

Lessons learned from the Large Organisations Partnership Pilot (LOPP)

Prepared by **GfK NOP Social Research** and **Risk Solutions**
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The Large Organisations Partnership Pilot (LOPP) was a joint initiative, launched in October 2005, between the Health and Safety Executive (HSE) and the Local Authorities Coordinators of Regulatory Services (LACORS) to explore how engagement with large organisations (defined as having > 10,000 employees in the UK, with multi-site operations), could be improved.

The objectives of LOPP were:

- to present a more coherent and coordinated face to large organisations,
- to secure improvements in health and safety outcomes in the participating organisations, and
- to give participating organisations an early voice in discussions on emerging policy areas such as reward and recognition and alternative penalties.

However, the purpose of this research is not to evaluate the extent to which these objectives have been met. The LOPP community (regulators and organisations involved) recognise that, at the end of three years of LOPP, the pace at which the various partnerships have developed has resulted in a wide variance in the maturity of the different relationships, and this would not provide a useful database for analysing the effectiveness of established partnerships at which the above objectives are aimed. Nevertheless, the experience over the three years provides a useful database for drawing practical lessons, and determining the factors which influence the establishment of LOPP-style relationships, for any future HSE/LA engagement with large organisations. The research findings outlined in this report is intended to help identify these lessons.

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1 Management Summary

The Large Organisations Partnership Pilot (LOPP) was a joint initiative, launched in October 2005, between the HSE and the Local Authorities Coordinators of Regulatory Services (LACORS) to explore how engagement with large organisations (defined as having > 10,000 employees in the UK, with a multi-site operation), could be improved.

This research is intended to understand the lessons that can be drawn from the experiences of LOPP, and to highlight the implications of these for future HSE/LA engagement with large organisations.

We have approached this study through a combination of:

- quantitative analysis of health and safety performance data from RIDDOR and the Labour Force Survey
- quantitative analysis of the HSE's COIN database for recording interventions
- telephone and face-to-face interviews with Local Authority (LA) representatives, LOPP Account Managers from the regulators and LOPP coordinators from the participating organisations
- a breadth survey of both the regulators and organisations involved in the LOPP initiative
- depth studies of two of the participating organisations
- separate workshops with the regulators and the participating organisations.

The implementation and roll out of LOPP relationships across the organisations has differed reflecting several factors including the complexity of the organisation (understanding complex organisations can delay the initiation and progress of partnership) and the extent to which some form of partnership was already in place.

We have found that in LOPP, a key driver for successful interaction with large organisations has been the extent to which a *genuine partnership* relationship has been established. This term can mean different things to different people but we believe it can be reduced to the following fundamental characteristics:

1. establishment and sustainability of relationships
2. engagement with relevant stakeholders
3. development of trust.

Here we summarise our main findings by reference to the lessons we can derive from the LOPP experience, and indicate how they apply to these characteristics:

Establishment and sustainability of relationships

- All parties regard LOPP as a useful construct or model for developing partnership between large organisations and health and safety regulators that builds on previous experience (e.g. Local Authority Partnership Scheme).
- A bespoke approach to developing partnership with large organisations, given the spectrum of organisational types, is essential. Large, complex organisations with site specific challenges and local procedures demand a different approach to engagement in comparison to a large organisation which consists of identical activities and operations repeated at each site across the country.

- The organisations regard establishment of a single point of contact (Account Manager) for managing the regulatory interface as a good thing. It simplifies lines of communication and facilitates efficient access to technical and regulatory expertise in the regulator.
- The precise role of the Account Manager and their equivalent in the organisation should be made perfectly clear to all relevant parties from the start, and continually communicated throughout the partnership.
- The personalities and competences of the key individuals in both the regulator and organisation, charged with establishing the partnership relationship, are critical to the effectiveness of this single point of contact.
- There needs to be a common understanding on both sides of the partnership of what the realistic objectives and expectations are.

Engagement with relevant stakeholders

- **Board** level support helps to ensure that enough resources are invested in developing the relationship.
- There needs to be effective lines of communication established right from the start of the initiative and maintained throughout. Communications with the regulator needs to recognise the difficulties associated with coordinating activities with over 400 organisations (Local Authorities) as opposed to one organisation (HSE).
- An engagement plan should form a core part of the communications strategy for the partnership by setting out overall objectives and expectations as well as providing information about the intended impact of the partnership on different stakeholders (i.e. how it affects their day job).
- The engagement plan should be structured as two documents: (1) engagement strategy, and (2) engagement activities, and there should be an agreed set of minimum contents including health and safety performance of the organisation.
- Where the organisation activities are complex, diverse and site specific, active engagement with the local work force will result in increased buy-in to the partnership.

Development of trust

- Both sides need to recognise that developing a partnership takes time and investment from both parties.
- Continuity of relationships is important in developing trust and this has implications for selection of individuals charged with developing the relationship.
- Consistency in regulation and consistency in business response to regulation are a requirement for trust development.
- The organisation can encourage worker trust in the partnership arrangement by actively involving them in the initiative and by demonstrating progress against the agreed objectives through measureable action/activity.

2 Background and Context

The Large Organisations Partnership Pilot (LOPP) was a joint initiative, launched in October 2005, between the HSE and the Local Authorities Coordinators of Regulatory Services (LACORS) to explore how engagement with large organisations (defined as having > 10,000 employees in the UK, with multi-site operations), could be improved.

The objectives of LOPP were:

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2. to secure improvements in health and safety outcomes in the participating organisations, and
3. to give participating organisations an early voice in discussions on emerging policy areas such as reward and recognition and alternative penalties.

However, the purpose of this research is not to evaluate the extent to which these objectives have been met. The LOPP community (regulators and organisations involved) recognise that, at the end of three years of LOPP, the pace at which the various partnerships have developed has resulted in a wide variance in the maturity of the different relationships, and this would not provide a useful database for analysing the effectiveness of established partnerships at which the above objectives are aimed. Nevertheless, the experience over the three years provides a useful database for drawing practical lessons, and determining the factors which influence the establishment of LOPP-style relationships, for any future HSE/LA engagement with large organisations. This research is intended to help identify these lessons.

The organisations that participated in the LOPP were as follows:

Regulatory Lead ⁽¹⁾	Organisation	Sector ⁽²⁾
Local Authority	HBOS	Banking
	Tesco	Retail
	ASDA	Retail
	B&Q	Retail
HSE	Grampian Foods	Food industry
	Northern Foods	Food industry
	Greggs	Food industry
	Royal Mail	Other services
	BAA plc	Other services
	Astrazeneca	Manufacturing
	General Electric	Manufacturing
	Rolls Royce	Manufacturing
	BAE Systems	Manufacturing
	BOC Group	Manufacturing

(1) Account managers were selected from the regulatory lead organisation who had primary contact with the organisation

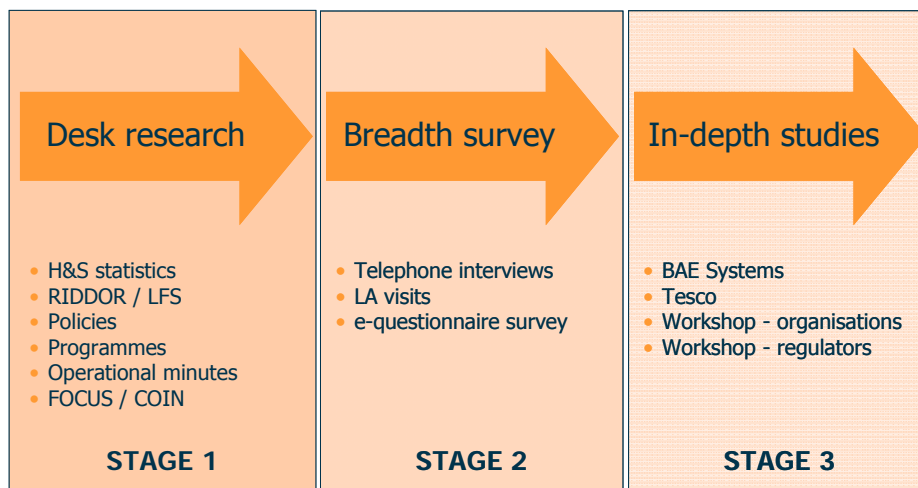
(2) Sector assumed

It can be seen from the range of organisations participating in LOPP that the scope and breadth of the services they offer is extremely broad and varied. Consequently the health and safety hazards faced by employees in these organisations will be quite different, depending on which organisation we are looking at. In addition, for the food and retail sectors in particular, there are regulatory requirements for consumer food safety. Consequently, it can be challenging for regulators to engage with large organisations on specific programmes or priority topics, especially if the organisation does not feel that these programmes or priority topics are relevant for the particular hazards faced by their employees.

LOPP builds on earlier joint initiatives (involving a central approach and an inspector providing a focal point for engagement), such as the Lead Authority Partnership Scheme (LAPS) but for LOPP the intention was to have a more reciprocal relationship between the regulators and the organisations. To help facilitate this, an Account Manager from the regulatory lead organisation (i.e. the HSE or LA) was appointed as the LOPP single point of contact between the health and safety regulators and the large organisation. In consultation with relevant stakeholders from both sides, an Engagement Plan was drawn up which was used as the basis for prioritising 'proactive' health and safety interventions between the regulators and the organisation. The Account Manager was responsible for agreeing the Engagement Plan with the organisation and for coordinating the regulator's response to it. The Engagement Plan would reflect both the regulator's and organisation's views (employee health and safety representatives as well as management) on what the health and safety priorities should be. The Engagement Plan was intended to address the frequency and nature of 'proactive' interventions only. It would have no bearing on 'reactive' regulatory interventions such as accident or complaint investigations and enforcement actions, which would be dealt with in the normal manner.

3 Methodology

The following schematic summarises the approach that we adopted for this study:



Whilst there was some overlap between the activities undertaken in each of the stages shown in the schematic, essentially there were three stages to the work:

3.1 Stage 1

This stage involved some preliminary desk studies to determine the health and safety context that the organisations participating in LOPP are currently operating in. This involved some analysis of publically available RIDDOR and Labour Force Survey (LFS) health and safety performance statistics. We also reviewed any policies/programmes and operational minutes or supporting guidance that had been issued to the regulators. The bulk of this was taken from documentation openly published on the HSE/LACORs web-sites. Finally, we undertook a detailed analysis of HSE inspection information – as recorded in the COIN/FOCUS databases.

3.2 Stage 2

Following the plenary meeting on 26 November 2007 we undertook a comprehensive call round of over 20 of the Account Managers from the regulatory side as well as the lead contacts from the organisation side. These telephone interviews gave us an initial feel for the issues surrounding the LOPP initiative which we could then test in more detail in the subsequent activities. The telephone interviews also informed the design of a breadth survey that we undertook across the regulators as well as the organisations.

During this stage we also visited three Local Authorities to understand how LOPP impacted on their plans for inspection of the associated large organisations.

3.3 Stage 3

In the final stage we undertook an in depth study of two of the participating organisations: BAE Systems and Tesco. This was to further test the emerging findings from the previous activities and to get a more detailed understanding of how LOPP had been implemented in these different organisations.

Finally, the overall findings that emerged from our research were tested in a couple of workshops involving (a) representatives from the LOPP organisations and (b) the regulator Account Managers and Account Directors (senior managers in HSE who assisted the HSE and LA Account Manager with board-level contact in the organisations, to initiate the partnership). We have taken feedback from these workshops into account in our report.

4 Detailed Findings

4.1 Initial phone rounds

A series of structured telephone interviews were carried out with the LOPP Account Manager and the company's LOPP co-ordinator for each of the 14 LOPP companies. This section brings together the main themes emerging from these interviews. The first part describes these themes discursively, while the second shows the results of a simple thematic analysis exercise.

4.1.1 *Emerging Themes*

The interviews revealed a wide range of LOPP experiences. One company regarded LOPP as a simple follow-on from a pre-existing Lead Unit Arrangement (LUA). This arrangement was working well, and the main additional benefit from the transition to LOPP was seen as the membership of a 'club', sharing experience at the LOPP plenaries. The lead inspector for another company was already trying to put similar arrangements in place before LOPP, but other inspectors were not fully signed up to them. The introduction of LOPP improved matters. Two companies where the regulatory lead (Account Manager) came from an LA had a Local Authority Partnership Scheme (LAPS) in place before LOPP. One of these saw LOPP as LAPS reinvented, but recognised that LOPP took the process forward and formalised certain areas of it – for example the Engagement Plan. Another saw LOPP as adding no extra value and would like to abandon it, going back to LAPS.

