£38.3	£0	£113	£22,148	12
Chemical (Hazard Information and Packaging for Supply) Regulations 2002	£36.1	£0	£213	£12,883	15
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	£34.4	£0	£682	£24,219	6
Workplace (Health, Safety and Welfare) Regulations 1992	£33.7	£33,686	£33,686	£33,686	1
Health and Safety Information for Employees Regulations 1989	£33.5	£216	£12,956	£20,373	3
Pressure Systems Safety Regulations 2000	£28.4	£0	£131	£22,045	12

Regulation	Total administrative cost per regulation	Distribution of administrative cost £ ('000)			Number of IO/DRs
	£ (million)	Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Health and Safety (Consultation with Employees) Regulations 1996	£22.9	£22,894	£22,894	£22,894	1
Noise at Work Regulations 1989	£22.6	£4	£1,478	£19,684	4
Control of Substances Hazardous to Health (Fifth edition) Approved Code of Practice and guidance	£19.9	£0	£1	£9,142	27
Quarries Regulations 1999	£17.4	£0	£49	£7,500	22
Dangerous Substances in Harbour Areas Regulations 1987	£14.5	£0	£3	£7,371	44
Approved Code of Practice to Confined Spaces Regulations	£14.2	£184	£3,510	£10,472	3
Offshore Installations (Safety Case) Regulations 1992	£13.5	£0	£94	£5,717	13
Offices, Shops and Railway Premises Act 1963	£12.5	£12,500	£12,500	£12,500	1
Factories Act 1961	£12.4	£0	£53	£10,991	9
Borehole Sites and Operations Regulations 1995	£11.2	£0	£3	£10,978	11
Control of Major Accident Hazards Regulations 1999	£10.4	£0	£47	£4,550	28
Biocidal Products Regulations 2001	£8.7	£0	£2	£3,602	41
Construction (Health, Safety and Welfare) Regulations 1996	£7.4	£0	£320	£2,696	10
Health & Safety (First Aid) Regulations 1982	£7.2	£720	£3,613	£6,505	2
Code of practice - Rider Operated Lift Trucks: Operator Training	£6.6	£2	£3,283	£6,565	2
Docks Regulations 1988	£6.4	£0	£33	£6,247	5
Health and Safety (Display Screen Equipment) Regulations 1992	£6.1	£2,213	£3,040	£3,866	2
Legionnaires' disease The control of legionella bacteria in water systems Approved Code of Practice and Guidance	£5.5	£190	£276	£5,010	5
Petroleum (Consolidation) Act 1928	£5.2	£101	£2,611	£5,121	2
Work with asbestos insulation, asbestos coating and asbestos insulating board (Fourth edition)	£5.0	£0	£3	£2,354	18

Regulation	Total administrative cost per regulation	Distribution of administrative cost £ ('000)			Number of IO/DRs
	£ (million)	Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Safety of Pressure Systems: Pressure Systems Safety code of practice	£4.8	£7	£592	£4,212	8
Health and Safety (Safety Signs and Signals) Regulations 1996	£4.8	£660	£2,391	£4,122	2
Control of Substances Hazardous to Health in the production of pottery	£3.8	£1	£27	£895	24
Gas Safety (Management) Regulations 1996	£3.6	£0	£1	£3,510	17
Control of Explosives Regulations 1991	£3.6	£0	£0	£2,859	7
Control of Lead at Work Regulations 2002	£3.2	£1	£99	£1,057	14
Nuclear Installations Act 1965	£3.1	£0	£0	£3,077	7
Unloading Petrol from Road Tankers, Dangerous Substances and Explosive Atmospheres regulations 2002	£3.0	£9	£128	£1,452	9
Construction (Head Protection) Regulations 1989	£2.5	£90	£360	£2,067	3
Offshore Installations and Wells (Design and Construction, etc) Regulations 1996	£2.2	£0	£29	£1,445	9
Standards of Training in Safe Gas Installation - code of practice	£2.2	£2,162	£2,162	£2,162	1
Notification of New Substances Regulations 1993	£2.0	£0	£4	£1,366	20
Control of Lead at Work (3rd edition) Approved Code of Practice & Guidance	£2.0	£0	£4	£911	28
Railways (Safety Case) Regulations 2000	£1.8	£0	£1	£914	24
Work at Height Regulations 2005	£1.7	£31	£48	£1,404	6
Diving at Work Regulations 1997	£1.5	£1	£7	£1,095	9
Radiation (Emergency Preparedness and Public Information) Regulations 2001	£1.0	£0	£8	£239	39
Fire Certificates (Special Premises) Regulations 1976	£0.9	£0	£1	£860	9
Pipelines Safety Regulations 1996	£0.8	£0	£0	£747	15

Regulation	Total administrative cost per regulation	Distribution of administrative cost £ ('000)			Number of IO/DRs
	£ (million)	Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Safety in the installation and use of gas systems and appliances - Gas Safety (Installation and Use) Regulations 1998	£0.8	£764	£764	£764	1
Zoos- Safety, Health and Welfare Standards for employers and persons at Work	£0.7	£1	£3	£594	10
Mines Miscellaneous Health And Safety Provisions Regulations 1995	£0.7	£0	£112	£548	3
Management of Asbestos in non-domestic premises Regulation 4 of the Control of Asbestos at Work Regulations 2002	£0.6	£290	£319	£347	2
Mines (Medical Examinations) 1964	£0.6	£0	£0	£492	7
Genetically Modified Organisms (Contained Use) Regulations 2000	£0.6	£0	£0	£473	33
Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995	£0.5	£0	£0	£423	11
Compressed Air Regulations 1996	£0.5	£2	£26	£177	7
Manufacture and Storage of Explosives Regulations 2005	£0.4	£0	£4	£366	8
Freight Containers (Safety Convention) Regulations 1984	£0.4	£0	£133	£236	3
Management and Administration of Safety and Health at Mines Regulations 1993	£0.4	£0	£1	£128	35
Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999	£0.3	£0	£0	£256	14
Mines (Shafts and Winding) Regulations 1993	£0.3	£0	£13	£137	14
Gas Safety (Rights of Entry) Regulations 1996	£0.2	£198	£198	£198	1
Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals	£0.2	£0	£23	£76	6
Escape and Rescue from Mines Regulations 1995	£0.2	£1	£3	£137	11
Control of Substances Hazardous to Health (Amendment) Regulations 2004	£0.2	£70	£76	£83	2

Regulation	Total administrative cost per regulation	Distribution of administrative cost £ ('000)			Number of IO/DRs
	£ (million)	Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Mines And Quarries (Tips) Regulations 1971	£0.1	£0	£0	£123	24
Railways and Other Transport Systems (Approval of Works, Plant and Equipment) Regulations 1994	£0.1	£2	£7	£72	7
Offshore installations (Safety Representatives and Safety Committees) Regulations 1989	£0.1	£0	£5	£47	17
Level Crossings Regulations 1997	£0.1	£105	£105	£105	1
Mines (Safety of Exit) Regulations 1988	£0.1	£0	£10	£69	5
Personal Protective Equipment at Work Regulations 1992	£0.1	£90	£90	£90	1
Construction (General Provisions) Regulations 1961	£0.1	£88	£88	£88	1
Dangerous Substances (Notification and Marking of Sites) Regulations 1990	£0.0	£4	£12	£18	5
Mines And Quarries Act 1954 (1954 C. 70)	£0.0	£0	£1	£27	7
Mines (Control of Ground Movement) Regulations 1999	£0.0	£0	£19	£38	9
Council Regulation (EEC) No 793/93 on the evaluation and control of the risks of existing substances	£0.0	£0	£0	£17	15
Asbestos (Licensing) Regulations 1983	£0.0	£0	£0	£30	4
Coal Mines (Cardrox and Hydrox) Regulations 1956	£0.0	£1	£3	£6	10
Electricity at Work Regulations 1989	£0.0	£1	£3	£7	7
Coal and Other Mines (Ventilation) Order 1956	£0.0	£2	£8	£12	8
Coal Mines (Precautions against Inflammable Dust) Order 1956	£0.0	£3	£6	£8	3
Notification of Installations Handling Hazardous Substances Regulations 1982	£0.0	£0	£0	£11	4
Mines And Quarries (Tips) Act 1969 (1969 C. 10)	£0.0	£0	£0	£7	10
Coal and Other Mines (Locomotives) Order 1956	£0.0	£0	£0	£2	9

