Expanding HSE’s ability to communicate with small firms:
A targeted approach

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Expanding HSE’s ability to communicate with small firms: A targeted approach

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Communicating with, and influencing the behaviour of, small firms is difficult. Raising awareness in small firms requires a high degree of focus on those activities that relate to the firms’ core business needs. This study has attempted to identify ‘key events’ in the life of small firms that may be indicative of their need for advice or information on health and safety and to identify appropriate communication channels, tools and techniques that will enable the HSE to make use of those key events.

The main output is a series of comprehensive Sector Key Events Approaches (SKEAs) for the Plastics, Catering, Motor Vehicle Repair, Bodyshop and Construction sectors. These describe the attitudes to health and safety, key events and the best communication channels for reaching small firms within each sector.

This report also contains a number of recommendations for the HSE to make use of the SKEAs. These include some recommendations that are generically applicable across small firms in all sectors and prioritised recommendations relevant to the five sectors studied.

The SKEA production methodology has proved to be effective. The SKEAs form comprehensive documents that describe when firms would benefit from advice, what advice they need, how to get it to them and how to present it. They should help the HSE to better target communication to small firms in a cost-effective manner.

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EXECUTIVE SUMMARY

The Health and Safety Executive (HSE) wishes to see continued reductions in the number of fatalities, major injuries and minor injuries and occupational illnesses sustained in the UK workplace. Improving the safety performance of small firms is an important component in achieving these reductions. However, past experience has shown that accessing and influencing small firms is very difficult to achieve. Health and safety tends to be given a low priority in small firms as they usually feel they need to focus exclusively on their core activities to ensure survival of the firm. So, raising awareness in small firms requires a high degree of focus on those activities that relate to core business needs. The challenge for the HSE is to target the dissemination of information and advice so that firms receive it when they are most receptive to the messages contained.

Accordingly, the main objectives of this research study were:

- to identify external indicators of 'key events' in the life of small firms that may be indicative of their need for advice or information on health and safety at work;
- to identify appropriate, cost effective communication channels, tools and techniques for influencing the health and safety behaviour of small firms.

Research was carried out using a world wide web search, telephone interviews with small companies, general intermediaries (eg Business Links), sector trade associations, and focus groups with representatives from small firms. The research focused on identifying actions that all small firms in a particular sector undertake, particularly those where they have contact with third parties or intermediaries. It was felt that adding relevant health and safety information to existing communication packages might be more cost-effective than developing a new communication channel from scratch.

The main output of the project is a series of comprehensive Sector Key Events Approaches (SKEAs) for the Plastics, Catering, Motor Vehicle Repair (MVR), Bodyshop and Construction (particularly painters & decorators and roofers) sectors. The SKEAs describe the attitudes to health and safety, key events and the most effective communication channels for reaching small firms within each sector.

The study has reinforced the findings of previous studies that small firms tend to give health and safety a low priority. Of the five sectors surveyed in this study, only the Catering sector did not perceive any major health and safety risks involved with their work. However, participants from the other sectors felt that they understood the hazards in their workplace and therefore the risks of accidents and occupational illness are small. For this reason, little attention appears to be given to health and safety on a day-to-day basis.

The sectors studied all felt there is too much health and safety regulation and that it is difficult for small firms to even know all the rules that apply to them and certainly for them to comply with those rules. There was a negative attitude to HSE inspectors and Environmental Health Officers. Few participants had heard of the HSE InfoLine. When they were told about it, they said they would be cautious about using it for fear of being identified and visited by an inspector.

It was initially expected that the SKEA would identify a large number of key events that could lead to many opportunities for HSE to communicate with small firms. In practice only a few key events were identified for each sector. However, this is considered to be a very positive outcome as it will enable the HSE to focus efforts on providing help when businesses really need it, or are at least receptive to advice.

Business start-up and business growth were the only key events found to be common to all sectors studied. Events such as preparation of financial accounts, contact with banks and payment of taxes...
were expected to be identified as key events and these activities were highlighted as critical activities by small firms and intermediaries. However, it was unanimously felt by participants that it would not be appropriate to link the provision of health and safety advice to these events. As very few key events were found to be common across all sectors, a strategic, sector-based approach is likely to be more effective than a generic cross-sectoral approach.

One of the original aims of the study was to identify external indicators associated with the key events. It became apparent that very few key events could be identified externally in advance in a form that would be useful to the HSE. It became clear that, even if key events could be identified externally and in advance, it would provide little benefit for the HSE. It is much more important to identify which intermediaries a small firm may have contact with when a key event occurs. The HSE can then work with the intermediary to prepare and communicate information whenever contact occurs, regardless of whether the actual timing of the event can be predicted in advance.

A qualitative matrix is presented overleaf that allows comparisons to be made between the sectors ‘at a glance’. It highlights some of differences in attitudes to health and safety between the sectors. It also shows which key events and communication channels are expected to be relevant for the sectors. A ‘key’ for the matrix is shown on the following page.

The Sector Key Events Approach has proved to be effective. The SKEAs form comprehensive documents that describe when firms would benefit from advice, what advice they need, how to get it to them and how to present it. Together with the findings of other HSE research into small firms and intermediaries, the results of this study will help ensure that the HSE’s effort is focused on the most effective communication routes to stimulate maximum positive action in the most cost-effective ways.

This report contains a number of prioritised recommendations for the HSE to consider pursuing, on how best to make use of the results of the research in the HSE’s approach to communicating with small firms in the sector studied.

It is recommended that:

- The HSE pilot the implementation of the top priority short term and strategic recommendations from the SKEAs in one or perhaps two of the sectors studied. The success of this approach should then be measured by market research.
- If the pilots are successful, the recommendations of all five SKEAs should be considered for implementation.
- In addition, the HSE should consider extending the SKEA to other sectors. Priority should be given to sectors with above average accident and occupational ill health rates and those with positive, pro-active sector trade associations.
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*Equip = equipment,  Mat = materials  
L=Low, M=Medium, H=High,  - = not determined during study

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The matrix allows ‘at a glance’ comparisons between the sectors studied. It highlights some differences in attitudes to health and safety between companies in the sectors. It also qualitatively summarises how relevant and useful different potential key events and communication channels are likely to be as dissemination channels for health and safety information.

Definitions
The following symbols are used in the matrix:

H = High       M = Medium       L = Low

Attitudes
Under Attitudes, there is an entry for each sector to show whether the issue shown is important. For example:

• For Catering, the entry for Need for Information is L. This suggests that Catering firms do not feel they have a need for much health and safety guidance information.

Key events and communication channels
Each Sector has three entries for each key event or communication channel. These entries are:

Cov = Coverage
This refers to the proportion of companies for which the key event or communication channel shown is relevant. For example:

• For Plastics, the entry for Insurance is H. This suggests that most Plastics companies have insurance.
• For all sectors, the entry for Business Start-up is L. This suggests that most businesses already exist and not many new ones start up.

Freq = Frequency
This refers to the frequency with which a key event occurs or a communication channel is used. For example:

• For Plastics, the entry for HSE/EHO visits is L. This suggests that plastics firms are rarely visited by HSE inspectors (in practice, usually less than once per year).
• For Catering, the entry for New Staff is H. This suggests new staff are employed frequently in the sector.

Imp = Importance
This refers to whether the key event or communication channel is likely to make an effective dissemination route for health and safety information by the HSE. For example:

• For Bodyshops, the entry for Insurance is H. This suggests that working with Insurance companies to encourage them to provide more health and safety information is likely to be effective for the HSE.

For Plastics, the entry for Training is L. This suggests that Training is not a suitable key event to link dissemination of health and safety information to (in this case because few employees attend formal training courses.)
1. INTRODUCTION

1.1 BACKGROUND AND OBJECTIVES

The year-on-year reduction in the number of annual fatalities, major injuries and over-three-day injuries sustained in the UK workplace has tended to flatten in recent years. The Health and Safety Executive (HSE) wishes to see improvements in these trends, and improving the safety performance of small firms has been identified as one way of achieving these improvements.

Small firms are the dominant feature of UK industry. There are about 3.5 million firms in the UK and over 99.5% of them employ fewer than 100 people. Raising the standard of health and safety within UK industry means accessing and influencing small firms; however, past experience has shown that this is very difficult to achieve. HSE has developed a comprehensive suite of information to help firms improve their safety performance. The challenge is to target the dissemination of this information so that firms receive it when they are most receptive to the messages contained.

Communicating with, and influencing the behaviour of, small firms is particularly difficult. This derives from the nature of small firms - they have insufficient resource to do anything other than focus exclusively on their core activities. So, raising awareness in small firms requires a high degree of focus on those activities that relate to core business needs.

Accordingly, the main objectives of this research study were:

- to identify external indicators of ‘key events’ in the life of small firms that may be indicative of their need for advice or information on health and safety at work;
- to identify appropriate, cost effective communication channels, tools and techniques for influencing the health and safety behaviour of small firms.

The research focused on identifying actions that all small firms in a particular sector undertake, particularly those where they have contact with third parties or intermediaries. It was felt that adding relevant health and safety information to an existing communication package might be more cost-effective than developing a new communication channel from scratch.

For the purposes of this study, ‘small firms’ were defined as those employing 50 people or less (and included sole traders).

Research was carried out using:

- brainstorming sessions with Small and Medium Enterprise (SME) and sector experts;
- a world wide web search;
- telephone interviews with small companies;
- telephone interviews with general intermediaries (eg Business Links);
- telephone interviews with sector specific intermediaries (eg sector trade associations);
- focus groups with representatives from small firms.

The main output of the project is a series of comprehensive Sector Key Events Approaches (SKEAs) for the Plastics, Catering, Motor Vehicle Repair (MVR), Bodyshop and Construction (particularly painters & decorators and roofers) sectors. The SKEAs describe the attitudes to health and safety, key events and the best communication channels for reaching small firms within each sector. The complete SKEAs can be found in Appendices 3-7.
In addition, this report contains prioritised recommendations for the HSE to consider pursuing, on how best to make use of the results of the research in the HSE’s approach to communicating with small firms.

This report is primarily directed at those readers within the HSE with responsibilities relating to health and safety in small firms in general and/or for communications with small firms.

During this study, account was taken of other studies that have been carried out for the HSE previously, and those running concurrently. However this study did not include a thorough review of all previous work in this area. This report is intended to be read in conjunction with those from other studies relating to the promotion of good health and safety practice in small firms and the dissemination of health and safety information in general.

1.2 STRUCTURE OF THIS REPORT

The structure of the report is described below:

Section 2 describes the concept of the Sector Key Events Approach and how this has been used as a model to determine good potential communication routes for the HSE to reach small firms in five specific sectors. This section also includes a description of the work undertaken.

Section 3 summarises the findings of the study that appeared to be common to small firms in all sectors. It begins with some representative quotes from the focus groups that highlight some of the main concerns of small firms. It includes comment on general attitudes towards health and safety and the HSE. Two key events are identified which are common to all firms, although in general key events have been found to be sector-specific. There is a description of communication channels that, whilst not specifically associated with key events, would still be useful conduits for HSE information. Details are given about the needs of small firms for printed and other forms of information, particularly relating to how publications are presented. Finally, there are two series of prioritised recommendations. Some could be implemented by the HSE in the short term, while others may require more strategic thinking and setting up or strengthening of partnerships and alliances.

Section 4 contains the findings relevant to specific sectors. For each of the 5 sectors the findings are laid out in the same structure as Section 3, described above.

Section 5 contains a qualitative matrix that allows comparisons to be made between the sectors ‘at a glance’. It highlights some of differences in attitudes to health and safety between the sectors. It also shows which key events and communication channels are expected to be relevant for the sectors.

Section 6 evaluates the benefits and difficulties of using the Sector Key Events Approach to identify how to target health and safety information at small firms.

Section 7 draws together the key findings from the study including the key recommendations and a summary of the perceived effectiveness of the Sector Key Events Approach.

Appendix 1 contains a list of all the potential key events that were considered as part of this study.

Appendix 2 contains a tailored key events list, constructed after the initial interviews with small firms and intermediaries. This was used to help guide the preparation of the topic guide for the focus groups.
Appendices 3-7 comprise the Sector Key Events Approach documents for the five sectors studied. Each document contains quotes made by participants during the focus groups. These quotes were generally representative of the feelings of the groups and give a useful insight into the views of small firms towards health and safety and the regulations surrounding it.

The information presented in this report includes the views of the intermediaries and small firms involved in interviews and focus groups. In the main report, use of the term ‘the participants’ refers to views expressed by small firms and intermediaries. However in the Sector Key Events Approaches, use of ‘the participants’ specifically relates to the views of the focus group participants.

The authors of this report would like to thank all of the intermediaries listed in Section 2.3, all of the participants of the focus groups and the market research company Databuild Ltd for their assistance during this study.
2. METHODOLOGY

2.1 THE SECTOR KEY EVENTS APPROACH

The origin of this study was to investigate the concept that small firms may be receptive to receiving information and advice at certain times or when carrying out certain activities. Even if they are interested in information other than health and safety, it may be possible and cost effective to link health and safety messages to the subject of interest.

The study therefore comprised interviews with small firms and intermediaries and small firm focus groups to identify what activities or ‘key events’ might be suitable indicators that information on health and safety may be successfully communicated at specific times. In addition, there was a need to identify how the key event could be harnessed — which intermediaries a small firm may have contact with at the time of the key event and how the HSE might work with those intermediaries to communicate with the firm. It was also important to consider the response of small firms to the types of information currently being provided by the HSE and the presentation of information.

Initially, a comprehensive list of potential ‘key events’ was developed (see Appendix 1) and this was tested on a random sample of small firms and cross-sectoral intermediaries (Business Links, Chambers of Commerce, Local Authorities etc). Initial findings are shown in Appendix 2. Then a more detailed study was carried out in five specific sectors, including interviews with sector-specific intermediaries (eg trade associations) and focus groups involving small firms from the chosen sectors.

The results of the research have been used to construct Sector Key Events Approaches (SKEAs) for the five sectors studied - Plastics, Catering, Motor Vehicle Repair (MVR), Bodyshop and Construction (focussing on painters & decorators and roofers). The SKEAs are included in Appendices 3-7 of this report.

2.2 STRUCTURES OF SECTOR KEY EVENTS APPROACHES

For ease of comparison, each SKEA has the same structure, namely:

- **Background** – included in each SKEA to ensure completeness, thus allowing them to function as stand alone documents.
- **The sector** – a short description defining the scope of the study of the sector and listing the intermediaries that were consulted.
- **Attitudes towards health and safety** – general views on the perceived hazards faced, the attitudes to health and safety regulation and what (if anything) motivates companies to operate good health and safety practices. This enables the subsequent analysis of the key events and communication channels to be put into context.
- **Key events** – identifies the key events applicable to the sector when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice.
- **Communication channels** - highlights additional communication channels that may be useful, although not specifically associated with a key event.
- **Provision of information** – includes an analysis of the requirements of small firms in the sector, the types of information they need and recommendations on how that information should be presented.
The SKEAs describe:
• the perceived hazards within the sector;
• the use of trade associations, intermediaries and other key players;
• the key events in the life-cycle of the sector's small firms, their timing, and any associated external indicators;
• what information and assistance small firms want and also when and in what format they want it;
• a qualitative indication of the importance of the key events in terms of their potential to act as conduits for health and safety information and assistance.

The SKEAs also attempt to identify:
• good and poorer health and safety practices;
• the key perceived health and safety issues;
• the barriers to improved health and safety performance;
• potential tools that would help to overcome the key barriers;
• the perceived benefits of improved health and safety performance;
• where firms go for advice at present;
• how well existing communication channels appear to be working;
• the effectiveness of communication methods currently employed by HSE.

Within the SKEAs the use of the term ‘participants’ refers solely to the participants in the focus groups, whereas in the main body of this report, ‘participants’ refers to the combined views of small firms and intermediaries from interviews and focus groups.

2.3 ACTIVITIES CARRIED OUT

This section describes in more detail the activities carried out during the project. The Programme of Work was modified during the course of the project to extend the approach from an in-depth study of one sector to a broader study of five sectors.

Brainstorming of SME and sector experts

At the project definition stage, a 'brainstorming session' was used to identify potential key events.

Web search

A limited search of web-sites was undertaken to gain initial indications of the number and type of sources of information available to small businesses, and to identify additional potential 'key events'. The findings from this activity are incorporated in Sections 3 and 4 under ‘Provision of Information’. (A brief review of the web-sites was carried out at the end of the study to check that the original findings remained relevant.)

A comprehensive list of key events was constructed and this is shown in Appendix 1.

Telephone contact with small firms

A small random survey of small firms was carried out to obtain their perceptions of the range of activities that occur during the life of small firms, their relative importance, and where firms themselves turn to for advice and information. This helped to narrow the focus on which key events and communication channels were likely to be most important.
Telephone contact with cross-sector intermediaries

A range of intermediaries was interviewed by telephone to obtain their views on the key events in the life of small firms. Interviews were held with representatives of:

- The Association of Chartered Certified Accountants.
- Ayrshire Enterprise (Local Enterprise Company).
- The British Bankers Association.
- Business Link Devon & Cornwall.
- Business Link Dorset.
- Caerphilly County Borough Council.
- The Forum of Private Business.
- The Institute of Directors.
- Mid Anglia Enterprise Agency.
- St Edmondsbury Borough Council.
- The Small Business Service.

Summarised results of the telephone interviews with intermediaries and small firms are shown in Appendix 2.

Telephone contact with sector-specific intermediaries

Telephone interviews were held with intermediaries from the Plastics, Hospitality, Motor Vehicle Repair, Bodyshop and Construction sectors. These helped identify the key events relevant to these sectors and key potential communication channels. The results were used to inform the preparation of a topic guide for use with focus groups of small firms. Interviews were held with representatives from:

- The British Plastics Federation.
- The Plastics and Industrial Films Association.
- The Plastics Machinery Distributors Association.
- An independent consultant specialising in Plastics.
- The Hotel and Catering International Management Association.
- The Brewers and Licensed Retailers Association.
- The British Hospitality Association.
- The Vehicle Builders and Repairers Association.
- The Retail Motor Industry Federation.
- The Scottish Motor Trade Association.
- The National Federation of Builders.
- The Federation of Master Builders.
- The Construction Plant Hire Association.
- The Federation of Small Businesses.
- The Engineering Construction Industry Association.
- The Royal Institute of British Architects.
- The Construction Industry Council.
- The Chartered Institute of Building.
Ten focus groups

Two focus groups were held with representatives from each of the Plastics, Catering, MVR, Bodyshop and Construction (specifically painters & decorators and roofers) sectors. The purpose of these focus groups was:

- to build on the earlier work so as to develop, for each sector, a detailed picture of the key events, their timing, and any associated external indicators;
- to examine the needs and perceived needs of representative small firms, within the selected sectors, for advice or information on health and safety at work;
- to gain initial indications of how responsive workers in these sectors are likely to be to different possible communication channels and types of health and safety communication;
- to determine the impact and potential impact of existing HSE literature in the target sectors, specifically testing different styles of HSE publications.

The focus groups were attended by:

- nine representatives of small Plastics firms;
- ten representatives of small Catering firms;
- nine representatives of small MVR firms;
- eight representatives of small Bodyshop firms;
- ten representatives of small painting/ decorating and roofing firms.
3. GENERIC FINDINGS RELEVANT TO SMALL FIRMS

“I have nothing to hide but there are so many rules and regulations that the HSE inspector is bound to find a problem with my company.”

“You can’t ask the HSE anything without them coming down on you like a ton of bricks.”

“Even if you’ve done the impossible and got everything right they would still find fault.”

“The idea of the HSE InfoLine is good so you can clear up grey areas but I wouldn’t trust it to be confidential if it was run by the HSE.”

“How do I know about new legislation if no-one tells me?”

“They should send me materials to use and the publications. I shouldn’t have to ask for them or pay for them.”

“If you’ve got no sales or business then health and safety is not an issue. First of all I have to get business.”

“The accountant or bank manager has no idea how to go about making my job safe.”

This section describes study findings that appear to be generic across most small firms in most sectors. The results are drawn from the initial generic phase of the work and common findings from the sector-specific elements.

3.1 ATTITUDES TO HEALTH AND SAFETY

In general, most owners and managers of small firms have not experienced a serious work-related injury themselves, in their firm, or even amongst colleagues in the same industry. This tends to result in them giving health and safety a lower priority than other issues that affect their businesses on a more frequent basis (eg sales, cash-flow, production).

Participants in the research perceived health and safety to be an area involving a large amount of regulation. Most participants talked about new legislation when health and safety was mentioned to them. The HSE was seen as a regulatory body operating a policing role. There was little acknowledgement of the HSE’s guidance and educational roles.

Participants saw HSE inspectors as clamping down on minor issues unnecessarily and always looking for problems in any organisation inspected. A fear of the HSE was reported, especially of factory inspectors. This leads to companies not being willing to call for advice because of the possibility of negative repercussions.

A desire was expressed that inspectors should distinguish between small and large companies when considering enforcement actions.

Most small companies perceive some benefits from good health and safety practices. These include:
- improved efficiency from keeping a tidy and orderly workplace;
- providing a good impression for customers;
• a ‘cared-for’ feeling amongst staff;
• reduced time off work by staff.

However, it is clear that for many companies, these benefits are not considered on a frequent basis.

3.2 KEY EVENTS

There were very few key events identified during the study that were found to be relevant to small firms across all sectors and useful to the HSE as a trigger for communication.

The key events that were identified are described below.

3.2.1 Business Start-Up and Growth

Business start-up was identified as a relevant key event for the HSE to use for communication with new small firms. Participants generally agreed that it would be useful to receive information in the start-up phase of a business, although this key event has limited application as it is only relevant to new firms. In addition, in the start-up phase of a small business, owners would have many issues to consider other than health and safety. However, they were also receptive to information at this time and this would be a good opportunity to advise owners and managers of their obligations regarding health and safety.

At start-up, businesses may seek advice from Business Links (England), Business Connect (Wales), Local Enterprise Companies (Scotland), Chambers of Commerce, Local / Regional Enterprise Agencies or Local Authorities. They are unlikely to specifically ask for health and safety information. Businesses may also seek advice from these intermediaries if they are planning a period of business growth. However, it is clear that most small businesses are stable in size and do not actively seek ‘business’ information. Several intermediaries stated that only a small proportion of new or growing businesses seek any help other than that of their bank.

Most participants were unsure whether small firms are required to register with the HSE at the start-up of a business. The guidance in this area is difficult to track down and is difficult for firms to interpret.

3.2.2 Financial Activities

The other main key event identified for small firms relates to financial activities and include:
• contact with banks to arrange finance;
• contact with accountants;
• preparing annual accounts;
• preparing tax returns;
• contact with the Inland Revenue and Customs and Excise;
• financial audits;
• preparing business plans.

However, there was strong feedback from participants that these would be inappropriate events to link to the provision of health and safety advice. Firms did not expect any health and safety advice received from intermediaries such as accountants, banks, and the Inland Revenue to be useful. These third parties were viewed as having no health and safety expertise and there was concern that they would charge extra for this service.
3.3 COMMUNICATION CHANNELS

Some communication channels were identified that were not specific to key events, but could nonetheless be used by the HSE for communicating with small firms.

3.3.1 Direct Contact with the HSE

In general, participants were unlikely to contact the HSE directly for information, as they feared this could lead to an inspector visiting and then inspecting other areas beyond the initial enquiry, possibly taking enforcement action.