Five companies said that it took a while for the LOPP arrangements to be sorted out and put in place. One expressed this as "neither party knew what they were letting themselves in for at the start" and "we were making it up as we went along". For this and other reasons, the LOPP process is at very different stages across the different companies. In some cases the Engagement Plans were well advanced, with the first round of activities completed and a second round underway. In others, LOPP activities were only just beginning, with a fear expressed in one case that the pilot would come to an end just as the activities proper were starting. In one case the Account Manager said that there had been good progress with LOPP because from the start both parties were realistic about what could be achieved. By deliberately setting limited objectives, for example, restricting LOPP to begin with to one division of the company, they were able to achieve these objectives. They are now able to think about extending the scope of LOPP within the company.

There was a general feeling that LOPP was more difficult and slow to set up than was anticipated. This highlights the length of time it takes to develop and establish a partnership. One of the issues is that 'large organisations' are by definition, large, complicated and dynamic. In at least one case the structure of the company was, and still is to some extent, opaque to the Account Manager who is supposed to co-ordinate the regulation of the company. Although this slowed down the implementation of LOPP, it also meant that LOPP forced the regulators towards a better understanding of the entities they are regulating (e.g. in the HSE's case, by putting company structures into the COIN database). It also helped some companies better co-ordinate health and safety management across the company.

Another aspect of the complexity of some companies is the rate of change of organisational change. A number of them are in the process of down-sizing, closing or selling off some divisions or subsidiaries. Other reorganisations or moves of headquarters also slowed down the LOPP process.

The degree of board-level buy-in to the LOPP process varied. Six companies reported good board support, while in two the board attitude lies somewhere between indifferent and hostility. In one of

the latter cases the attitude seemed to be, "we don't have much engagement with the HSE at the moment, so why stir things up".

In the four cases where the level of HSE resource required by LOPP was mentioned, some concern was expressed that it was resource-intensive. There were two aspects of this: the effort required in setting up LOPP arrangements within the regulator in the first place, and the resource put into 'virtual'¹ team inspections. In one case it was questioned whether the HSE would have the resource to continue supporting the virtual teams.

A possible conclusion from all the themes reported above is that there should have been more pre-planning of LOPP, more definition of roles and of ground-rules. However it may well be the case that the learning derived from the experience and the interaction with the realities of modern businesses, are where the real value can be derived from the LOPP.

4.1.2 Thematic Analysis

The table below collects together a series of propositions about LOPP, and their negations. There is then a count of those organisations where something like the proposition, or something like the negation, was said. If the positive and negative numbers do not add up to 14, then the remainder did not bring the issue up. We have highlighted those themes where the difference between the positive and negative propositions is four or more on the basis that in these cases there is a stronger weight of opinion in support of the proposition.

¹ Here 'virtual' is meant to indicate the fact that whilst the teams involved in the inspections were made up from the same constituent elements: Account Manager: local inspectors and topic specialists; in practice the membership of these inspection teams was site and topic specific.

Positive Proposition	Negation of Proposition	(+ve)	(-ve)
LOPP is resource intensive for regulators.	LOPP has cut down regulator workload.	4	0
LOPP is resource intensive for companies.	LOPP has cut down company workload.	6	0
Regulator management supports LOPP.	Regulator management obstructs LOPP.	2	2
Company board supports LOPP.	Company board does not support LOPP.	6	2
HSE or organisation says LAs on board	HSE or organisation says LAs not on board.	0	2
LA says some other LAs on board.	LA says some other LAs not on board.	0	3
LA says HSE on board	LA says HSE not on board	0	1
Use virtual teams	Do not use virtual teams.	5	2
Follows on from LUA.	No LUA in place.	1	0
Follows on from LAPS.	No LAPS in place.	2	0
Union is main means of employee health and safety representation.	Employee health and safety reps may or may not be TU reps.	0	5
LOPP started early and is well developed.	LOPP started late, or is poorly developed.	3	5
Action plans are in place and being acted upon.	Action plans are not yet in place.	7	3
LOPP was well understood from the beginning.	LOPP was poorly understood at the beginning - made it up as we went along.	0	5
LOPP was not hindered by organisational complexity or changes.	LOPP was hindered by organisational complexity or changes.	1	7
LOPP facilitates and encourages partnership	LOPP does not improve partnership.	6	0
It would be useful to survey some shop-floor workers.	It would not be useful to survey shop-floor workers.	0	6
It would be useful to survey some site managers.	It would not be useful to survey site managers.	1	4
It would be useful to survey some board-level managers.	It would not be useful to survey board-level managers.	2	3

Table 4.1 Thematic Analysis

4.2 Breadth survey

Here we describe:

- how we went about designing and piloting the survey instrument, and
- the main results from the survey.

The survey questionnaire we deployed for the purposes of this research is presented in Appendix A, the detailed results from the survey are presented in Appendix B.

4.2.1 *Design of breadth survey*

As described in Section 4.1, telephone interviews were carried out with the lead LOPP regulators (Health and Safety Executive inspectors or Local Authority inspectors dependent on the lead inspection authority) and with each of the company LOPP contacts to build a picture of the 14 companies and their initial perceptions of how LOPP has been working for them. This also enabled us to determine whether the organisation would be responsive to an online survey. Whilst there was a strong prevalent view that a survey of shop floor workers would not be meaningful, it was decided that a survey of the regulators involved in inspecting LOPP organisation premises, and a selection of the primary LOPP contacts in each organisation could yield valuable information. As a result of this we designed a questionnaire which underwent rigorous scrutiny from some of the HSE and company LOPP contacts. The final questionnaire was piloted with 2 HSE inspectors, 2 LA inspectors and 3 LOPP company staff. Further modifications were incorporated as a result of this pilot and the final questionnaire is presented in Appendix A.

The sample to be surveyed was provided from the HSE, Local Authorities and the LOPP companies in the form of email addresses of a selection of staff who were likely to have heard of, or be familiar with LOPP in their jobs. A total of 675 people were subsequently sent an online link to an e-questionnaire or a postal questionnaire.

The sample profile is shown in the following table with the numbers in brackets indicating the number of responses received.

LOPP Organisation	HSE		Local Authority		Company Email + Postal	
Asda	9	(6)	68	(68)	3 + 12	(3)
Astra Zeneca	14	(13)			5	(3)
B&Q	2	(2)	33	(79)	10	(6)
BAA	16	(11)			21	(13)
BAE Systems	27	(36)			19	(10)
BOC Group	24	(18)		(2)	15	(13)
General Electric		(2)		(2)		
Grampian	11	(12)		(2)	39	(19)
Greggs	3	(9)	6	(61)	17	(14)
HBOS		(2)		(36)		
Northern Foods	23	(18)		(2)	7 + 11	(5)
Rolls Royce	42	(17)			12	(10)
Royal Mail	1	(13)	13	(68)	27	(20)
Tesco	5	(7)	167	(105)	13	(12)
TOTAL	177	(102)	287	(117)	188	(128)

Various measures were taken to boost the response. Reminder emails were sent after a couple of weeks and again two weeks later. Later on in the fieldwork some company LOPP contacts were contacted by telephone to ask if they would encourage staff to respond to the survey.

The survey was run between 19th April 2008, when the first invitations to take part were sent, and 13th August 2008 when the survey was closed. During this time 347 responses were received.

Except in the case of the company responses the totals are not a sum of the parts. In the case of the regulators, particularly the LA inspectors but to some extent the HSE as well, regulators inspect two or more LOPP companies. This is notable in the LA sample where many LA inspector respondents are attributed to organisations that were absent of LA inspectors in the invitations to take part.

Respondents were given the option to list as many of the LOPP organisations as they inspect and were asked about each one in turn in the questionnaire. This explains why in some cases the number of respondents was greater than the number invited to participate. In addition inspectors appear for General Electric and HBOS, two LOPP companies that elected not to take part in the survey.

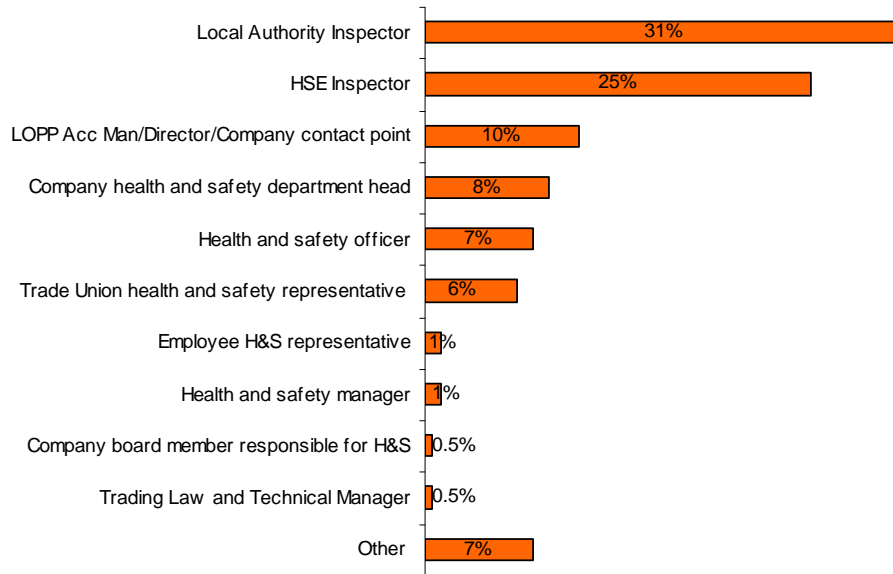
Of those emailed a survey invitation, 70 of the email addresses did not work, they were either incorrect and so never reached their intended recipient, or people were no longer in post or on maternity leave. This means the overall adjusted response rate is 57%. Broken down by type of sample, the response rates were as follows.

- HSE regulators: 67%
- LA regulators: 45%
- LOPP company employees: 71%

4.2.2 *Running the breadth survey*

The detailed results from the breadth survey are presented in Appendix B.

The profile of the sample that we surveyed was as follows:



It can be seen that the majority of the respondents were from the target population, i.e. regulators and the main LOPP and health and safety contacts from the LOPP participating organisations. As these are the people who should have had most involvement and/or contact with the LOPP initiative, we believe that the findings from the survey are representative of the experience in the field and should therefore be informative.

It is important to state that the limited sample size of the survey means that the results cannot in any way be claimed to be statistically robust. Rather they should be interpreted as providing possible indicators of emerging themes and lessons, which we have then gone on to test further by triangulation with data analysis (e.g. COIN/FOCUS db and LA Health & Safety Service Plans), the depth studies and the subsequent workshops.

4.2.3 Results from the breadth survey

Here we summarise some of the main findings from the Breadth Study. The source chart or table in Appendix B that the finding corresponds to is shown in brackets.

Finding	Observation
There are a large number of regulators who do not know how the LOPP participating organisations are currently performing with respect to health and safety. (Chart 3)	This implies that the organisations are not communicating their health and safety performance well enough, or, that the information is not readily available for the inspectors.
Despite there being a strong view from the preliminary telephone interviews that resourcing LOPP activities was an issue, this is not reflected in the returns where the majority of returns imply there has been no change. (Chart 7)	The survey respondents include all aware of LOPP. It may well be that there is an increased resource burden on those individuals directly charged with managing the LOPP relationships.
Local Authority inspectors have been least impacted by LOPP. (Chart 8)	This appears to be consistent with findings from LA visits (see Section 4.5)
There appears to be a marked difference in the amount of duty-holder contact time, as a percentage of total work time, between the HSE and LAs. LA inspectors report a much greater proportion of contact time. (Table C.2)	
Most inspectors spend less than 10% of their contact time with LOPP organisations, although there are small numbers who report more than 50% of their time is spent with LOPP organisations. (Table C.3)	The small number who spend a lot of time with the LOPP organisations are likely to be the LOPP Account Managers.
55% of LA inspectors do not account for their time in timesheets or by keeping a diary. This is much higher than the HSE equivalent of 15%. (Table C.4)	
Communications with Local Authorities (both HSE to LA and company to LA) is seen to be more problematic than with the HSE (Chart 12)	LOPP was meant to improve coordination between HSE and LAs. This implies there may be some way to go yet.
For those organisations where there is a more active LOPP relationship, awareness of the LOPP action plan / engagement plan is good. Interestingly some respondents reported awareness of the Asda action plan – which did not exist at the time of the survey. (Chart 13)	Four of the organisations: Grampian foods, Northern Foods, BAE Systems and Astra Zeneca would appear to have the most mature LOPP arrangements.
There is not a consistent view as to whether or not LOPP has resulted in more or less proactive inspections. (Table C.12)	This is consistent with findings reported in Section 4.6.
Asda, Tesco and B&Q all report that there is not an effective single point of contact with the regulator. (Table C.13)	These are all retailers with large numbers of stores and large numbers of inspectors who have inspected them. To date the LOPP initiative does not appear to have improved communication channels with the Local Authorities through the Account Manager. Will this ever be possible given the large numbers of contacts and interfaces?