Regulation	Total administrative cost per regulation	Distribution of administrative cost £ ('000)			Number of IO/DRs
	£ (million)	Minimum cost IO/DR	Median cost IO/DR	Maximum cost IO/DR	
Miscellaneous Mines (Explosives) Regulations 1959	£0.0	£0	£0	£3	15
Submarine Pipe-lines (Inspectors etc.) Regulations 1977	£0.0	£1	£1	£1	3
Notification of Cooling Towers and Evaporative Condensers Regulations 1992	£0.0	£1	£1	£1	3
Biocidal Products (Amendment) Regulations 2003	£0.0	£1	£1	£1	2
Agriculture (Tractor Cabs) Regulations 1974	£0.0	£0	£0	£1	5
Work with asbestos which does not normally require a licence (Fourth edition)	£0.0	£0	£0	£2	9
Coal and Other Safety -Lamp Mines (Explosives) Regulations 1993	£0.0	£0	£0	£1	10
Mines (Precautions against Inrushes) Regulations 1979	£0.0	£1	£1	£1	8
Coal and Other Mines (Shafts, Outlets and Roads) Regulations 1960	£0.0	£0	£0	£0	12
Placing on the Market and Supervision of Transfers of Explosives Regulations 1993	£0.0	£0	£0	£0	4
Offshore Installations (Logbooks and Registration of Death) Regulations 1972	£0.0	£0	£0	£0	4
Coal and Other Mines (Fire and Rescue) Order 1956	£0.0	£0	£0	£0	2
Railways (Safety Critical Work) Regulations 1994	£0.0	£0	£0	£0	3
Coal Mines (Owners Operating Rules) Regulations 1993	£0.0	£0	£0	£0	3
Coal and Other Mines (Horses) Order 1956	£0.0	£0	£0	£0	6
HSE Total	£2,869.6	£0	£6	£738,396	1,209

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Table 17: Administrative costs by regulation - breakdown by third party/non-third party and internal/ external categories¹⁹

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Management of Health & Safety at Work Regulations 1999	-	-	£0.0	94%	6%	£923.0	94%	6%	£923.0
Gas Safety (Installation and Use) Regulations 1998	85%	15%	£25.3	48%	52%	£361.0	50%	50%	£386.3
Lifting Operations & Lifting Equipment Regulations 1998	100%	0%	£0.4	20%	80%	£200.2	20%	80%	£200.6
Control of Substances Hazardous to Health Regulations 2002	100%	0%	£110.2	100%	0%	£61.2	100%	0%	£171.4
Manual Handling Operations Regulations 1992	75%	25%	£150.0	34%	66%	£16.0	71%	29%	£166.0
Health and Safety at Work etc Act 1974	100%	0%	£56.4	52%	48%	£66.2	74%	26%	£122.6
Control of Asbestos at Work Regulations 2002	100%	0%	£109.0	100%	0%	£12.1	100%	0%	£121.2
Safety Representatives and Safety Committees Regulations 1977	52%	48%	£75.8	-	-	£0.0	52%	48%	£75.8
Construction (Design and Management) Regulations 1994	100%	0%	£67.3	100%	0%	£4.3	100%	0%	£71.7
Provision & Use of Work equipment Regulations 1998	100%	0%	£13.0	58%	42%	£36.0	69%	31%	£49.0
Dangerous Substances and Explosive Atmospheres Regulations 2002	59%	41%	£42.4	85%	15%	£5.9	62%	38%	£48.3

¹⁹ A third party is any other person or organisation that is not a public sector body, for example employees, consumers, parents and other stakeholders. For the purposes of the definition, a public sector body is a government department or agency (including law enforcement, local government, emergency services etc), a court, a government funded school or other educational institution. Where an IO/DR refers specifically to an inspector but does not clarify who the inspector might be, it is deemed to refer to a public sector body. For the purpose of distinguishing third party and non-third party administrative costs, an obligation to a third party arises only if it is exclusively owed to third parties (e.g. parents). Therefore, there are some obligations that apply to third parties that are not flagged as such because they also apply to public sector bodies

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Ionising Radiation Regulations 1999	99%	1%	£7.5	22%	78%	£35.5	36%	64%	£43.0
Offshore Installations (Prevention of Fire and Explosion and Emergency response) Regulations 1995	49%	51%	£13.8	19%	81%	£24.5	30%	70%	£38.3
Chemical (Hazard Information and Packaging for Supply) Regulations 2002	40%	60%	£35.1	19%	81%	£1.0	39%	61%	£36.1
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	-	-	£0.0	100%	0%	£34.4	100%	0%	£34.4
Workplace (Health, Safety and Welfare) Regulations 1992	3%	97%	£33.7	-	-	£0.0	3%	97%	£33.7
Health and Safety Information for Employees Regulations 1989	63%	37%	£33.5	-	-	£0.0	63%	37%	£33.5
Pressure Systems Safety Regulations 2000	46%	54%	£6.2	100%	0%	£22.1	88%	12%	£28.4
Health and Safety (Consultation with Employees) Regulations 1996	100%	0%	£22.9	-	-	£0.0	100%	0%	£22.9
Noise at Work Regulations 1989	100%	0%	£3.0	4%	96%	£19.7	16%	84%	£22.6
Control of Substances Hazardous to Health (Fifth edition) Approved Code of Practice and guidance	100%	0%	£13.9	97%	3%	£6.0	99%	1%	£19.9
Quarries Regulations 1999	21%	79%	£9.5	13%	87%	£7.9	17%	83%	£17.4
Dangerous Substances in Harbour Areas Regulations 1987	100%	0%	£11.3	95%	5%	£3.2	99%	1%	£14.5

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Approved Code of Practice to Confined Spaces Regulations	100%	0%	£3.5	12%	88%	£10.7	34%	66%	£14.2
Offshore Installations (Safety Case) Regulations 1992	-	-	£0.0	60%	40%	£13.5	60%	40%	£13.5
Offices, Shops and Railway Premises Act 1963	-	-	£0.0	0%	100%	£12.5	0%	100%	£12.5
Factories Act 1961	-	-	£0.0	100%	0%	£12.4	100%	0%	£12.4
Borehole Sites and Operations Regulations 1995	100%	0%	£0.2	100%	0%	£11.0	100%	0%	£11.2
Control of Major Accident Hazards Regulations 1999	100%	0%	£0.7	38%	62%	£9.8	42%	58%	£10.4
Biocidal Products Regulations 2001	100%	0%	£0.0	42%	58%	£8.7	42%	58%	£8.7
Construction (Health, Safety and Welfare) Regulations 1996	100%	0%	£3.5	100%	0%	£3.9	100%	0%	£7.4
Health & Safety (First Aid) Regulations 1982	100%	0%	£7.2	-	-	£0.0	100%	0%	£7.2
Code of practice - Rider Operated Lift Trucks: Operator Training	100%	0%	£0.0	9%	91%	£6.6	9%	91%	£6.6
Docks Regulations 1988	45%	55%	£0.2	6%	94%	£6.2	7%	93%	£6.4
Health and Safety (Display Screen Equipment) Regulations 1992	100%	0%	£6.1	-	-	£0.0	100%	0%	£6.1
Legionnaires' disease The control of legionella bacteria in water systems Approved Code of Practice and Guidance	100%	0%	£0.5	100%	0%	£5.0	100%	0%	£5.5
Petroleum (Consolidation) Act 1928	5%	95%	£5.1	10%	90%	£0.1	5%	95%	£5.2