All participants would prefer the HSE to take on a more advisory role and for inspectors to be seen to listen to their concerns and help them comply with regulations rather than penalise them for ignorance. In several sectors, participants even stated that they would like to see inspectors more frequently as long as the inspectors were constructive in their approach. They would prefer to receive face-to-face practical advice from the HSE than publications that they had to find time to read and interpret themselves.

3.3.2 The HSE InfoLine

Awareness of the HSE InfoLine was low, but participants did express a desire for a well-publicised confidential helpline that they could call for advice and information in specific circumstances. Many participants were afraid of 'comeback' from the HSE should they ring with an enquiry – some users admitted withholding their telephone numbers (by blocking 'caller line identification') to remain anonymous. Although the current InfoLine is confidential, most participants felt that they would be cautious about using it until the HSE had ‘proved that they could be trusted’.

The findings are consistent with those found in other studies of health and safety support to SMEs. In Contract Research Report 185/1998, 'Developing Proposals on how to Work with Intermediaries' prepared by Durham University Business School, it was reported that “there is a ‘fear factor’ associated with the HSE”. Intermediaries had been asked to contact the HSE InfoLine on behalf of small firms to preserve anonymity.

The HSE could consider promoting more widely the results of independent market research by BMG Research, which showed over 95% caller satisfaction with the InfoLine.

3.3.3 Other Communication Channels

The first point of contact for small firms seeking advice from Government is intended to be the Business Link web-site www.businesslink.org provided by the Small Business Service (SBS). The web-site has been developed since the beginning of this study, and it is now relatively straightforward to locate the section on health and safety, to obtain the phone number for the HSE InfoLine, and download the HSE booklet ‘An introduction to health and safety’, INDG259. However, there is no obvious link to the small firms pages of the HSE web-site. It was also noted that the SBS web-site www.sbs.gov.uk does not contain an obvious link to the HSE web-site or any health and safety advice. It is unclear from the SBS web-site, that the main source of advice for small firms is obtained via the link to the Business Link web-site. Strong co-ordination between the HSE and SBS will be vital to ensure that good, relevant health and safety information is accessible via the Business Link web-site and that Business Links have sufficient skills to offer health and safety services.

A number of cross-sectoral intermediaries are running or planning schemes to offer health and safety assistance, such as providing health and safety audits and arranging for ‘independent’ experts to give advice. For example, the Forum of Private Business (FPB) provides a health and safety audit service, produced in partnership with the TUC. This is linked to enabling businesses to lower their insurance
premiums. Several thousand firms have made use of this service to date. These schemes should be actively encouraged by the HSE.

One Local Authority interviewed pointed out that, because they have an enforcement role, this can deter businesses from seeking help and advice. Interestingly, this Authority had plans to set up an 'independent' health and safety agency that would deal with health and safety issues. The agency would be staffed by experts and would allow companies to seek advice without fear of details being passed on to enforcement staff in the Local Authority. If firms are persuaded of the confidentiality, this could be very effective and prove a very useful model.

The Fire Brigade were mentioned a number of times as providers of health and safety advice. Many companies (especially larger ones) receive an annual inspection by the Fire Brigade. The HSE could investigate the opportunity of training Fire Brigade personnel to provide some general health and safety advice when visiting small firms.

A number of intermediaries said they would also welcome information tailored specifically to help them provide initial advice to small firms, without recourse to HSE and others. Toolkits, including checklists were requested. This finding complements the conclusions of other research studies that have been carried out for the HSE. For example Contract Research Report 353/2001, ‘The Health and Safety Needs of the Business Support Network’ prepared by the Small Firms Enterprise Development Initiative found that a web-based ‘product’ was valuable in assisting business advisers with giving advice to small firms. Business advisers perceived a need to be able to offer generalist, but not specialist, advice on health and safety.

This study has not investigated in detail information delivery options other than provision of publications, use of the Internet and face-to-face communication. However, other options were discussed briefly during focus groups:

- Mass communication campaigns (eg TV or radio advertising) – not considered to be as effective as advice targeted at specific sectors.
- Events – generally small firms have little time to attend events, although for Construction, some possibilities have been considered (eg roadshows at builders merchants and toolbox talks on–site).
- Videos – although they can be more graphic than publications, there is unlikely to be much interest. Small firms would not have video recorders and managers were not found to be interested in spending time on work-related health and safety issues at home.

3.4 PROVISION OF INFORMATION

This section considers provision of information directly to small firms.

3.4.1 Publications

Companies in most sectors wanted some printed information. In particular, most participants would welcome:
- A single document laying out all the significant health and safety requirements for small companies in their sector, written in a clear and understandable form.
- Updates on changes in health and safety legislation which affect them – sent directly by the HSE.
- Display material such as posters and stickers to inform staff.

Feedback from participants suggested information should be:
- Tailored to particular sectors (and where possible, individual sub–sectors) so that it is more likely to be read.
• Clear and concise - focussing on the most important hazards and actions to be taken.
• Understandable – avoiding complex or ‘legal’ language where possible.
• Well structured – using bold and clear headings and illustrations to generate interest and with an eye-catching front page and title.
• Short – a maximum of four sides of A4 - except for a comprehensive guide for the sector.
• Free – and preferably sent directly to companies by the HSE (rather than needing to be ordered).
• Up-to-date - with the publication date clearly shown.
• Specific to firms’ needs - focused on the main areas where accidents occur.
• ‘Official’ looking – clearly HSE branded.
• Tailored, if possible, to the size of the firm - participants felt that most health and safety awareness raising information currently produced by the HSE is directed at larger companies.
• Hard-hitting – two key drivers for improving health and safety in small firms are the fear of prosecution and the fear of a member of staff suffering a serious injury. Participants felt that promotional materials should make use of these drivers, to try to persuade managers that such events could happen in their firm and that the personal and financial consequences could be very severe.

Publications should be imaginative and eye-catching. However, participants agreed that documents in black and white were acceptable. Some felt that brightly coloured information risked looking like junk mail.

It was agreed that there are two suitable approaches for ‘signposting’ information:

• **The checklist approach** - For example, a small firm contact might say: *'I'm a textiles company. I don't know where to start - what do I have to do to satisfy health and safety requirements?’* The checklist would take them through, stage by stage, everything that a company in their sector needs to think about and address. This process could also facilitate benchmarking against others in the sector.

• **The specific advice approach** - For example, a company identifies potential risks in a particular area and wants to obtain further relevant information. They may be asking: *'What do I have to do to be safe if I am using these particular chemicals?’* or *'How can I secure a ladder if the ground isn’t solid?’*

Case studies may be useful for demonstrating good practice. But more case studies which demonstrate poorer practice and show the human, business and financial consequences would probably be more effective. The more hard-hitting the case studies, the more effect they would be likely to have.

### 3.4.2 The Internet

A limited web search was carried out (in July 2000) to determine how straightforward it would be for small firms to find relevant health and safety information, and how likely they were to be directed to health and safety information if searching for something else. A brief review was carried out at the end of the study (October 2001) to confirm that the results remained valid.

It was found that:

• Links to web-sites usually connect to a home page. On many home pages there is no immediate indication of where to find information relevant to small firms.
• Guidance for small firms can be downloaded from many web-sites. There is wide variation in structure, type of language used and 'new-user friendliness' of the web-sites accessed. It may be difficult for an inexperienced web user working in a small firm to find the information they need and to understand it.
• Early indications are that bodies with which small firms have statutory dealings have comprehensive web-sites. Some web-sites visited appear to offer scope for raising awareness of relevant HSE publications or perhaps even linking to the HSE web-site.
• The HSE web-site has been updated since the web survey was carried out and now contains much
more information of relevance to small firms. It is reasonably 'small firm friendly' and is easily
accessed via the HSE home page. However, it is surprising that the link refers only 'new’ small firms
to the information, as it is relevant to all small firms. On first viewing, the small firms site appears to
contain or link to most information that a small firm might need. However, the indexing could be
improved so that it is easier for a manager to see if the information being searched for is present on
the site and where to find it, without needing to work through each heading. In particular, the index
linking to specific HSE leaflets is not obviously reached.
• The new ‘Workers Webpage’ section on the HSE web-site provides some useful information for
employers and employees within small firms.
• The HSEdirect website (hsedirect.com) which has been produced in partnership between the HSE
and the law publishers Butterworths Tolley appears to provide a useful source of information. There
is a link from the home page of the HSE web-site. However, it is unlikely that many small firms
would pay the £200 per year annual subscription to use this service, or even the £20 for a ‘day ticket’.
The information available free on the web-site would be of limited use and is unlikely to persuade
small firms of the value of subscribing unless they are looking for something very specific that they
are sure will be available on the web-site.
• At present, the Small Business Service web-site does not appear to have good information on
health and safety or to highlight its importance. There is also no obvious link to the HSE web-site.
The Business Link web-site does have some limited information on health and safety and directs
readers to the HSE InfoLine – but there is no link to the HSE web-site.
• The Direct Access Government web-site appears to be a useful route to guidance and forms if the
user has an initial idea of what they need and where they should be looking. There is no obvious
introductory information to help those new to running a business.
• Many small firms felt that the Internet and electronic mail are only likely to be of limited use to
the HSE for disseminating information. Although small firms in most sectors have access to the
Internet, few managers would use it specifically to search for health and safety information. In very
small firms, the owner usually uses his / her home computer in the evening for Internet access, and
would be even less likely to search for health and safety web-sites.

3.4.3 Events
Many local and regional events for small firms are held by the HSE. Participants felt that it is difficult
for some small firms to find the time to attend such events, although they would probably find the
information received very valuable.

3.5 RECOMMENDATIONS

This section presents the authors’ recommendations based on the findings described above. The
recommendations are divided into those which could be considered immediately or in the short term
and those which are longer term, more strategic and may involve more departments within the HSE or
more external bodies.

The recommendations are listed in an approximate order of priority

3.5.1 Short-term recommendations
• Now that the HSE web-site for new small firms has been redesigned and launched, the design and
content should be reviewed, taking into account the views of small firms. It is recommended that the
indexing is made clearer and that the web-site is promoted as relevant to all small firms, not just new
ones.
• It is recommended that the HSE run a campaign to encourage companies to register with the HSE or their Local Authority. This could be done on a sector-by-sector basis, using the trade press as the main communication mechanism.

• It is recommended that the HSE investigate the opportunity to work more closely with the Fire Brigade, encouraging them to offer more general health and safety advice and to advocate small firms seeking assistance from the HSE.

• An enhanced campaign is recommended to inform and educate general business intermediaries, for example Business Links (England), Business Connect (Wales), Local Enterprise Companies (Scotland), Chambers of Commerce and Local/Regional Enterprise Agencies. The HSE should review whether these intermediaries are able to provide sufficient health and safety advice to small firms at business start-up and whether they are aware of the information that is available and where to find it. A publication or ‘toolkit’ designed specifically for intermediaries could be produced which highlights the importance of health and safety for their clients, provides some basic introductory information (questions to ask and things to look out for when visiting a client) and clearly ‘signposts’ where businesses should go for further information.

• A need was identified for a health and safety ‘start-up’ pack for new businesses. This should identify the most important aspects of health and safety to be considered when setting up a new firm. It should also contain clear ‘signposting’ information to the wide variety of help, advice and information that is available. It is recommended that the pack comprises a mixture of general advice applicable to all small firms, and some sector specific information – if possible, a comprehensive guide to health and safety for the relevant sector.

• Within each sector, it is recommended that a ‘starter pack’ is designed for new employees. New staff may be more receptive to information than long term employees, and may be encouraged to ask questions to seek information. These questions may then stimulate owners/managers into considering health and safety issues that had not been looked at before.

• Continued co-ordination between HSE and the Small Business Service is important to ensure that good, relevant health and safety information is accessible via the Business Link and SBS web-sites.

3.5.2 Strategic recommendations

• It is recommended that the HSE investigate the potential for obtaining information from Companies House on new business registrations, and proactively contacting new businesses to a) offer a ‘start-up pack’ with introductory health and safety information; and b) encourage companies to formally register with HSE or their Local Authority.

• There is a strong feeling across most sectors, from trade bodies as well as companies, that HSE inspectors undertake their policing role much more strongly than their advisory role. This also applies to Environmental Health Officers. In addition, inspectors are seen as enforcing all the regulations to the same severity, regardless of the company’s size and available resources. To some extent, this is inevitable and it is right that small companies have to be rigorous in their adherence to health and safety regulations. However, this leads to an unwillingness amongst companies to ask the HSE for advice, or even call the HSE InfoLine.

It is therefore recommended that further efforts are made to ensure inspectors take a sympathetic approach when visiting small firms – and that the HSE promotes more strongly the guidance role of HSE inspectors as well as the policing role.
HSE inspectors would gain more support from small firms if they were seen to be moderating their advice, taking into account the size of the firm. All firms, large and small expect inspectors to take a pragmatic approach to enforcing regulations – based on the genuine risk present in each workplace, rather than blanket enforcement of regulations, even where the impact would be negligible.

It is recognised that these can only be long term objectives and that they must be balanced against the legal requirements for HSE inspectors to ensure good health and safety standards in the premises they inspect.
4. FINDINGS RELEVANT TO SMALL FIRMS IN SPECIFIC SECTORS

This section describes the findings that were particularly relevant to specific sectors. The findings are primarily drawn from the focus groups held with small firms and from telephone interviews with sector trade associations.

4.1 FINDINGS SPECIFIC TO PLASTICS FIRMS

“It’s important that my staff don’t get hurt. If the HSE did not enforce regulations I would still work to protect my staff.”

“I would read anything that said ‘HSE’ on the front just in case it was about new legislation.”

“Inspections should be more regular and inspectors should be more customer friendly and offer advice. At the moment they are just not approachable.”

The Plastics sector covers manufacturing facilities that turn dry polymer granules into plastic, usually by moulding and extrusion. Processes used include granulation, injection moulding, blow moulding, rotational moulding, extrusion, cutting and pressing. The sector covers around 15,000 businesses, of which 95% are small firms (i.e. with under 50 employees).

A full Sector Key Events Approach is shown in Appendix 3. The highlights are summarised below.

4.1.1 Attitudes to Health and Safety

The plastics sector has a poor health and safety record relative to other industrial sectors and participants perceived the industry to be potentially hazardous. Some small firms treat health and safety as important, but in general ‘business issues’ such as cash-flow, sales and production levels are given the highest priority. Most small firms do not even consider health and safety as an issue for most of the time.

Although managers in many small firms uphold good working practices, their employees do not always work in the safest way. A lot of health and safety issues are common sense, but there is a danger of them being ignored for reasons of ease, speed or bravado in the workplace.

Participants felt that it was important to keep their staff safe regardless of the regulations. They felt that they were operating safe practices but that it would be impossible to comply fully with all the rules and regulations and remain competitive.

Participants felt that having good health and safety led to some business advantages including lower insurance premiums, portraying a good image to customers and having staff that feel cared for.

4.1.2 Key Events

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice. They are presented in an approximate order of priority for potential use as communication opportunities for the HSE.
Obtaining Insurance

Participants felt that insurance companies would be keen to see improved health and safety in the Plastics industry. All companies renewed their premiums annually and in some cases this involves an inspection. Participants felt that an insurance company would be able to offer them advice on hazards in their workplace and that this could be a good route for dissemination of health and safety information. However, participants were concerned that their businesses should not incur additional cost for provision of this service.

Buying Equipment

The more severe health and safety risks tend to be associated with operating machinery. Plastics companies occasionally make significant equipment purchases and this would be a good opportunity for the HSE to promote some of its own publications.

Participants often buy equipment second hand and would like advice and information on what to look for in second hand equipment and how to check that it is safe.

Business Start-Up

The start-up phase of a business is a useful time to receive information, but this key event has limited application as it is only relevant to new firms. In the start-up phase of a small business, owners have many issues to consider other than health and safety. Small firms are often unsure whether they are required to register with the HSE at the start-up of the business.

Contact with Customers

Contact with customers is a relevant key event in some circumstances. Many small Plastics companies supply much larger companies and there is evidence of supply chain pressure being exerted.

Inspections

Most equipment is subject to annual inspections, for example annual certification of electrical equipment, as well as insurance inspections mentioned above. Traders expect to receive information on health and safety at these times.

4.1.3 Communication Channels

Direct Contact with the HSE

In general participants felt that they wanted to receive advice and information in person from an HSE inspector - but they needed to be able to trust the inspector to support them rather than seek to put them out of business. They felt that the HSE should take a more proactive role in offering advice and support and that inspectors should seek to give practical hands-on guidance to organisations.

The HSE InfoLine would benefit from increased publicity. It may be more attractive to potential users if it was called a Helpline rather than InfoLine. In addition, potential callers need to be convinced that all calls are treated in strict confidence.

Other Communication Channels

The Plastics trade associations are doing excellent work in helping to produce health and safety information and distributing it to their members. However, the majority of small firms are not members of Plastics trade associations, so dissemination of information through trade associations cannot be relied upon as the sole means of communication with the industry.
Some small Plastics firms use their local Business Link or Chamber of Commerce for business advice and find they can be very useful. However, it was felt by most participants that these organisations would not be able to provide useful advice on health and safety.

Most participants received copies of the trade press publication ‘Rubber and Plastics Weekly’.

4.1.4 Provision of Information

Publications

All participants felt that they had a need for advice and information on health and safety issues and particularly on new legislation concerning their industry. There was a positive response to the current HSE information leaflets, which have been produced for specific Plastics subsectors, although participants were not previously aware of them. Information on health and safety (especially from the HSE) is at least skim read.

Participants were keen to have a general reference document containing information on all the legislation and guidelines that might be relevant to small Plastics companies along with practical guidance for complying. They also need to be regularly updated on new legislation. It was suggested that the HSE might provide a binder in which regular, short updates could be filed.

Very small, flyer-size documents were also thought to be a good way of signposting people to other useful information. Colourful posters with a clear, visual impact and summaries of key points were thought to be a good way of reminding staff of their health and safety responsibilities, providing that they were regularly changed to maintain interest.

The Internet

Some participants had Internet access and felt that it would be a good source of information on health and safety if they knew where to look. A web-site specific to small firms in the Plastics sector would be useful. None of the participants had used the HSE web-site.

Some participants felt that information on CD-ROM would be good for reference and would be better than the paper files that they currently have. A CD-ROM would need to come with a clearly headed paper contents sheet so that it was obvious what information was stored on the disk without having to load it into a computer.

4.1.5 Recommendations

In addition to the recommendations made in Section 3, the following recommendations are made specifically for the Plastics sector.

Short-term recommendations

- Participants were generally not aware of the HSE’s Plastics specific publications, which they felt would be useful. It is recommended that these are promoted more widely in the trade press and are sent directly to Plastics companies that have registered with HSE. Publications should be made available on CD-ROM.

- The HSE should send regular updates on new legislation to all Plastics companies that have registered with it. It is recommended that the HSE provides a binder in which updates can be filed.

- Regular features in ‘Rubber and Plastics Weekly’ would be an effective way of getting the health and safety message across to companies that have little contact with intermediaries. ‘Health and Safety 2001’, a supplement to ‘Plastics and Rubber Weekly’ produced jointly with the HSE was an
excellent example of a joint publication giving practical, easy to use information on a wide variety of topics. However, it may be more appropriate in future to publish a smaller amount of information on a more regular basis. A ‘drip-feed’ approach would probably be more effective than one-off campaigns.

- It is recommended that the HSE, together with relevant trade associations, produce a general reference document containing information on all the health and safety legislation and guidelines that might be relevant to small Plastics companies along with practical guidance for complying. If possible, this should be made available free to companies.

- A web-site specific to health and safety for small firms in the Plastics sector would be useful. Consideration should be given to this – linked from both the HSE and Plastics trade association websites.

**Strategic recommendations**

- It is recommended that the HSE liaise with insurance companies with a view to working in partnership to disseminate health and safety advice and information, and to encourage insurance company inspectors to offer on-site advice. This would be relevant in other manufacturing sectors in addition to Plastics.

- It is recommended that the HSE works more closely with equipment suppliers to the Plastics industry to ensure good health and safety advice and training is provided when new equipment is installed. The option of joint publications between equipment suppliers and the HSE should be considered. Participants felt that they would like more information to be available to them when purchasing second hand equipment. This is a difficult area for the HSE to address, but it could investigate making information available to traders at sales and auctions.

- The HSE could consider working with maintenance contractors to ensure appropriate information is being disseminated when inspections (eg of hydraulic equipment or electrical systems) are carried out. This would be relevant in other manufacturing sectors in addition to Plastics. However, it may be difficult for HSE to identify contractors in this area and persuade them to promote HSE’s interests.

- The HSE could work with major industrial companies to encourage them to demand good health and safety practice amongst suppliers (including small Plastics firms), possibly including the implementation of the Health and Safety Management Standard ISO18000. This would be relevant in other manufacturing sectors in addition to Plastics.

- It was suggested by Plastics companies that if operation of the InfoLine was visibly independent from the HSE, this may enhance its credibility and reduce the fear of calling. The HSE should consider promoting the fact that the InfoLine is run by ‘independent’ Contractors with no links to HSE inspectors.

- Some Plastics companies would like to see more frequent visits to sites by HSE staff to provide guidance rather than ‘issuing instructions’ during inspections. An initiative to pilot this approach is recommended. Annual ‘guidance’ visits are suggested to supplement formal inspections, which are carried out on a less frequent timescale.

### 4.2 FINDINGS SPECIFIC TO CATERING FIRMS

“I've never come across a serious injury. I don’t think my job is any more dangerous than crossing a road.”
“My business is too small for health and safety to be an issue.”

“It’s expensive to pay sick pay and to pay someone else to come in and do the job so it’s in your interest to make sure your staff are safe.”

“You’re always wary of an EHO as you know what power they have and what they can do to your business.”

For the purpose of this study, the Catering sector was agreed to consist of sub-sectors represented by the Health and Safety in Catering Industry Liaison Committee. In particular, this includes pubs, restaurants, hotels and contract caterers. The sector covers approximately 150,000 businesses, of which almost 99% are small firms (employing fewer than 50 people).

A full Sector Key Events Approach is shown in Appendix 4. The highlights are summarised below.

4.2.1 Attitudes to Health and Safety

In the Catering sector, health and safety is not viewed as a high priority. The risks are perceived to be low because they are similar to those encountered in a domestic situation. Many small firms feel their business is too small for health and safety to be a problem. Food hygiene is given a much higher priority than general health and safety.

Most companies operating in the Catering industry are regulated by their Local Authority’s Environmental Health Officer (EHO) rather than directly by the HSE. Attitudes to regulation and regulators are similar to those in HSE regulated sectors.

Little attention is given to the business benefits of health and safety on a day-to-day basis in this sector.

4.2.2 Key Events

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice. However, in general, small Catering firms did not feel much need for information on health and safety.

Local Authority EHO Inspections.

The main key event relevant to health and safety for the Catering industry is inspection by the Environmental Health Officer (EHO). All registered firms receive regular visits from an EHO. In general, small firms respond best to face-to-face site-specific advice rather than, for example, being given general Catering health and safety publications.

All participants felt that that it was important for the Environmental Health Officer (EHO) to provide general health and safety information. Participants felt that EHO inspectors paid some attention to general health and safety issues, but were primarily concerned with food hygiene matters.

Employing New Staff and Attending Training Courses.

Participants recognised that new staff may need some information and training on health and safety, although much of it is common sense and can be learnt ‘on the job’. However, many employees in the Catering industry receive formal training at the beginning of their careers – and this usually includes health and safety.
**Business Start-Up**

The need for advice, including information on general health and safety principles, is greatest at business start-up and businesses in this sector may be more likely to seek help than in other sectors, due to the need to comply with food hygiene regulations. Owners and managers would be receptive to information at this time however they are also very busy at start-up and there are many competing issues to consider.