4.3 Interviews with Local Authorities

In order to get a richer picture of how Local Authorities have been impacted by LOPPs, three Local Authorities were visited as part of this research. These were selected in consultation with LACORS in order to be representative of a fairly wide range of Local Authority types. The selected LAs and the individuals interviewed were as follows:

- Arun District Council
Principal Environmental Health Officer, 6 March 2008
- Enfield Council
Team Leader, Environmental Protection and Safety, 11 March 2008
- Chesterfield Borough Council
Head of Health and Safety Team, 1 April 2008

The following text box contains the prompt list that we used to structure the discussions.

1. Your overall impressions of LOPP. Is it working? How do you interact with the LOPP lead coordinators? Interaction with HSE? etc.
2. What your current plans/practices are with respect to inspection of large organisations in general?
3. How does this relate (if at all) to the plans/practices associated with the large organisations participating in LOPP?
4. The systems you use to record visits/inspections/actions arising as well as the length of time spent by your inspectors on such interactions.
5. The availability of such data for us to review and analyse
6. Your views on how LOPP could be improved
7. Any thoughts on how we could identify a range of candidates (inspectors) to survey on their experiences of LOPP

A few common themes emerged from the interviews. These can be summarised as follows:

- The introduction of LOPP was not well communicated at the start of the initiative.
- It has never been made particularly clear how LOPP should impact on Local Authority inspectors. There was a common perception that LOPP was intended to result in reduced frequency of inspections of large organisations' premises, and it was further observed that there was no guidance on how this should be realised.
- There are limited numbers of Environmental Health Officers (EHOs) and Health and Safety Enforcement Officers (HSEOs) to resource inspection activities and there is a high churn rate of staff.
- There was very little awareness of the engagement plans. Where some awareness was demonstrated the plans were criticised as (a) not being plans, and (b) not providing practical guidance on what LOPP meant at Local Authority level.
- Current plans for inspection by Local Authorities are driven by Section 18 of the HSWA (1974 etc) which places an obligation on Local Authorities to produce a Health and Safety Annual Services Plan.

The point about early communications to LAs about LOPP is supported by the following excerpt from the minutes of HELA, the principal HSE/LA liaison committee (Wednesday 11 October 2006). We have highlighted key points in the minutes in bold:

.....
.....

8.2 Initial communication of LOPP to LAs had not been good. However, a letter, to be signed by the Joint Chairs of HELA had been drafted, to go out to all CEHOs, with a view to foster better understanding of LOPP.

8.3 Advice was currently being sought as to the legal vires which LAs possess to enforce standards across multiple site organisations which operate in more than one LA area. **There was concern among LAs that LOPP was restricting inspection activities.**

8.4 Funding for LOPP remained an issue. HSE had provided 90k in funding but **there was concern that LAs would have difficulty in sustaining LOPP.**

.....

It was indicated that plans for proactive inspections are driven by the premises risk rating scheme described in HSE/LA Liaison Committee (HELA) (67/1 Rev 3). The risk rating scheme allows inspectors to 'score' premises against a set of predefined factors according to the existence or not of various risk control or mitigation factors. The premises are then assigned an aggregate score and the next inspection is scheduled according to the rules specified in the following table:

Description	Risk Group	Score	Visit Frequency
Highest hazard / risk	A	>=186	Not less than once per year
Intermediate hazard / risk	B1	171-185	Not less than once per 18 months
	B2	156-170	Not less than once per two years
	B3	141-155	Use other intervention strategies, but review rating after 3 years
	B4	126-140	Use other intervention strategies, but review rating after 5 years
Lowest hazard / risk	C	<= 125	Use other intervention strategies

In developing LA inspection plans, the LAs are expected to take into account local needs and national priorities such as the HSC Strategic Plan and the Fit3 programme. By implication, LOPP had made no difference to the behaviours of the LA inspectors, nor of the planning process. In order to test this further we looked at the published Health and Safety Annual Services Plans for a random selection of Local Authorities (downloaded from the internet), to check if the practices reported above agreed with what other LAs are reporting. The findings are summarised in the following table:

Local Authority	No of Premises	Size of Health & Safety Team (*)	Profile of Premises (or proposed plans)	Does LOPP feature?
Mid Sussex District Council	~3,000	1 PEHO, 2 SEHOs, 1 H&SEO	Planned inspections: A(0), B1+B2+Fit3(192)	No
Rutland County Council	975	1 Public protection manager, 2SEHOs	Planned inspections: A(0), B1(1), B2(4) Other interventions: B3(8), B4(8), C(55)	No
Torbay Council	3,064	2 PEHOs, 5 SEHOs, 2 EHOs, 1 TO	A(0), B1(132), B2(386), B3(369), B4(1,246), C(896)	No
Babergh District Council (06/07 Plan)	1,193	4 EHOs, 3 FT TOs	A(1), B1(16), B2(47), B3(125), B4(188), C(816)	No
Rushcliffe Borough Council (08/09 plan)	1,115	1 Protection & safety manager, 1 SEHO, 2 EHOs, 1 TO.	Planned inspections: A(2), B1(4), B2(37) Other interventions: B3(85), B4 (51), C(11)	Yes (Asda only LOPP participant in catchment area)
East Riding of Yorkshire Council (06,07 plan)	5,794	1 SEHO, 2 H&SEOs, 1 technical assistant	A(12), B1(169), B2(1,369), B3(635), B4(759), C(2,850)	No

(*) PEHO – Principal Environmental Health Officer
SEHO - Senior Environmental Health Officer
H&SEO - Health and Safety Enforcement Officer
TO – Technical Officer

Note that in the table above the staff in the health and safety teams carry out statutory duties in many areas including: food control, pollution control including air quality and private water supplies, animal welfare, infectious diseases, contaminated land, entertainment and other licensing issues. Typically therefore, the resource available for health and safety inspection and enforcement is only a proportion of the total numbers of staff recorded in the table. This is an important point because in almost all the health and safety service plans we reviewed, the difficulty in resourcing these different activities was highlighted with, in some cases, resource constraints being cited as a reason why they may not be able to deliver the planned activities.

In addition to this sample of published Health and Safety Service Plans, we reviewed a limited sample of inspection data from two of the Local Authorities we visited.

Arun District Council

We looked at the number of times that Tesco had been inspected two years prior to the start of LOPP and the two and a half years subsequent to this.

Before LOPP (2 yrs pre 2005), there were seven proactive inspections across six premises. After LOPP, the two and a half years up to the end of March 2008, there had been four alternative enforcement questionnaires sent out and returned from four premises with no physical visits to any sites.

In this case there is evidence for less inspection of Tesco's premises since LOPP was introduced. However, it is not clear if the reduced number of inspections reflects the possibility that the Tesco premises have been assigned to a low risk category where less frequent inspections would be expected.

Chesterfield Borough Council

Here the health and safety team is structured around food safety (3EHOs) & health and safety (2.5FTE). Chesterfield is responsible for ~1,560 LA enforced premises. The LOPP organisation premises present in the area (and the risk rating scheme) is as follows: Tesco, 1 large store, 1 Tesco Express (B4), 1 B&Q (B3), 2 Greggs (shops) (C), and a couple of Royal Mail premises (B2 and C). The following table summarises the inspection history of these premises:

Organisation	Last inspection	Inspection rating	Next inspection
B&Q	2004	B3	???
Tesco – warehouse + shop floor	2001	B4	2006
Tesco - staff restaurant	2001	C	n/a
Tesco - baker	2004	B3	n/a
Tesco – butcher (nothing recorded)	???	???	???
Tesco – customer restaurant	2005	B4	2009
Greggs (1)	2004	B4	2009
Greggs (2)	2001	B4	2006 (not done)
Royal Mail (sorting depot)	2002	B4	
(joint with HSE)	2006	B1	
	Feb 2008	B2	2010
Royal Mail (office accommodation)	2003	C	2010

The limited data we looked at here seems to support the hypothesis that the inspection plans are driven by the risk scores only and that LOPP has had no impact on this.

Enfield Council

The story at Enfield seemed to be consistent with what we found elsewhere. In this case however they were able to point to the joint LA/HSE plan for how the London LAs (grouped according to quadrants: NE, NW, SE, SW) would tackle health and safety priorities. The '*LAs and HSE Partnership - London LAs Joint Workplan spreadsheet 2008/9*' is a comprehensive description of the priorities and how the HSE(FOD) and LAs will work together to address them. LOPP is only mentioned in this plan briefly and only in the context of Royal Mail. There is no reference to any of the other LOPP organisations even though the majority of them have premises in the areas covered by the plan.

On the basis of the evidence provided here, as well as the discussions during the interviews, we can draw the following conclusions:

- Local Authorities appear to be characterised by limited resources.
- The planned inspections are driven by HELA: Local Authority Circular LAC 67/1 Rev 3.
- There is no common understanding as to what LOPP actually means for LA inspectors despite the issuing of guidance from HELA.
- The action / engagement plans have not been well communicated (in some cases they have never been seen) and do not meet the needs of LA inspection planners. In some cases it is felt that they are misnomers in that they are not action plans but rather strategic statements.
- Generally there has been no (or limited) contact with the LOPP Account Managers but in any case it is not clear what the Account Managers role is.
- Over the period of interest since LOPP was initiated (October 2005), there has been good evidence of improved interaction and contact with the HSE but this has not been driven by LOPP.

Note that these conclusions need to be seen in the context of the slow development of LOPP plans impacting on Local Authority enforcement.

4.4 Analysis of COIN/FOCUS Data

The aim of this part of the evaluation was to look at the data HSE collect on their activities, to see if there is any evidence of the impact of LOPP on how they regulated the relevant companies. The relevant database is COIN, which also contains data migrated from the previous database, FOCUS. COIN is the HSE's national database for recording inspector interventions (proactive and reactive inspections, investigations, inspection report forms, etc) by organisation, premise location, and date.

The extraction and analysis of relevant data from COIN was supported by the HSE COIN team at Bootle in Liverpool and for this we are immensely grateful.

Detailed findings from our analysis are presented in Appendix C but the main findings are summarised here:

- We find that there has been no systematic change in the frequency of proactive inspections of premises managed by LOPP participating organisations. Some organisations have experienced an increase, some a decrease and some no change.
- From an analysis of the Inspection Report Form (IRF) returns we conclude that LOPP has not had a systematic impact on the topics covered during the inspections. The range of topics covered is reasonably consistent in each of the years for which we have material numbers of inspections.
- We conclude that these points suggest that in most cases, the LOPP initiative will take several years to filter down to changes in behaviour at the HSE inspector level.

4.5 Detailed case studies

We undertook two depth studies for BAE Systems and Tesco. These are reported in detail in Appendices D and E respectively. In this section we summarise and contrast the findings from these depth studies.

These organisations were selected for the detailed case studies as it was felt that they had travelled further down the 'partnership' journey than most of the other LOPP participants and they represented organisations with different regulatory leads. In both cases there had been an initiative in place prior to the LOPP initiative. In the case of BAE Systems this was the Multi-Site Large Organisation (MSLO)

joint initiative with the HSE which had started to generate health and safety intervention plans for key topics. In Tesco's case there had already been a 15 years Lead Authority relationship with Dundee City Council which was formalised in a Lead Authority Partnership Scheme (LAPS) in 1995.

It is generally accepted by both organisations that the existence of these previous relationships meant that they were able to progress faster than most during the LOPP.

In both cases there was strong support of health and safety management at Board level. This means the central health and safety management teams in both organisations were well motivated and resourced to ensure that the LOPP progressed well.

The level of Board support in both organisations was felt to be an important contributory success factor to the LOPP.

The nature of the activities, and the associated health and safety hazards and risks, faced by employees in both organisations are quite different.

In BAE Systems case the activities are highly technical in nature and involve heavy engineering across multiple buildings on large scale sites. The activities are highly bespoke reflecting the fact that the organisation is working in an environment where it needs to demonstrate flexibility. In this case good health and safety management demands local, coal-face involvement as the type of hazards faced and the appropriate controls are highly localised. BAE Systems recognise this and have had an extremely strong historical relationship with the industrial Trade Unions (TU) representing employees on the shop floor. Furthermore, their implementation of health and safety management activities in response to the LOPP was designed to explicitly involve the TU representatives both in developing the high level policies and key performance indicators for particular topics, and in developing local procedures for how they should be interpreted at specific site locations.