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Work with asbestos insulation, asbestos coating and asbestos insulating board (Fourth edition)	100%	0%	£2.8	99%	1%	£2.3	100%	0%	£5.0
Safety of Pressure Systems: Pressure Systems Safety code of practice	-	-	£0.0	100%	0%	£4.8	100%	0%	£4.8
Health and Safety (Safety Signs and Signals) Regulations 1996	94%	6%	£4.8	-	-	£0.0	94%	6%	£4.8
Control of Substances Hazardous to Health in the production of pottery	100%	0%	£1.1	100%	0%	£2.7	100%	0%	£3.8
Gas Safety (Management) Regulations 1996	100%	0%	£3.6	100%	0%	£0.0	100%	0%	£3.6
Control of Explosives Regulations 1991	100%	0%	£0.0	96%	4%	£3.6	96%	4%	£3.6
Control of Lead at Work Regulations 2002	93%	7%	£2.1	55%	45%	£1.2	79%	21%	£3.2
Nuclear Installations Act 1965	100%	0%	£0.0	3%	97%	£3.1	3%	97%	£3.1
Unloading Petrol from Road Tankers, Dangerous Substances and Explosive Atmospheres regulations 2002	100%	0%	£2.7	100%	0%	£0.3	100%	0%	£3.0
Construction (Head Protection) Regulations 1989	100%	0%	£2.1	100%	0%	£0.4	100%	0%	£2.5
Offshore Installations and Wells (Design and Construction, etc) Regulations 1996	100%	0%	£1.4	100%	0%	£0.7	100%	0%	£2.2
Standards of Training in Safe Gas Installation - code of practice	100%	0%	£2.2	-	-	£0.0	100%	0%	£2.2

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Notification of New Substances Regulations 1993	71%	29%	£0.2	28%	72%	£1.9	32%	68%	£2.0
Control of Lead at Work (3rd edition) Approved Code of Practice & Guidance	100%	0%	£0.3	100%	0%	£1.7	100%	0%	£2.0
Railways (Safety Case) Regulations 2000	96%	4%	£0.0	54%	46%	£1.8	54%	46%	£1.8
Work at Height Regulations 2005	100%	0%	£0.2	100%	0%	£1.5	100%	0%	£1.7
Diving at Work Regulations 1997	100%	0%	£0.1	100%	0%	£1.4	100%	0%	£1.5
Radiation (Emergency Preparedness and Public Information) Regulations 2001	59%	41%	£0.3	98%	2%	£0.6	85%	15%	£1.0
Fire Certificates (Special Premises) Regulations 1976	100%	0%	£0.0	100%	0%	£0.9	100%	0%	£0.9
Pipelines Safety Regulations 1996	100%	0%	£0.0	100%	0%	£0.8	100%	0%	£0.8
Safety in the installation and use of gas systems and appliances - Gas Safety (Installation and Use) Regulations 1998	100%	0%	£0.8	-	-	£0.0	100%	0%	£0.8
Zoos- Safety, Health and Welfare Standards for employers and persons at Work	13%	87%	£0.6	100%	0%	£0.1	21%	79%	£0.7
Mines Miscellaneous Health And Safety Provisions Regulations 1995	17%	83%	£0.7	-	-	£0.0	17%	83%	£0.7
Management of Asbestos in non-domestic premises Regulation 4 of the Control of Asbestos at Work Regulations 2002	100%	0%	£0.6	-	-	£0.0	100%	0%	£0.6

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Mines (Medical Examinations) 1964	100%	0%	£0.0	4%	96%	£0.6	4%	96%	£0.6
Genetically Modified Organisms (Contained Use) Regulations 2000	100%	0%	£0.0	100%	0%	£0.6	100%	0%	£0.6
Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995	100%	0%	£0.0	65%	35%	£0.4	67%	33%	£0.5
Compressed Air Regulations 1996	100%	0%	£0.0	100%	0%	£0.4	100%	0%	£0.5
Manufacture and Storage of Explosives Regulations 2005	100%	0%	£0.4	100%	0%	£0.0	100%	0%	£0.4
Freight Containers (Safety Convention) Regulations 1984	100%	0%	£0.2	100%	0%	£0.1	100%	0%	£0.4
Management and Administration of Safety and Health at Mines Regulations 1993	100%	0%	£0.0	100%	0%	£0.3	100%	0%	£0.4
Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999	100%	0%	£0.0	32%	68%	£0.3	33%	67%	£0.3
Mines (Shafts and Winding) Regulations 1993	9%	91%	£0.2	0%	100%	£0.1	6%	94%	£0.3
Gas Safety (Rights of Entry) Regulations 1996	100%	0%	£0.2	-	-	£0.0	100%	0%	£0.2
Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals	-	-	£0.0	36%	64%	£0.2	36%	64%	£0.2
Escape and Rescue from Mines Regulations 1995	100%	0%	£0.0	100%	0%	£0.2	100%	0%	£0.2

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Control of Substances Hazardous to Health (Amendment) Regulations 2004	100%	0%	£0.2	-	-	£0.0	100%	0%	£0.2
Mines And Quarries (Tips) Regulations 1971	-	-	£0.0	3%	97%	£0.1	3%	97%	£0.1
Railways and Other Transport Systems (Approval of Works, Plant and Equipment) Regulations 1994	-	-	£0.0	100%	0%	£0.1	100%	0%	£0.1
Offshore installations (Safety Representatives and Safety Committees) Regulations 1989	100%	0%	£0.1	-	-	£0.0	100%	0%	£0.1
Level Crossings Regulations 1997	-	-	£0.0	15%	85%	£0.1	15%	85%	£0.1
Mines (Safety of Exit) Regulations 1988	16%	84%	£0.1	100%	0%	£0.0	25%	75%	£0.1
Personal Protective Equipment at Work Regulations 1992	100%	0%	£0.1	-	-	£0.0	100%	0%	£0.1
Construction (General Provisions) Regulations 1961	100%	0%	£0.1	-	-	£0.0	100%	0%	£0.1
Dangerous Substances (Notification and Marking of Sites) Regulations 1990	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Mines And Quarries Act 1954 (1954 C. 70)	38%	62%	£0.0	100%	0%	£0.0	40%	60%	£0.0
Mines (Control of Ground Movement) Regulations 1999	-	-	£0.0	100%	0%	£0.0	100%	0%	£0.0
Council Regulation (EEC) No 793/93 on the evaluation and control of the risks of existing substances	-	-	£0.0	85%	15%	£0.0	85%	15%	£0.0