**Other Inspections**

Traders in the Catering industry may be subject to a number of annual inspections. Participants mentioned inspections of electrical equipment, fire and pest control inspections, fire extinguisher checks and gas safety checks in Local Authority buildings. They feel that they get some information on health and safety from these inspections but only relevant to the specific topics covered by an inspection.

**4.2.3 Communication Channels**

*Direct Contact with the HSE*

Participants felt that the HSE or EHO should send them some information directly, especially updates on new legislation. However, in general, face-to-face advice from the EHO to the company was the preferred route for receiving information for small Catering companies, although companies would prefer EHOs to take a more constructive and pragmatic approach to inspections.

In general, small firms are not particularly interested in health and safety. They do not view it as an important issue and are therefore unlikely to seek advice from the HSE or Intermediary organisations. If they *did* have a problem, they would be unlikely to contact their EHO. Participants were concerned that if they contacted the EHO (or HSE) directly for information, then an inspector might visit and inspect other areas beyond the initial enquiry, possibly taking enforcement action.

None of the participants were aware of the HSE InfoLine. All agreed that they would trust it to be confidential and most said that they would use it if they knew about it and they had a query regarding health and safety.

*Other Communication Channels*

The communication channel with the potential to reach the widest audience is the trade press. There are a number of well-read journals, including ‘The Publican’, ‘Catering and Hotel Keeper’, ‘Hotel and Caterer’ and ‘Ethnic Cuisine’.

All of the participants were aware of Business Links and Chambers of Commerce and most use them for business information. Participants said that they would not specifically request information on health and safety from either of these organisations. Nevertheless, this may still be a good route for disseminating health and safety information.

The majority of companies, especially very small ones, aren’t members of trade associations. Trade associations are therefore of limited use for disseminating health and safety information and advice, however they are a useful communication route for the companies that are members. Trade associations have an interest in health and safety issues and appear to be happy to disseminate information to their members.

**4.2.4 Provision of Information**

Small catering firms feel they have little need for information on health and safety. Participants had little time to spend reading written information and current use of such material was very low.
Publications
The only area in which participants stated a need for printed information was the receipt of updates on changes to legislation. They are interested in how the changes affect their company and what they need to do to comply. If the information is clearly ‘official’, it is likely to be skim read.

Some participants felt that basic information on health and safety for new staff would also be beneficial. Small firms would also value extra printed information, in the provision of more posters and warning signs.

Small firms may also benefit from some more pragmatic guidance on carrying out a risk assessment than is currently available. This would probably be used if it was widely publicised, as EHOs would expect all firms to have some form of risk assessment document and procedures in place.

Internet
The Internet is unlikely to be a good route for disseminating information in the Catering sector, as companies are very unlikely to search out health and safety advice.

4.2.5 Recommendations
In addition to the recommendations made in Section 3, the following recommendations are made specifically for the Catering sector.

Short-term recommendations
• The Trade press offers the most effective communication channel to reach small firms in the Catering sector. An ongoing campaign is recommended to highlight the risks and hazards, to provide some basic practical advice and to encourage businesses to seek help from their EHO or the HSE InfoLine. Features will have to be carefully designed to attract attention and new information will need to be released frequently to retain interest.

• The main focus for printed information should be the update and distribution of leaflets to inform firms of changes to legislation. These should show how the changes affect companies in individual subsectors and what they need to do to comply. Ideally, leaflets should be sent free to all registered Catering companies.

• The HSE already works closely with EHOs through the Health and Safety Executive / Local Authority Enforcement Liaison Committee (HELA). It is recommended that the HSE builds on the activities already being stimulated by HELA to ensure that EHOs are equipped and encouraged to provide more Catering-specific health and safety information to the companies they are visiting, as well as food and staff hygiene advice. Guidance material and checklists for EHOs may be required.

• The HSE should consider producing some more pragmatic guidance on carrying out a risk assessment. A template document could be developed in conjunction with sector trade associations.

• As there are so few good communication channels for reaching small Catering firms, and a significant minority of firms are members of one or more trade association, it is recommended that the HSE continues and expands upon its partnership work with Catering trade associations. More jointly produced publications would be a useful output.
• The HSE InfoLine should be more widely publicised in the sector. Consideration should be given to joint HSE/EHO ‘branding’ of promotional materials for the InfoLine to ensure Catering companies recognise its relevance to them, as well as to manufacturing companies.

**Strategic recommendations**

• At the start of their career, employees should be receptive to information and so it is recommended that the HSE works closely with training organisations to ensure that sector-specific information on health and safety is incorporated within courses.

• Participants said that they would not specifically request information on health and safety from Business Links and Chambers of Commerce. However, as they do tend to have regular contact with these organisations, they would form a good dissemination channel, at least for general health and safety advice and signposting to information. It is recommended that the HSE and Local Authorities engage further with these organisations (possibly stimulated by HELA) to raise their awareness of health and safety issues. This could include providing literature and running awareness raising training courses.

• As Catering firms feel their EHO is more relevant to their business than the HSE, consideration should be given to jointly ‘branding’ Catering-specific information with an EHO identity as well as an HSE logo. This concept could also be investigated by HELA for other Local Authority regulated sectors.

4.3 **FINDINGS SPECIFIC TO MVR FIRMS**

“It’s up to the staff to take care of their own health and safety. Employees have to tighten up a bit.”

“I want help without penalties. Health and safety is not something I worry about but I know that there can be strict penalties. If someone came round and said they would fine me then I would be outraged as they’ve never been along to give me any advice on how I should be doing things.”

“You also get better staff morale from having a safe and tidy environment.”

“Colour and cartoons in leaflets and stuff all looks like junk mail and I’d just throw it away. It needs to look important. I need to know who sent it to me.”

“Things that you have to comply with should be free.”

For the purpose of this study the Motor Vehicle Repair (MVR) sector was agreed to consist of independent and franchised service and repair garages with less than 50 employees. There are around 30,000 MVR companies within this definition.

A full Sector Key Events Approach is shown in Appendix 5. The highlights are summarised below.

4.3.1 **Attitudes to Health and Safety**

There is some interest in health and safety amongst MVR small firms, but it is not given a high priority. Firms do not proactively seek health and safety advice, often because they do not know they need it. The main health and safety risks are perceived to be slips, trips and falls rather than use of equipment and petrol. All participants were aware of the hazards, however they felt that common sense measures would be sufficient to protect themselves against these risks.
Although all participants recognised that health and safety was important, they seemed to distinguish between accidents (or potential risks) that were the employer’s fault and accidents that were the employee’s fault – for which they considered they should not be held responsible.

Generally small firms are unlikely to keep up with, or even be aware of, changes in the relevant legislation.

Good health and safety was considered by participants to have several benefits, for example creating good customer impressions, giving a ‘cared for’ feeling amongst staff and to be an example of good business efficiency. It also reduces lost staff time and the potential risk of injury claims being made against the company.

4.3.2 Key Events

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice.

Regular Inspections

The MVR sector is subject to a variety of annual and bi-annual inspections:

- Small firms would welcome more regular visits by HSE Inspectors, as long as they are carried out in a supportive manner and are focused on providing practical advice. Small firms would value regular visits to help them to check that they are complying with regulations and advise them on how health and safety could be improved.
- MOT inspections are carried out for the Department of Transport, Local Government and the Regions and firms should be receptive to advice from the MOT inspectors.
- Insurance companies make regular (usually annual) risk assessment inspections of garage premises to examine equipment such as ramps and lifting gear. They have an incentive to ensure good health and safety practice as it will reduce the likelihood of claims.
- Many MVR firms have contracts with maintenance companies to inspect and maintain equipment – especially ramps and lifting gear. However, this may be a difficult key event for the HSE to make use of.
- Motor manufacturers also inspect their own franchised garages, either directly or via trade association inspections. The criteria used include good health and safety practice. However, this dissemination route has limited applicability to small firms as many franchised garages are owned by firms with over 50 employees.

Employing New Staff

The employment of new staff - particularly a new apprentice from college – is relevant to the provision of health and safety information. College supervisors will often inspect the MVR premises for health and safety considerations.

Business Start-Up

Participants felt that small firms would be receptive to all forms of advice during the business start-up phase. Start-up firms may seek business advice from intermediary organisations, such as trade associations or local enterprise companies, so these would make good communication channels. However start-up only happens once for a business so, although it is an important key event, it has limited application.
**4.3.3 Communication Channels**

*Direct Contact with the HSE*

Small firms are unlikely to spend much time reading publications and face-to-face inspector visits are likely to be the best route to encouraging improved health and safety practice. However, the sector may be described as ‘authority averse’ and they are very unlikely to contact the HSE directly.

Participants stated that information, for example updates on legislation, should be provided directly to companies, free of charge.

Participants expressed a desire for a confidential helpline but only one of them was aware of the HSE InfoLine. Participants were unsure whether they would trust the InfoLine to be confidential.

*Other Communication Channels*

Generally the trade press is widely read by participants. Trade press mentioned included the ‘Motor Trader’, ‘Scottish Motor Trade Monthly’, ‘Scottish Auto Professional’, ‘MOT Tester’ and ‘Authorised Examiner’. These were considered as good conduits to get the HSE’s messages out to small MVR firms.

Small firms suggested sector trade associations as a good potential route for disseminating well-targeted and concise health and safety information. Most garages that are members of trade associations contact them occasionally. In addition, trade associations disseminate useful information to members, for example through newsletters or web-sites. Although only a minority of small firms are members of trade associations, for those that are members, they form an excellent dissemination route.

Local business support organisations are used in a limited way. Many participants had made some contact with either their local Business Link or Chamber of Commerce. In Scotland, Local Enterprise Companies are fairly well utilised. All of these organisations could form useful dissemination routes for health and safety information, although they will only reach a minority of MVR companies.

Franchised garages also seek advice from their motor manufacturer. However franchised garages tend to be larger companies, so there is limited scope to use motor manufacturers to target small firms.

**4.3.4 Provision of Information**

*Publications*

In general, small firms prefer to be given information directly rather than publications to read and interpret themselves. Participants did not feel that they had the time or need to look at health and safety information. Their main requirement was one document containing everything they need to know and advice on how best to comply with regulations. This could be based on HS(G)67, ‘Health and Safety in Motor Vehicle Repair’\(^5\). Annual revisions or updates were requested.

Posters and stickers are thought to be a very good idea for communicating health and safety messages to staff. They need to contain just a few short simple messages and be eye-catching. Participants would also value checklists and concise ‘must do’ lists relating to specific health and safety issues.

*Internet*

None of the participants felt that the Internet was a useful channel for the delivery of information at present.
4.3.5 Recommendations

In addition to the recommendations made in Section 3, the following recommendations are made specifically for the MVR sector.

Short-term recommendations

• It is recommended that HS(G)67 is updated and expanded to form a more comprehensive document. Annual updates should be sent free to MVR companies registered with the HSE.

• The HSE should continue to work closely with sector trade associations to ensure they are kept informed of new regulations and the likely implications for small firms in the sector. In addition, the HSE could pass on information such as details of prosecutions, and accident statistics, for trade associations to disseminate to their members, for example in newsletters.

Strategic recommendations

• It is recommended that the HSE attempts to engage MOT inspectors in communicating information about health and safety. Inspectors could be provided with basic health and safety awareness training, checklists and guidance notes. They could encourage firms to register with the HSE and provide ‘signposting’ information. This would only be relevant to firms that carry out MOT testing.

• It is recommended that the HSE works closely with colleges running MVR apprenticeships to ensure that the apprentices gain a good awareness of health and safety issues and legislation – and take the lessons learned into their new workplace. This could include feeding health and safety information into course materials.

• Small firms taking part in focus groups claimed they would welcome more regular visits by HSE inspectors, as long as they are carried out in a supportive manner and are focused on providing practical advice. A pilot programme of more frequent advisory (rather than regulatory focused) visits could be undertaken to provide on-site advice.

• The HSE could work more closely with the insurance companies that carry out inspections of equipment, for example of lifting gear. Insurance inspectors could be encouraged to give some appropriate on-site advice and to disseminate appropriate written information. HSE could request that insurance companies make registration with HSE a condition of insurance.

4.4 FINDINGS SPECIFIC TO BODYSHOP FIRMS

“You should be wearing mask, glasses, gloves and clothing and by the time you’ve got it all on then you are a physical hazard. As soon as the phone rings you have to take it all off and then start again.”

“Bureaucracy and red tape is a real cost for a one man band. Any time I give to this is time lost working.”

“If it said that it was information on new legislation then I’d read it because that’s something that I need to know. You need an update whenever there’s a change in legislation. If they are going to move the goal posts then they need to tell us where they’ve put them.”

“I need a book that covers everything so that I can refer to it if I’m unsure and I need it to be updated whenever there are changes to the law.”

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For the purpose of this study the Bodyshop sector was agreed to consist of independent and franchised Bodyshop establishments with less than 50 employees. There are around 5,000 companies within this definition.

A full Sector Key Events Approach is shown in Appendix 6. The highlights are summarised below.

### 4.4.1 Attitudes to Health and Safety

There is a general level of awareness and interest in health and safety issues amongst Bodyshops, however these issues are not given a high priority on their business agenda. Survival is becoming more difficult for small firms in the sector as larger companies are gaining a greater share of insurance company work. For Bodyshops, the main perceived health and safety risk is exposure to paint fumes. Many of the paints contain isocyanates and emit solvent vapour. Other perceived hazards include dust, welding, lifting, and using spray booths.

Participants felt that they could never be sure of full compliance because there were too many regulations. They claimed that they do not receive information or guidance on changes in legislation and how to comply with all the regulations. All participants expressed a need to be kept up-to-date with new legislation and felt that the HSE should undertake this role proactively.

The sector is ‘authority averse’ and the HSE is generally viewed by Bodyshops as an enforcing body with a poor image. They feel that the HSE needs to take a more advisory role in giving up-to-date and practical guidance and information to small firms.

All participants recognised that there were business benefits to good health and safety. They felt that it was in their interest for their employees to be fit to work and also felt that organisations with good health and safety had a better reputation among clients. Bodyshops with poor health and safety standards might risk losing their insurance company clients and are also concerned about penalties for non-compliance with regulations.

### 4.4.2 Key Events

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice.

**Insurance Company Inspections**

Insurance companies impact on Bodyshops in two ways: where the Bodyshop is buying insurance for their own business and where the Bodyshop carries out repair work for an insurance company.

Bodyshop purchasing insurance:
Business insurance usually requires an annual inspection. Participants did not feel that their insurance companies would know enough about health and safety to advise on specific issues. However, this annual visit does provide a good opportunity for the HSE to disseminate relevant information to Bodyshops.

Bodyshop working for insurance company:
Insurance companies are keen to maintain their reputation and so are careful about the standards that Bodyshops adhere to. Insurance companies carry out monthly inspections to check standards. These inspections potentially provide a regular opportunity for the HSE to disseminate information to the industry, in partnership with insurance companies and trade associations. However, this is not an effective route by which to reach the smallest Bodyshops, which only have a small share of insurance work.
Contact with Paint Suppliers

All participants had regular contact with their paint suppliers. These suppliers were respected and viewed as a valuable source of information on health and safety. Paint company field staff visit their customers regularly, so the HSE could potentially use this as a route to deliver more comprehensive advice and information on a number of health and safety issues.

In addition, Bodyshops have some contact with equipment suppliers and maintenance providers. These could be useful channels for disseminating health and safety advice, although contact is less frequent than with paint suppliers, and these organisations may be more difficult for the HSE to target.

Business Start-Up

All the participants felt that the start-up phase of a new business was a time when health and safety information was needed. However, start-up businesses probably give other business issues a higher priority than health and safety.

New traders with employees are required to register with the HSE, so HSE registration would be a good time for HSE to disseminate information directly to companies. In addition, start-up firms often seek advice from a trade association, so these organisations could also be used as conduits to deliver information.

Inevitably, this route will only be valid for new firms and will not address the problems faced by existing Bodyshops.

Other Regular Inspections

Bodyshops are subject to a number of other annual tests and inspections including fire inspections for organisations, annual lung function tests for employees, testing of electrical equipment, HSE inspections and, in larger Bodyshops, inspections by the AA and RAC.

Participants perceived all of the above as being relevant to health and safety for their business. Although they currently receive very limited additional information during these tests and inspections, this would be a good dissemination route in the future, particularly for relevant changes in legislation.

Employing New Staff

Most traders in the industry receive formal training and serve apprenticeships. All participants felt that this was the right time for traders to learn about health and safety issues. They felt that general health and safety issues were covered relatively well in current college courses and that apprentices were well trained in the issues surrounding the use of isocyanates.

Participants felt that training manuals for staff on the health and safety issues in workshops would be beneficial. New workers in the trade who are still training would be more likely than established workers to read potentially large documents covering a number of health and safety areas.

4.4.3 Communication Channels

Direct Contact with the HSE

Participants agreed that they had a need for more advice and information on health and safety, particularly concerning changes in legislation. They would have greater trust in this information if it was to be provided directly by the HSE and not by their current sources (usually other traders and paint suppliers).
Some participants prefer information to be provided face-to-face by inspectors. They felt it would like more visits from inspectors with a specific knowledge of their sector, and who could advise them of changes in legislation and improvements that they needed to make in the workplace.

All participants expressed a desire for a confidential helpline to be available, yet all were unaware of the HSE InfoLine. They agreed that, although it was advertised as confidential, they would be very wary of this claim and therefore were unlikely to use the service. If the helpline were seen clearly to be independent of the HSE, they would be more likely to use and trust it.

*Other Communication Channels*

‘Bodyshop Magazine’ and ‘Body’ magazine are widely read by both managers and staff in the industry. They are regarded as being useful and informative. Participants felt that press articles about prosecutions of companies with poor health and safety practices would help to increase their awareness of current health and safety requirements. The trade press was felt to be good for headline stories, but flyers and checklists were more appropriate for detailed information.

The trade associations (the Motor Vehicle Repairers Association – MVRA, and the Vehicle Builders and Repairers Association - VBRA) require members to meet certain standards, including health and safety standards, and they carry out inspections. They also provide some useful advice for members, including help that is available on their web-sites. In particular, the VBRA publishes a monthly magazine, ‘Body’, and issues bulletin updates when needed.

Small firms do not tend to use trade associations specifically as a means of obtaining health and safety information and advice and the smallest firms are not generally members of trade associations. The use of trade associations as a conduit to disseminate health and safety information is a good one, but only a limited proportion of the industry will be reached.

**4.4.4 Provision of Information**

*Publications*

In general most Bodyshops have very little time to read written information. They also feel that much of what is available is too complex.

Small firms would like one all-inclusive health and safety Bodyshop reference document. This would detail all the regulations, provide information on how to comply, and answer health and safety concerns. The content could be based on the HSE MVR publication HS(G)67, “Health and Safety in Motor Vehicle Repair”, but expanded to include information specific to Bodyshops. Issues such as airbags and the handling of burnt-out cars were specifically identified by participants as important. It would need to be regularly reviewed and updated as legislation and circumstances change.

Participants felt that information should be provided free of charge, although they agreed that cost was not the real issue. The problem was that participants themselves would have to take action to obtain information and, in reality, they would not get around to doing this. Thus information needs to be delivered to them directly.

To convey information to staff, hard hitting, eye-catching posters need to be displayed around workshops. Stickers are also an effective communication tool for staff. Participants also liked the idea of health and safety checklists and concise ‘must do’ information, particularly on the practices required to comply with legislation. A start-up pack and training workbooks for new employees may be useful.
The Internet is not yet seen to be very important by participants, but there is a growing use of electronic mail. Participants who had Internet access at work felt that, in the future, they may be more likely to use the Internet to obtain information on business issues, including health and safety. Those who only had Internet access at home would not be prepared to use their home computer for work.

4.4.5 Recommendations

In addition to the recommendations made in Section 3, the following recommendations are made specifically for the Bodyshops sector.

Short-term recommendations

- It is recommended that the HSE run regular features in the trade press. These should highlight the dangers of not implementing good health and safety practice as well as the benefits of doing so.

- A single all-inclusive guide should be produced to inform Bodyshops of all the relevant health and safety regulations and checklists to help them decide where action is needed. This could be based on HG(G)67, updated and expanded to form a more comprehensive document. Annual updates should be sent free to Bodyshop companies registered with the HSE.

- The HSE should continue to work closely with trade associations to identify the needs for information from small firms and produce suitable outputs. The HSE should ensure trade associations are kept informed of new regulations and the likely implications for small firms in the sector. In addition, the HSE could pass on information such as details of prosecutions and accident statistics, for trade associations to disseminate to their members, for example in newsletters.

- It is recommended that the HSE produce more eye-catching materials in the form of posters and stickers, for use throughout the workplace.

Strategic recommendations

- It is recommended that the HSE should work with paint suppliers as a route for dissemination of health and safety information. The suppliers could be encouraged to provide general health and safety information from the HSE as well as details on the safe use of their particular product.

- Bodyshops that carry out work for insurance companies, are regularly inspected. The inspectors may be from the insurance company or a trade association. It is recommended that the HSE investigate this as a route for disseminating information. Inspectors’ checklists could cover health and safety issues (as some already do) and give details of where companies can obtain further help.

- It is recommended that the HSE works closely with colleges running apprenticeships to ensure that the apprentices gain a good awareness of health and safety issues and legislation – and take the lessons learned into their new workplace. This could include feeding health and safety information into course materials. Training manuals for new staff on the health and safety issues in workshops would also be beneficial. HSE could work closely with training organisations to produce appropriate workbooks and training manuals and to ensure effective dissemination of these.

- Business insurance usually requires an annual inspection from the company that provides their business insurance. It is recommended that the HSE liaise with those organisations carrying out testing/inspection so that information can be regularly disseminated using these conduits. HSE could request that insurance companies to make registration with HSE a condition of insurance
4.5 FINDINGS SPECIFIC TO CONSTRUCTION FIRMS

“The job doesn’t feel dangerous until you have an accident”.

“If you follow all the rules and regulations then you just become too expensive”.

“I’d rather lose a job than do it dangerously, if I’m injured I can’t work”.

“When you work for a big firm they abdicate their duties by getting you to sign a disclaimer”.

“Information needs to do more than state the obvious. It needs to contain some aspect that you would otherwise not have known. Statistics or facts would be very useful as they make you stop and think”.

There are approximately 690,000 Construction firms in the UK with under 50 employees. However, for the purpose of this study, investigation focused on firms in the painting & decorating and roofing sub-sectors. In general, discussions with intermediaries confirmed that similar attitudes and issues are found in other sub-sectors of the industry.

A full Sector Key Events Approach is shown in Appendix 7. The highlights are summarised below.

4.5.1 Attitudes to Health and Safety

Many small builders do not even think about health and safety. It is not because safety is unimportant; just that they do not consider it in the first place. Small builders also tend to have very little direct contact with HSE inspectors.

Most focus group participants felt that compliance with health and safety guidelines was costly and that they had to achieve a balance between safety and cost. They felt that small firms could not be competitive if they adhered strictly to all the regulations.

The painting & decorating and roofing trades were considered by participants to be potentially dangerous. Hazards identified included fumes from chemicals and paints, electrocution and falling from heights. All the participants felt that they took risks at some level but considered that they only took risks that were manageable and ‘acceptable’.

Participants saw conforming to health and safety regulations as a bureaucratic procedure rather than a means of protection. In addition, they perceived that the way some companies implement the regulations is an attempt to avoid responsibility for accidents to small building contractors. Interestingly, whilst participants felt that there are too many regulations applying to them, they believed there should be more strict policing of compliance with existing regulations for contractors obliging them to provide a safe working environment for subcontractors, such as painters/decorators and roofers.