In Tesco's case the activities are essentially identical and replicated over all their sites (1,692 stores) which are themselves designed to be as similar as possible for operational efficiency reasons as well as to ensure a consistent customer experience. In this case there is far less need to have local input into how to manage particular hazards and risks and indeed it is not desirable to have differences in approach across their stores. Consequently the challenge is to agree a national approach on how best to manage the health and safety risks to employees and customers at their stores, and then ensure that this is implemented and adhered to locally. This is achieved by determining the national priorities and approach to health and safety management at head office and cascading this out to the organisation. At each store it is the responsibility of the Store Manager and the Compliance Manager to demonstrate adherence to these policies and procedures.

On the basis of the experience from these two organisations, we conclude that the level of employee and TU involvement required for good health and safety management depends on how different or bespoke the working environment and associated activities are at the coal face. The more differentiated the activities are at the coal-face the more important it is to ensure local employee engagement and involvement in decisions about health and safety management.

Both organisations reported that they felt relationships with the regulators had improved during the LOPP. Having a single point of contact was regarded as a good thing by both organisations although they had slightly different experiences of this.

In BAE Systems' case, the single point of contact with the HSE has worked extremely well. Development of the action plans has been undertaken jointly and in the spirit of partnership. Furthermore there was anecdotal evidence that the HSE Account Manager had been able to facilitate

access to HSE expertise on specific technical issues that would have taken the organisation some time and effort to determine for itself.

In Tesco's case it was felt that the LOPP helped to facilitate and coordinate interactions with the HSE for advice on particular issues as this was coordinated through the LOPP Account Manager. As far as interaction with Local Authorities was concerned however, this was seen as an evolving process. Whilst there was evidence that some LA inspectors were requesting information from the Account Manager in Dundee City Council, this was not always the case and some LA inspectors were still inspecting premises without being fully aware of the LOPP initiative. The implication is that while LOPP has been helping to encourage a more consistent regulatory approach to Tesco, the fact that there are about 400 separate LAs means that there is still some way to go before this can be fully realised.

The experience of the two organisations highlights the difficulties of developing a relationship with a single point contact with a single organisation (HSE) or with several hundred organisations (LAs).

4.6 Workshops

At the end of the main part of the evaluation, two workshops were held, the first with representatives from the LOPP organisations, and the second with regulators. Results from the breadth survey were presented to both workshops. Results from the analysis of COIN data were presented to the regulators' workshop only. In the second part of both workshops, key issues arising from the study were discussed and summarised. Here, we present a synthesis of the discussions arising during these workshops.

4.6.1 Organisations

The general consensus was that the findings of the breadth survey were a fair representation of organisations' experience and that the data, for the most part, was fair and sufficiently robust. It was accepted that the research is only intended to give a broad indication of the LOPP experience and what they can learn collectively rather than as individual organisations. Some concern was expressed about the lack of information behind some of the statistics, so it is important that they should not be over interpreted. It is for individual organisations to draw their own conclusions from the statistics and to use it to help inform messages and where they go from here.

In addition, the following specific points were made:

- **Perception of changes in health and safety performance.** Participants were surprised by the number of "don't knows" from regulators. Why don't they know? Is it because they don't have any benchmark? Are visits too infrequent? No feedback following visits? Are organisations not good at communicating their h & s performance? There is a need to have a better understanding of what lies behind the "don't know" responses, or people may draw the wrong conclusions.
- **Effective communications.** It was noted that organisations have a more favourable perception of the communications than do the regulators. Why is this? Are the organisations deluding themselves? It was also noted that again there was a considerable number of "don't knows".
- **On the question of resources,** it was generally agreed that the challenges are greater for LAs than for HSE, because of number of sites and distinct LAs. Lead LAs need more resources to carry out this role.

- There was **no control study** with non-LOPP HSE and LA inspectors. It would be useful to have had their perception of whether things were better or worse under LOPP.

Communication was one of the themes picked up in the broader discussions. Organisations have more effective communications with the HSE than with LAs. Moreover there is some way to go to produce an effective relationship between HSE and LAs. This evaluation reinforces the differences between them. More generally, LOPP needs to be better communicated on all fronts – at present the communication is too *ad hoc* and reactive. Action and engagement plans should be better communicated to all, and should be available centrally to regulators to help them plan better for visits. (For example, the LA Extranet has limited access, by password only.)

It is however not important for people at the coal face to recognise or understand LOPP, nor is there any value in attaching the LOPP tag to what they do. It is more important that Account Managers have confidence that the business unit knows about LOPP and that they ensure it is implemented locally.

Many LAs are still operating outside LOPP. They need a better steer and input from Account Managers. The published LOPP Plans should be used to get more co-operation and buy-in from LA inspectors. It was suggested that an HSE newsletter to the LOPP community would be a useful mechanism to enable more joined-up thinking, and the sharing of good practice.

A second focus of discussion was **the LOPP plans**. The following points were made.

- Engagement and Action Plans should be *separate* documents and should be kept centrally and be easily accessible to everyone. (See the point made above about the LA Extranet.)
- The format of the plans is not important - one size does not fit all. What is important is that they demonstrate key agreed actions, priorities and other relevant information. It was felt that an outline template or guidance as to the minimum content of the plans would be helpful.
- The LOPP Plan is often one of several other health and safety plans. It needs to be joined up with them and not seen as an addition.
- LOPP Plans have the advantage of a longer time horizon enabling a more strategic overview. Account Managers have a better understanding of this than inspectors. The challenge is how to better communicate this to all the regulators?

Another theme was **the difference LOPP has made within organisations**. There was strong disagreement with any suggestion that the breadth survey indicates that LOPP has made no real difference within organisations. LOPP has brought many benefits: a better working relationship with the regulator; more consistent interventions and common standards. The relationship with the Account Manager provides a single point of contact, clearer channels of communication and a conduit for advice and specialist support. It was also noted that the benefits of LOPP can flow through to business partners and the supply chain. There was therefore strong support for continuing with LOPP or alternative partnership arrangements.

Overall it was argued that to make LOPP work, **the key is personality**. The Account Manager must have the right qualities. There has to be a balance between the inspector role (policing) and the partner role, and within this it is important for the Account Manager to see himself or herself more as a partner than as an inspector. The best inspectors do not always make the best partners; the challenge for the HSE and the LAs is to identify Account Managers with the right qualities. Also essential for partnership are honesty, openness and continuity.

4.6.2 Regulators

Participants said that although the 'LOPP' name will be superseded (if for no other reason, then because it contains the word 'pilot'), the LOPP arrangements will continue to develop and advance where they are working well. The lessons of LOPP will be carried forward into future schemes. Examples were cited of organisations who were not part of LOPP but who nevertheless are working with regulators to put LOPP-like arrangements in place.

When presented with the breadth survey, participants expressed concern that the results would be distorted because the sample was not representative, but was biased towards those people more closely involved in LOPP. However some detailed discussions of the composition in particular cases showed that there was less bias of this type than initially feared.

An underlying theme of the workshop was the diversity of the LOPP engagements with the different organisations. These ranged from cases where LOPP built upon previously developed partnership arrangements through to those which were late in getting started to cases where for various internal reasons the organisations proved uninterested in building up a partnership. Because of this it was felt that aggregating breadth survey results across the organisations might not produce meaningful results. For the same reason, it was unlikely that a single, consistent LOPP picture would have emerged from the COIN analysis.

Various barriers to building up a partnership relationship were identified. Some organisations are reluctant to produce and then sign up to engagement plans, mistaking them for some form of contractual commitment. Often it takes several years to build up the level of trust required before organisations will understand what an engagement plan is and agree to develop one with the regulator. A barrier to partnership and developing plans for improvement in health and safety performance is that some organisations are sensitive to anything that might be taken as a criticism. They can think that talk of "improvement" suggests that their present performance is bad. Regulators should realise that in the end it may simply not be possible to build partnerships with all organisations, which does not mean that valuable partnerships cannot be developed with others.

Because of the autonomy of LAs, they do not have the same degree of central control that is available to the HSE. It takes only a few LAs who act contrary to the agreed LOPP procedures to damage the partnership. However, when challenged, those organisations who have complained about "maverick" LAs have been unable to specify numbers and details. To some extent the complaining organisations are authors of their own misfortune. The cause of inconsistent regulation can be their own inconsistent management.

LAs have tended to regulate in a mechanistic way, based upon HELA Risk Rating System scores. They are slowly being weaned off this approach, but some still cling to the old approach. The relationships between LAs and large organisations will be taken over by the new statutory "Primary Authority" scheme, to be run by the Local Better Regulation Office. This scheme will cover all aspects of regulation, not just health and safety. Experience from LOPP will be taken forward into this scheme.

5 Conclusions and Lessons Learned

The primary objective of this work has been to establish the lessons that can be drawn from the Large Organisations Pilot Partnership (LOPP) and what these might mean for the HSE and LAs for how they approach regulation of large organisations. We have found that in the LOPP, a key driver for successful interaction has been the extent to which a genuine partnership has been established. In particular we are able to structure the lessons according to the following chronological steps that are necessary in order to develop a partnership:

1. establishment and sustainability of relationships
2. engagement with relevant stakeholders
3. development of trust.

In the following text we highlight the lessons learned in coloured boxes. The narrative immediately before these boxes summarises the evidence collated in our research to support each lesson.

5.1 Establishment and sustainability of relationships

LOPP was seen by many as a natural extension of some pre-existing schemes and was an obvious development of the groundwork undertaken in these schemes. There was a general consensus that the overall approach was a good one and that it provided a useful template for developing relationships with large organisations in the future. The extent to which the participating organisations had been involved in these pre-existing schemes was a key driver of how well the organisation/regulator relationships developed during the LOPP. Those organisations that started the journey only when they joined LOPP did not develop their relationships as quickly as those where relationships and contacts had already been established.

Lesson 1: All parties regard LOPP as a useful construct or model for developing partnership between large organisations and health and safety regulators that builds on previous experience (e.g. Local Authority Partnership Scheme).

Whilst the overall approach was well received, the implementation at an individual organisation level needs to be carefully considered. On the basis of the evidence we have collected, we conclude that there is no one best way to regulate large organisations. One of the biggest drivers of the need to allow different approaches is the level of complexity and diversity in the structure and business activities within the organisation. At one end of the spectrum (e.g. BAE Systems) you have sites which are geared up to manufacture highly bespoke and immensely complicated engineering products. In addition, to remain competitive, the working environments in which such work is undertaken must remain flexible and configurable and consequently are changing on a regular basis. On the other hand, the business model for a Tesco or B&Q retail store is to have a set of highly repeatable and standard set of operations in stores and depots of similar design and layout, up and down the land. Standardisation of the operations helps to control costs but also ensures that the quality of customer experience is the same.

In the former case, in order to manage health and safety effectively, it will be necessary to undertake regular site and area specific risk assessments and for local staff to be involved both in undertaking the risk assessments and in implementing any associated risk controls. In the latter case, the business can undertake generic risk assessments and specify how these are to be managed locally.

The only local input that is necessary is to demonstrate that the risk controls specified are being implemented effectively.

It is clear from these two extreme cases that the regulator's approach to inspecting these sites should be different.

Lesson 2: A bespoke approach to developing partnership with large organisations is essential, given the spectrum of organisation types. Large, complex organisations with site specific challenges and local procedures demand a different approach to engagement in comparison to a large organisation which consists of identical activities and operations repeated at each site across the country.

In developing the relationship between the organisation and the regulator, the 'Account Manager' system (as adopted by LOPP) was judged as being a success. A single point of contact was seen as providing a clear communications channel and a conduit for advice and specialist support. This was especially the case for those organisations where the HSE was the regulatory lead. HSE Account Managers were able to coordinate and facilitate access to HSE technical and regulatory experts much more efficiently than if the organisation was doing it itself. For those organisations where Local Authorities were the regulatory lead, the single point of contact was also seen as a good idea but there were some concerns expressed about the effectiveness and consistency of communications with LAs through this single point of contact. This reflects the fact that LA Account Managers have to coordinate communications with over 400 separate LAs as opposed to a single organisation, which is the case for the HSE. From the regulator's perspective, having an equivalent single point of contact in the organisation was also regarded as a good thing as this allowed relationships to develop and mature at an individual and more personal level.

Lesson 3: The organisations regard establishment of a single point of contact (Account Manager) for managing the regulatory interface as a good thing. It simplifies lines of communication and facilitates efficient access to technical and regulatory expertise in the regulator.