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Asbestos (Licensing) Regulations 1983	-	-	£0.0	99%	1%	£0.0	99%	1%	£0.0
Coal Mines (Cardrox and Hydrox) Regulations 1956	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Electricity at Work Regulations 1989	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Coal and Other Mines (Ventilation) Order 1956	-	-	£0.0	100%	0%	£0.0	100%	0%	£0.0
Coal Mines (Precautions against Inflammable Dust) Order 1956	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Notification of Installations Handling Hazardous Substances Regulations 1982	-	-	£0.0	100%	0%	£0.0	100%	0%	£0.0
Mines And Quarries (Tips) Act 1969 (1969 C. 10)	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Coal and Other Mines (Locomotives) Order 1956	6%	94%	£0.0	100%	0%	£0.0	20%	80%	£0.0
Miscellaneous Mines (Explosives) Regulations 1959	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Submarine Pipelines (Inspectors etc.) Regulations 1977	-	-	£0.0	100%	0%	£0.0	100%	0%	£0.0
Notification of Cooling Towers and Evaporative Condensers Regulations 1992	-	-	£0.0	100%	0%	£0.0	100%	0%	£0.0
Biocidal Products (Amendment) Regulations 2003	-	-	£0.0	100%	0%	£0.0	100%	0%	£0.0
Agriculture (Tractor Cabs) Regulations 1974	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Work with asbestos which does not normally require a licence (Fourth edition)	-	-	£0.0	100%	0%	£0.0	100%	0%	£0.0
Coal and Other Safety -Lamp Mines (Explosives) Regulations 1993	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Mines (Precautions against Inrushes) Regulations 1979	100%	0%	£0.0	-	-	£0.0	100%	0%	£0.0
Coal and Other Mines (Shafts, Outlets and Roads) Regulations 1960	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Placing on the Market and Supervision of Transfers of Explosives Regulations 1993	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Offshore Installations (Logbooks and Registration of Death) Regulations 1972	100%	0%	£0.0	100%	0%	£0.0	100%	0%	£0.0
Coal and Other Mines (Fire and Rescue) Order 1956	100%	0%	£0.0	-	-	£0.0	100%	0%	£0.0
Railways (Safety Critical Work) Regulations 1994	100%	0%	£0.0	-	-	£0.0	100%	0%	£0.0
Coal and Other Mines (Horses) Order 1956	-	-	£0.0	-	-	£0.0	0%	0%	£0.0
Coal and Other Mines (Safety-Lamps and Lighting) Order 1956	-	-	£0.0	-	-	£0.0	0%	0%	£0.0
Coal Mines (Firedamp Drainage) Regulations 1960	-	-	£0.0	-	-	£0.0	0%	0%	£0.0
Coal Mines (Owners Operating Rules) Regulations 1993	-	-	£0.0	-	-	£0.0	0%	0%	£0.0

	Third Party			Non-third Party			Total administrative costs		
	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)	Internal cost %	External cost %	Total £ (million)
Dangerous Substances and Explosive Atmospheres, Approved Code of Practice	-	-	£0.0	-	-	£0.0	0%	0%	£0.0
HSE Total	79%	21%	£895.2	70%	30%	£1,974.4	73%	27%	£2,869.6

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Table 18 below summarises the origin breakdown for each regulation.

The regulations have been listed in order of the total administrative cost, with the highest cost regulation shown first.

Table 18: Administrative costs by origin

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Management of Health & Safety at Work Regulations 1999	£738.4	80%	£184.6	20%	£0.0	0%	£923.0
Gas Safety (Installation and Use) Regulations 1998	£0.0	0%	£0.0	0%	£386.3	100%	£386.3
Lifting Operations & Lifting Equipment Regulations 1998	£200.0	100%	£0.0	0%	£0.6	0%	£200.6
Control of Substances Hazardous to Health Regulations 2002	£170.4	99%	£1.0	1%	£0.0	0%	£171.4
Manual Handling Operations Regulations 1992	£150.0	90%	£16.0	10%	£0.0	0%	£166.0
Health and Safety at Work etc Act 1974	£0.0	0%	£0.0	0%	£122.6	100%	£122.6
Control of Asbestos at Work Regulations 2002	£0.2	0%	£116.7	96%	£4.3	4%	£121.2
Safety Representatives and Safety Committees Regulations 1977	£0.0	0%	£0.0	0%	£75.8	100%	£75.8
Construction (Design and Management) Regulations 1994	£27.7	39%	£39.8	56%	£4.1	6%	£71.7

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Provision & Use of Work equipment Regulations 1998	£35.5	72%	£0.1	0%	£13.5	27%	£49.0
Dangerous Substances and Explosive Atmospheres Regulations 2002	£48.3	100%	£0.0	0%	£0.0	0%	£48.3
Ionising Radiation Regulations 1999	£40.0	93%	£2.6	6%	£0.4	1%	£43.0
Offshore Installations (Prevention of Fire and Explosion and Emergency response) Regulations 1995	£0.0	0%	£0.0	0%	£38.3	100%	£38.3
Chemical (Hazard Information and Packaging for Supply) Regulations 2002	£36.1	100%	£0.0	0%	£0.0	0%	£36.1
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	£0.0	0%	£34.1	99%	£0.3	1%	£34.4
Workplace (Health, Safety and Welfare) Regulations 1992	£0.0	0%	£0.0	0%	£33.7	100%	£33.7
Health and Safety Information for Employees Regulations 1989	£0.0	0%	£0.0	0%	£33.5	100%	£33.5
Pressure Systems Safety Regulations 2000	£0.0	0%	£0.0	0%	£28.4	100%	£28.4
Health and Safety (Consultation with Employees) Regulations 1996	£0.0	0%	£22.9	100%	£0.0	0%	£22.9
Noise at Work Regulations 1989	£22.6	100%	£0.0	0%	£0.0	0%	£22.6
Control of Substances Hazardous to Health (Fifth edition) Approved Code of Practice and guidance	£0.0	0%	£0.0	0%	£19.9	100%	£19.9
Quarries Regulations 1999	£0.0	0%	£0.0	0%	£17.4	100%	£17.4
Dangerous Substances in Harbour Areas Regulations 1987	£0.0	0%	£0.0	0%	£14.5	100%	£14.5

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Approved Code of Practice to Confined Spaces Regulations	£0.0	0%	£0.0	0%	£14.2	100%	£14.2
Offshore Installations (Safety Case) Regulations 1992	£0.0	0%	£0.0	0%	£13.5	100%	£13.5
Offices, Shops and Railway Premises Act 1963	£0.0	0%	£0.0	0%	£12.5	100%	£12.5
Factories Act 1961	£0.0	0%	£0.0	0%	£12.4	100%	£12.4
Borehole Sites and Operations Regulations 1995	£11.2	100%	£0.0	0%	£0.0	0%	£11.2
Control of Major Accident Hazards Regulations 1999	£10.2	98%	£0.2	2%	£0.0	0%	£10.4
Biocidal Products Regulations 2001	£7.5	86%	£1.2	14%	£0.0	0%	£8.7
Construction (Health, Safety and Welfare) Regulations 1996	£0.0	0%	£7.4	100%	£0.0	0%	£7.4
Health & Safety (First Aid) Regulations 1982	£0.0	0%	£0.0	0%	£7.2	100%	£7.2
Code of practice - Rider Operated Lift Trucks: Operator Training	£0.0	0%	£0.0	0%	£6.6	100%	£6.6
Docks Regulations 1988	£0.0	0%	£0.0	0%	£6.4	100%	£6.4
Health and Safety (Display Screen Equipment) Regulations 1992	£6.1	100%	£0.0	0%	£0.0	0%	£6.1
Legionnaires' disease The control of legionella bacteria in water systems Approved Code of Practice and Guidance	£0.0	0%	£0.0	0%	£5.5	100%	£5.5
Petroleum (Consolidation) Act 1928	£0.0	0%	£0.0	0%	£5.2	100%	£5.2
Work with asbestos insulation, asbestos coating and asbestos insulating board (Fourth edition)	£0.0	0%	£0.0	0%	£5.0	100%	£5.0
Safety of Pressure Systems: Pressure Systems Safety code of practice	£0.0	0%	£0.0	0%	£4.8	100%	£4.8