4.5.2 Key Events

Contact with Suppliers

All small Construction firms have regular contact with suppliers (particularly builders’ merchants, trade centres and equipment hire companies). Participants felt that they particularly needed health and safety information and advice when using new equipment or working in a new environment. They wanted any new piece of equipment, whether hired or purchased, to come with practical information on safe use. Currently, information from suppliers or manufacturers is often of poor quality.
One participant suggested that the HSE should run a programme of health and safety seminars in conjunction with builders merchants, offering ‘money off’ vouchers to attendees.

**Contact with Clients**

All but the smallest firms will tend to work for public sector or large private contractors/clients. These clients are likely to explicitly require compliance with health and safety legislation and expect to see evidence of such compliance in bids for work. Some Local Authorities run a Contractors’ Health and Safety Scheme with approved lists of firms that are allowed to tender for work. It is important that clients provide genuine, relevant health and safety guidance, rather than issuing paperwork just to comply with the regulations. ‘Toolbox talks’ given by contractor foremen can be the most effective way of getting the health and safety message across on site. These usually comprise a 15 minute informal talk about a single health and safety issue, attended by everyone on a construction site, including subcontractors, perhaps once per week.

Participants also have contact with designers and architects. Participants felt that architects could be used as a communication channel for the HSE. Architects should be encouraged to show that they have considered and addressed health and safety issues in their plans and specifications. Ideally this would be a prerequisite for obtaining planning permission.

**Business Start-Up / New Traders**

All participants felt that health and safety information and advice should be disseminated at the start-up phase of a new business. New construction workers involved in subcontract work could be identified when they register for their Construction Industry Scheme (CIS) card. This could be a route for the dissemination of information. Participants suggested that attendance on a compulsory basic health and safety skills training course could be a requirement before a Construction worker could qualify for a CIS card.

**Insurance Companies**

All reputable firms have employers’ liability insurance, so they have contact with an insurance broker. The HSE could use brokers as a possible communication route. Insurance brokers may be able to find reduced premiums for traders who had attended health and safety training courses. However, participants felt that trust in insurance companies is low and so brokers would be of limited use as a conduit of health and safety help.

**Employing New Staff and Training**

Participants saw education and training as being key events and a way to improve health and safety in the painting & decorating and roofing trades. However many traders do not attend any formal training courses and, even where they do, it was felt that bad practice currently exists in some training colleges. Therefore, this key event will have limited application, but may still be useful for the HSE to influence some traders.

Some participants recommended a compulsory certification scheme as a means of ensuring qualification in safe procedures for the trade and in the correct use of equipment. The trader’s employer could use this certification scheme to check their qualifications. However, this scheme may be hard to enforce for sole traders, especially those working in the domestic sector.
4.5.3 Communication Channels

Direct Contact with the HSE

Participants saw the HSE largely as a regulatory body operating a policing role. They were wary of HSE inspectors and avoided contact with them. HSE inspectors were associated with large fines for what are regarded as “silly misdemeanours”. Even though participants rarely see an inspector, they recommended that HSE inspectors need to take a more proactive role, providing education alongside enforcement.

Few participants were aware of the HSE’s InfoLine, but all felt that a helpline is a very useful way of getting health and safety information to small builders. They felt that this service needed to be better publicised and, particularly important, available in the evenings when traders have the opportunity to call it.

The participants recommended that a helpline be used not only to obtain information but also to report poor practice to the HSE, for example if they had a concern about being forced to work in hazardous conditions by a client. For both types of use, it is essential that the confidentiality of the helpline is guaranteed, and participants would need to be reassured of this.

Other Communication Channels

Participants felt that ‘The Professional Builder’ was one of the best trade journals for the sector; it is provided through builders merchants. ‘Construction News’ (CN) is also well read, although perhaps not by painters and decorators. CN often includes health and safety features and information provided by the HSE. Coverage of health and safety issues in the trade press is considered to be important. Participants thought that the use of ‘hard-hitting’ press adverts would make traders consider more carefully the health and safety issues in their work. Few participants had previously seen material from the HSE’s ‘Working Well Together’ campaign but, when shown some of the material, thought that it was an effective approach.

Members of trade associations use their associations for obtaining information and advice. For example, members of the Federation of Master Builders (FMB) use the FMB’s helpline to ask health and safety questions. Trade associations also publish and distribute members' newsletters that sometimes contain health and safety related information. However, only around 10% of building firms belong to trade associations and smaller firms in particular are least likely to be members. So, although this is an important communication route for member organisations, it does not serve the majority of small building firms.

4.5.4 Provision of Information

Publications

In most cases, when asked directly, participants said they did not feel they needed information on how they could work more safely. Participants have little time to spend reading advice leaflets and their current use of such information is very low. All the participants felt that they had a good awareness of how to work sensibly on site. However, they were less confident that they knew all the regulations and legislation. Their main need for information was to know and understand the regulations that apply to them.

Participants requested health and safety information that they could give to their customers/clients on how to provide a safe working environment. This could cover safe practice and any relevant regulations. This was felt to be particularly important where a trader was starting work in a new environment and/or situation.
When asked what would encourage them to use health and safety information, participants stated that they might value a ‘toolkit’ to give advice on the major hazards for their sector. This could comprise a specifically designed folder, with inserts being available from builders merchants, hire shops, trade associations, major contractors, through the trade press or direct from the HSE. Good ‘signposting’ to appropriate information is essential because small firms need to know which of the many available publications it is essential for them to read. Participants stressed that consistency is vital in the advice provided by different sources. They also felt that information needs to be targeted at specific sub-sectors (for example painters and decorators rather than construction as a whole) if it is to be used.

Material must have strong messages and be easy to use and read.

Internet

Many builders have computers and Internet access. However, they are unlikely to proactively search for health and safety advice via the Internet. Small builders could be encouraged to access health and safety information, for example through links from sites they may visit (especially supplier web-sites).

4.5.5 Recommendations

In addition to the recommendations made in Section 3, the following recommendations are made specifically for the Construction sector.

Short-term recommendations

- The trade press is reasonably well read by firms in the sector. Continued campaigns in The Professional Builder and Construction News are recommended. A ‘drip-feed’ approach is likely to be more successful than a one-off campaign. Hard-hitting adverts and articles describing the potential fatal effects of poor health and safety are likely to have most effect. These should be supported by simple checklists for builders to use. Separate campaigns targeted a) by trade and b) by topic are suggested. The HSE InfoLine should be promoted (and reassurance given about its confidentiality).

- Only a minority of companies are members of trade associations, but they are a good dissemination route for those firms that are members. The HSE should continue to work closely with the sector trade associations to guide the type and presentation of new materials and to help with distribution. Preparation of articles and press releases for trade association newsletters is recommended.

- It is recommended that HSE carries out a thorough review of the publications currently targeted at the construction industry to determine their accessibility to small firms. The HSE should then repackage its materials to make them more practical and more attractive. It is suggested that the HSE consider supplying ‘toolkits’ in the form of binders, customised to each trade. These would contain some core information and inserts (supplements and updates) could be provided through suppliers, contractors, trade associations and trade journals.

Strategic recommendations

- All traders regularly visit builders’ merchants and these range from small, specialised trade-only suppliers through to large DIY superstores. This appears to be the most important communications route for small builders as it has the potential to reach the majority of them. It is recommended that HSE launch an initiative to work with builders merchants, equipment hire companies and other suppliers. They should be encouraged to take part in supplying HSE materials (for example the ‘toolkit inserts’ described above). The HSE could consider running short seminars in conjunction with builders merchants, offering ‘money off’ vouchers to attendees.
• The HSE should encourage manufacturers/suppliers to provide clear, legible, laminated information sheets, securely attached to every piece of equipment that is for sale or for hire. They could encourage material suppliers to include more practical health and safety information on the packaging, for example printed on cement bags.

• It is recommended that the HSE increase the use of the contractor supply chain as a route for promoting good health and safety practice. The challenge is to ensure that clients provide genuine, relevant health and safety guidance, rather than issuing paperwork just to comply with the regulations. Preparation of some templates for practical guidance and checklists may be useful. The HSE should also encourage the use of ‘toolbox talks’ by contractors for their subcontractors (and employees). Some materials could be produced to support these.

• The HSE should investigate the potential for increased communication with small construction firms through designers and architects. Architects should be encouraged to show that they have considered and addressed health and safety issues in their plans and specifications. The HSE could liaise with local authorities to suggest they require architects to comment on health and safety issues during the construction process, as part of planning permission applications.

• It is recommended that the HSE work with the issuers of CIS cards to investigate the opportunities for disseminating a ‘start-up’ pack of relevant health and safety information. In addition, a scheme could be considered whereby attendance on a compulsory basic health and safety skills training course is required before a Construction worker could qualify for a CIS card.

• The HSE could use insurance companies or brokers as a possible communication route. An HSE supported scheme could be set up to encourage insurance companies to offer reduced premiums for traders who had attended health and safety training courses and demonstrated good practices in the workplace.

• It is recommended that the HSE work more closely with sector training providers to ensure that training courses include sufficient and relevant content on safe working practices.
5. SECTOR COMPARISON MATRIX

Figure 1 comprises a matrix that has been constructed to allow ‘at a glance’ comparisons between the sectors studied. It highlights some differences in attitudes to health and safety between companies in the sectors. It also qualitatively summarises how relevant and useful different potential key events and communication channels are likely to be as dissemination channels for health and safety information.

Definitions
The following symbols are used in the matrix:

H = High       M = Medium       L = Low

Attitudes
Under Attitudes, there is an entry for each sector to show whether the issue shown is important. For example:

- For Catering, the entry for Need for Information is L. This suggests that Catering firms do not feel they have a need for much health and safety guidance information.

Key events and communication channels
Each Sector has three entries for each key event or communication channel. These entries are:

Cov = Coverage
This refers to the proportion of companies for which the key event or communication channel shown is relevant. For example:

- For Plastics, the entry for Insurance is H. This suggests that most Plastics companies have insurance.
- For all sectors, the entry for Business Start-up is L. This suggests that most businesses already exist and not many new ones start up.

Freq = Frequency
This refers to the frequency with which a key event occurs or a communication channel is used. For example:

- For Plastics, the entry for HSE/EHO visits is L. This suggests that plastics firms are rarely visited by HSE inspectors (in practice, usually less than once per year).
- For Catering, the entry for New Staff is H. This suggests new staff are employed frequently in the sector.

Imp = Importance
This refers to whether the key event or communication channel is likely to make an effective dissemination route for health and safety information by the HSE. For example:

- For Bodyshops, the entry for Insurance is H. This suggests that working with Insurance companies to encourage them to provide more health and safety information is likely to be effective for the HSE.
- For Plastics, the entry for Training is L. This suggests that Training is not a suitable key event to link dissemination of health and safety information to (in this case because few employees attend formal training courses.)
### FIGURE 1 - MATRIX COMPARING ATTITUDES, RELEVANT KEY EVENTS AND COMMUNICATION CHANNELS FOR FIVE SECTORS

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<tr>
<th>Attitudes</th>
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*Equip = equipment, Mat = materials, L=Low, M=Medium, H=High, - = not determined during study

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6. EVALUATION OF THE SECTOR KEY EVENTS APPROACH

6.1 BENEFITS OF THE SECTOR KEY EVENTS APPROACH

Small firms are particularly difficult for the HSE to engage with. Business issues such as cash flow, sales, staffing and production are even more critical for small firms than for larger ones – and health and safety is often given a very low priority. In addition, small firms often appear to be unaware of their legal obligations, do not realise the dangers of poor practice, do not think about the benefits of good health and safety practice and have insufficient resource to devote to health and safety. They are very unlikely to seek out information on health and safety, unless prompted by an event such as an accident at their premises. However, encouragingly, participants in most sectors did say they would at least skim read ‘official looking’ HSE-branded documents sent to them directly by the HSE.

Factors for the HSE to consider

There is therefore a need for the HSE to identify all potential methods of communication to maximise the opportunities for small firms to take notice of health and safety and take actions. To do this the HSE needs to consider the following questions:

- What health and safety information do small firms need?
- When do small firms need information?
- When might small firms be receptive to receiving information?
- What are the best communication channels to use to disseminate information to small firms?
- What is the best way to present information?

The Key Events Approach deals very effectively with the ‘when’ questions, which have sometimes been given less prominence in other studies. In practice these are critical questions. Findings in this study indicate that, even when firms are sent information directly, if they do not feel they need the information, it will be thrown away immediately or filed and probably not referred to again. This applies even when the material is considered to have been well designed.

The outcome of the SKEA approach

It was initially expected that the SKEA would identify a large number of key events that could lead to many opportunities for HSE to communicate with small firms. In practice only a few key events were identified for each sector. This is considered to be a very positive outcome as it will enable the HSE to focus efforts on providing help when businesses really need it, or are at least receptive to advice. Focussing on a few important key events and communication channels in each sector should be considerably more cost effective to HSE than other approaches, such as trying to engage all the intermediaries that have contact with small firms.

The SKEA production methodology has proved to be effective. The study has included interviews with intermediaries (both sector-specific and cross-sectoral) and interviews and focus groups with small firms, across a range of sectors. This has allowed a combination of broad and in-depth investigation.

Similarities and differences between the sectors

It is particularly interesting to compare the similarities and differences between the findings for the different sectors.
Within sectors, the findings were very consistent; common views were expressed in both focus groups and the intermediary interviews. This provides confidence that a representative view was identified.

In addition, there were strong similarities on certain issues across all sectors. In particular, common views were found on the attitudes towards the regulators, the perception of over-regulation, the lack of resource to devote to health and safety, and views on how information should be presented.

However, there were significant differences in views on the key events and how they could be utilised when comparing between some of the sectors. This may reflect differing attitudes on the importance of health and safety, especially between sectors that at least recognise some of the dangers (eg Plastics and Construction) and those which vary rarely even consider the risks (eg Catering).

**Benefits unrelated to key events**

A strength of the methodology employed is that as well as focussing on the key events and how they might be utilised by the HSE, it has also identified the other important factors that the HSE should consider, but that are not specifically related to key events. This includes the identification of additional communication channels and considerable insight on the best ways of presenting information to both gain the attention of small firms and encourage them to take action. The resulting SKEAs therefore form comprehensive documents that describe: when firms would benefit from advice, what advice they need, how to get it to them, and how to present it.

**Overturning initial assumptions**

Applying a structured approach to collecting, analysing and collating information has resulted in a number of early assumptions being challenged and over-turned. An example is an initial expectation that accountants and banks would be a good communication channel for health and safety information. The results contained in the SKEA represent the views of both the small firms that need the information and of the intermediaries that may help deliver it. They have been collected using an ‘inclusive’ approach that should help ensure support if the recommendations are implemented.

**Implications for the HSE**

The findings of this work have shown that it is essential to link communication of health and safety information to those activities and ‘key events’ that relate to the core business and interests of small firms. The Sector Key Events Approach has proved to be a powerful methodology for identifying:

- when small firms may be receptive to communications from the HSE;
- what information they need;
- what is the best form in which to present it;
- which communication channels would be most effective.

Together with the findings of other HSE research into small firms and intermediaries, it will help ensure that the HSE’s effort is focused on the most effective communication routes to stimulate maximum positive action in the most cost-effective ways.

### 6.2 LIMITATIONS OF THE SECTOR KEY EVENTS APPROACH

**Use of the term ‘key event’**

A major obstacle to the use of the SKEA was identified early in the course of the study. Small firms and intermediaries did not really understand the concept of a ‘key event’ and how it related to their needs for health and safety advice. It was quickly identified that while the SKEA is a sound methodology, simpler language needed to be used when carrying out the data collection. Therefore the study concentrated on asking questions such as:
• What important activities do you undertake regularly and occasionally during the course of your business?
• Where do you go for information on business issues?
• What hazards do you face at work, what information do you need to help you manage any hazards and where would you go to get such information?

It was then possible to collate the results into the standard SKEA document which provides a structured way of describing the needs of the sector and how the HSE might act to meet these needs.

**External indicators of key events**

One of the original aims of the study was to identify external indicators associated with the key events. It became apparent that very few key events could be identified externally in advance in a form that would be useful to the HSE. As an illustration, key events included:

- **Taking on new staff** – This is usually organised informally by small firms and there are few external indicators.
- **Contact with customers or suppliers** – These are important events, but it would be difficult for the HSE to find out about such contact from the customers, suppliers or the small firm themselves.
- **Insurance company inspections** – Although in any one company insurance company inspections may take place on a regular basis, it would be impractical to gather information on the timing of inspections for all small firms in a sector.

It became clear that, even if key events could be identified externally and in advance, it would provide little benefit for the HSE. It is much more important to identify which intermediaries a small firm may have contact with when a key event occurs. The HSE can then work with the intermediary to prepare and communicate information whenever contact occurs, regardless of whether the actual timing of the event can be predicted in advance.

**Operational 'events'**

The key events approach is not really suited to identifying day-to-day operational issues such as manufacturing products, marketing and sales activities, winning new orders, and distribution. However the methodology employed for collecting information for the SKEAs also readily identified where these activities involve contact with intermediaries and their identities. The SKEAs therefore include sections on communication channels that, although not associated with key events, may nonetheless be useful dissemination routes for the HSE to consider.

**Importance of health and safety issues to small firms**

Few 'key events' are directly concerned with health and safety issues, and so they are unlikely to provide triggers for companies to specifically seek health and safety advice. However, they may encourage the companies to seek business support from a professional adviser, trade association, business support organisation or other intermediary. The challenge for the HSE will be encouraging the advisers and organisations to couple the importance of health and safety as an issue with the concerns on which companies are seeking support. This should be possible if the HSE continues, and further develops, its existing experience of working in partnership with intermediaries.

**Lack of common key events across all sectors**

Although considered positive that only a few key events were identified for each sector, it was disappointing to discover that only business start-up and business growth were considered to be useful key events relevant to all sectors (and then only relevant to a limited number of companies). It had been expected that there would be a reasonable number of generic key events, with several others specific to certain sectors. Events such as preparation of financial accounts, contact with banks and payment of taxes were expected to be identified as key events and these activities were highlighted as
critical activities by small firms and intermediaries. However, it was unanimously felt by focus group participants that it would not be appropriate to link the provision of health and safety advice to these events.

6.3 RECOMMENDATIONS

The key events approach has proved to be an effective method for identifying how the HSE could potentially improve communications with small firms.

A number of key events have been identified for each sector and the HSE will be able to make use of these events in planning future communication approaches with small firms. As very few key events were found to be common across all sectors, a strategic, sector-based approach is likely to be more effective than a generic cross-sectoral approach. In the authors’ experience this has worked well in other areas. For example, it has proved highly successful in targeting communication with small firms to improve their environmental performance in the Government’s Envirowise and Energy Efficiency Best Practice Programmes.

It is recommended that:

• The HSE pilot the implementation of the top priority short term and strategic recommendations from the SKEAs in one or perhaps two of the sectors studied. This would involve some further, more detailed study of the best approach to take, development of action plans in conjunction with relevant intermediaries, and preparation and dissemination of suitable materials. The success of this approach should then be measured by market research of small firms that involves a combination of telephone interviews, focus groups and perhaps postal questionnaire.

• If the pilots are successful, the recommendations of all five SKEAs should be considered for implementation. The progress of these should also be reviewed on an ongoing basis with the use of market research.

• In addition, the HSE should consider extending the SKEA to other sectors. Priority should be given to sectors with above average accident and occupational ill health rates and those with positive, pro-active sector trade associations.
REFERENCES

The majority of sector-specific publications listed below were used as reference material during Focus Groups.

1. “Developing Proposals on how to Work with Intermediaries”
   Durham University Business School

2. “An introduction to health and safety”
   HSE booklet INDG259, 1999

   Small Firms Enterprise Development Initiative

   Supplement to Plastics and Rubber Weekly
   Emap Maclaren, 2001

5. “Health and Safety in Motor Vehicle Repair”
   HSE booklet HS(G)67, 1999

6. "Managing Machinery Safely in Small Plastics Factories"
   HSE leaflet – Plastics Processing Sheet No. 3, 1999

7. "Safety at Injection Moulding Machines"
   HSE leaflet – Plastics Processing Sheet No. 4, 1999

8. "Safety at Blow Moulding Machines"
   HSE leaflet – Plastics Processing Sheet No. 5, 1999

9. "Safety at Thermoforming Machines"
   HSE leaflet – Plastics Processing Sheet No. 6, 1999

10. "Safety at Extruders with Caterpillar, Belt or Roller Haul-offs"
    HSE leaflet – Plastics Processing Sheet No. 7, 1999

11. "Safety at Window Frame Manufacturing Machines"
    HSE leaflet – Plastics Processing Sheet No. 8, 1999

12. "Safety at Compression Moulding Machines"
    HSE leaflet – Plastics Processing Sheet No. 9, 1999

13. "Safety at Granulators"
    HSE leaflet – Plastics Processing Sheet No. 10, 1999

    A Practical Guide to Legislation for Accommodation Providers
    English Tourism Council, 2000

15. “Manual Handling in the Brewing and Licensed Retailing Industry”
   Brewers and Licensed Retailers Association
   The Macmillan Press, 1994

17. “Priorities for Health and Safety in Catering Activities”
   HSE leaflet – Catering Sheet No. 2, 1998

18. “Occupational Dermatitis in the Catering and Food Industries”
   HSE leaflet – Food Sheet No. 17, 1997

   HSE leaflet – Engineering Sheets No. 18, 1997

20. “Safe Use of Petrol in Garages”
    HSE leaflet INDG331, 2000
APPENDICES

APPENDIX 1  FULL LIST OF POTENTIAL KEY EVENTS CONSIDERED DURING STUDY

APPENDIX 2  INITIAL ANALYSIS OF KEY EVENTS

APPENDIX 3  SECTOR KEY EVENTS APPROACH – PLASTICS

APPENDIX 4  SECTOR KEY EVENTS APPROACH – CATERING

APPENDIX 5  SECTOR KEY EVENTS APPROACH – MVR

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APPENDIX 7  SECTOR KEY EVENTS APPROACH – CONSTRUCTION
APPENDIX 1 - FULL LIST OF POTENTIAL KEY EVENTS CONSIDERED DURING STUDY

The following list comprises all of the key events that were considered during this study. The list was constructed following a brainstorming of industry and SME experts and a web-search. Several additional items were added as a result of initial telephone interviews with SMEs from a variety of sectors and with business support organisations.

- Business start-up
- Changes in working practices
- New product development
- Production of business plans
- Recruitment of staff
- Training
- Events involving nearby firms
- Renewal of insurance premiums
- Bid for new work
- Returns from customer
- Feedback from customer
- Payment of business rates
- Marketing / advertising
- Adoption of revised legislation
- Business expansion
- Change in customer base
- Competitor activity
- Trades Union activity
- Information about products
- Applying for funding - eg grants, loans, venture capital
- Start of new order
- Registration with HSE or Local Authority
- Completion of tax returns
- Applying for patents
- Registering limited companies, franchises etc
- Retirement or selling of business
- Insolvency and closing business down
- Financial audit
- Accidents
- Change of suppliers
- Social networking
- Investment decisions
- Visit of regulators
- Completion of order
- Customer enquiry about management practices
- Payment of VAT
- Payment of National Insurance
- Applying for licences
- Pre-acquisition audit, mergers and demergers
- Locating, expanding, moving or altering premises - contact with Land Registry and planning permission
APPENDIX 2 - INITIAL ANALYSIS OF KEY EVENTS

The list of key events contained in Appendix 1 was used to develop a questionnaire for use in telephone interviews with small firms and intermediaries. The following tables contain a tailored list of key events which was constructed following those interviews. The tables list the main events that could have some potential for identifying dissemination opportunities in the view of respondents. For each event, a brief summary of the views obtained from the interviews is presented.