For the 'Account Manager' approach to work, it was generally recognised that the role of the Account Manager, and their equivalent on the organisation side, was something that needed to be clearly defined and articulated for all relevant parties. This is particularly challenging for LA Account Managers - to ensure that the health and safety inspectors from over 400 LAs understand their role better and use them as a conduit for communications and engagement with the large organisations more consistently.

Lesson 4: The precise role of the Account Manager and their equivalent in the organisation should be made perfectly clear to all relevant parties from the start, and continually communicated throughout the partnership.

It was recognised that development of the relationships between the organisations and the regulators is critically dependent on the personalities and traits of the individuals charged with this responsibility; and that the reciprocal partnership envisaged by LOPP implies a relationship which is more open than

the traditional relationship between regulator and organisation and more understanding of the particular business context. This has implications for those individuals assigned as Account Managers, and their organisational equivalent. The regulators and the organisations should invest in developing a framework of competences expected of those who are selected on both sides of the partnership.

Lesson 5: The personalities and competences of the key individuals in both the regulator and organisation charged with establishing the partnership relationship are critical to the effectiveness of this single point of contact.

As indicated above, different organisations developed their relationships at different speeds. There are various reasons that contributed to this but for the relationships to develop successfully, there needs to be a general recognition on both sides of where they are starting from and, on the basis of this, where can they realistically be expected to get to in a specified time. This should set expectations on both sides and the objectives of the partnership development should be framed accordingly.

Whilst the published objectives for LOPP were unambiguous (see Section 2) the interpretation of what they meant and how they translated to the participating organisations were not. In particular, the objectives as specified could not be translated to measureable indicators of success. This lack of goal congruence meant that there were different and inconsistent expectations from LOPP and this had repercussions for effective communication and the development of the engagement plans, both of which are discussed below.

Lesson 6: There needs to be a common understanding on both sides of the partnership of the realistic objectives and expectations.

5.2 Engagement with relevant stakeholders

We found that where an opinion was given, most of the organisations involved in LOPP indicated that the Board supported it. There were two cases where there was apparent resistance to supporting the LOPP at Board level. This is not to say that these Boards were not supportive of health and safety management, but rather that they did not completely buy-in to the LOPP initiative. Unsurprisingly in these two cases, lack of support and resources meant that they did not develop relationships with the regulators as effectively as those majority of cases where Board support was indicated.

Lesson 7: Board level support helps to ensure that enough resources are invested in developing the relationship.

Initial communications about the LOPP initiative was not well done – particularly to LAs. This meant that LA inspector expectations about what LOPP meant to them was not necessarily informed by fact but rather by subjective interpretation. This does not align with one of the overall objectives to have a consistent and coordinated approach. At the time of the LOPP launch, there was very limited information available but in particular, there was no explicit guidance or instructions as to how inspectors would be affected by LOPP, nor of how it would impact on inspection activities.

Furthermore, so far as we can tell, there has never been any guidance produced that describes what a successful 'partnership' would look like, and the steps to attaining this.

On-going communications throughout the LOPP initiative has been mixed. In particular the role of the Account Manager on the regulatory side was unclear to the majority of inspectors with a strong perception that communication with Account Managers was very much of a one-way nature.

There is evidence that developing a relationship with the single regulatory organisation (i.e. the HSE) is easier than with multiple regulatory organisations (i.e. Local Authorities). When the regulatory lead is a Local Authority, communicating the engagement plan and associated communications in an effective manner is particularly challenging.

Lesson 8: There needs to be effective lines of communication established right from the start of the initiative and maintained throughout. Communications with the regulator needs to recognise the difficulties associated with coordinating activities with over 400 organisations (Local Authorities) as opposed to one organisation (HSE).

The engagement plans produced to date were extremely varied both in terms of content and detail. Some were essentially statements of how health and safety is managed by the respective organisation; others were concise summaries of the planned joint activities for current and future years. The consensus is that this is the key document around which the LOPP activities should have been communicated and managed. The lack of knowledge about available guidance on the minimum content needed for the engagement plans is indicative of the communication difficulties already highlighted. It would have been a legitimate outcome of the pilot for a consensus on the engagement plan contents. Unfortunately it would appear that different views about the status of the engagement plans meant that there was considerable divergence in the rate at which they were developed. Some organisations have still not agreed an engagement plan. In these cases there is some evidence that there was resistance to signing up to something that was perceived as having potential contractual or regulatory implications.

More attention should have been paid to developing the engagement plans early on in the pilot as with the correct content; this would have addressed directly the difficulties around agreeing common objectives and facilitated better communications between all parties.

Lesson 9: An engagement plan should form a core part of the communications strategy for the partnership by setting out overall objectives and expectations as well as providing information about the intended impact of the partnership on different stakeholders (i.e. how it affects their day job).

A surprisingly strong result from our study was the lack of awareness of the relative health and safety performance of the LOPP organisations. Whether this is down to the organisations not publishing the health and safety performance in a readily accessible form, or reflects the possibility that the regulators have not looked for it, is unknown. Whatever the reason, we believe that a common understanding and awareness of such information is a fundamental requisite for development of any sort of partnership.

Lesson 10: The engagement plan should be structured as two documents: (1) engagement strategy, and (2) engagement activities, and there should be an agreed set of minimum contents including health and safety performance of the organisation.

We have already indicated that a bespoke approach to developing partnership should be adopted. In those organisations where the business activities are complex and site-specific, local engagement with employees should be pursued.

Lesson 11: Where the organisation activities are complex, diverse and site specific, active engagement with the local work force will result in increased buy-in to the partnership.

5.3 Development of trust

The rate at which partnerships developed within LOPP depended to a large extent on whether or not there was a pre-existing relationship in place. In addition to this it was impeded if there was lack of 'goal congruence' with respect to the objectives from the initiative resulting in delays to the development of the engagement plans.

Lesson 12: Both sides need to recognise that developing a partnership takes time and investment from both parties.

Developing the previous point, the development of relationships during the LOPP was also critically dependent on the individuals on both sides charged with developing the relationships. At the first level, the relationship is developed between these individuals and inevitably will take time to mature. Consequently, any disruption to this relationship such as an individual changing job, can have a disproportionate impact on the development of relationships between the organisations.

Lesson 13: Continuity of relationships is important in developing trust and this has implications for selection of individuals charged with developing the relationship.

One way to undermine the development of a partnership is to have an inconsistent approach to regulation of the organisation and/or inconsistency in the way the business responds to this approach. This is a particular challenge for Account Managers where Local Authorities have the regulatory lead.

Lesson 14: Consistency in regulation and consistency in business response to regulation are a requirement for trust development.

The final lesson is really drawn from the BAE Systems case study but is consistent with the other evidence we have collected for this study. In this case the seriousness that BAE Systems management had placed on good health and safety management was evidenced through reference to

anecdotal tales of particular events, personal experience and involvement in some of the safety management decisions. This level of personal involvement and engagement reinforced the workers' belief that some good was being done.

Lesson 15: The organisation can encourage worker trust in the partnership arrangement by actively involving them in the initiative and demonstrating progress against the agreed objectives through measureable action/activity.

Appendix A – Breadth Survey – LOPP Questionnaire

Here we present the questions used in the breadth survey. In practice, not all the questions were posed to every participant – some questions are clearly conditional on previous responses. Similarly, some questions were only posed to regulators, others only to the organisations. These ‘rules’ are not described here.

CONTEXT

1. Do you work for...

The Health & Safety Executive
A local authority
Or a company?

2. And are you any of the following?

LOPP Account Manager
LOPP Account Director
LOPP company counterpart to Account Manager
No, none of these

3. If any of the above, how long have you held this role?

Years Months

4. Which of the following best describes your role in your organisation in relation to health and safety?

HSE inspector
Local Authority Inspector
Company health and safety department head
Company board member responsible for health and safety
Employee health and safety representative
Trade Union health and safety representative
Health and safety officer

Other (please specify)

5. And how long have you held this role?

Years Months

6. Is health and safety your primary role within the organisation you work for?

Yes
No

7. What is your job title?

ENTER HERE

8. And how long have you held this role?

Years Months

Q9. Which of these organisations do you work for/inspect.

Asda

Astra Zeneca

B&Q

BAA plc

BAe Systems

BOC Group

General Electric

Grampian Foods

Greggs

HBOS

Northern Foods

Rolls Royce

Royal Mail

Tesco

10a. How has health and safety performance in the company changed over the past two or three years?

Marked improvement

No change

Has got worse

Don't know

10b. How has health and safety performance in (ANSWER TO Q9 – REPEAT FOR EACH COMPANY MENTIONED) changed over the past two or three years?

Marked improvement

No change

Has got worse

Don't know

11. Has your company changed its health and safety management system (organisation and arrangements) over the past 2 to 3 years?

Yes

No

Don't know

LOPP AWARENESS

12. The Health and Safety Executive (HSE) began a new initiative with some large organisations 2½ years ago with an aim to form better partnerships with large organisations to improve health and safety, and better partnerships between HSE and local authority (LA) inspectors to improve co-ordination of inspections. This initiative may be known under a different name in your organisation but its official name is Large Organisations Partnership Pilot or LOPP. Which of these comes closest to describing your understanding and experience of this initiative which we will refer to as LOPP from here on?

I fully understand what LOPP is and how it affects the organisation I inspect/work for
I know about LOPP but I do not know exactly how it affects the organisation I inspect/work for
It's just a name I've heard but I know very little about it.
Never heard of it

LOPP INVOLVEMENT

13. How has LOPP changed your workload?

My workload has increased
There has been no change to my workload
My workload has decreased

14. Do you have sufficient time to support LOPP?

Yes
No

14. How much of your time, as a proportion of your work, is currently contact time – i.e. interactions with ALL duty holders (please provide an estimate if necessary).

___%

15. What proportion of your contact time is currently taken up with activities associated with LOPP (please provide an estimate if necessary)

___%

16. How do you account for how your working time is spent?

Weekly timesheet
Manual diary
Other
I don't

17. Do you have more contact (visits/letters/tel calls/emails etc) with (NAME OF ORG INSPECTED AT Q9 – REPEAT QUESTION FOR EACH AT Q9) as a result of LOPP or less, or is it about the same as other large organisations that are not LOPP partners?

More
About the same
Less
Don't know
Not applicable – haven't inspected non LOPP orgs

18. And are the number of planned visits more, less, or are they about the same as a result of LOPP compared with large non LOPP organisations you inspect?

- More
- About the same
- Less
- Don't know

19a. How effective are communications between HSE staff with regard to LOPP?

- Very effective
- Fairly effective
- Not very effective
- Not effective at all
- Don't know

19b. How effective are communications between LA staff with regard to LOPP?

- Very effective
- Fairly effective
- Not very effective
- Not effective at all
- Don't know

19c. How effective are communications between HSE and the LAs with regard to LOPP?

- Very effective
- Fairly effective
- Not very effective
- Not effective at all
- Don't know

20. How effective are communications between yourself and (ORG AT Q9 – REPEAT FOR EACH ORG AT Q9) with regard to LOPP.

- Very effective
- Fairly effective
- Not very effective
- Not effective at all
- Don't know

21. How effective are communications between (ORG AT Q9) and the HSE inspectors with regard to LOPP.

- Very effective
- Fairly effective
- Not very effective
- Not effective at all
- Don't know
- Not applicable – not inspected by HSE

22. And how effective are communications between (ORG AT Q9) and local authority inspectors with regard to LOPP.

- Very effective
- Fairly effective
- Not very effective
- Not effective at all
- Don't know
- Not applicable – not inspected by local authority

22a. How effective are communications within your organisation with regard to LOPP?

- Very effective
- Fairly effective
- Not very effective
- Not effective at all
- Don't know

23. One of the first stages of LOPP is for the large organisations and the appropriate regulator to agree an Action Plan which sets out what the health and safety priorities are to be, and how and when inspections will be carried out.

Are you aware that such an Action Plan exists in the organisation which you work for?

[OR – if regulator responding:](#)

'Are you aware that an Action Plan exists in (ORG NAME FROM Q9).

- Yes
- No

24. And how much do you know about the contents of the Action Plan?

- A great deal
- A fair amount
- Not very much
- Nothing at all

25. And which of the following topics does the Action Plan cover? (Tick as many as are applicable)

- Priority topics for health and safety in the organisation
- Programme of general inspections
- Programme of specific, topic-based inspections
- Regular meetings between company and inspectors
- Other (please specify)
- Don't know

26. To what extent were you involved in or consulted on the development of the Action Plan?

- Closely involved
- Limited involvement
- No involvement

27 Were you satisfied or dissatisfied with the amount of involvement or consultation you had?

Very satisfied
Fairly satisfied
Fairly dissatisfied
Very dissatisfied
Don't know

28. To what extent do you agree or disagree that the topics in the Action Plan are the right ones for the organisation concerned?