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Health and Safety (Safety Signs and Signals) Regulations 1996	£0.0	0%	£4.8	100%	£0.0	0%	£4.8
Control of Substances Hazardous to Health in the production of pottery	£0.0	0%	£0.0	0%	£3.8	100%	£3.8
Gas Safety (Management) Regulations 1996	£0.0	0%	£0.0	0%	£3.6	100%	£3.6
Control of Explosives Regulations 1991	£0.0	0%	£0.0	0%	£3.6	100%	£3.6
Control of Lead at Work Regulations 2002	£3.1	95%	£0.2	5%	£0.0	0%	£3.2
Nuclear Installations Act 1965	£0.0	0%	£0.0	0%	£3.1	100%	£3.1
Unloading Petrol from Road Tankers, Dangerous Substances and Explosive Atmospheres regulations 2002	£0.0	0%	£0.0	0%	£3.0	100%	£3.0
Construction (Head Protection) Regulations 1989	£0.0	0%	£0.0	0%	£2.5	100%	£2.5
Offshore Installations and Wells (Design and Construction, etc) Regulations 1996	£0.0	0%	£0.0	0%	£2.2	100%	£2.2
Standards of Training in Safe Gas Installation - code of practice	£0.0	0%	£0.0	0%	£2.2	100%	£2.2
Notification of New Substances Regulations 1993	£2.0	100%	£0.0	0%	£0.0	0%	£2.0
Control of Lead at Work (3rd edition) Approved Code of Practice & Guidance	£0.0	0%	£0.0	0%	£2.0	100%	£2.0
Railways (Safety Case) Regulations 2000	£0.0	0%	£0.0	0%	£1.8	100%	£1.8
Work at Height Regulations 2005	£1.5	90%	£0.1	8%	£0.0	2%	£1.7
Diving at Work Regulations 1997	£0.0	0%	£0.0	0%	£1.5	100%	£1.5

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Radiation (Emergency Preparedness and Public Information) Regulations 2001	£0.0	4%	£0.9	96%	£0.0	0%	£1.0
Fire Certificates (Special Premises) Regulations 1976	£0.0	0%	£0.0	0%	£0.9	100%	£0.9
Pipelines Safety Regulations 1996	£0.0	0%	£0.0	0%	£0.8	100%	£0.8
Safety in the installation and use of gas systems and appliances - Gas Safety (Installation and Use) Regulations 1998	£0.0	0%	£0.0	0%	£0.8	100%	£0.8
Zoos- Safety, Health and Welfare Standards for employers and persons at Work	£0.0	0%	£0.0	0%	£0.7	100%	£0.7
Mines Miscellaneous Health And Safety Provisions Regulations 1995	£0.0	0%	£0.0	0%	£0.7	100%	£0.7
Management of Asbestos in non-domestic premises Regulation 4 of the Control of Asbestos at Work Regulations 2002	£0.0	0%	£0.0	0%	£0.6	100%	£0.6
Mines (Medical Examinations) 1964	£0.0	0%	£0.0	0%	£0.6	100%	£0.6
Genetically Modified Organisms (Contained Use) Regulations 2000	£0.5	83%	£0.0	4%	£0.1	13%	£0.6
Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995	£0.0	0%	£0.0	0%	£0.5	100%	£0.5
Compressed Air Regulations 1996	£0.0	0%	£0.0	0%	£0.5	100%	£0.5
Manufacture and Storage of Explosives Regulations 2005	£0.0	0%	£0.0	0%	£0.4	100%	£0.4
Freight Containers (Safety Convention) Regulations 1984	£0.4	100%	£0.0	0%	£0.0	0%	£0.4

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Management and Administration of Safety and Health at Mines Regulations 1993	£0.0	0%	£0.0	0%	£0.4	100%	£0.4
Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999	£0.0	0%	£0.3	100%	£0.0	0%	£0.3
Mines (Shafts and Winding) Regulations 1993	£0.0	0%	£0.0	0%	£0.3	100%	£0.3
Gas Safety (Rights of Entry) Regulations 1996	£0.0	0%	£0.0	0%	£0.2	100%	£0.2
Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals	£0.2	100%	£0.0	0%	£0.0	0%	£0.2
Escape and Rescue from Mines Regulations 1995	£0.0	0%	£0.0	0%	£0.2	100%	£0.2
Control of Substances Hazardous to Health (Amendment) Regulations 2004	£0.0	0%	£0.0	0%	£0.2	100%	£0.2
Mines And Quarries (Tips) Regulations 1971	£0.0	0%	£0.0	0%	£0.1	100%	£0.1
Railways and Other Transport Systems (Approval of Works, Plant and Equipment) Regulations 1994	£0.0	0%	£0.0	0%	£0.1	100%	£0.1
Offshore installations (Safety Representatives and Safety Committees) Regulations 1989	£0.0	0%	£0.0	0%	£0.1	100%	£0.1
Level Crossings Regulations 1997	£0.0	0%	£0.0	0%	£0.1	100%	£0.1
Mines (Safety of Exit) Regulations 1988	£0.0	0%	£0.0	0%	£0.1	100%	£0.1
Personal Protective Equipment at Work Regulations 1992	£0.0	0%	£0.1	100%	£0.0	0%	£0.1
Construction (General Provisions) Regulations 1961	£0.0	0%	£0.0	0%	£0.1	100%	£0.1

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Dangerous Substances (Notification and Marking of Sites) Regulations 1990	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Mines And Quarries Act 1954 (1954 C. 70)	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Mines (Control of Ground Movement) Regulations 1999	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Council Regulation (EEC) No 793/93 on the evaluation and control of the risks of existing substances	£0.0	100%	£0.0	0%	£0.0	0%	£0.0
Asbestos (Licensing) Regulations 1983	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Coal Mines (Cardrox and Hydrox) Regulations 1956	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Electricity at Work Regulations 1989	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Coal and Other Mines (Ventilation) Order 1956	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Coal Mines (Precautions against Inflammable Dust) Order 1956	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Notification of Installations Handling Hazardous Substances Regulations 1982	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Mines And Quarries (Tips) Act 1969 (1969 C. 10)	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Coal and Other Mines (Locomotives) Order 1956	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Miscellaneous Mines (Explosives) Regulations 1959	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Submarine Pipe-lines (Inspectors etc.) Regulations 1977	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Notification of Cooling Towers and Evaporative Condensers Regulations 1992	£0.0	0%	£0.0	0%	£0.0	100%	£0.0

	International, no domestic discretion (A)		International, domestic discretion (B)		Domestic (C)		Total admin costs £ (million)
	£ (million)	% of Regulation total	£ (million)	% of Regulation total	£ (million)	% of Regulation total	
Biocidal Products (Amendment) Regulations 2003	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Agriculture (Tractor Cabs) Regulations 1974	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Work with asbestos which does not normally require a licence (Fourth edition)	£0.0	0%	£0.0	100%	£0.0	0%	£0.0
Coal and Other Safety - Lamp Mines (Explosives) Regulations 1993	£0.0	79%	£0.0	0%	£0.0	21%	£0.0
Mines (Precautions against Inrushes) Regulations 1979	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Coal and Other Mines (Shafts, Outlets and Roads) Regulations 1960	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Placing on the Market and Supervision of Transfers of Explosives Regulations 1993	£0.0	64%	£0.0	36%	£0.0	0%	£0.0
Offshore Installations (Logbooks and Registration of Death) Regulations 1972	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Coal and Other Mines (Fire and Rescue) Order 1956	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Railways (Safety Critical Work) Regulations 1994	£0.0	0%	£0.0	0%	£0.0	100%	£0.0
Coal Mines (Owners Operating Rules) Regulations 1993	£0.0	0%	£0.0	0%	£0.0	0%	£0.0
Coal and Other Mines (Horses) Order 1956	£0.0	0%	£0.0	0%	£0.0	0%	£0.0
HSE Total	£1,512.0		£432.9		£924.7		£2,869.6

Note: Shares sum to 100 for each row not column.