Regular Activities

<table>
<thead>
<tr>
<th>Key Event</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial audit and preparing financial accounts</td>
<td>Firms agreed this was compulsory/essential, with most making use of an accountant. This suggests that there could be opportunities to make use of accountants as a health and safety communication route to firms.</td>
</tr>
<tr>
<td>Completion of tax returns, paying VAT bills and business rates</td>
<td>Important to all businesses – often via accountant. Smallest firms don’t tend to be VAT registered</td>
</tr>
<tr>
<td>Obtaining insurance and renewing insurance premiums</td>
<td>Seen as a key event by all firms and by some intermediaries. There should be scope for using a number of channels here for health and safety communications. This could dovetail with activities related to Action point 5 of the Revitalising Health and Safety Strategy Statement</td>
</tr>
<tr>
<td>Keeping up-to-date with and adopting revised legislation</td>
<td>Recognised as a key and problematic activity by several intermediaries and small firms. Where this was not identified as a key activity by small firms this could indicate a lack of awareness rather than a downgrading of significance. A range of means were used to keep up-to-date</td>
</tr>
</tbody>
</table>

One Off / Occasional Activities

<table>
<thead>
<tr>
<th>Business Start-up</th>
<th>A whole range of events/ activities are associated with start-up. Some are likely to be only associated with start-up (eg initial registration with Companies House, HSE or LA). Others may also occur at other specific stages of the lifecycle, such as raising finance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business Growth</td>
<td>This can cover a wide range of activities, from investing in capital – eg equipment, computers, transport - to applying for planning permission and leasing or constructing new premises. It could also involve increasing the number of customers, volume of sales and similar.</td>
</tr>
<tr>
<td>Winning new work or new customers</td>
<td>Important to some companies, but often done through personal communications and recommendations, sometimes by visiting trade fairs.</td>
</tr>
<tr>
<td>Applying for funding – grants, loans, venture capital</td>
<td>Likely to be particularly important during the start-up phase.</td>
</tr>
<tr>
<td>Recruiting staff</td>
<td>Identified as a key event by some firms. Tends to be of ongoing importance.</td>
</tr>
<tr>
<td>Expanding, moving or altering business premises</td>
<td>Often related to Start-up or Growth</td>
</tr>
<tr>
<td>Changing suppliers</td>
<td>Wide variation in importance that small firms attach to this, possibly reflecting whether continuity and building a relationship or getting the best deal is seen to be of greater importance.</td>
</tr>
<tr>
<td><strong>New product development</strong></td>
<td>Firms generally do not seek help from outside sources with this.</td>
</tr>
<tr>
<td>----------------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Investing in capital eg equipment, computers, transport etc</strong></td>
<td>Although identified as a key event by intermediaries and by firms, the range of decisions and the potential sources of information are wide. There were also indications that some firms would definitely <strong>not</strong> seek external advice before making such decisions.</td>
</tr>
<tr>
<td><strong>Networking with other companies, attending seminars, workshops etc</strong></td>
<td>Firms did not tend to class this as a key event, although some intermediaries did. Most firms surveyed do not make use of seminars etc. This is not surprising considering the cost implications of attending.</td>
</tr>
<tr>
<td><strong>Visits of regulators – applying for licences or consents</strong></td>
<td>Importance is likely to be dependent on the nature of activities carried out by a firm. Although visits by regulators were not mentioned, there was reference to dealing with various regulatory bodies - eg Local Authorities, the Environment Agency, and other Government bodies - by intermediaries and firms. There was no mention of contact being made by the HSE; if anything, firms actively sought <strong>not</strong> to have contact with the HSE fearing adverse consequences.</td>
</tr>
<tr>
<td><strong>Dealing with and prevention of Accidents and Work-related illness</strong></td>
<td>Dealing with accidents would be high priority if they happened.</td>
</tr>
</tbody>
</table>
APPENDIX 3 - SECTOR KEY EVENTS APPROACH – PLASTICS SECTOR

A3.1 BACKGROUND

This Sector Key Events Approach (SKEA) for the Plastics sector has been produced by AEA Technology plc under the HSE project ‘Expanding HSE’s Ability to Communicate with Small Firms – A Targeted Approach’ (RSU ref. 4142/R68.057).

The overall objectives for the study are:
• to identify external indicators of ‘key events’ in the life of small firms that may be indicative of their need for advice or information on health and safety at work
• to identify appropriate, cost effective communication channels, tools and techniques for influencing the health and safety behaviour of small firms

This SKEA summarises the findings of interviews with key intermediaries and focus groups with small firms in the Plastics sector. It describes the sector’s general attitude towards health and safety and identifies key events that could be used by the HSE as opportunities to disseminate advice and information.

A3.2 THE SECTOR

The Plastics sector covers manufacturing facilities that turn dry polymer granules into plastic, usually by moulding and extrusion. Processes used include granulation, injection moulding, blow moulding, rotational moulding, extrusion, cutting and pressing. The sector covers around 15,000 businesses, of which 95% are small firms (i.e. with under 50 employees).

Views on key events in the life of the sector’s small firms and communication mechanisms were gathered from three key sector intermediary organisations (the British Plastics Federation, the Plastics and Industrial Films Association and the Plastics Machinery Distributors Association), one independent consultant and two focus group meetings that were attended by nine representatives of small Plastics firms.

A3.3 ATTITUDES TOWARD HEALTH AND SAFETY

A3.3.1 General Attitude

The trade associations felt that the industry has a poor health and safety record and that health and safety should have a higher priority. Some small firms treat health and safety as important, but in general the ‘health’ of the business was given the highest priority. Owners and managers are mainly concerned with the survival and growth of their businesses, which leaves little time to dedicate to health and safety matters. Most small firms do not even consider health and safety as an issue for most of the time – except when they have an accident. Firms generally try to comply with legislation where they know what it is, but their resources are minimal; they cannot spend much time trying to obtain relevant information about the latest legislation.

A3.3.2 Perceived Risks

The Plastics industry was perceived by focus group participants as potentially hazardous. Some of the hazards they identified included machinery (cuts, burns, crushing injuries), fork lift trucks, manual handling and chemicals. None of the participants had experienced a major injury in their industry.
There was a feeling that, although good working practices were upheld by small firms, their employees did not always work in the safest way. It was felt that a lot of health and safety issues were common sense, but there is a danger of them being ignored for reasons of ease, speed or bravado in the workplace.

**A3.3.3 Attitude to Legislation and Regulators**

Participants perceived health and safety to be an area involving many regulations. Most talked about new legislation when they mentioned information on health and safety. Participants felt that it was important to keep their staff safe regardless of the regulations. They felt that they were operating safe practices but that there were so many rules and regulations that they could not be aware of all the rules/regulations relevant to their industry. They also felt that, even if they were aware of all the relevant legislation, it would be impossible to comply fully. Keeping up to date and complying with all legislation would necessitate having a dedicated health and safety staff member, yet as small businesses they could not afford this.

The HSE was seen by participants as a regulatory body operating a policing role. Health and safety inspectors were seen as clamping down on minor issues unnecessarily and always looking for problems in any organisation inspected. A fear of the HSE was reported, especially of factory inspectors. This leads to companies not being willing to call for advice. There was a desire that inspectors should distinguish between small and large companies when considering enforcement actions.

**A3.3.4 The Benefits of Health and Safety**

Participants felt that having good health and safety led to some business advantages including lower insurance premiums, portraying a good image to customers and having staff that feel cared for. They felt that they ensure safe working in their factories regardless of legislation, to ensure that their staff are safe.

**A3.4 KEY EVENTS IN THE LIFE CYCLE OF A SMALL PLASTICS FIRM**

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice.

**A3.4.1 Business Start-Up**

Participants agreed that it was useful to receive information in the start-up phase of a business, although this key event has limited application as it is only relevant to new firms. In addition, in the start-up phase of a small business, owners would have many issues to consider other than health and safety. Participants were unsure whether they were required to register with the HSE at the start-up of the business; the advisability of doing so should be promoted more widely. Participants felt that the HSE should obtain information from Companies House on new business registrations, so that the HSE would know when new companies were set up and could proactively make contact.

A general ‘start-up’ pack relevant to the Plastics industry would be a useful way of communicating basic health and safety guidelines and signposting to more specific information. It is suggested that the HSE provide such a start-up pack when new firms register with them.

**A3.4.2 Buying Equipment**

The more severe health and safety risks tend to be associated with operating machinery. Plastics companies occasionally make significant equipment purchases and working through equipment suppliers may be a good route for providing H&S advice. New equipment tends to have an
accompanying training manual that covers safe operation of the equipment. As information is expected in these circumstances, this would be a good opportunity for the HSE to include some of its own publications.

With regard to second hand equipment, participants felt that they would like more information to be available to them. Participants often buy equipment second hand and would like advice and information on what to look for in second hand equipment and how to check that it is safe. The HSE could investigate making information available to traders at sales and auctions.

A3.4.3 Obtaining Insurance

Participants felt that insurance companies would be keen to see improved health and safety in the Plastics industry. All companies renewed their premiums annually and in some cases this involves an inspection. Participants felt that an insurance company would be able to offer them advice on hazards in their workplace and that this could be a good route for dissemination of health and safety information. However, participants were concerned that their businesses should not incur additional cost for provision of this service.

It is suggested that the HSE liaise with insurance companies with a view to working in partnership to disseminate health and safety advice and information, and to encourage insurance inspectors to offer on-site advice.

A3.4.4 Inspections

Most equipment is subject to annual inspections, for example annual certification of electrical equipment, as well as insurance inspections mentioned above. Traders expect to receive information on health and safety at these times. The HSE could consider working with maintenance contractors to ensure appropriate information is being disseminated.

A3.4.5 Regular and Frequent Activities

Contact with customers was thought to be a relevant key event in some circumstances. Many small Plastics companies supply much larger companies and there is evidence of supply chain pressure being exerted. Large companies already require their suppliers to operate to the Quality Standard ISO9001 and, increasingly, the Environmental Standard ISO14001. The HSE could work with major industrial companies to encourage them to demand good health and safety practice amongst suppliers, possibly including the implementation of the Health and Safety Management Standard ISO18000.

A3.4.6 Events not Appropriate for Linking to the Provision of Health and Safety Advice

Participant feedback suggested that regular activities such as financial audits, preparing tax returns and applying for loans, would be inappropriate events to link to the provision of H&S advice. Firms did not expect health and safety advice received from accountants, banks, and the Inland Revenue to be useful. These third parties were viewed as having no health and safety expertise and there was concern that they would charge extra for this service.

Employing staff was not considered to be a suitable key event. Although new staff do need to receive training, most is carried out ‘on the job’ and staff are not usually sent on external training courses. However, it was agreed that provision of a ‘starter pack’ for new employees would be helpful.

A3.5 KEY COMMUNICATION CHANNELS

The key events described above identify when it is appropriate to target small firms with help and advice. They also suggest appropriate channels for disseminating information. This section highlights
additional communication channels that may be useful, although not specifically related to a key event.

**A3.5.1 Direct Communication with the HSE**

In general, participants were unlikely to contact the HSE directly for information, as they feared this could lead to an inspector visiting and then inspecting other areas beyond the initial enquiry, possibly taking enforcement action.

However, participants did feel that the HSE should send them information directly, especially updates on new legislation.

**Helpline**

Awareness of the HSE InfoLine was low, but participants did feel a need for a confidential helpline that they could call for advice and information in specific circumstances. All participants were afraid of ‘comeback’ from the HSE should they ring with an enquiry – one current InfoLine user withholds their telephone numbers (by blocking ‘caller line identification’) to remain anonymous. Although the current InfoLine is confidential, all participants felt that they would be cautious until the HSE had ‘proved that they could be trusted’.

The HSE InfoLine would benefit from increased publicity. It may be more attractive if it was called a Helpline rather than InfoLine. In addition, potential callers need to be convinced that all calls are treated in strict confidence. Visibly independent (from the HSE) operation of the InfoLine may enhance its credibility.

**HSE visits**

In general participants felt they wanted to receive advice and information in person from an inspector - but they needed to be able to trust the inspector to support them rather than seek to put them out of business. They felt that the HSE should take a more proactive role in offering advice and support and that inspectors should seek to give practical hands-on guidance to organisations. Participants felt that the HSE had a poor public image and needed to improve this and build relations with workers in the industry. However, a minority of participants said that they had come across several very helpful inspectors.

It is suggested that the HSE consider carrying out more frequent visits to sites in a role that is more advisory than policing.

**A3.5.2 Communication through Intermediaries**

**Trade associations**

The Plastics trade associations are doing excellent work in helping to produce health and safety information and distributing it to their members. However, they have limited resources and cannot always afford to provide the steady drip-feed of information that is needed to guarantee attention and action.

In addition, the majority of small firms are not members of Plastics trade associations, so dissemination of information through trade associations cannot be relied upon as the sole means of communication with the industry. Participants in the focus groups said they would be unlikely to approach a trade association for advice on health and safety, as they did not think trade associations would offer this kind of information.
Local business support organisations

Some small Plastics firms use their local Business Link or Chamber of Commerce for business advice and find they can be very useful. It was felt by most participants that these organisations would not be able to provide useful advice on health and safety. They are therefore unlikely to be a good ‘reactive’ source of health and safety advice (as small firms wouldn’t approach them) but could usefully act in a ‘proactive’ way (as firms would probably use information they were sent).

If the HSE were to form partnerships with Chambers of Commerce, Business Links etc, to provide general health and safety advice, it would be worthwhile highlighting the information available specifically to small Plastics firms.

A3.5.3 Other Communication Channels

Trade press

Most participants received copies of the trade press publication ‘Rubber and Plastics Weekly’. Participants read this when they found time but felt that any health and safety information that came with the publication should be on a separate sheet or flyer to attract their attention. Regular features in ‘Rubber and Plastics Weekly’ would be an effective way of getting the health and safety message across to companies that have little contact with intermediaries. A campaign to encourage firms to register with the HSE would be particularly worthwhile.

Other traders

Most participants seek advice from friends in the trade and they share information about different situations or equipment. Participants felt that they would always approach other traders in the first instance if they wanted information and advice. This is not very useful as a dissemination mechanism for HSE as it is difficult to identify and target the ‘other traders’.

Internet and emailing

Some participants had Internet access and felt that it would be a good source of information on health and safety if they knew where to look. A web site specific to small firms in the Plastics sector would be useful. None of the participants had used the HSE web site.

A3.5.4 Communication Channels not Appropriate for Disseminating Health and Safety Information and Advice

Some participants said that small firms receive information on health and safety from materials suppliers, but this is usually only a data sheet rather than practical advice on safe handling. The overall view was that material suppliers to the industry are unlikely to be a good communication channel.

Specialist consultants are able to provide useful practical advice on keeping the workforce safe, complying with legislation and achieving ISO18000. However, it was agreed that few small firms could afford to employ a specialist consultant, so they are not suitable for use as a major communication channel for the HSE.

A3.6 PROVISION OF INFORMATION

All participants felt that they had a need for advice and information on health and safety issues and particularly on new legislation concerning their industry. There was a positive response to the current HSE information leaflets, which have been produced for specific Plastics subsectors – although they
are still ‘a bit too long and dry’. The trade association / industry input to these leaflets has been valuable.

A3.6.1 Key Requirements of Small Plastics Companies

Needs of small firms
Small Plastics firms’ needs for information are:
- To be provided with a general reference document
- To be regularly updated on new legislation

Requirements of written information
Most participants wanted some written health and safety information, but it must be:
- Tailored to particular sectors (and where possible, individual sub–sectors) so it is more likely to be read. It should be clearly identified as specific to the Plastics industry
- Clear and concise - focussing on the most important hazards and actions to be taken
- Understandable – avoiding complex or ‘legal’ language where possible
- Well structured – using bold and clear headings and illustrations to generate interest
- Short – a maximum of four sides of A4
- Free – and preferably sent directly to companies by the HSE

Use of information by Plastics firms
Information on health and safety (especially from the HSE) is at least skim read, usually on receipt, to identify any immediate needs. It is then filed for future reference.

A3.6.2 Types of Information
Most participants were not aware of the HSE’s Plastics specific publications. Having seen examples at the Focus Group meetings, they agreed that these publications would be useful and would like to see them better promoted throughout the industry. However, participants also agreed that there were a number of generic issues such as manual handling and the safe use of fork lift trucks that did not need to be identified as specifically targeted at the Plastics industry for them to be relevant.

Plastics firms were keen to have a general reference document, containing information on all the legislation and guidelines that might be relevant to them, along with practical guidance for complying. As the Plastics industry is heavily regulated, participants felt that they needed regular updates on new legislation. They would like these to be sent to them automatically.

Participants felt that developing a health and safety policy document was very difficult and the framework recommended for such policies is very complex. They asked for a simpler, ‘standard’ health and safety policy document template that they could then amend to their own particular company.

A health and safety starter pack for new employees would be useful.

A3.6.3 Presentation of Information
Information needs to be clearly labelled as relevant to the Plastics industry, and preferably tailored to particular sub-sectors. The title, section headings and design of the front cover/first page were thought to be critical in determining whether a document was discarded immediately or read in more detail. Participants agreed that if the title was relevant then the rest of the publication would be read. Information also needs to be relevant, clear and concise. Headings should be bold and clear so that the
document can be easily read in a short space of time. Bullet points were thought to be a good way of making sure each point was clear.

A short document is much less time consuming to read and so is more likely to be read. Documents of around 2-4 sheets of A4 paper (such as the Plastics Processing Sheets produced by the HSE\(^6\)\(^-\)\(^13\) were thought to be of a suitable length. Longer booklets in either A4 or A5 size would be acceptable as reference documents providing that they had a clear contents page. It was suggested that the HSE might provide a binder in which regular, short updates could be filed.

Very small, flyer-size documents were also thought to be a good way of signposting people to other useful information. Colourful posters with a clear, visual impact and summaries of key points were thought to be a good way of reminding staff of their health and safety responsibilities, providing that they were regularly changed to maintain interest.

Publications should be imaginative and eye-catching. However, participants agreed that documents in black and white were suitable. Some felt that brightly coloured information risked looking like junk mail. The HSE logo on the front of the document was considered to highlight the importance of the document.

Some participants felt that information on CD-ROM would be good for reference and would be better than the paper files that they currently have. A CD-ROM would need to come with a clearly headed paper contents sheet so that it was obvious what information was stored on the disk without having to load it into a computer.

**A3.7 QUOTES FROM FOCUS GROUPS**

“It’s important that my staff don’t get hurt. If the HSE did not enforce regulations I would still work to protect my staff.”

“Employees don’t always see the common sense as they’re looking out for what is easiest. Not everyone has common sense and sometimes bravado amongst young men can be a stronger pull than common sense.”

“Staff prefer to do it the simple quick way that is less safe.”

**Attitudes to regulation:**

“I have nothing to hide but there are so many rules and regulations that the HSE inspector is bound to find a problem with my company.”

“I just can’t stick to any more rules and regulations.”

“How do I know about new legislation if no-one tells me?”

“Inspectors vary from area to area - they are not consistent about how they lay down the law.”

“Complying with all the rules and regulations takes a dedicated person to co-ordinate and costs a lot of money.”

“There’s no way I can comply with all the regulations. I’ll close the business if I’m forced to comply.”

**Reasons for good health and safety practices:**

“In running my business properly I make sure my staff are safe.”

“Health and safety is paramount to running my business on a day-to-day basis.”

“If you’ve got no sales or business then health and safety is not an issue. First of all I have to get business.”
“Our customers ask about our health and safety.”

**Attitudes to health and safety information:**

“I would read anything that said ‘HSE’ on the front just in case it was about new legislation.”

“I keep all my health and safety stuff in a file so that I can refer to it when I have a problem.”

“Often you get a pile of junk and only a little bit of relevant stuff. I sent for some information once and they sent me four booklets. The only relevant bit was one page in one booklet but I had to read all of them to find it. Why couldn’t they just send me the page that I needed?”

“There’s nowhere to go for advice on handling. You can’t just pick up the phone and say ‘can we have a chat about handling’ without the likes of the HSE coming down heavy handed on you.”

“You can’t ask the HSE anything without them coming down on you like a ton of bricks.”

“The problem with coloured leaflets is that they look like junk mail and I get so much of it.”

“If it comes from the HSE then I would assume that it may have some useful information in it and I’d at least read the contents.”

**Attitudes to intermediaries:**

“Insurance inspections do provide health and safety advice broadly. Recently I’ve had an insurance man give me suggestions on how to improve safety.”

“The accountant has no idea how to go about making my job safe.”

“You wouldn’t expect the Business Link to have the kind of information that you’d want.”

“There are informal networks of people you know in the industry.”

**Attitude to the HSE:**

“I would contact the HSE but I would speak to someone else in the trade first.”

“There needs to be a helpline where you know you won’t get the third degree.”

“I’m afraid of calling the HSE in case we get a prohibition slapped on us.”

“You need the confidence to ring without the fear of any comeback.”

“You should be able to phone a helpline, tell them what equipment you have and then they should send you relevant information.”

“Current perception is that the HSE is the bad guy.”

“When they visit they don’t just look at what you asked them to but they pick on other little things.”

“People in enforcement authorities don’t work to sorting out a reasonable solution.”

“They need to improve their image and change it from public enemy number one.”

“I need the HSE to be more helpful and supportive.”

“Inspections should be more regular and inspectors should be more customer friendly and offer advice. At the moment they are just not approachable.”

**Comments on publications:**

“The title needs to jump out at you.”

“It’s got to be in plain English with clear headings and bullet points.”

“The front cover needs to be a general overview of what is inside so that you can easily tell what it contains.”

**Feedback on Plastics Processing Sheets No.3 and No.4:**

“I’d scan it and read the bullet points to see if it was relevant.”
“I’d look at the references to other sheets to see if there was anything else relevant. There isn’t and so it’s a switch off.”

“I looked at the title and thought this isn’t relevant, I need another document.”

“I’d order the one listed on the front that’s relevant to me if I felt I had a problem in this area.”
APPENDIX 4 - SECTOR KEY EVENTS APPROACH – CATERING SECTOR

A4.1 BACKGROUND

This Sector Key Events Approach (SKEA) for the Catering sector has been produced by AEA Technology plc under the HSE project ‘Expanding HSE’s Ability to Communicate with Small Firms – A Targeted Approach’ (RSU ref. 4142/R68.057).

The overall objectives for the study are:

- to identify external indicators of ‘key events’ in the life of small firms that may be indicative of their need for advice or information on health and safety at work
- to identify appropriate, cost effective communication channels, tools and techniques for influencing the health and safety behaviour of small firms

This SKEA summarises the findings of interviews with key intermediaries and focus groups with small firms in the Catering sector. It describes the sector’s general attitude towards health and safety and identifies key events that could be used by the HSE as opportunities to disseminate advice and information.

A4.2 THE SECTOR

For the purpose of this study, the Catering sector was agreed to consist of sub-sectors represented by the Health and Safety in Catering Industry Liaison Committee. In particular, this includes pubs, restaurants, hotels and contract caterers. The sector covers approximately 150,000 businesses, of which almost 99% are small firms (employing under 50 people).

Views on key events in the life of the sector’s small firms and communication mechanisms were gathered from four key sector intermediary organisations (the Hotel and Catering International Management Association, the Catering Equipment Suppliers Association, the Brewers and Licensed Retailers Association and the British Hospitality Association), and two focus group meetings that were attended by ten representatives of small Catering firms. Three participants were members of trade associations.