Strongly agree
Tend to agree
Neither agree nor disagree
Tend to disagree
Disagree strongly
Don't know

29. How clear is your own role in relation to the Action Plan?

Very clear
Quite clear
Not very clear
Not clear at all
Don't know

30. Is there a clear link between the Action Plan and what is actually happening in the organisation?

Clear link to plan
Actual activities not related to plan
Don't know

LOPP IMPACT

31. To what extent do you agree or disagree that LOPP has significantly improved relationships between regulators and large organisations?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Disagree strongly
- Don't know

32. Please think back now to before the LOPP initiative was launched in the large organisation that you inspect/work for and indicate to what extent you agree or disagree with the following statements. (Agree strongly, tend to agree, neither agree nor disagree, tend to disagree, disagree strongly)

- Inspections under LOPP are more frequent than they were before LOPP.
- Inspections under LOPP are less structured.
- LOPP inspections tend to concentrate on specific issues when they occur.
- The coordination of visits by LA and HSE inspectors is worse under LOPP.
- There is an effective single channel of communication between the regulator and the company
- LOPP has worsened relationships between the organisations and the regulators.
- LOPP has improved partnership working

Not applicable – did not work for/inspect the organisation before LOPP

33. Has your company changed its health and safety management system (organisation and arrangements) in response to LOPP?

- Yes
- No
- Don't know

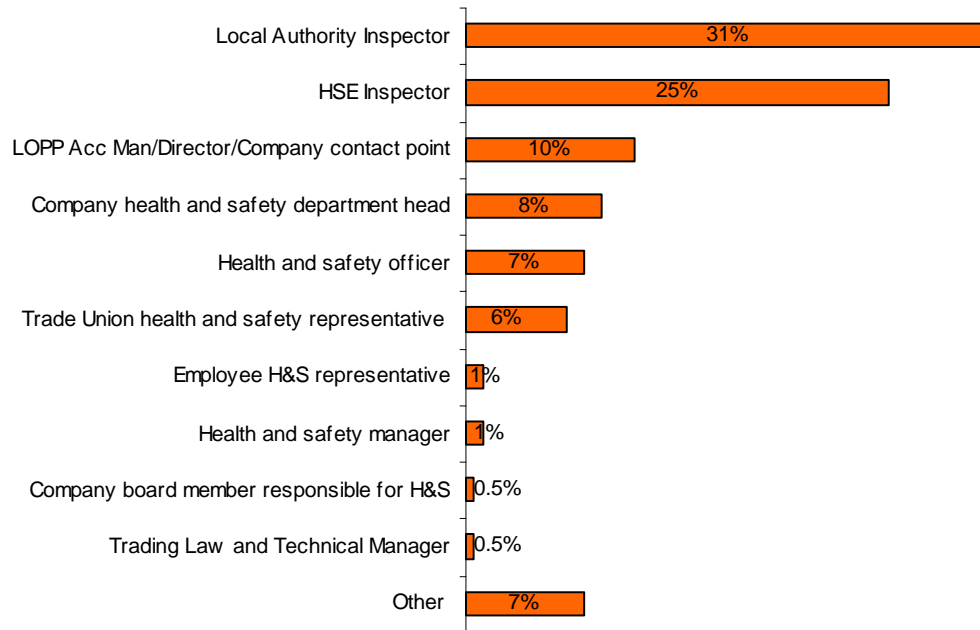
34. Thank you for your views so far. If you would like to suggest ways in which LOPP could be improved please enter them here.

35. Your responses are important to us and to help us get as full a picture as possible of the impact of LOPP we may find it useful to talk to you again. If you are happy to be re-contacted, please provide your details.

Appendix B – Breadth Survey Results

The distribution of sample types is discussed in detail in Section 4.2. One of the first questions in the survey explored the role of respondents to the survey. The chart below shows the distribution of roles.

Chart 1: Q4 Which of the following best describes your role in your organisation in relation to health and safety?



Base: all respondents

Respondents were asked how long they had been in their current role. This ranged from less than 6 months to more than 10 years and on average it was 9 years and 1 month as nearly a third of respondents (31%) have been in their current role for more than 10 years. The table below shows that HSE inspectors are the most likely to have been in their roles long term.

Table C.1: Q5 How long have you been in this role?

Length of time	Total (347) %	HSE (102) %	LA (117) %	Company (128) %
Less than 6 months	1	-	-	2
6 mths to 1 year	6	3	6	9
1 yr 1 mth to 2 yrs	12	4	9	20
2 yrs 1 mth to 3 yrs	12	11	12	13
3 yrs 1 mth to 4 yrs	7	3	5	12
4 yrs 1 mth to 5 yrs	5	1	9	4
5 yrs 1 mth to 8 yrs	13	22	12	6
8 yrs 1 mth to 10 yrs	13	11	16	13
10 yrs 1 mth+	31	46	31	21
Average time	9 yrs	12 yrs	9 yrs	7 yrs

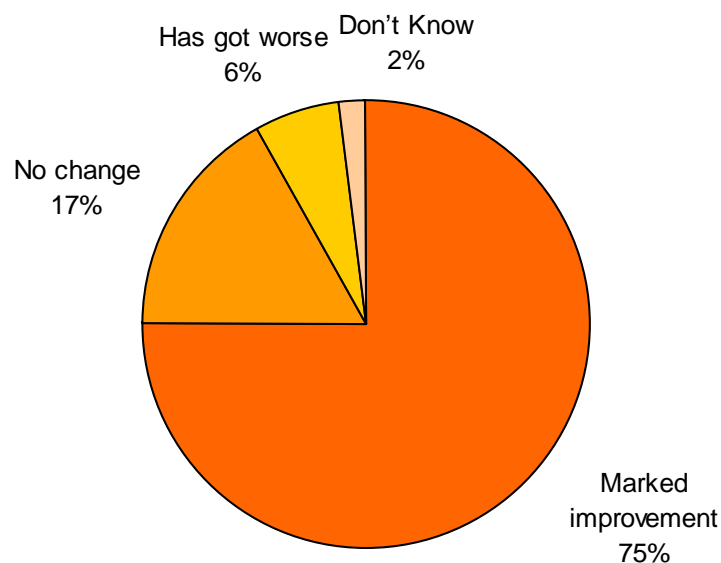
Base: all respondents

Most respondents (80%) indicated that health and safety was their primary role within the organisation they worked for.

Change in health and safety Over the Past 2-3 years

Company representatives and inspectors were asked separately how health and safety performance had changed over the past 2-3 years. The company employees' responses are shown in the chart below with the majority saying that they think there has been a marked improvement.

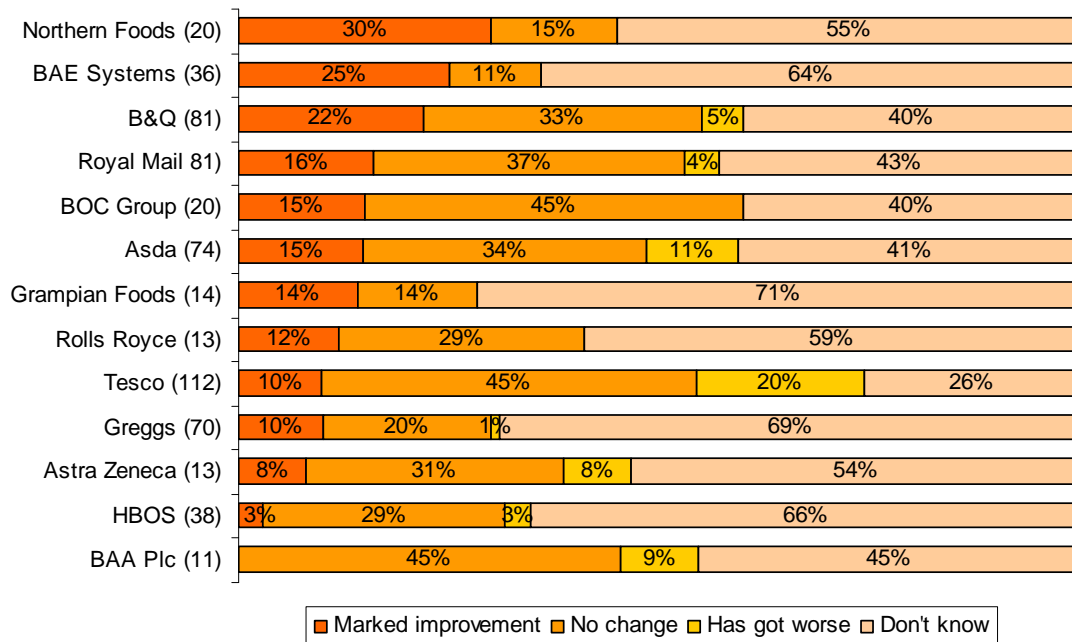
Chart 2: Q10a How has health and safety performance changed over the past two or three years?



Base: all who work for a company (128)

When the same question was asked of the HSE and LA inspectors the picture was very different and the high proportion of 'Don't know' responses are of particular note.

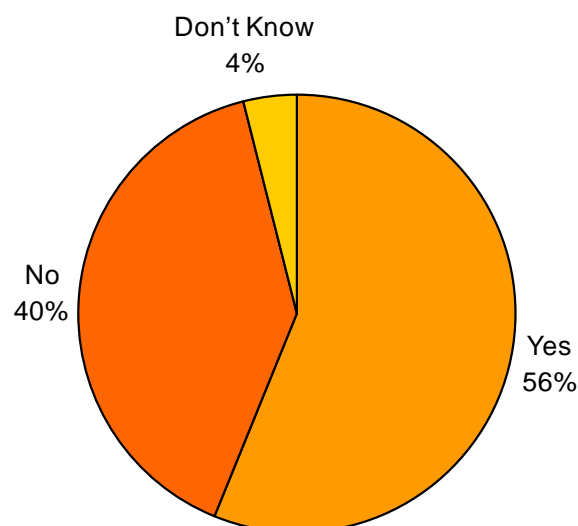
Chart 3: Q10b How has health and safety performance in the company changed over the past two or three years?



Base: all HSE and LA inspectors

A subsequent question, only asked of company employees, aimed to see if they had noticed any change in the health and safety system over the same period. As the chart below indicates, just over a half had noticed this.

Chart 4: Q11 Has your company changed its health and safety management system (organisation and arrangements) over the past 2 to 3 years?

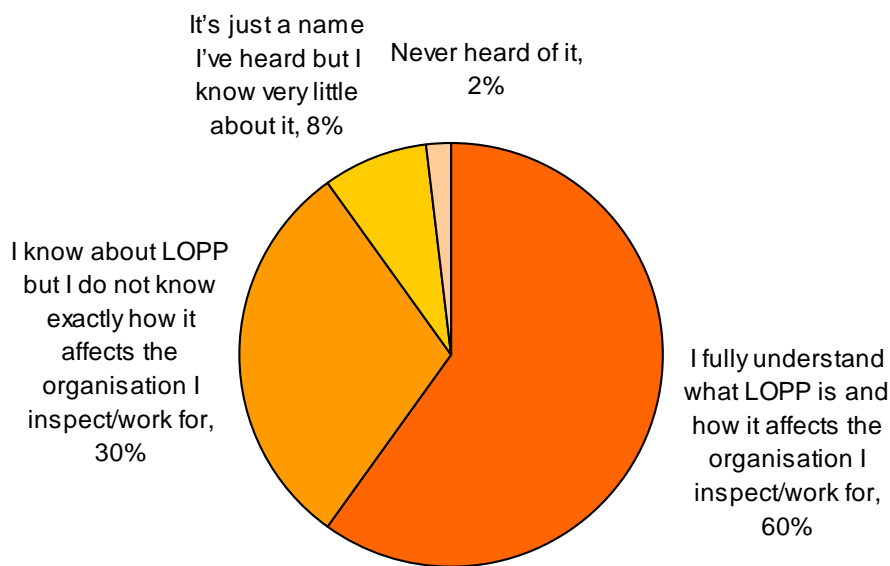


Base: all who work for a company (128)

Knowledge of LOPP

A little way into the survey respondents were asked their knowledge of LOPP, but the question was worded in such a way as to ensure that even those who did not know the initiative as 'LOPP' would still be able to answer the question. As the chart below indicates only one in ten either knew very little or had never heard of it and at this point the survey ended for them.