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Footnote: A detailed non-standard segmentation was applied in order to estimate administrative costs associated with the Management of Health & Safety at Work Regulations 1999 (See Section 2.3.5 for further details). Due to the fact that individual IOs within these Regulations were 'rolled-up' into a generic/combined IO to facilitate the segmentation, it was not possible to allocate the various IOs across different Origin categories in the same way as for the other Regulations in the table above. Discussions between BRE and HSE resulted in an agreement that 80% of the administrative costs associated with the MHSW Regulations 1999 should be considered as Origin Category A, with the remaining 20% to be considered as Origin Category B.

Table 19 below summarises the breakdown of third party / non-third party admin costs by origin. This table is at summary level only.

Table 19: Summary administrative costs by origin by third party/non-third party

	International, no domestic discretion (A) £ (million)			International, domestic discretion (B) £ (million)			Domestic (C) £ (million)			Total £ million
	Third party	Non-third party	Total	Third party	Non-third party	Total	Third party	Non-third party	Total	
HSE Total	£394.2	£1,117.8	£1,512.0	£176.5	£256.4	£432.9	£324.5	£600.2	£924.7	£2,869.6

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Table 20 below shows a more detailed breakdown of administrative costs by origin according to type (as defined in the UK Standard Cost Manual) by regulation.

The regulations have been listed in order of the total administrative cost, with the highest cost regulation shown first.

Table 20: Administrative costs by sub category by origin by regulation

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Management of Health & Safety at Work Regulations 1999	£0.0	£738.4	£0.0	80%	£0.0	£184.6	£0.0	20%	0%
Gas Safety (Installation and Use) Regulations 1998	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Lifting Operations & Lifting Equipment Regulations 1998	£0.0	£200.0	£0.0	100%	£0.0	£0.0	£0.0	0%	0%
Control of Substances Hazardous to Health Regulations 2002	£0.0	£170.4	£0.0	99%	£0.0	£1.0	£0.0	1%	0%
Manual Handling Operations Regulations 1992	£0.0	£150.0	£0.0	90%	£0.0	£16.0	£0.0	10%	0%
Health and Safety at Work etc Act 1974	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Control of Asbestos at Work Regulations 2002	£0.0	£0.2	£0.0	0%	£0.0	£116.7	£0.0	96%	4%
Safety Representatives and Safety Committees Regulations 1977	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Construction (Design and Management) Regulations 1994	£0.0	£27.7	£0.0	39%	£0.0	£39.8	£0.0	56%	6%
Provision & Use of Work equipment Regulations 1998	£0.0	£35.5	£0.0	72%	£0.0	£0.1	£0.0	0%	27%
Dangerous Substances and Explosive Atmospheres Regulations 2002	£0.0	£48.3	£0.0	100%	£0.0	£0.0	£0.0	0%	0%
Ionising Radiation Regulations 1999	£0.0	£40.0	£0.0	93%	£0.0	£1.5	£1.1	6%	1%
Offshore Installations (Prevention of Fire and Explosion and Emergency response) Regulations 1995	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Chemical (Hazard Information and Packaging for Supply) Regulations 2002	£0.0	£36.1	£0.0	100%	£0.0	£0.0	£0.0	0%	0%
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	£0.0	£0.0	£0.0	0%	£0.0	£34.1	£0.0	99%	1%
Workplace (Health, Safety and Welfare) Regulations 1992	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Health and Safety Information for Employees Regulations 1989	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Pressure Systems Safety Regulations 2000	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Health and Safety (Consultation with Employees) Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£22.9	£0.0	100%	0%
Noise at Work Regulations 1989	£0.0	£22.6	£0.0	100%	£0.0	£0.0	£0.0	0%	0%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Control of Substances Hazardous to Health (Fifth edition) Approved Code of Practice and guidance	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Quarries Regulations 1999	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Dangerous Substances in Harbour Areas Regulations 1987	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Approved Code of Practice to Confined Spaces Regulations	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Offshore Installations (Safety Case) Regulations 1992	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Offices, Shops and Railway Premises Act 1963	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Factories Act 1961	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Borehole Sites and Operations Regulations 1995	£0.0	£11.2	£0.0	100%	£0.0	£0.0	£0.0	0%	0%
Control of Major Accident Hazards Regulations 1999	£0.0	£10.2	£0.0	98%	£0.0	£0.2	£0.0	2%	0%
Biocidal Products Regulations 2001	£0.0	£7.5	£0.0	86%	£0.0	£1.2	£0.0	14%	0%
Construction (Health, Safety and Welfare) Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£7.4	£0.0	100%	0%
Health & Safety (First Aid) Regulations 1982	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Code of practice - Rider Operated Lift Trucks: Operator Training	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Docks Regulations 1988	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Health and Safety (Display Screen Equipment) Regulations 1992	£0.0	£6.1	£0.0	100%	£0.0	£0.0	£0.0	0%	0%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Legionnaires' disease The control of legionella bacteria in water systems Approved Code of Practice and Guidance	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Petroleum (Consolidation) Act 1928	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Work with asbestos insulation, asbestos coating and asbestos insulating board (Fourth edition)	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Safety of Pressure Systems: Pressure Systems Safety code of practice	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Health and Safety (Safety Signs and Signals) Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£4.8	£0.0	100%	0%
Control of Substances Hazardous to Health in the production of pottery	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Gas Safety (Management) Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Control of Explosives Regulations 1991	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Control of Lead at Work Regulations 2002	£0.0	£3.1	£0.0	95%	£0.0	£0.2	£0.0	5%	0%
Nuclear Installations Act 1965	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Unloading Petrol from Road Tankers, Dangerous Substances and Explosive Atmospheres regulations 2002	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Construction (Head Protection) Regulations 1989	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Offshore Installations and Wells (Design and Construction, etc) Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Standards of Training in Safe Gas Installation - code of practice	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Notification of New Substances Regulations 1993	£0.0	£2.0	£0.0	100%	£0.0	£0.0	£0.0	0%	0%
Control of Lead at Work (3rd edition) Approved Code of Practice & Guidance	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Railways (Safety Case) Regulations 2000	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Work at Height Regulations 2005	£0.0	£1.5	£0.0	90%	£0.0	£0.1	£0.0	8%	2%
Diving at Work Regulations 1997	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Radiation (Emergency Preparedness and Public Information) Regulations 2001	£0.0	£0.0	£0.0	4%	£0.0	£0.9	£0.0	96%	0%
Fire Certificates (Special Premises) Regulations 1976	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Pipelines Safety Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Safety in the installation and use of gas systems and appliances - Gas Safety (Installation and Use) Regulations 1998	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Zoos- Safety, Health and Welfare Standards for employers and persons at Work	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Mines Miscellaneous Health And Safety Provisions Regulations 1995	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Management of Asbestos in non-domestic premises Regulation 4 of the Control of Asbestos at Work Regulations 2002	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Mines (Medical Examinations) 1964	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Genetically Modified Organisms (Contained Use) Regulations 2000	£0.0	£0.5	£0.0	83%	£0.0	£0.0	£0.0	4%	13%
Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Compressed Air Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Manufacture and Storage of Explosives Regulations 2005	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Freight Containers (Safety Convention) Regulations 1984	£0.0	£0.0	£0.4	100%	£0.0	£0.0	£0.0	0%	0%
Management and Administration of Safety and Health at Mines Regulations 1993	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999	£0.0	£0.0	£0.0	0%	£0.0	£0.3	£0.0	100%	0%
Mines (Shafts and Winding) Regulations 1993	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Gas Safety (Rights of Entry) Regulations 1996	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals	£0.2	£0.0	£0.0	100%	£0.0	£0.0	£0.0	0%	0%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Escape and Rescue from Mines Regulations 1995	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Control of Substances Hazardous to Health (Amendment) Regulations 2004	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Mines And Quarries (Tips) Regulations 1971	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Railways and Other Transport Systems (Approval of Works, Plant and Equipment) Regulations 1994	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Offshore installations (Safety Representatives and Safety Committees) Regulations 1989	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Level Crossings Regulations 1997	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Mines (Safety of Exit) Regulations 1988	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Personal Protective Equipment at Work Regulations 1992	£0.0	£0.0	£0.0	0%	£0.0	£0.1	£0.0	100%	0%
Construction (General Provisions) Regulations 1961	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Dangerous Substances (Notification and Marking of Sites) Regulations 1990	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Mines And Quarries Act 1954 (1954 C. 70)	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Mines (Control of Ground Movement) Regulations 1999	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Council Regulation (EEC) No 793/93 on the evaluation and control of the risks of existing substances	£0.0	£0.0	£0.0	100%	£0.0	£0.0	£0.0	0%	0%
Asbestos (Licensing) Regulations 1983	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Coal Mines (Cardrox and Hydrox) Regulations 1956	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Electricity at Work Regulations 1989	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Coal and Other Mines (Ventilation) Order 1956	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Coal Mines (Precautions against Inflammable Dust) Order 1956	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Notification of Installations Handling Hazardous Substances Regulations 1982	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Mines And Quarries (Tips) Act 1969 (1969 C. 10)	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Coal and Other Mines (Locomotives) Order 1956	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Miscellaneous Mines (Explosives) Regulations 1959	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Submarine Pipe-lines (Inspectors etc.) Regulations 1977	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Notification of Cooling Towers and Evaporative Condensers Regulations 1992	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Biocidal Products (Amendment) Regulations 2003	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Agriculture (Tractor Cabs) Regulations 1974	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Work with asbestos which does not normally require a licence (Fourth edition)	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	100%	0%