A4.3 ATTITUDES TOWARD HEALTH AND SAFETY

A4.3.1 General Attitude

In the Catering sector, health and safety is not viewed as a high priority. The risks are perceived to be small because they are similar to those encountered in a domestic situation. Many small firms feel their business is too small for health and safety to be a problem. They are more concerned with winning and keeping business and feel that they have little time to devote to health and safety.

To the extent that health and safety is seen as important, food hygiene is given a much higher priority than general health and safety.

Focus group participants did not know that they had to report accidents that required more than three days off work.
A4.3.2 Perceived Risks

All of the participants felt that in a small Catering firm there was potential for minor injuries such as burns, cuts, trips and falls. These were felt to be mainly due to rushing, meeting new situations (such as working with different ovens) and carelessness. Another area for concern was considered to be the risk of injury to members of the public either on Catering premises or at external functions such as weddings.

None of the participants felt that they used particularly hazardous machinery. Some used meat slicers but did not perceive these as very hazardous. Participants felt that reducing the number of minor injuries was a matter of common sense. Major injuries were not seen to be a problem in small firms. They were thought more likely to occur in much larger firms that make extensive use of machinery.

It was commented that most people have not seen a serious accident and did not know of any colleagues who had experienced one, so it does not occur to them to treat health and safety as a high priority.

A4.3.3 Attitude to Legislation and Regulators

Most companies operating in the Catering industry are regulated by their Local Authority’s Environmental Health Officer (EHO) rather than directly by the HSE. Attitudes to regulation and regulators are similar to those in HSE regulated sectors.

Most participants had heard of the HSE but did not feel that it was a relevant body to their business. They associated the HSE with manufacturing industry and serious injuries and therefore felt that the HSE was irrelevant to them.

Participants knew that they were regulated by the EHO but were not aware whether they had to register. They viewed the Local Authority as an enforcing body and so were wary of them.

The Catering sector is recognised as one in which there is a heavy load of regulation. In addition, the regulations, legislation and codes of practice are often written in a form which is difficult to understand. This is particularly the case for small firms, which also have little time to study the documents. However, there have been some good materials produced, often by trade associations in conjunction with the HSE.

A4.3.4 The Benefits of Health and Safety

One of the benefits of having good health and safety is that staff take less time off work for minor injuries. Some participants paid their staff when they were off sick, while others did not, but all agreed that loss of staff time was expensive. Participants also agreed that staff benefited from knowing that they had a safe environment to work in. However, it was clear that not much thought is given to these benefits on a day-to-day basis.

A4.4 KEY EVENTS IN THE LIFE CYCLE OF A SMALL CATERING FIRM

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice. In general, small Catering firms did not feel much need for information on health and safety. However, some key events have been identified and it is suggested that the HSE considers promotion of information at these times.
A4.4.1 Business Start-Up

All participants felt that the need for advice, including information on general health and safety principles, would be greatest at business start-up. Participants felt that owners and managers of small firms were very busy at start-up, having to deal with many issues such as attracting customers, arranging finance and purchasing equipment. However, they were also receptive to information at this time and this would be a good opportunity to advise owners and managers of their obligations regarding health and safety.

All participants thought that traders in the Catering industry are required to register with Environmental Health Services. All participants were registered and felt that the Environmental Health Officer (EHO) should be able to provide information not just on food hygiene but also on general health and safety. Participants felt that EHO’s provide some general health and safety advice, but focus primarily on compliance with food hygiene regulations.

It is suggested that the HSE arranges for a ‘business start-up’ pack to be distributed through EHOs when new businesses register with their Local Authorities.

A4.4.2 Local Authority EHO Inspections.

The main key event relevant to health and safety for the Catering industry is inspection by the Environmental Health Officer (EHO). All registered firms receive regular visits from an EHO. In general, small firms respond best to face-to-face site specific advice rather than, for example, being given general Catering health and safety publications.

It is recommended that the HSE ensure that EHOs are equipped and encouraged to provide Catering-specific health and safety information to the companies they are visiting as well as food and staff hygiene advice. Guidance material and checklists for EHOs may be required.

A4.4.3 Employing New Staff and Attending Training Courses.

Participants recognised that new staff may need some information and training on health and safety, although much of it is common sense and can be learnt ‘on the job’. However, many employees in the Catering industry receive formal training at the beginning of their careers – and this usually includes health and safety.

At the start of their career, employees should be receptive to information and so it is recommended that the HSE works closely with training organisations to ensure that sector-specific information on health and safety is incorporated within courses.

It is also recommended that the HSE produce an employee starter pack containing both sector-specific and general health and safety information. This would help new employees directly but may also raise awareness amongst owners/managers of their responsibility to keep staff up to date on health and safety matters.

A4.4.4 Other Inspections

Traders in the Catering industry may be subject to a number of annual inspections. Participants mentioned inspections of electrical equipment, fire and pest control inspections, fire extinguisher checks and gas safety checks in Local Authority buildings. They feel that they get some information on health and safety from these inspections but only relevant to the specific topics covered by an inspection.
The HSE could consider working in partnership with the providers of some of these inspections (eg the Fire Brigade) to encourage them to promote more general good health and safety practice and to signpost small firms to their EHO for further advice.

**A4.4.5 Regular and Frequent Activities**

The only ‘regular and frequent event’ considered as a potentially suitable dissemination route for health and safety advice was contact with suppliers, notably ‘Cash and Carry’ stores. However, small firms do not currently get any advice or information from these stores and did not think that they would pay any attention to information on health and safety given out at the ‘Cash and Carry’.

**A4.4.6 Events not Appropriate for Linking to the Provision of Health and Safety Advice**

Participant feedback suggested that regular activities such as financial audits, preparing tax returns and applying for loans would be inappropriate events to link to the provision of health and safety advice. Some firms would approach their bank manager or accountant for business advice but did not expect any health and safety advice provided to be useful. There was also concern that banks or accountants would charge extra for this service.

All participants had business insurance but agreed their premises were not usually inspected by insurance companies prior to giving a quote. Because small firms prefer to receive face-to-face, site-specific advice (rather than being sent publications), but insurance companies do not visit the Catering firms, insurance companies are not seen as a good conduit for information to reach the Catering sector.

**A4.5 KEY COMMUNICATION CHANNELS**

The key events described above identify when it is appropriate to target small firms with help and advice. They also suggest appropriate channels for disseminating information. This section highlights additional communication channels that may be useful, although not specifically related to a key event.

**A4.5.1 Direct Communication with the HSE/EHO**

Small firms would be unlikely to contact their EHO if they had a problem and wanted some advice. They would be more likely to turn to colleagues or a trade association. In general, participants were concerned that if they contacted the EHO (or HSE) directly for information, then an inspector might visit and inspect other areas beyond the initial enquiry, possibly taking enforcement action.

However, participants did feel that the HSE or EHO should send them information directly, especially updates on new legislation.

In general, small firms are not particularly interested in health and safety. They do not view it as an important issue and are therefore unlikely to seek advice from the HSE or Intermediary organisations. There is therefore a need for the HSE and EHOs to proactively and directly engage small Catering firms.

It is recommended that the focus is placed on encouraging EHOs to provide general health and safety advice and on direct mailing of practical information to Catering firms. Publicity in the trade press should also reach a wide audience, although regular, eye-catching features will be needed to stimulate interest and action.
As Catering firms feel the EHO is more relevant to their business than the HSE, consideration should be given to ‘branding’ information and advice with an EHO identity.

**Helpline**

None of the participants were aware of the HSE InfoLine. All agreed that they would trust it to be confidential and most said that they would use it if they knew about it and they had a query regarding health and safety. Participants felt that the HSE InfoLine should be more widely publicised. There may be a need to jointly brand it with EHOs or market it through EHOs to ensure Catering companies recognise its relevance to them, as well as to manufacturing companies.

**HSE visits**

All participants were visited once every 12-18 months by an EHO. They said that an EHO could call at their own discretion and close a business down if they felt the working environment was not satisfactory. Participants felt that vigilance varied from region to region.

When participants talked about health and safety within the context of the EHO regulation they generally meant food hygiene. Some small firms do approach their EHO for advice and information and in some cases this includes information on health and safety rather than food hygiene.

In general face-to-face advice from the EHO to the company was the preferred route for receiving information for small Catering companies.

**A4.5.2 Communication through Intermediaries**

**Trade associations**

The majority of companies, especially very small ones, aren’t members of trade associations. Trade associations are therefore of limited use for disseminating health and safety information and advice.

In focus groups, the participants said that membership of trade associations is low, so this would not be a good route for widespread promotion of information and advice.

However, as there are so few good communication channels for reaching small Catering firms and a significant minority of firms are members of one or more trade association, it is recommended that the HSE carries out some partnership work with Catering trade associations. It was clear from interviews with trade associations that they have an interest in health and safety and they are happy to disseminate information to their members.

Some trade associations already produce useful guidance for their sectors which includes health and safety information. Examples collected during this study include:

- “Manual Handling in the Brewing and Licensed Retail Industry” and “Safety in Pubs” produced by the Brewers and Licensed Retailers Association.

**Local business support organisations**

All of the participants were aware of Business Links and Chambers of Commerce and most use them for business information. Participants said that they would not specifically request information on health and safety from either of these organisations.

However, as they do tend to have regular contact, these would form a good dissemination channel, at least for general health and safety advice.
A4.5.3 Other Communication Channels

Trade press

The communication channel with the potential to reach the widest audience is the trade press. There are a number of well read journals, including ‘The Publican’, ‘Catering and Hotel Keeper’, ‘Hotel and Caterer’ and ‘Ethnic Cuisine’.

An ongoing campaign in the trade press to highlight the risks and hazards, to provide some basic practical advice and to encourage businesses to seek help from their EHO or the HSE InfoLine would be useful. Features would have to be carefully designed and be updated frequently to gain attention as, otherwise, participants felt that they would be unlikely to pay much attention to information on health and safety.

Other traders

All participants talk to other colleagues in the Catering industry and this is their first point of contact for any information, including that on health and safety. This is not very useful as a dissemination mechanism for HSE as it is difficult to identify and target the ‘other traders’.

A4.5.4 Communication Channels not Appropriate for Disseminating Health and Safety Information and Advice

Only one of the participants had regular Internet access but did not use this for obtaining information on health and safety. Participants felt that the Internet would not be an appropriate means of getting health and safety information to traders in the Catering industry.

A4.6 PROVISION OF INFORMATION

Participants felt that they had a need for information on general business matters but not specifically on health and safety. They felt that because of their long experience in the business, health and safety was a matter of common sense and that they did not need advice on how to avoid accidents such as trips and falls. Participants had little time to spend reading written information and current use of such material was very low.

A4.6.1 Key Requirements of Small Catering Companies

Needs of small firms

- Small firms need to be kept updated on the latest legislation, how it affects them and what they need to do to comply
- Some participants felt that basic information on health and safety for new staff would also be beneficial

Requirements of written information

Where written information is provided, participants said it must be:
- Tailored to particular sectors (and where possible, individual sub–sectors) so that it is more likely to be read
- ‘Official’ looking – be clearly HSE (and possibly EHO) branded
- Clear and concise - focussing on the most important hazards and actions to be taken
- Free – and preferably sent directly to companies by the HSE
- Up to date – with the publication date clearly shown
Use of information by Catering firms

If information is clearly ‘official’ it is likely to be skim read, especially if it contains updates on new legislation. Then it is likely to be filed.

A4.6.2 Types of Information

Generally, Catering firms were not keen on written information. However, clear guidance on what legislation affects small Catering firms - ‘what traders can do about it and how’ - may be useful. However, common sense information is a “turn off” so it is difficult to get the balance right. Information should not merely state the obvious but should say something new.

None of the participants were aware of the information leaflets currently produced by the HSE. It is recommended that the HSE increase the profile of the information that is available, although the response to the existing information leaflets was muted.

One area where small firms would value some extra printed information, is in the provision of more posters and warning signs. These should be informative and eye-catching. They must also be updated regularly to maintain awareness.

A4.6.3 Presentation of Information

There is a feeling that advice has to be kept very simple and this may be at the expense of making it comprehensive. It needs to be eye-catching. It is important that the information concentrates on the basics (slips, trips & falls, manual handling etc) which are the cause of most accidents. There is also a need for good, practical, pragmatic guidance on carrying out a risk assessment.

Participants agreed that all information needs to be relevant with a clear title stating that it is specifically for the Catering industry. Information needs to be up to date and should preferably say on the front page if it is new information and provide a clear publication date.

Participants agreed that any information on health and safety needed to look official. There would be a greater likelihood that such information would be read, as it might include information on new legislation. None of the participants recognised the HSE logo as that of an official (Government) body but they would recognise the royal crest. As the HSE logo was not recognised by many participants the HSE should consider ways in which its logo might be made more widely recognisable.

Information sheets are better in black and white as colourful information may appear like junk mail and be instantly discarded.

In this sector, there is a need to produce information in a variety of languages for those who do not speak English as a first language. This is particularly true for ethnic restaurants.

A4.7 QUOTES FROM FOCUS GROUPS

“The main problem is probably trips and falls but it’s all about teaching yourself to take care.”

“I’ve never come across a serious injury. I don’t think my job is any more dangerous than crossing a road.”

“I keep an accident book but only in case someone comes back on me.”

“You need to know your market before you can get any staff. After you’ve got some business, you can get the staff and then you might have to think about health and safety.”

“My business is too small for health and safety to be an issue.”
“It’s expensive to pay sick pay and to pay someone else to come in and do the job so it’s in your interest to make sure your staff are safe.”

The importance of health and safety advice:
“I’d like more information about running my own business but not really on health and safety.”
“You don’t feel like you know where to go for advice.”
“You need advice right at the beginning of your business. The business should be structured around that.”
“I need to think about health and safety when I am expanding my business.”
“You should be able to get information on health and safety from the EHO.”
“If you register with Environmental when you start up why don’t they give you some information then?”

Attitudes to intermediaries:
“I don’t get advice on health and safety from my insurance company and I wouldn’t expect it.”
“I’d ask my bank manager for financial advice but not information on health and safety.”
“If my bank manager tried to give me information on health and safety I’d be suspicious in case someone was trying to check up on me.”
“I think my accountant is only interested in money. I wouldn’t talk to him about health and safety.”

Comments on staff and training issues:
“My staff have all been to college and are trained, they should know about health and safety.”
“A lot of my staff are part time, Saturday girls and I train them myself and watch over them. It’s better that they learn on the job.”
“Some kind of starter pack would be a good idea for new employees.”

Comments on publications:
“If the first impression is that it’s not something useful then you won’t read it.”
“If it said current information on it and gave you a date then I’d be inclined to look at it to see if there was anything that I needed to know.”
“It does help that it comes from a government official as you think you’d better read it just in case.”
“I wouldn’t know the HSE logo was official but I’d recognise the royal crest.”
“It doesn’t need to be colourful for me. A lot of the glitzy stuff is junk mail.”
“I’d want more than just a little flyer that looks like junk mail.”
“There’s no point putting general, common sense information in a leaflet. It needs to be on a poster so everyone can be reminded of it.”
“I do use the internet but only to look for equipment.”

Feedback on Catering Sheet No. 2 and Food Sheet No. 17:
“If it landed on the desk I wouldn’t look at it straight away, I’d put it on one side for later.”
“By the time I’d got to the bottom of the first page I had decided that it had no relevance to me whatsoever.”
“I suppose the facts are quite interesting but it’s mainly common sense isn’t it.”
“The first page puts you off with all the gubbins about who has put it together and why. I don’t need to know this.”
“If it mentions Catering then I’d think that I probably should read it.”

Comments on the HSE InfoLine:
“I’d ring if I had a query now that I know it exists.”

Comments on the HSE:
“I’ve never heard of it.”

“Isn’t it a regulatory body for industrial things?”

“It’s got nothing to do with my business as I see it.”

“They don’t provide anything that is relevant for me.”

Comments on Environmental Health Officers:
“You’re always wary of an EHO as you know what power they have and what they can do to your business.”

“They come whenever they please and can shut you down if they don’t like what they find.”

“At the moment it’s a threatening approach and so you draw back from it.”

“It depends where you are. Rules and enforcement are not uniform nationwide.”

“I get visits from the EHO. They are sometimes helpful but mostly on food hygiene.”
APPENDIX 5 - SECTOR KEY EVENTS APPROACH – MVR SECTOR

A5.1 BACKGROUND

This Sector Key Events Approach (SKEA) for the Motor Vehicle Repair sector has been produced by AEA Technology plc under the HSE project ‘Expanding HSE’s Ability to Communicate with Small Firms – A Targeted Approach’ (RSU ref. 4142/R68.057).

The overall objectives for the study are:
• to identify external indicators of ‘key events’ in the life of small firms that may be indicative of their need for advice or information on health and safety at work
• to identify appropriate, cost effective communication channels, tools and techniques for influencing the health and safety behaviour of small firms

This SKEA summarises the findings of interviews with key intermediaries and focus groups with small firms in the Motor Vehicle Repair sector. It describes the sector’s general attitude towards health and safety and identifies key events that could be used by the HSE as opportunities to disseminate advice and information.

A5.2 THE SECTOR

For the purpose of this study the Motor Vehicle Repair (MVR) sector was agreed to consist of independent and franchised service and repair garages with less than 50 employees. There are around 30,000 MVR companies within this definition.

Views on key events in the life of the sector’s small firms, and communication mechanisms were gathered from three key sector intermediary organisations (the Retail Motor Industry Federation, the Scottish Motor Trade Association & Vehicle Builders and Repairers Association) and two focus group meetings that were attended by nine representatives of small MVR firms. Only three participants were members of trade associations.

A5.3 ATTITUDES TOWARD HEALTH AND SAFETY

A5.3.1 General Attitude

There is some interest in health and safety amongst MVR small firms, but it is not given a high priority. Firms do not proactively seek health and safety advice, often because they do not know they need it. They only tend to seek advice when they need to know about a particular issue, e.g. when they get into difficulty or after a health and safety event. This then acts as a trigger to increase the firm’s level of interest.

Although all participants recognised that health and safety was important, they seemed to distinguish between accidents (or potential risks) that were the employer’s fault and accidents that were the employee’s fault. Some employers felt that health and safety was their employees’ responsibility alone.

A5.3.2 Perceived Risks

The main health and safety risks are perceived to be slips, trips and falls. People (customers, salespeople etc) entering the workshop without permission, the lifting of heavy objects, sparks from welding and general untidiness (tools left lying around and oil spills etc) are all considered as potential risks. All participants were aware of these hazards, however they felt that the health and
safety risks in their work were not serious and that common sense measures would be sufficient to protect themselves against these risks.

A5.3.3 Attitude to Legislation and Regulators

Generally small firms are unlikely to keep up with, or even be aware of, changes in the relevant legislation. Compliance with health and safety regulations was not seen as time consuming (although this could be because participants were not aware of the full scale of their obligations). However participants do not want to have to comply with what they perceive as additional bureaucracy. They may also be described as ‘authority averse’ and they are very unlikely to contact the HSE directly.

A5.3.4 The Benefits of Health and Safety

Good health and safety was considered by most of the participants to have several benefits for the business, which impacts positively on staff, customers and general efficiency. For example, keeping a tidy and orderly workshop will benefit the business in terms of improved efficiency, giving the right impression to customers and increasing staff morale. Participants also felt that generally the MVR business is a close knit community, with low staff turnover. Employers generally have a close relationship with their staff, care about their welfare, and consciously avoid causing accidents and injury.

Managers mainly see accidents as a problem for two reasons. The loss of staff time is hard for a small firm to bear. Also, there is a potential risk of injury claims being made against the company by employees.

A5.4 KEY EVENTS IN THE LIFE CYCLE OF A SMALL MVR FIRM

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice.

A5.4.1 Business Start-Up

Participants felt that small firms would be receptive to all forms of advice during the business start-up phase. It is essential that new garages are set up in a way that meets health and safety regulations. However start-up firms would tend to give other business issues a higher priority than health and safety issues. A complete set of reference materials could be provided at this time directly by the HSE. More could be done to raise awareness that new firms starting up should register with the HSE, possibly via regular features in the trade press.

Start-ups often seek business advice from intermediary organisations, such as trade associations or local enterprise companies, so these would make good communication channels. Intermediaries could be encouraged to signpost relevant HSE information and sources of advice (eg the HSE InfoLine). Start-up only happens once for a business so although it is an important key event, it has limited application. Similar issues also apply for major business expansion, but this is also rare in the MVR sector.

A5.4.2 Regular Inspections

The MVR sector is subject to a variety of annual and bi-annual inspections:
• Small firms would welcome more regular visits by HSE Inspectors, as long as they are carried out in a supportive manner and are focussed on providing practical advice. Small firms would value regular visits to help them to check that they were complying with regulations and to advise them on how health and safety could be improved.
• Insurance companies make regular (usually annual) risk assessment inspections of garage premises to examine equipment such as ramps and lifting gear. They have an incentive to ensure good health and safety practice to reduce the likelihood of claims. HSE could work more closely with insurance companies to help them give appropriate on-site advice and to disseminate appropriate written information. HSE could ask insurance companies to make registration with HSE a condition of insurance.

• Many MVR firms have contracts with maintenance companies to inspect and maintain equipment — especially ramps and lifting gear. HSE could collaborate with the contractors to help them provide more general advice and also use them as a dissemination route.

• MOT inspections are carried out for the Department of Transport, Local Government and the Regions. MOT inspectors could be provided with basic H&S awareness training, checklists and guidance notes. They could encourage firms to register with the HSE and provide ‘signposting’ information. This would only be relevant to firms which carry out MOT testing.

• Motor manufacturers also inspect their own franchised garages, either directly or via trade association inspections. The criteria used include good health and safety practice. HSE could feed into the health and safety content of such inspections and assist with drawing up inspection checklists. This dissemination route would have limited applicability to small firms as many franchised garages belong to firms with over 50 people.

A5.4.3 Employing New Staff

The employment of new staff — particularly a new apprentice from college — is relevant to the provision of health and safety information. College supervisors will often inspect the MVR premises for health and safety considerations. The HSE could provide more information to colleges running MVR apprenticeships to ensure that the apprentices gain a good awareness of health and safety issues and legislation — and take the lessons learned into their new workplace. A workbook could be developed specifically for new employees in the sector.

A5.4.4 Regular and Frequent Activities

The only ongoing regular and frequent activity which some participants felt would be useful for obtaining health and safety information was contact with their suppliers. Some firms saw this as an effective mechanism of communication, however others had concerns. In some cases suppliers already fail to provide information required under COSHH regulations, therefore they may also be unreliable as a route for providing additional information.

A5.4.5 Events not Appropriate for Linking to the Provision of Health and Safety Advice

Participant feedback suggested that regular activities such as financial audits, preparing tax returns and applying for loans would be inappropriate events to link to the provision of H&S advice. Firms did not expect H&S advice received from accountants, banks, and the Inland Revenue to be useful. Also, these third party conduits were viewed as having no existing health and safety expertise and there was concern they would charge extra for this service.

A5.5 KEY COMMUNICATION CHANNELS

The key events described above identify when it is appropriate to target small firms with help and advice. They also suggest appropriate channels for disseminating information. This section highlights additional communication channels that may be useful, although not specifically related to a key event.
A5.5.1 Direct Communication with the HSE

A range of possible key events and delivery channels were identified that could be used effectively as an opportunity to provide health and safety information. However, in general, small firms felt that information should be provided directly from the HSE. There was no significant demand for information to come through third parties. In addition, participants generally felt that all HSE’s support should be free and proactively supplied. An annual pack could be sent out, showing new legislation relevant to the sector and also providing updated practical good practice guidance.