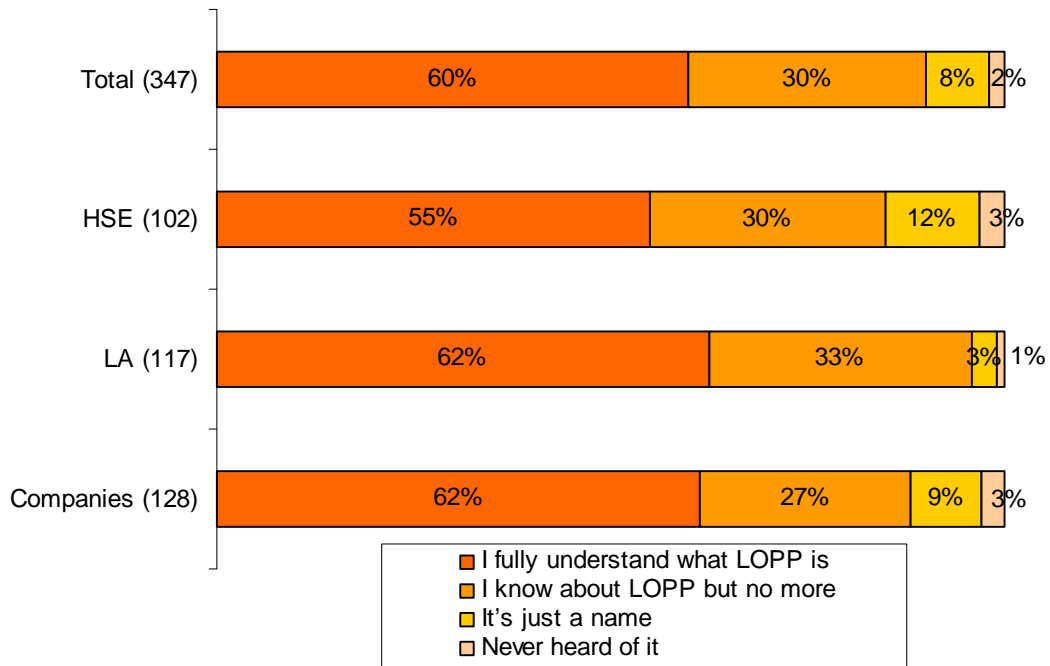
Chart 5: Q12 The Health and Safety Executive (HSE) began a new initiative with some large organisations 2½ years ago with an aim to form better partnerships with large organisations to improve health and safety, and better partnerships between HSE and local authority (LA) inspectors to improve co-ordination of inspections. This initiative may be known under a different name in your organisation but its official name is Large Organisations Partnership Pilot or LOPP. Which of these comes closest to describing your understanding and experience of this initiative which we will refer to as LOPP from here on?



Base: all respondents (347)

When broken down by type of respondent the results are quite similar to one another.

Chart 6 Knowledge of LOPP by type of organisation

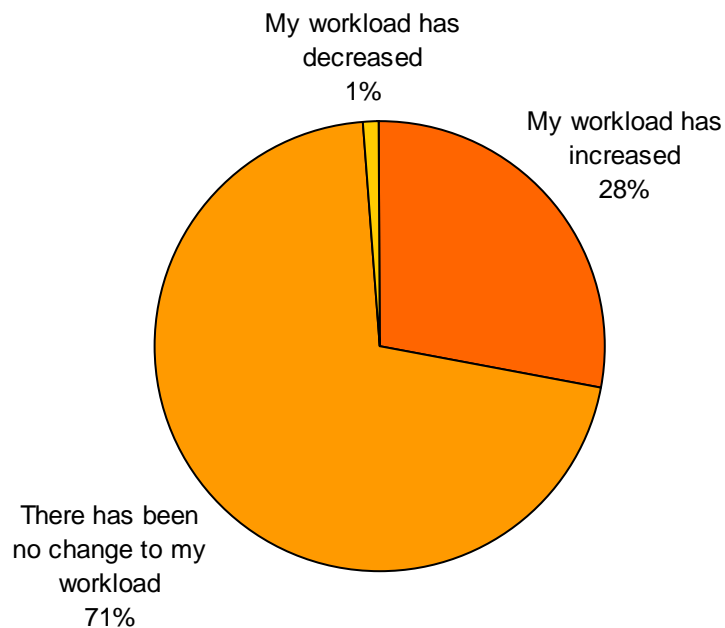


Base: all respondents (347)

How Much Time LOPP Uses

Those who fully understood or knew something about LOPP were asked how it affected their workload. As the chart below indicates, the majority indicated that nothing has changed, although over a quarter (28%) say that it has increased workload.

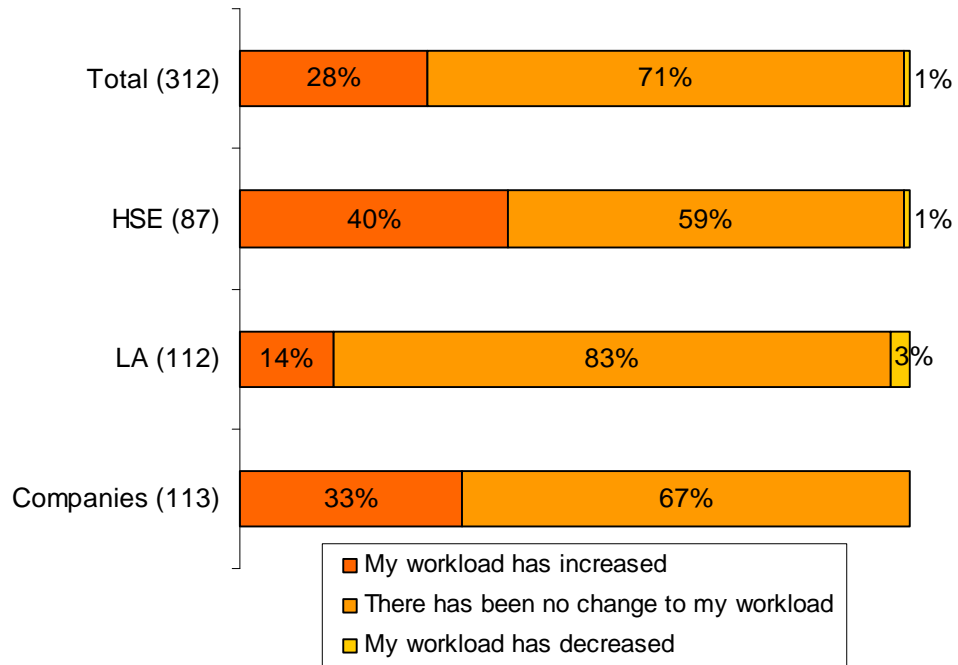
Chart 7: Q13 How has LOPP changed your workload?



Base: all aware of LOPP (312)

Quite a difference can be seen by type of respondent as chart 8 below indicates with LA inspectors much more likely than HSE inspectors or company employees to say no change has occurred and much less likely to say their workload has increased.

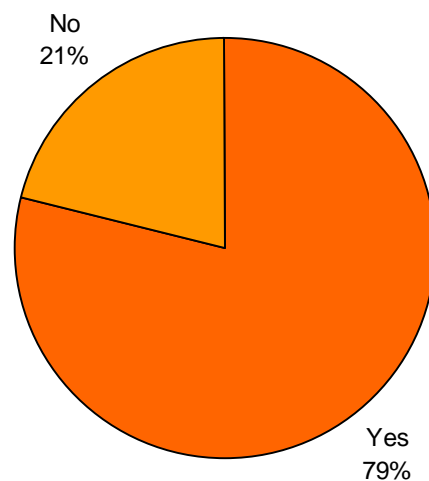
Chart 8: How LOPP has changed workload by type of organisation



Base: all aware of LOPP (312)

Most respondents (79%) considered that they had sufficient time to support LOPP.

Chart 9: Q14a Do you have sufficient time to support LOPP?



Base: aware of LOPP (312)

Inspectors were asked how much time, as a proportion of their work, is contact time with all duty holders (not just LOPP organisations). The table below indicates that HSE inspectors have much less contact time (27% on average) as a proportion of their work, than LA inspectors (an average of 42%).

Table C.2: Q14b How much of your time, as a proportion of your work, is currently contact time – i.e. interactions with ALL duty holders (please provide an estimate if necessary)

Proportion of work	Total (199) %	HSE (87) %	LA (112) %
Less than 10%	18	17	19
10-19%	10	13	7
20-29%	17	32	5
30-39%	9	11	7
40-49%	10	11	9
50-59%	17	8	23
60%+	20	7	29
Average % of time	35	27	42

Base: All HSE and LA inspectors aware of LOPP

The next question asked what proportion of contact time is currently taken up with LOPP activities. This time there was little to compare between the two regulator bodies, the majority of respondents in both authorities saying that less than 10% of their contact time is taken up with LOPP, averaging just over 5%.

Table C.3: Q15 What proportion of your contact time is currently taken up with activities associated with LOPP (please provide an estimate if necessary)?

Proportion of contact time	Total (199) %	HSE (87) %	LA (112) %
Less than 10%	85	82	88
10-19%	8	13	4
20-29%	3	2	3
30-39%	2	1	2
40-49%	1	1	1
50-59%	1	-	2
60%+	1	1	1
Average % of contact time	5	5	6

Base: All HSE and LA inspectors aware of LOPP

Accounting for Time

HSE and LA inspectors have different ways of accounting for their working time with a good proportion of LA inspectors (20%) not accounting for it at all and most HSE inspectors (80%) using a timesheet compared to less than a third of LA inspectors (31%).

Table C.4: Q16 How do you account for how your working time is spent?

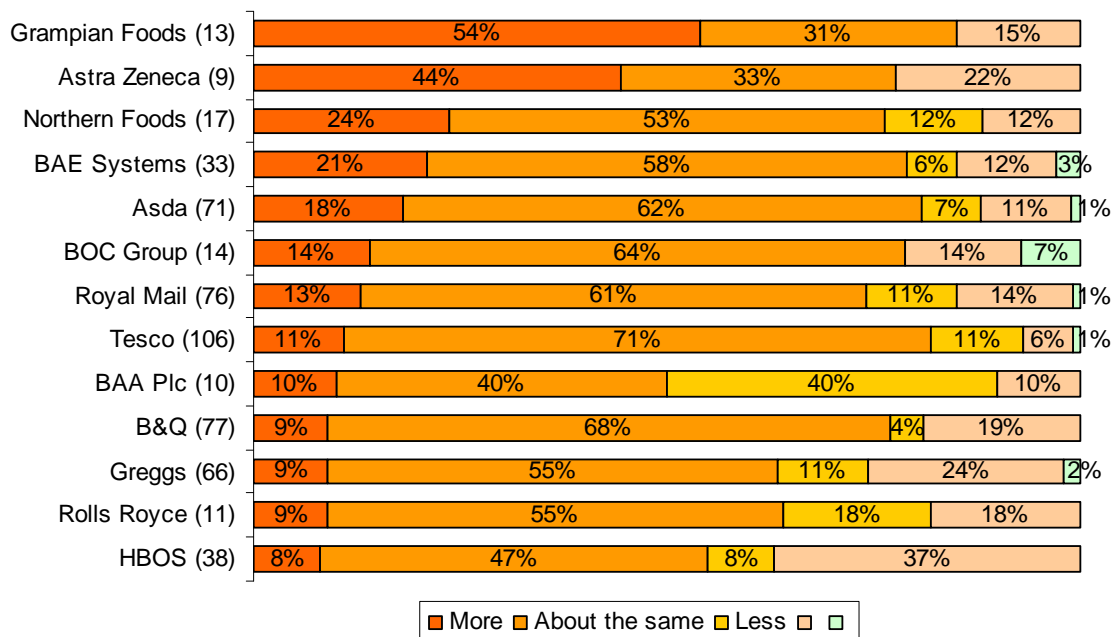
Proportion of contact time	Total (199) %	HSE (87) %	LA (112) %
Weekly timesheet	53	80	31
Manual diary	21	11	28
Other	23	7	35
I don't	15	8	20

Base: All HSE and LA inspectors aware of LOPP

Contact and Visits Under LOPP

HSE and LA inspectors were asked whether they have more contact under LOPP than they had before LOPP. As the chart below indicates this alters significantly depending on the company. Some inspectors (represented in green in the chart) had not visited non LOPP companies so could not draw any comparison.