	International, no domestic discretion (A)				International, domestic discretion (B)				Domestic (C)
	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type A	1: EU Regulation £ (million)	2: EU Directive £(million)	3: Other International £ (million)	% for type B	% for type C
Coal and Other Safety - Lamp Mines (Explosives) Regulations 1993	£0.0	£0.0	£0.0	79%	£0.0	£0.0	£0.0	0%	21%
Mines (Precautions against Inrushes) Regulations 1979	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Coal and Other Mines (Shafts, Outlets and Roads) Regulations 1960	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Placing on the Market and Supervision of Transfers of Explosives Regulations 1993	£0.0	£0.0	£0.0	64%	£0.0	£0.0	£0.0	36%	0%
Offshore Installations (Logbooks and Registration of Death) Regulations 1972	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Coal and Other Mines (Fire and Rescue) Order 1956	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Railways (Safety Critical Work) Regulations 1994	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	100%
Coal and Other Mines (Horses) Order 1956	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	0%
Coal and Other Mines (Safety-Lamps and Lighting) Order 1956	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	0%
Coal Mines (Firedamp Drainage) Regulations 1960	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	0%
Coal Mines (Owners Operating Rules) Regulations 1993	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	0%
Dangerous Substances and Explosive Atmospheres, Approved Code of Practice	£0.0	£0.0	£0.0	0%	£0.0	£0.0	£0.0	0%	0%
HSE Total	£0.2	£1,511.4	£0.4	53%	£0.0	£431.8	£1.1	15%	32%

Note: Shares sum to 100 for each row not column.

Note: The percentage shown is the proportion of the admin cost for type A,B and C as a proportion of the admin cost for the reporting unit / department overall i.e. by row.

Footnote: The costs shown in this Table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

Table 21 shows the percentage origin for all regulations in the department.

The regulations have been listed in order of the total administrative cost, with the highest cost regulation shown first.

Table 21: Percentage administrative cost by origin by regulation

Regulation	Total administrative cost		% Cost by origin		
	£ (million)	% of department total	A	B	C
Management of Health & Safety at Work Regulations 1999	£923.0	32%	80%	20%	0%
Gas Safety (Installation and Use) Regulations 1998	£386.3	13%	0%	0%	100%
Lifting Operations & Lifting Equipment Regulations 1998	£200.6	7%	100%	0%	0%
Control of Substances Hazardous to Health Regulations 2002	£171.4	6%	99%	1%	0%
Manual Handling Operations Regulations 1992	£166.0	6%	90%	10%	0%
Health and Safety at Work etc Act 1974	£122.6	4%	0%	0%	100%
Control of Asbestos at Work Regulations 2002	£121.2	4%	0%	96%	4%
Safety Representatives and Safety Committees Regulations 1977	£75.8	3%	0%	0%	100%
Construction (Design and Management) Regulations 1994	£71.7	2%	39%	56%	6%
Provision & Use of Work equipment Regulations 1998	£49.0	2%	72%	0%	27%
Dangerous Substances and Explosive Atmospheres Regulations 2002	£48.3	2%	100%	0%	0%
Ionising Radiation Regulations 1999	£43.0	2%	93%	6%	1%
Offshore Installations (Prevention of Fire and Explosion and Emergency response) Regulations 1995	£38.3	1%	0%	0%	100%
Chemical (Hazard Information and Packaging for Supply) Regulations 2002	£36.1	1%	100%	0%	0%
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	£34.4	1%	0%	99%	1%
Workplace (Health, Safety and Welfare) Regulations 1992	£33.7	1%	0%	0%	100%
Health and Safety Information for Employees Regulations 1989	£33.5	1%	0%	0%	100%
Pressure Systems Safety Regulations 2000	£28.4	1%	0%	0%	100%
Health and Safety (Consultation with Employees) Regulations 1996	£22.9	1%	0%	100%	0%
Noise at Work Regulations 1989	£22.6	1%	100%	0%	0%
Control of Substances Hazardous to Health (Fifth edition) Approved Code of Practice and guidance	£19.9	1%	0%	0%	100%
Quarries Regulations 1999	£17.4	1%	0%	0%	100%

Regulation	Total administrative cost		% Cost by origin		
	£ (million)	% of department total	A	B	C
Dangerous Substances in Harbour Areas Regulations 1987	£14.5	1%	0%	0%	100%
Approved Code of Practice to Confined Spaces Regulations	£14.2	0%	0%	0%	100%
Offshore Installations (Safety Case) Regulations 1992	£13.5	0%	0%	0%	100%
Offices, Shops and Railway Premises Act 1963	£12.5	0%	0%	0%	100%
Factories Act 1961	£12.4	0%	0%	0%	100%
Borehole Sites and Operations Regulations 1995	£11.2	0%	100%	0%	0%
Control of Major Accident Hazards Regulations 1999	£10.4	0%	98%	2%	0%
Biocidal Products Regulations 2001	£8.7	0%	86%	14%	0%
Construction (Health, Safety and Welfare) Regulations 1996	£7.4	0%	0%	100%	0%
Health & Safety (First Aid) Regulations 1982	£7.2	0%	0%	0%	100%
Code of practice - Rider Operated Lift Trucks: Operator Training	£6.6	0%	0%	0%	100%
Docks Regulations 1988	£6.4	0%	0%	0%	100%
Health and Safety (Display Screen Equipment) Regulations 1992	£6.1	0%	100%	0%	0%
Legionnaires' disease The control of legionella bacteria in water systems Approved Code of Practice and Guidance	£5.5	0%	0%	0%	100%
Petroleum (Consolidation) Act 1928	£5.2	0%	0%	0%	100%
Work with asbestos insulation, asbestos coating and asbestos insulating board (Fourth edition)	£5.0	0%	0%	0%	100%
Safety of Pressure Systems: Pressure Systems Safety code of practice	£4.8	0%	0%	0%	100%
Health and Safety (Safety Signs and Signals) Regulations 1996	£4.8	0%	0%	100%	0%
Control of Substances Hazardous to Health in the production of pottery	£3.8	0%	0%	0%	100%
Gas Safety (Management) Regulations 1996	£3.6	0%	0%	0%	100%
Control of Explosives Regulations 1991	£3.6	0%	0%	0%	100%
Control of Lead at Work Regulations 2002	£3.2	0%	95%	5%	0%
Nuclear Installations Act 1965	£3.1	0%	0%	0%	100%
Unloading Petrol from Road Tankers, Dangerous Substances and Explosive Atmospheres regulations 2002	£3.0	0%	0%	0%	100%
Construction (Head Protection) Regulations 1989	£2.5	0%	0%	0%	100%
Offshore Installations and Wells (Design and Construction, etc) Regulations 1996	£2.2	0%	0%	0%	100%
Standards of Training in Safe Gas Installation - code of practice	£2.2	0%	0%	0%	100%
Notification of New Substances Regulations 1993	£2.0	0%	100%	0%	0%