Participants expressed a desire for a confidential helpline. Only one participant was aware of the HSE InfoLine. They agreed that the HSE should promote its InfoLine more widely and do more to demonstrate that this is a confidential service if it is to be trusted by potential users.

A5.5.2 Communication through Intermediaries

Local business support organisations are used in a limited way. Many participants had made some contact with either their local Business Link or Chamber of Commerce. In Scotland, Local Enterprise Companies are well utilised. All of these organisations should form useful dissemination routes for health and safety information and should be happy to signpost companies to more specific support. However, these business support organisations will only reach a minority of MVR companies.

Visits from regular suppliers, maintenance providers (for compressor and lifting gear examinations) and other inspectors (such as insurance companies) all provide potentially good routes for disseminating health and safety information. In particular, participants are familiar with receiving information at annual inspections. MOT and insurance inspections were considered as the most appropriate times to receive health and safety information.

Several participants mentioned that they receive regular visits from sales people and consultants. Sometimes these individuals claim to be operating in a semi-official capacity, for example on behalf of the local authority. These people inform the small firms of new health and safety legislation and then try to sell information, including posters (sometimes at inflated prices). It may be possible for the HSE to work with reputable consultants and providers of health and safety information to ensure that consistent messages are disseminated to small firms.

Small firms suggested sector trade associations as a good potential route for disseminating well-targeted and concise health and safety information. Most garages that are members of trade associations contact them occasionally. In addition, trade associations disseminate useful information to members, for example through newsletters or web sites. Although only a minority of small firms are members of trade associations (maybe 20-30%), for those that are members, they form an excellent dissemination route. The HSE could provide regular updates to trade associations about new legislation, prosecutions, accident statistics, and details of ‘where to go for help’. Trade associations could be encouraged to require a minimum standard of health and safety from members (some already do this). Trade associations could also encourage their members to register with the HSE.

Franchised garages also seek advice from their motor manufacturer. Small firms felt that although motor manufacturers could signpost them to services, none took a proactive role in providing information, for example on health and safety. The HSE could work more closely with the major motor manufacturers as a dissemination route.

A5.5.3 Other Communication Channels

and ‘Authorised Examiner’. These were considered as good conduits to get the HSE’s messages out to small MVR firms.

There are some networking opportunities within the sector, for example through meetings and events organised by trade associations, business support organisations and local business clubs. However, according to intermediaries, it is becoming increasingly difficult to attract people to meetings. The HSE should consider attending high profile events, especially where there are other participants that are likely to draw delegates. Organisations which may stimulate additional interest include the Vehicle Inspectorate, Trading Standards Officers and the Police.

**A5.5.4 Communication Channels not Appropriate for Disseminating Health and Safety Information and Advice**

None of the participants felt that the Internet was a useful channel for the delivery of information at present. Most did not have access to the Internet at work and would not spend time at home searching for health and safety information. However, participants felt that the importance of the Internet and emailing would grow in the future.

**A5.6 PROVISION OF INFORMATION**

In general, small firms prefer to be given information directly rather than publications to read and interpret themselves. Participants did not feel that they had the time or need to look at health and safety information. They also felt that much of the information presently available is too complex. Participants felt that it was the HSE’s responsibility to provide them with information in a way that minimised the effort required from their business.

**A5.6.1 Key Requirements of Small MVR Companies**

*Needs of small firms*

Small MVR firms’ needs for information are:
- To have a clear understanding of their obligations
- To be provided with advice on how best to comply with regulations.

*Requirements of written information*

Most participants wanted some written health and safety information, but it must be:
- Relevant to the motor trade – i.e. sector specific
- Complete – i.e. one document should contain all they need to know. Participants recognised that this may not be short.
- Up to date – participants felt strongly that documents needed to be regularly updated (i.e. at least annually)
- Providing information on new legislation – e.g. as supplements to the ‘complete’ document mentioned above.
- Focused on the main areas where accidents occur (e.g. slips, trips & falls). One intermediary commented that sometimes excessive coverage is given to more technical ‘hot topics’, for example petrol handling.
- Free – although some participants felt that the cost was not a major issue
- Easy to obtain – impact would be much wider if documents were sent directly to companies rather than having to be ordered

*Use of information by MVR firms*

Participants would use information in a variety of ways:
- To give to new employees, trainees or apprentices as an introduction to health and safety
• As a ‘one-off’ check that they were doing everything correctly
• As a reference document to use when undertaking unfamiliar or new activities

A5.6.2 Types of Information
An all encompassing guide to health and safety regulations and guidance for small MVR firms should be produced – possibly based on HS(G)67. To supplement this, short leaflets should be produced and sent directly to companies to inform them of new legislation. Leaflets should contain basic principles and only a limited amount of information if they are to be effective.

Posters and stickers are thought to be a very good idea for communicating health and safety messages to staff. They need to contain just a few short simple messages and be eye-catching.

Participants would also value checklists and concise ‘must do’ lists relating to specific health and safety issues. Some participants did not want to be told things that were common sense, whereas others did recognise that an element of teaching common sense was needed for some employees.

The use of the trade press was thought by participants to be good for headline stories, but flyers and checklists were more appropriate for detailed information.

Eye-catching web site information would become more important in the future.

A5.6.3 Presentation of Information
Critical to the success of any information provided is that it is clear, jargon free, concise and user friendly. In particular, participants felt that information received needs to have clear titles so that they can see if it is relevant to them. It must clearly identify the sector and subject it refers to. Documents should convey their important messages in as few words as possible.

All participants agreed that information from HSE should display the HSE logo in a prominent position as this helped to identify the importance of the information. Interestingly, most participants disliked colourful leaflets. They felt these looked like ‘junk mail’ and so would be discarded without being read.

A5.7 QUOTES FROM FOCUS GROUPS

Comments on responsibilities of employees:
“Some accidents are employer negligence and some are staff irresponsibility.”
“It’s up to the staff to take care of their own health and safety. Employees have to tighten up a bit.”
“My MD is set in his ways and doesn’t bother about health and safety. The HSE should put pressure on him.”
“No one smokes in the workshop, it’s just common sense.”
“You have to teach people common sense.”

Reasons for good health and safety practice:
“The work environment is more efficient and so more profitable.”
“A tidy environment attracts customers. They won’t want to leave their car in a run down place.”
“You also get better staff morale from having a safe and tidy environment.”
“If my staff are working for me – they are not off sick, they are not claiming off me for insurance. I have peace of mind even if the sickness is not really my fault.”
“When you get new equipment the supplier demonstrates it to the lads. Most equipment is idiot proof.”

**Needs for information:**
“**They should send me materials to use and the publications. I shouldn’t have to ask for them or pay for them.**”

“**They should provide a list of booklets available. Most sensible people would read them.**”

“**They should send you free publications when you register and then send regular updates.**”

“**Colour and cartoons, leaflets stuff all looks like junk mail and I’d just throw it away. It needs to look important. I need to know who sent it to me.**”

“I don’t mind if it’s twice the size as long as it covers everything that I need to do.”

“The only advantage of a sign is that it means, as an employer, you’re not liable.”

**Feedback on HS(G)67 and INDG331:**
“The cover gave me an accurate idea of what was inside. The title tells me that it’s relevant which is why it doesn’t go in the bin.”

“I would skim it straight away and look for issues that I hadn’t thought about. It would sit on the desk and get read in dribs and drabs through the week.”

“If I am going to spend money on something I would want it to be complete. I need to comply with Health and Safety so if it makes sure that I do it’s worth £50.”

“Things that you have to comply with should be free.”

**Comment on the HSE:**
“They need to come and give me advice when I want to open a garage and then come and tell me every year what has changed.”

“Maybe the insurance companies should be in cahoots with the HSE as these are the guys who will pick up the tab if there’s a problem.”

“They need to be there to guide you but I don’t want to be checked up on all the time.”

“The HSE are like sales people. They have to prove their existence and prove what they’ve seen and what they’ve done. All the paperwork they give you is to justify themselves.”

“I want help without penalties. Health and safety is not something I worry about but I know that there can be strict penalties. If someone came round and said they would fine me then I would be outraged as they’ve never been along to give me any advice on how I should be doing things.”

**Comments on Apprenticeships:**
“Colleges bend to your way of thinking as they need to get their trainee to you and they need the placements.”
APPENDIX 6 - SECTOR KEY EVENTS APPROACH – BODYSHOPS SECTOR

A6.1 BACKGROUND

This Sector Key Events Approach (SKEA) for the Bodyshop sector has been produced by AEA Technology plc under the HSE project ‘Expanding HSE’s Ability to Communicate with Small Firms – A Targeted Approach’ (RSU ref. 4142/R68.057).

The overall objectives for the study are:

• to identify external indicators of ‘key events’ in the life of small firms that may be indicative of their need for advice or information on health and safety at work
• to identify appropriate, cost effective communication channels, tools and techniques for influencing the health and safety behaviour of small firms

This SKEA summarises the findings of interviews with key intermediaries and focus groups with small firms in the Bodyshop sector. It describes the sector’s general attitude towards health and safety and identifies key events that could be used by the HSE as opportunities to disseminate advice and information.

A6.2 THE SECTOR

For the purpose of this study the Bodyshop sector was agreed to consist of independent and franchised Bodyshop establishments with less than 50 employees. There are around 5,000 companies within this definition.

Views on key events in the life of the sector’s small firms, and on communication mechanisms, were gathered from three key sector intermediary organisations (the Vehicle Builders and Repairers Association, Retail Motor Industry Federation, and the Scottish Motor Trade Association) and two focus group meetings that were attended by eight representatives of small Bodyshop firms. Only one participant was a member of a trade association.

A6.3 ATTITUDES TOWARD HEALTH AND SAFETY

A6.3.1 General Attitude

There is a general level of awareness and interest in health and safety issues amongst Bodyshops, however these issues are not given a high priority on their business agenda. Survival is becoming more difficult for small firms in the sector as larger companies are gaining a greater share of insurance company work. Survival of the business, winning work, and cash flow are seen as the key priorities. In addition, Bodyshops generally do not realise they need advice on health and safety and are therefore unlikely to seek it proactively. When they do seek advice, it is usually only because they have a significant problem.

A6.3.2 Perceived Risks

For Bodyshops, the main perceived health and safety risk is exposure to paint fumes. Many of the paints contain isocyanates and emit solvent vapour. Other perceived hazards include dust, welding, lifting, and using spray booths.
Focus group participants felt that they knew how to carry out their own work safely on a day-to-day basis. Their job involves repetitive tasks and they feel familiar with the safety procedures surrounding these tasks.

Participants were also conscious of their employees’ safety in the work place, including the requirement on them to wear personal protective clothing. Failure on the part of staff to comply with the correct clothing and procedures are usually taken seriously by managers, including, if necessary, taking disciplinary action. However, participants did feel that protective clothing was ‘a hassle’ and took too much time to put on and remove. They agreed there were therefore occasions when they and their employees did not fully protect themselves.

A6.3.3 Attitude to Legislation and Regulators

Participants were aware that their industry is heavily regulated with frequent changes in legislation that affects their business. They felt that they could never be sure of full compliance because there were too many regulations. They claimed that do they not receive information or guidance on changes in legislation and how to comply with all the regulations. All participants expressed a need to be kept up to date with new legislation and felt that the HSE should undertake this role proactively.

The sector is ‘authority averse’ and the HSE is generally viewed by Bodyshops as an enforcing body with a poor image. Participants felt that inspectors did not generally know much about the Bodyshop trade. They also felt that the HSE needed to take a more proactive and advisory role in giving up to date and practical guidance and information to small firms.

Compliance with regulations involves a large amount of filling in forms and paperwork that participants felt was very time consuming. In some cases these forms were thought to duplicate each other and so unnecessary effort is expended. An example given was related to the forms for COSHH regulations and for the Environment Agency.

A6.3.4 The Benefits of Health and Safety

All participants recognised that there were business benefits to good health and safety. They felt that it was in their interest for their employees to be fit to work and also that employees felt well cared for. Employees were thought to be more productive when they knew that they were working in a safe environment. Participants also felt that organisations with good health and safety had a better reputation among clients. This was especially important for their insurance company clients. The insurance companies carry out monthly inspections and these include a check on health and safety practices. A Bodyshop with poor health and safety standards would risk losing its insurance clients.

Participants’ motivations for health and safety were often more related to concern about possible penalties for non-compliance than to injuries to themselves or their staff.

A6.4 KEY EVENTS IN THE LIFE CYCLE OF A SMALL BODYSHOP FIRM

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice.

A6.4.1 Business Start-Up

All the participants felt that the start-up phase of a new business was a time when health and safety information was needed. However, start-up businesses probably give other business issues a higher priority than health and safety issues.
During the start-up phase, traders may be aware of their need to comply with health and safety legislation and will need information and advice on how to do so. It is recommended that the HSE provide information to start-up businesses, perhaps in the form of a start-up pack.

New traders with employees are required to register with the HSE, so HSE registration would be a good time for HSE to disseminate information directly to companies. In addition, start-up firms often seek advice from a trade association, so these organisations could also be used as conduits to deliver information.

Inevitably, this route will only be valid for new firms and will not address the problems faced by existing Bodyshops.

**A6.4.2 Insurance Company Inspections**

Insurance companies impact on Bodyshops in two ways: where the Bodyshop is buying insurance for their own business and where the Bodyshop carries out repair work for an insurance company.

**Bodyshop purchasing insurance**

All participants had business insurance that requires an annual inspection. Insurance companies are keen to minimise their risk and so require Bodyshops to demonstrate good health and safety practice. Participants did not feel that their insurance companies would know enough about health and safety to be of help to them. However, this annual visit does provide a good opportunity for the HSE to disseminate relevant information to Bodyshops.

**Bodyshop working for insurance company**

Insurance companies are keen to maintain their reputation and so are careful about the standards (including health and safety) that Bodyshops adhere to. The insurance companies carry out monthly inspections to check these standards (or use approved members of trade associations, where the association carries out regular inspections). These monthly inspections potentially provide a regular opportunity for the HSE to disseminate information to the industry, in partnership with insurance companies and trade associations. However, this is not an effective route to reach the smallest Bodyshops, which only have a small share of insurance work. Many small Bodyshops do not carry out work for insurance companies. In addition, Bodyshops may resent additional conditions being imposed by insurance companies.

**A6.4.3 Other Regular Inspections**

Bodyshops are subject to a number of other annual tests and inspections. Participants mentioned fire inspections for organisations with more than 12 employees, annual lung function tests for all employees, testing of electrical equipment, COSHH inspections, HSE inspections and, in larger Bodyshops, inspections by the AA and RAC.

Participants perceived all of the above as being relevant to health and safety for their business. Although they currently receive very limited additional information during these tests and inspections, this would be a good dissemination route in the future, particularly for relevant changes in legislation.

It is recommended that the HSE liaise with those organisations carrying out testing/inspection so that information can be regularly disseminated using these conduits.

**A6.4.4 Employing New Staff**

Many traders in the industry receive formal training, usually by serving an apprenticeship. All participants felt that this was the right time for traders to learn about health and safety issues. They
felt that general health and safety issues were covered relatively well in current college courses and that apprentices were well trained in the issues surrounding the use of isocyanates.

Participants felt that training manuals for staff on the health and safety issues in workshops would be beneficial. New workers in the trade who are still training would be more likely to read potentially large documents covering a number of health and safety areas.

HSE could work closely with training organisations to produce appropriate workbooks and training manuals and to ensure effective dissemination of these.

A6.4.5 Regular and Frequent Activities

All participants had regular contact with their paint suppliers. These suppliers were respected and viewed as a valuable source of information on health and safety. Participants felt that the HSE should work with paint suppliers as a route for dissemination of health and safety information.

In addition, Bodyshops have some contact with equipment suppliers and maintenance providers. These too could be useful channels for disseminating health and safety advice, although contact is less frequent than with paint suppliers.

A few firms (usually larger ones) buy in health and safety specialist help to advise them and to produce their written health and safety guidance. However, even when a good quality health and safety document is produced, it often remains ‘on the shelf’ and is not communicated to staff.

A6.4.6 Events Not Appropriate for Linking to the Provision of Health and Safety Advice

Participant feedback suggested that regular activities such as financial audits, preparing tax returns and applying for loans would be inappropriate events to link to the provision of H&S advice. Firms did not expect H&S advice received from accountants, banks, and the Inland Revenue to be useful. These third party conduits were viewed as having no health and safety expertise and there was concern that they would charge extra for this service.

A6.5 KEY COMMUNICATION CHANNELS

The key events described above identify when it is appropriate to target small firms with help and advice. They also suggest appropriate channels for disseminating information. This section highlights additional communication channels that may be useful, although not specifically related to a key event.

A6.5.1 Direct Communication with the HSE

Participants agreed that they had a need for more advice and information on health and safety, particularly concerning changes in legislation. They would have greater trust in this information if it was to be provided directly by the HSE and not their current sources (usually other traders and paint suppliers).

Participants felt that information should be provided free of charge, although they agreed that cost was not the real issue. The problem was that participants themselves would have to take action to obtain information and, in reality, they would not get around to doing this. Thus information needs to be delivered to them directly.
Helpline

All participants expressed a desire for a confidential helpline to be available, yet all were unaware of the HSE InfoLine. They agreed that, although it was advertised as confidential, they would be very wary of this claim and therefore were unlikely to use the service. If the helpline was clearly independent of the HSE, they would be more likely to use and trust it.

HSE visits

Some participants prefer information to be provided face to face by inspectors. They felt they would like more visits from inspectors with a specific knowledge of their sector, who could advise them of changes in legislation and improvements that they needed to make in the workplace. All participants would prefer the HSE to take on a more advisory role and for inspectors to listen to their concerns and help them comply with regulations rather than penalise them for ignorance.

Where the same inspector had visited a company over a period of years, firms felt they had built up some rapport and mutual respect, although they would still be wary when the inspector visited.

A6.5.2 Communication Through Intermediaries

Bodyshops currently receive most of their health and safety information from other traders in the industry and from paint suppliers. They receive limited relevant information from their trade associations and little of value from local business support organisations.

Other traders

All participants said that their main source of information was other colleagues in the industry. They felt that their industry had a bad reputation and so colleagues in the industry supported one another to compensate for this. Often there are a number of traders in close proximity and this provides a good networking opportunity for Bodyshops. Much information is passed on by word of mouth. However, these networks would be difficult for the HSE to tap into.

Paint suppliers

All the participants valued their supplier as a source of information and advice, even though information is restricted to product ingredients and safe product use, and does not extend to general health and safety in the workshop. Some paint companies help to write sections of their customers’ internal health and safety guidance.

All the participants felt comfortable in asking the paint suppliers for relevant safety information. However, they considered that some of the paint suppliers’ printed information was too detailed and needs to be made more concise.

Paint company field staff visit their customers regularly, so the HSE could potentially use this as a route to deliver more comprehensive advice and information on a number of health and safety issues.

Trade associations

The trade associations (the Motor Vehicle Repairers Association – MVRA, and the Vehicle Builders and Repairs Association - VBRA) tend to require members to meet certain standards, including health and safety standards, and they carry out annual inspections. They also provide some useful advice for members, including help that is available on their web sites. In particular, the VBRA publishes a monthly magazine, ‘Body’, and issues bulletin updates when needed. These help to keep its members up to date with new developments.
Participants did not tend to use trade associations as a means of obtaining health and safety information and advice. The smallest firms are not generally members of trade associations. Therefore relying on companies to contact trade associations would be of limited use as a conduit to disseminate health and safety information.

However, it would be worthwhile for the HSE to work with trade associations to disseminate information through newsletters, journals and local events and also when they carry out inspections.

### A6.5.3 Other Communication Channels

**Trade press**

‘The Bodyshop’ and the ‘Body’ magazines are widely read by both managers and staff in the industry. They are regarded as being useful and informative.

It is recommended that the HSE publish regular, targeted, concise articles in these magazines. In this way they would reach many and diverse members of the industry.

**Vehicle manufacturers**

The vehicle manufacturers have an influence on the operational practices of franchised Bodyshops including health and safety aspects.

They could be used by HSE to supply health and safety information, although most franchised operations are larger companies.

**Meetings**

There are some networking opportunities in the sector, for example through trade association meetings and events. However, with increasing time and business pressures it is becoming harder to attract the industry to these meetings. Relevant and high profile events, where organisations of real interest are represented (such as the Vehicle Inspectorate, Trading Standards or the Police) would attract some participants. Attending such events would help promote a better image for the HSE, but this is not a good dissemination route for reaching the majority of Bodyshops.

**Internet and electronic mail**

At present the Internet is not yet seen to be very important by participants, but there is a growing use of electronic mail. Participants felt that the use of electronic mail and web-sites would grow in the future. Bodyshops that do work for insurance companies tend to be computer literate as computers are used for preparing repair estimates and communicating with the insurers.

Participants who had Internet access at work felt that, in the future, they may be more likely to use the Internet to obtain information on business issues, including health and safety. Those who only had Internet access at home would not be prepared to use their home computer for work.

### A6.5.4 Communication Channels not Appropriate for Disseminating Health and Safety Information and Advice

Bank managers and accountants would not be effective communication channels for disseminating health and safety advice and information.

Most participants had not used local business support organisations (such as Chambers of Commerce and Business Links) for advice or information. They did not feel that these organisations could
provide information on health and safety relevant to the needs of Bodyshops. These were therefore viewed as an ineffective route for HSE to disseminate information.

A6.6 PROVISION OF INFORMATION

In general most Bodyshops do not want to receive written information and would have very little time to read it. They also feel that much of what is available is too complex.

A6.6.1 Key Requirements of Small Bodyshop Companies

Needs of small firms

- Small firms feel they need to be told not just what to do, but how to do it.
- They prefer advice to be given face-to-face on site.
- They also need to be kept up to date with new legislation.

Requirements of written information

Where written information is provided, participants said it must be:

- Free of charge
- Delivered directly to small firms by the HSE (rather than needing to be ordered)
- Specific to firms’ needs - focused on the main areas where accidents occur
- Up to date
- Well structured with a relevant title
- Look official – prominently displaying the HSE logo

Use of information by Bodyshop firms

Unfortunately, there was a feeling that most written information provided to Bodyshops would not be used, as there would be insufficient time to study such information. However, a start-up pack and training workbooks for new employees may be useful.

A6.6.2 Types of Information

All participants wanted to have an all inclusive health and safety Bodyshop reference document. This would make them feel safer as they would be aware of all the regulations, have information on how to comply and could check out health and safety concerns. This would necessarily be a long document. The content could be based on the current HSE publication HS(G)67, “Health and Safety in Motor Vehicle Repair”, but updated to include, for example, information on airbags and the handling of burnt out cars. It would also need to be regularly reviewed and updated as legislation and circumstances change. This would also be a good document to give to apprentices as an overview.

Participants felt that to convey information to staff, hard hitting, eye catching posters would need to be displayed around the workshop. Stickers were thought to be an effective communication tool for staff.

Participants also liked the idea of health and safety checklists and concise ‘must do’ information, particularly on the practices required to comply with legislation.

Participants felt that press articles about prosecutions of companies with poor health and safety practices would help to increase their awareness of current health and safety requirements. The trade press was felt to be good for headline stories, but flyers and checklists were more appropriate for detailed information.
Eye catching web site information would become more important in the future.

**A6.6.3 Presentation of Information**

Most traders have very little time to spend reading written publications. All participants agreed that information should have a relevant title, clearly identifiable sections, and bullet points to make information easier to read. The language should be clear and concise with all the information being important and necessary.