Regulation	Total administrative cost		% Cost by origin		
	£ (million)	% of department total	A	B	C
Control of Lead at Work (3rd edition) Approved Code of Practice & Guidance	£2.0	0%	0%	0%	100%
Railways (Safety Case) Regulations 2000	£1.8	0%	0%	0%	100%
Work at Height Regulations 2005	£1.7	0%	90%	8%	2%
Diving at Work Regulations 1997	£1.5	0%	0%	0%	100%
Radiation (Emergency Preparedness and Public Information) Regulations 2001	£1.0	0%	4%	96%	0%
Fire Certificates (Special Premises) Regulations 1976	£0.9	0%	0%	0%	100%
Pipelines Safety Regulations 1996	£0.8	0%	0%	0%	100%
Safety in the installation and use of gas systems and appliances - Gas Safety (Installation and Use) Regulations 1998	£0.8	0%	0%	0%	100%
Zoos- Safety, Health and Welfare Standards for employers and persons at Work	£0.7	0%	0%	0%	100%
Mines Miscellaneous Health And Safety Provisions Regulations 1995	£0.7	0%	0%	0%	100%
Management of Asbestos in non-domestic premises Regulation 4 of the Control of Asbestos at Work Regulations 2002	£0.6	0%	0%	0%	100%
Mines (Medical Examinations) 1964	£0.6	0%	0%	0%	100%
Genetically Modified Organisms (Contained Use) Regulations 2000	£0.6	0%	83%	4%	13%
Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995	£0.5	0%	0%	0%	100%
Compressed Air Regulations 1996	£0.5	0%	0%	0%	100%
Manufacture and Storage of Explosives Regulations 2005	£0.4	0%	0%	0%	100%
Freight Containers (Safety Convention) Regulations 1984	£0.4	0%	100%	0%	0%
Management and Administration of Safety and Health at Mines Regulations 1993	£0.4	0%	0%	0%	100%
Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999	£0.3	0%	0%	100%	0%
Mines (Shafts and Winding) Regulations 1993	£0.3	0%	0%	0%	100%
Gas Safety (Rights of Entry) Regulations 1996	£0.2	0%	0%	0%	100%
Regulation (EC) 304/2003 - The Export and Import of Dangerous Chemicals	£0.2	0%	100%	0%	0%
Escape and Rescue from Mines Regulations 1995	£0.2	0%	0%	0%	100%
Control of Substances Hazardous to Health (Amendment) Regulations 2004	£0.2	0%	0%	0%	100%
Mines And Quarries (Tips) Regulations 1971	£0.1	0%	0%	0%	100%

Regulation	Total administrative cost		% Cost by origin		
	£ (million)	% of department total	A	B	C
Railways and Other Transport Systems (Approval of Works, Plant and Equipment) Regulations 1994	£0.1	0%	0%	0%	100%
Offshore installations (Safety Representatives and Safety Committees) Regulations 1989	£0.1	0%	0%	0%	100%
Level Crossings Regulations 1997	£0.1	0%	0%	0%	100%
Mines (Safety of Exit) Regulations 1988	£0.1	0%	0%	0%	100%
Personal Protective Equipment at Work Regulations 1992	£0.1	0%	0%	100%	0%
Construction (General Provisions) Regulations 1961	£0.1	0%	0%	0%	100%
Dangerous Substances (Notification and Marking of Sites) Regulations 1990	£0.0	0%	0%	0%	100%
Mines And Quarries Act 1954 (1954 C. 70)	£0.0	0%	0%	0%	100%
Mines (Control of Ground Movement) Regulations 1999	£0.0	0%	0%	0%	100%
Council Regulation (EEC) No 793/93 on the evaluation and control of the risks of existing substances	£0.0	0%	100%	0%	0%
Asbestos (Licensing) Regulations 1983	£0.0	0%	0%	0%	100%
Coal Mines (Cardrox and Hydrox) Regulations 1956	£0.0	0%	0%	0%	100%
Electricity at Work Regulations 1989	£0.0	0%	0%	0%	100%
Coal and Other Mines (Ventilation) Order 1956	£0.0	0%	0%	0%	100%
Coal Mines (Precautions against Inflammable Dust) Order 1956	£0.0	0%	0%	0%	100%
Notification of Installations Handling Hazardous Substances Regulations 1982	£0.0	0%	0%	0%	100%
Mines And Quarries (Tips) Act 1969 (1969 C. 10)	£0.0	0%	0%	0%	100%
Coal and Other Mines (Locomotives) Order 1956	£0.0	0%	0%	0%	100%
Miscellaneous Mines (Explosives) Regulations 1959	£0.0	0%	0%	0%	100%
Submarine Pipe-lines (Inspectors etc.) Regulations 1977	£0.0	0%	0%	0%	100%
Notification of Cooling Towers and Evaporative Condensers Regulations 1992	£0.0	0%	0%	0%	100%
Biocidal Products (Amendment) Regulations 2003	£0.0	0%	0%	0%	100%
Agriculture (Tractor Cabs) Regulations 1974	£0.0	0%	0%	0%	100%
Work with asbestos which does not normally require a licence (Fourth edition)	£0.0	0%	0%	100%	0%
Coal and Other Safety -Lamp Mines (Explosives) Regulations 1993	£0.0	0%	79%	0%	21%
Mines (Precautions against Inrushes) Regulations 1979	£0.0	0%	0%	0%	100%
Coal and Other Mines (Shafts, Outlets and Roads) Regulations 1960	£0.0	0%	0%	0%	100%

Regulation	Total administrative cost		% Cost by origin		
	£ (million)	% of department total	A	B	C
Placing on the Market and Supervision of Transfers of Explosives Regulations 1993	£0.0	0%	64%	36%	0%
Offshore Installations (Logbooks and Registration of Death) Regulations 1972	£0.0	0%	0%	0%	100%
Coal and Other Mines (Fire and Rescue) Order 1956	£0.0	0%	0%	0%	100%
Railways (Safety Critical Work) Regulations 1994	£0.0	0%	0%	0%	100%
Coal and Other Mines (Horses) Order 1956	£0.0	0%	0%	0%	0%
Coal and Other Mines (Safety-Lamps and Lighting) Order 1956	£0.0	0%	0%	0%	0%
Coal Mines (Firedamp Drainage) Regulations 1960	£0.0	0%	0%	0%	0%
Coal Mines (Owners Operating Rules) Regulations 1993	£0.0	0%	0%	0%	0%
Dangerous Substances and Explosive Atmospheres, Approved Code of Practice	£0.0	0%	0%	0%	0%
HSE Total	£2,869.6	100%	53%	15%	32%

Note: % cost by origin is by regulation i.e. by row

Footnote: The costs shown in this table are indicative estimates. They have been prepared on a consistent basis in accordance with the SCM but still need to be interpreted with caution given the nature of the SCM (see Section 2.3 for further details).

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