Any document that looked official and came from a recognised government body would be treated as important information by the participants and would probably be read. If, in addition, it was clear that the document contained guidance on new legislation, this would further ensure that even the smallest and busiest trader read the document. The display of the HSE logo in a prominent position would help to reinforce the importance of the document.

Participants felt that information that was too colourful or commercialised risking looking like junk mail and would usually be thrown away without being read.

**A6.7 QUOTES FROM FOCUS GROUPS**

"Solvents are the major hazard but really it’s just the tip of the iceberg."

**Attitudes to regulation:**

“I know how to work safely but I can’t keep up with the law.”

“You should be wearing mask, glasses, gloves and clothing and by the time you’ve got it all on then you are a physical hazard. As soon as the phone rings you have to take it all off and then start again.”

“The law keeps changing so fast we just can’t keep up with it.”

“You have to fill in forms for them all but they are repetitive so you are filling in the same stuff several times for different authorities.”

“Bureaucracy and red tape is a real cost for a one man band. Any time I give to this is time lost working.”

“You accept the fact that you want to look after your guys but the bureaucracy is too much.”

**Information needs:**

“It would be really helpful to know who is getting done for what so that you can see what the current bugbears are. Different things are a priority at different times and it’s good to keep up to date.”

“I need a book that covers everything so that I can refer to it if I’m unsure and I need it to be updated whenever there are changes to the law.”

“An ‘everything you need to know guide’ would be useful.”

“You need an update whenever there’s a change in legislation. If they are going to move the goal posts then they need to tell us where they’ve put them.”

**Attitudes to intermediaries:**

“I used the Chamber of Commerce once. They weren’t much help.”

“I wouldn’t use them for health and safety information. You’d expect that to come from the HSE.”

“There are usually similar organisations nearby and we all help each other out.”

“Insurance companies don’t want to know about the small companies - they just deal with the larger organisations.”

**Comments on training needs:**
“When you are starting out you need to conform so you need to know how.”
“You need to instil health and safety into youngsters.”
“Training opened my eyes to the dangers and made me take much more care.”

Comments on publications:
“It needs a catchy title. It has to be relevant to me.”
“I’d look at the bullet points and if they were relevant then I’d read the whole section.”
“Because it comes from the HSE I feel that I should read it fairly soon.”
“If it comes from the government then there’s always something in it that you don’t know.”
“If it said that it was information on new legislation then I’d read it because that’s something that I need to know.”
“Colourful leaflets look like junk mail and I get too much of that. I prefer the grey leaflets.”

Feedback on HS(G) 67 and Engineering Sheet No. 18:
“It’s got MVR on the front so I know that I should read it because it’s relevant to me.”
“My staff won’t read it. I’d have to break it down into a simple form for display.”
“It’s good for inexperienced staff. I could give that to an apprentice.”
“If it arrived you’d think ‘Great a book on everything I have to do’. But it’s not complete. There’s no information on burnt out cars in here.”
“It’s incomplete. It doesn’t cover airbags. It’s not up to date for the modern car.”
“It covers stuff that I already know. When you’ve been in the trade for 30 years you know about paints. It would be useful for a new employee.”
“It’s got a relevant title so I’d put it on the wall to refer to.”
“Looking at the date I must have seen this in the past. This isn’t new information.”
“The problem for me is not the cost but that I would have to go and get it. If it landed on the desk then I’d read it.”

Comments on the Trade Press:
“Everyone gets ‘The Bodyshop’ magazine.”
“I’d read articles on health and safety in this, yes.”

Comments on the HSE InfoLine:
“The idea of it is good so you can clear up grey areas but I wouldn’t trust it to be confidential if it was run by the HSE.”
“You need advice from experienced people from the trade. A helpline should be independent. You never know which side of the fence the HSE are on.”

Comments on HSE inspectors:
“They could walk into most companies and find something wrong but they never praise you for what you are doing right and they are never lenient if they think you are trying. They just come the heavy mob and find fault.”
“Even if you’ve done the impossible and got everything right they would still find fault.”
“I’d like someone to come around and give me guidance in the right direction.”
“I want someone to come and look around and let me know what I need to improve without any of the policeman attitude.”
“If they think it is so important then they should have the manpower to send someone out to me. If we are to take it seriously then so should they.”

Comments on bank managers and accountants:
“They are good with money and stuff but they wouldn’t know anything about health and safety in my business.”
“I’d like to think that I wouldn’t need a leaflet off him about health and safety.”
APPENDIX 7 - SECTOR KEY EVENTS APPROACH – CONSTRUCTION SECTOR

A7.1 BACKGROUND

This Sector Key Events Approach (SKEA) for the Construction sector has been produced by AEA Technology plc under the HSE project ‘Expanding HSE’s Ability to Communicate with Small Firms – A Targeted Approach’ (RSU ref. 4142/R68.057).

The overall objectives for the study are:

• to identify external indicators of ‘key events’ in the life of small firms that may be indicative of their need for advice or information on health and safety at work
• to identify appropriate, cost effective communication channels, tools and techniques for influencing the health and safety behaviour of small firms

This SKEA summarises the findings of interviews with key intermediaries and focus groups with small firms in the Construction sector, focussing on the painting & decorating and roofing sub-sectors. It describes the sector’s general attitude towards health and safety and identifies key events that could be used by the HSE as opportunities to disseminate advice and information.

A7.2 THE SECTOR

There are approximately 690,000 Construction firms in the UK with under 50 employees. However, for the purpose of this study, investigation focussed on firms in the painting & decorating and roofing sub-sectors. In general, discussions with intermediaries confirmed that similar attitudes and issues are found in other sub-sectors of the industry.

Views on key events in the life of the sector’s small firms, and communication mechanisms were gathered from:

• five current and two recent members of the Small Firms Advisory Group of the Health & Safety Commission's Construction Industry Advisory Committee (CONIAC)
• two focus group meetings that were attended by ten representative of small painting/ decorating and roofing firms.

For the purposes of this report, the term ‘small builder’ is used where the findings are thought to be relevant across the whole Construction sector, as opposed to just painters & decorators and roofers.

A7.3 ATTITUDES TOWARD HEALTH AND SAFETY

A7.3.1 General Attitude

Many small builders do not even think about health and safety. It is not because safety is unimportant; just that they do not consider it in the first place. Most small builders do not know anyone else in the trade who has had a serious accident, so they perceive the level of risk to be low. Because of this, and also a fear of being investigated/prosecuted if they did contact a regulatory body, they do not tend to seek health and safety information and advice.

Most focus group participants felt that compliance with health and safety guidelines was costly and that they had to achieve a balance between safety and cost. They felt that small firms could not be competitive if they adhered strictly to all the regulations; working in the safest possible way (e.g. using scaffolding rather than ladders) leads to higher costs and the subsequent risk of losing work,
because of uncompetitive prices. Participants agreed that if all firms were to comply with the same standards, then competition would be fairer.

**A7.3.2 Perceived Risks**

The painting & decorating and roofing trades were considered by participants to be potentially dangerous. Hazards identified included fumes from chemicals and paints, electrocution and falling from heights. All the participants felt that they took risks at some level but considered that they only took risks that were manageable and ‘acceptable’. Interestingly, different individuals were prepared to take different levels of risk for the same job. Also older participants felt that they had become more safety conscious with age and experience.

Payment schedules were cited by participants as leading to health and safety risks. For example, large firm customers require work to be completed quickly and payment is only made on completion. This can lead to some builders ‘cutting corners’ to complete the work more quickly.

**A7.3.3 Attitude to Legislation and Regulators**

Participants saw conforming to health and safety regulations as a bureaucratic procedure rather than a means of protection. In addition, they perceived that the way some companies implement the regulations is an attempt to avoid responsibility for accidents to small building contractors. For example, equipment hire companies require their customers to complete a disclaimer form so that the customer takes responsibility for their own health and safety. Similarly, when working on a site, the main contractor will require paperwork to be completed and signed by all sub-contractors, which effectively acts as a disclaimer against responsibility for accidents on the site.

The HSE was seen by participants as an enforcing body and it was felt that the HSE should take on a more proactive educational role. Participants felt that there should be tighter legislation so that contractors employing painters/decorators and roofers were obliged to provide a safer working environment.

**A7.3.4 The Benefits of Health and Safety**

Participants did not mention any business benefits of health and safety, other than avoiding the potential loss of income that would be incurred through an injury or accident. They felt that, currently, health and safety advice was provided primarily for ‘companies to cover their backs’ rather than being aimed at reducing hazards and accidents.

**A7.4 KEY EVENTS IN THE LIFE CYCLE OF A SMALL CONSTRUCTION FIRM**

The key events described here represent occasions when either there is a need for health and safety advice, or there is a good opportunity for disseminating information or advice.

**A.7.4.1 Business Start-Up / New Traders**

All participants felt that health and safety information and advice should be disseminated at the start-up phase of a new business. People starting up as sole traders could be identified when they register for their Construction Industry Scheme (CIS) card. Registration for the CIS card is compulsory for traders and is therefore issued to all members of the Construction industry at the beginning of their career. Obtaining a CIS card is a one-off event and would be an appropriate time to receive health and safety advice.

It is recommended that the HSE work with the issuers of the CIS cards to investigate the opportunities for disseminating a ‘start-up’ pack of relevant health and safety information.
Some participants suggested that attendance on a compulsory basic health and safety skills training course could be required before a Construction worker could qualify for a CIS card. This could also be investigated by the HSE.

A7.4.2 Contact with Clients

All but the smallest firms will tend to work for the public sector or large private contractors/clients. These clients are likely to specifically require compliance with health and safety legislation and expect to see evidence of such compliance in bids for work. Some Local Authorities run a Contractors' Health and Safety Scheme with approved lists of firms that are allowed to tender for work.

It is recommended that the HSE increases the use of these supply chains as potential routes for promoting health and safety practices. In particular, the challenge is to ensure that clients provide genuine, relevant health and safety guidance, rather than issuing paperwork just to comply with the regulations.

Participants also have contact with designers and architects. Participants felt that architects could be used as a communication channel for the HSE. Architects should be encouraged to show that they have considered and addressed health and safety issues in their plans and specifications. Ideally this would be a prerequisite for obtaining planning permission.

Much smaller firms tend to have smaller, often domestic, customers with little or no knowledge of health and safety legislation. Applying supply chain pressure in this case is likely to be impractical, especially as domestic clients tend to want work carried out as cheaply as possible.

A7.4.3 Employing New Staff and Training

Participants saw education and training as being key events and a way to improve health and safety in the painting & decorating and roofing trades. Participants felt that traders should receive health and safety training before they start work and that schools, colleges and job centres could provide this training. However they also felt that bad practice currently exists in many training colleges. It was therefore suggested that HSE should provide a stronger health and safety message through schools and colleges.

Participants also recommended a compulsory certification scheme as a means of ensuring qualification in safe procedures for the trade and in the correct use of equipment. The trader’s employer could use this certification scheme to check their qualifications. However, this scheme may be hard to enforce for sole traders, especially those working in the domestic sector.

A7.4.4 Insurance Companies

All reputable firms have employers’ liability insurance, so they have contact with an insurance broker. The HSE could use brokers as a possible communication route. Insurance brokers may be able to find reduced premiums for traders who had attended health and safety training courses. However, participants felt that trust in insurance companies is low and so brokers would be of limited use as a conduit of health and safety help.

A7.4.5 Regular and Frequent Activities

Small Construction firms have regular contact with suppliers (particularly builders’ merchants, trade centres and equipment hire companies). Participants felt they particularly needed health and safety information and advice when using new equipment or working in a new environment. They wanted any new piece of equipment, whether hired or purchased, to come with practical information on safe use. Currently, some participants receive information from suppliers or manufacturers, but this is
often of poor quality. They suggested that clear, legible, laminated information sheets should be securely attached to every piece of equipment, bought or hired. For materials, they would like to see more useful, practical health and safety information on the packaging, for example printed on cement bags.

It is suggested that the HSE considers working more closely with suppliers to the Construction industry to develop and disseminate useful information alongside products and materials.

A7.4.6 Events not Appropriate for Linking to the Provision of Health and Safety Advice

Participants’ feedback suggested that regular activities such as financial audits, preparing tax returns and applying for loans would be inappropriate events to link to the provision of health and safety advice. Many small painters & decorators and roofers are not VAT or PAYE registered and rarely visit their bank managers. Participants were also concerned that banks would charge for any information and advice given; participants were not prepared to pay for information on health and safety. In addition, bank managers and accountants are not seen as having credibility to pass on information about health and safety, as they do not know enough about the painting & decorating and roofing trades.

Participants did not see business growth and related activities (eg. expanding the customer base and staff recruitment) as key events. This was because most small firms are not actively seeking to grow. The tendency is for a small number of individuals to continue to work together in a stable set-up while there is sufficient work available.

A7.5 KEY COMMUNICATION CHANNELS

The key events described above identify when it is appropriate to target small firms with help and advice. They also suggest appropriate channels for disseminating information. This section highlights additional communication channels that may be useful, although not specifically related to a key event.

A7.5.1 Direct Communication with the HSE

Helpline

Only two participants were aware of the HSE’s InfoLine, but all felt that a helpline is a very useful way of getting health and safety information to small builders. They felt that this service needed to be better publicised and, particularly important, available in the evenings when traders have the opportunity to call it.

The participants recommended that a helpline be used not only to obtain information but also to report poor practice to the HSE, for example if they had a concern about being forced to work in hazardous conditions by a client. For both types of use, it is essential that the confidentiality of the helpline is guaranteed, and participants would need to be reassured of this. In addition, it was suggested that the helpline could offer a fax back service for information – a facility that is offered by some suppliers to the sector.

HSE visits

Participants see the HSE largely as a regulatory body operating a policing role. They were wary of HSE inspectors and avoided contact with them. HSE inspectors were associated with large fines for what are regarded as “silly misdemeanours”. Even though participants rarely see an inspector, they recommended that HSE inspectors needed to take a more proactive role, providing education alongside enforcement.
A7.5.2 Communication through Intermediaries

Suppliers

All traders regularly visit builders' merchants and these range from small, specialised trade-only suppliers through to large DIY superstores. This appears to be the most important communications route for small builders as it has the potential to reach the majority of them.

Participants felt that there is a need to obtain key health and safety communication at the point of sale. They requested that manufacturers supply more and better health and safety information on packaging. One participant suggested that the HSE should run a programme of health and safety seminars in conjunction with builders merchants, offering 'money off' vouchers to attendees.

Trade associations

Members of trade associations use their associations for obtaining information and advice. For example, members of the Federation of Master Builders (FMB) use the FMB’s helpline to ask health and safety questions. Trade associations also publish and distribute members' newsletters that sometimes contain health and safety related information. However, only around 10% of building firms belong to trade associations and smaller firms in particular are least likely to be members. So, although this is an important communication route for member organisations, it does not serve the majority of small building firms.

Other traders

If participants wanted to obtain any advice on health and safety issues, they would initially contact friends and colleagues in the trade. This may occur when they are working in situations or with equipment that they have not come across before. However, ‘other traders’ are usually other small firms, so there is no specific communication route through ‘other traders’.

A7.5.3 Other Communication Channels

Media and trade press

Participants felt that ‘The Professional Builder’ was one of the best trade journals for the sector; it is provided though builders merchants. ‘Construction News’ (CN) is also well read, although perhaps not by painters and decorators. CN often includes health and safety features and information provided by the HSE. The trade press, particularly CN, tends to be read by the larger firms (eg with over ten employees) whereas many of the smaller firms (especially sole traders) tend not to read journals. Nevertheless, regular coverage of health and safety issues in the trade press is considered to be important.

Traders may identify with ‘home makeover’ television programmes and participants felt that these television programmes should incorporate good practice with respect to health and safety advice. Makers of these programmes could be encouraged to comment on accident statistics to highlight the consequences of bad practice.

Meetings and events

‘Toolbox talks’ can be the most effective way of getting the health and safety message across on site. These usually comprise a 15 minute informal talk about a single health and safety issue, attended by everyone on a construction site, including subcontractors, maybe once per week. Encouraging wider use of toolbox talks, including all subcontractors, would be an effective way of stimulating health and safety awareness.
**Internet and emailing**

Many builders have computers and Internet access. However, they are unlikely to proactively search for health and safety advice via the Internet.

Small builders should be encouraged to access health and safety information, for example through links from sites they may visit (especially supplier web sites).

**A7.5.4 Communication Channels not Appropriate for Disseminating Health and Safety Advice**

Bank managers, accountants and the Inland Revenue are not effective communication channels for disseminating health and safety advice and information. In addition, most participants had not used local business support organisations (such as Chambers of Commerce and Business Links) for advice or information. Participants did not feel that these organisations could provide information on health and safety relevant to their needs. These are all therefore viewed as an ineffective route for HSE to disseminate information.

Smaller businesses generally do not attend networking events and meetings because they cannot afford the time, so events are also an ineffective route for disseminating information.

**A7.6 PROVISION OF INFORMATION**

In most cases, when asked directly, participants said they did not want or need information on how they could work more safely. Participants have little time to spend reading advice leaflets and their current use of such information is very low. All the participants felt that they had a good awareness of how to work sensibly on site. However, they were less confident that they knew all the regulations and legislation.

Some participants knew that there was a lot of information available but they did not know how to find information that is directly relevant to them quickly and easily. In addition, most available information was perceived to be ‘too obvious’; a matter of common sense.

**A7.6.1 Key Requirements of Small Painting / Decorating and Roofing Companies**

*Needs of small firms*

Small traders’ needs for information are:
- To know and understand the regulations that apply to them
- To be able to identify relevant information quickly and easily

*Requirements of written information*

Most participants wanted some written health and safety information, but it must be:
- Tailored to particular sectors (and where possible, individual sub–sectors) so it is more likely to be read. It should be clearly identified as specific for Construction firms (and where possible, for painters/ decorators or roofers - however, this may be difficult where activities overlap)
- Tailored to the size of the firm - participants felt that most health and safety awareness raising information currently produced by the HSE is directed at larger companies
- Relevant, clear and concise - focussing on the most important hazards and actions to be taken
- Understandable – avoiding complex or ‘legal’ language where possible
- Well structured – using bold and clear headings and illustrations to generate interest
- Short – a maximum of four sides of A4
- Free – and preferably sent directly to companies by the HSE
Use of information by painting/ decorating and roofing firms

Information on health and safety (especially from the HSE) may be skim read if it looks ‘official’. Most companies would then file it. However, it is unlikely to be referred to again.

A7.6.2 Types of Information

Participants requested health and safety information that they could give to their customers/ clients on how to provide a safe working environment. This could cover safe practice and any relevant regulations. This was felt to be particularly important where a trader was starting work in a new environment and/or situation. This information should be provided by the HSE.

Participants recommended that HSE should provide all relevant third party intermediary organisations (such as builders merchants and trade associations) with a standard toolkit to help them provide health and safety advice. This could come in the form of specifically designed folders, with inserts being available from builders merchants, hire shops, trade associations, major contractors, through the trade press or direct from the HSE. Participants stressed that consistency is vital in the advice provided by different sources.

Painters and decorators had a particular interest in information on the safe use of solvents. This issue was perceived by participants as more important than falling from heights, presumably because participants felt that they knew the risks associated with working at height and were able to control those risks. Participants currently receive health and safety information on the use of solvents via suppliers but found it difficult to understand. Apart from this, there were no real differences between the views of painters & decorators and those of roofers.

Participants believed that clear ‘signposting’ to appropriate information is essential because they need to know which of the many available publications, it is essential for them to read.

Participants thought that the use of ‘hard-hitting’ press adverts would make traders consider more carefully the health and safety issues in their work. Few participants had previously seen material from the HSE’s ‘Working Well Together’ campaign but, when shown some of the material, thought that it was an effective approach.

A7.6.3 Presentation of Information

Participants felt that all written information on health and safety needs to be relevant, clear and concise. The material must have strong messages and be easy to use and read. Participants perceived the use of pictures as a very important way to illustrate key points, suggesting in particular photographs of accidents in dangerous situations. They felt that written information should not be longer than an A4 sheet and it should have a clear, bold title and contain bullet points within the text. Participants felt that a document the length of a small booklet would only be useful as a comprehensive signposting guide to all the available information.

Content of health and safety advice should be targeted at specific sub-sectors where possible and should then be directly relevant to the target audience. So for example, separate information sheets could be needed for painters and for roofers, even though the content may be similar. Advice should contain new facts and some ‘non-obvious’ information to be interesting and relevant.

A7.7 QUOTES FROM FOCUS GROUPS

Attitudes to risk:
“The job doesn’t feel dangerous until you have an accident”
“Just putting a picture hook on a wall can be dangerous if you put it into an electric cable”
“I’d rather lose a job than do it dangerously, if I’m injured I can’t work”
“Obviously I only take reasonable risks. I’ll stretch the last arm’s length to reach the corner but if
don’t feel safe then I’ll sort it out”
“An accident at work will make you wary for a while but then you get your confidence back and you
take risks again. Like when you have a near miss in the car”

**Attitudes to regulations:**
“If you follow all the rules and regulations then you just become too expensive”
“A lot of it’s down to time and money, safety means time and expense”
“Paperwork is a pain and it gets in the way of hands on work. Some basic paperwork is needed but
you don’t want to be tied up with it at the end of the day”
“I don’t get any information from the HSE I just know that there are lots of rules and regulations”
“If you employ people then you have to be much more careful about the rules as you are responsible
for them”

**Comments on suppliers, customers and contractors:**
“When you work for a big firm they abdicate their duties by getting you to sign a disclaimer”
“Big contractors tend to insist on health and safety”
“The people you are working for should have a legal obligation to protect the worker”
“Hire companies give you a certain level of advice but you sign a disclaimer and it’s all about
covering their own backs”
“Suppliers should give out free leaflets with equipment”
“Workers at the hire shop should know all about the equipment they are hiring out. At the moment
people in hire shops don’t know how to use the equipment”

**Needs for information:**
“If you suddenly realise that you need advice then you don’t know where to go for it”
“It’s such a big area and I only want information that is relevant to me”
“When you want information you want it now, tomorrow is too late”
“A practical demonstration is much better than reading about something in a book”
“Information has to be free. If it costs the people who are borderline safe at the moment will go away
rather than get safer”
“Those home makeover television programmes are very safety conscious. They give safety tips when
they’re doing jobs”

**Attitudes to intermediaries:**
“The only reason to go to the bank is for money”
“An accountant doesn’t know anything about roofing”
“Job centres could give out information. Along with a job description they could explain any dangers
and also advise on safety. You don’t know the dangers of life when you’re just setting out”
“Health and safety needs to be part of training but there are a lot of unqualified cowboys out there;
people who buy a paintbrush and think they are a painter/decorator”
“I could ring my trade association if I wanted information”
Comments on publications:
“Any written information would have to say that is was for painters not just for anyone in the construction industry”

“Information needs to do more than state the obvious. It needs to contain some aspect that you would otherwise not have known. Statistics or facts would be very useful as they make you stop and think”

“Anything that is just obvious and common sense is a turn off”

“It’s got to be simple and clear. Clear headings and then bullet points and a helpline number. Not a big book”

Comments on the HSE InfoLine:
“It needs to be a freephone number that’s easy to remember”

“A helpline could be promoted at supplier stores”

“You need information to be available in the evenings so that when you’re sitting at home thinking about the problems of a job you can get answers. The next day you can go back with both the problem and the solution”

Comments on domestic customers:
“The homeowner doesn’t know the dangers of the job. They just want their house painted”

“If I price for a scaffold for a domestic customer then I’ll be too expensive”
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