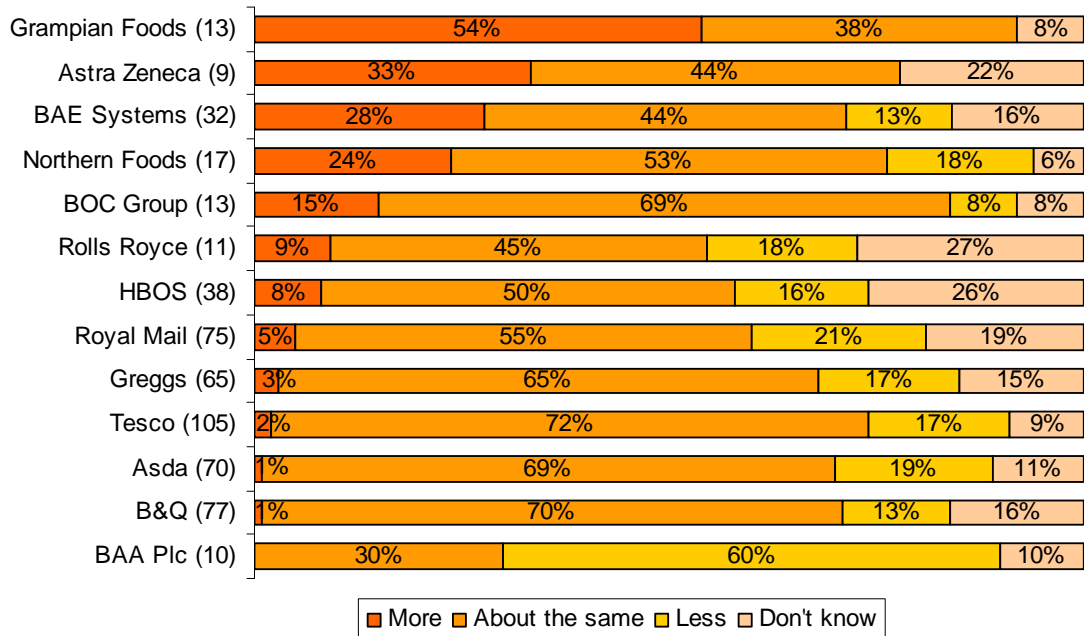
Chart 10: Q17 Do you have more contact (visits/letters/tel calls/emails etc) with the LOPP company as a result of LOPP or less, or is it about the same as other large organisations that are not LOPP partners?



Base: all HSE and LA inspectors aware of LOPP (bases in brackets after each company in the chart)

The follow-on question looked at the number of visits and as the chart below shows, while there are differences by company inspected, only Greggs have a higher proportion suggesting visits have increased than suggesting the number of visits has not altered.

Chart 11: Q18 And are the number of planned visits more, less, or are they about the same as a result of LOPP compared with large non LOPP organisations you inspect?

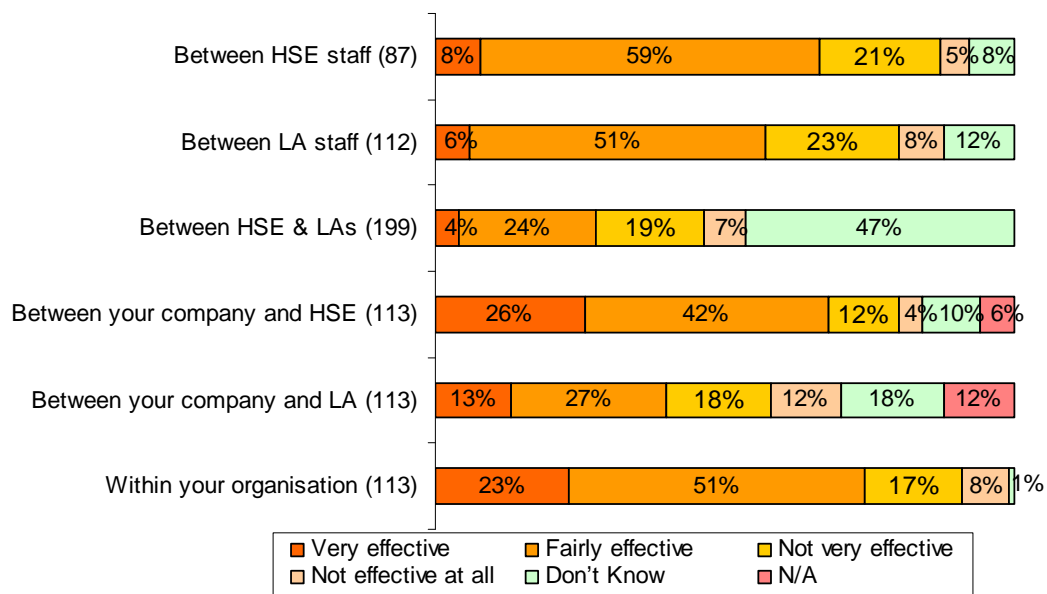


Base: all HSE and LA inspectors aware of LOPP except those who have not visited non LOPP companies (bases in brackets after each company in the chart)

Communications

A series of questions were asked of different respondents about communication and the results are shown in the chart below. As one might expect, internal communications about LOPP are the most effective, particularly within the LOPP companies (74% very or fairly effective) and between HSE staff (67%). However, internal communication between LA staff at 56% very or fairly effective, is less effective than communication between LOPP companies and HSE inspectors (68% very or fairly effective). The least effective communication was between HSE and LA inspectors (28% effective). If we remove the 'don't knows' and 'not applicables' communication between HSE and LAs is still the least effective (52% very or fairly effective) behind 57% effective between your company and LA.

Chart 12: Q19-22 How effective are communications...



Base: all aware of LOPP

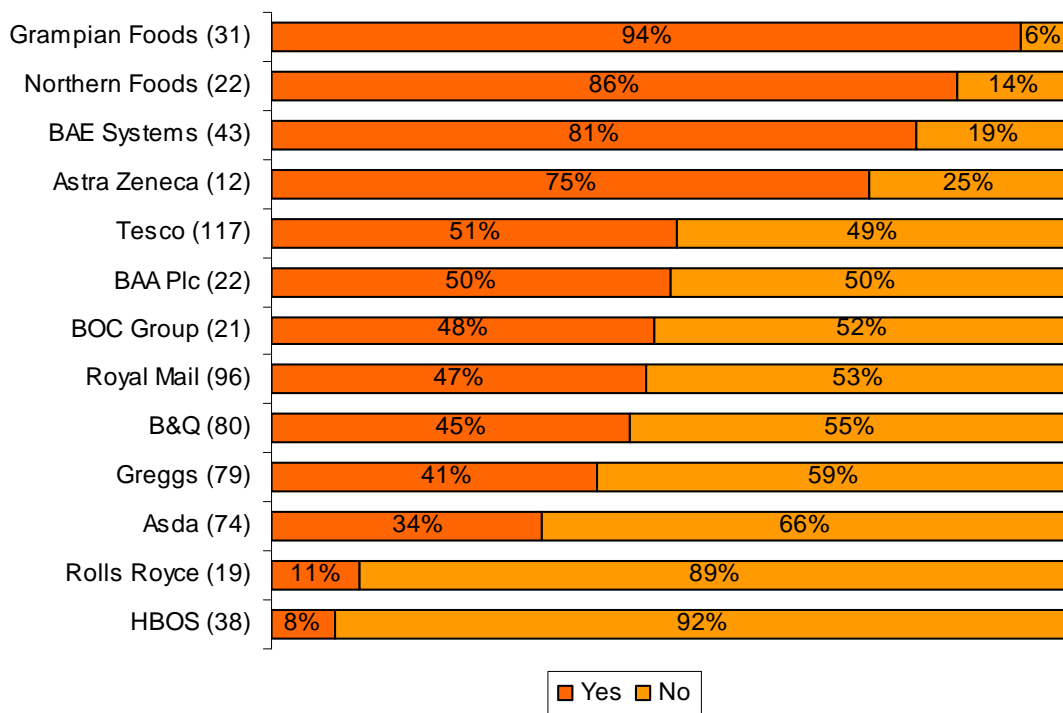
The LOPP Action Plan

One of the first stages of LOPP is for the large organisations and the appropriate regulator to agree an Action Plan which sets out what the health and safety priorities are to be, and how and when inspections will be carried out. The survey asked a number of questions about this to ascertain the plans existence and respondents’ knowledge of it.

Knowledge of the Action Plan’s existence

The first question in the series was knowledge of the plan’s existence. As the chart below indicates, responses range from 8% (HBOS, but remember that this is only inspectors – no company employees from HBOS took part in the survey) to 94% in the case of Grampian Foods.

Chart 13: Q23 One of the first stages of LOPP is for the large organisations and the appropriate regulator to agree an Action Plan which sets out what the health and safety priorities are to be, and how and when inspections will be carried out. Are you aware that such an Action Plan exists in the organisation which you work for/inspect?



Base: all aware of LOPP

Table C.5 looks at the knowledge of an Action Plan's existence broken down by type of sample. Note the small sample sizes in some companies so that a high proportion may indicate only a small number of people. With the exception of BAA (and HBOS where no employees took part to enable comparison), company employees are more likely to be aware of an Action Plan than the inspectors, either HSE or LA. LA inspectors are the least likely to be aware of an Action Plan in all the companies they inspect.

Table C.5 Awareness of an Action Plan by sample type.

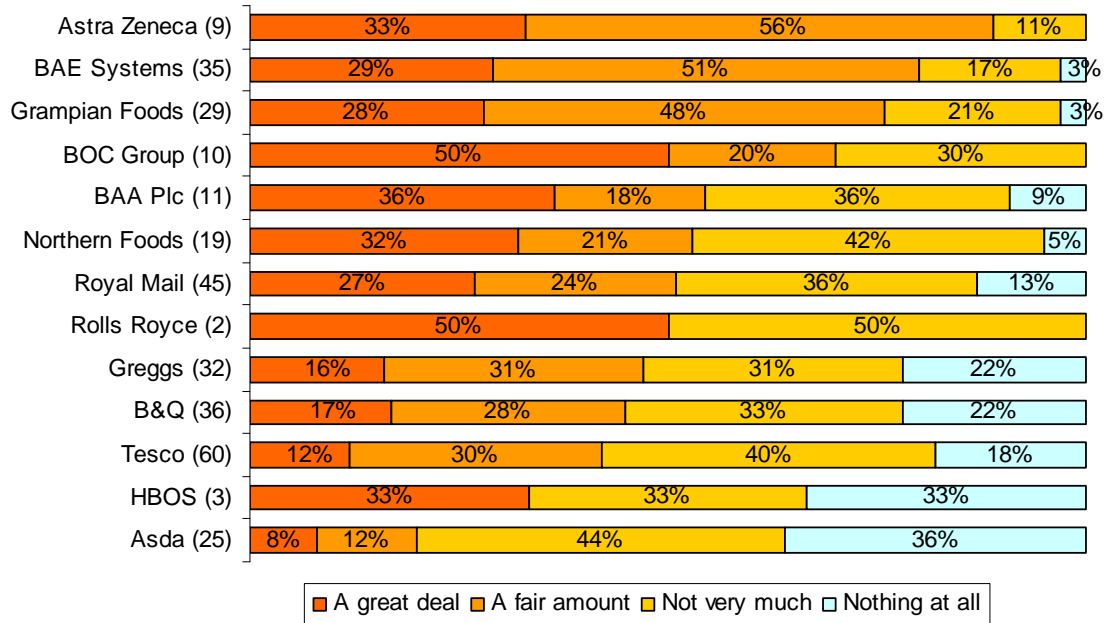
	HSE inspectors			LA inspectors			Company employees		
	(Base)	Yes	No	(Base)	Yes	No	(Base)	Yes	No
Asda	(6)	33%	67%	(65)	32%	68%	(3)	67%	33%
Astra Zeneca	(9)	67%	33%				(3)	100%	
B&Q	(2)	100%		(75)	41%	59%	(3)	100%	
BAA	(10)	70%	30%				(12)	33%	67%
BAE Systems	(33)	76%	24%				(10)	100%	
BOC Group	(12)	42%	58%	(2)		100%	(7)	71%	29%
Grampian	(11)	91%	9%	(2)	50%	50%	(18)	100%	
Greggs	(7)	100%		(59)	20%	80%	(13)	100%	
HBOS	(2)		100%	(36)	8%	92%			
N. Foods	(15)	87%	13%	(2)	50%	50%	(5)	100%	
Rolls Royce	(11)		100%				(8)	25%	75%
Royal Mail	(11)	55%	45%	(65)	35%	65%	(20)	80%	20%
Tesco	(6)	83%	17%	(100)	46%	54%	(11)	82%	18%

Base: all who are aware of LOPP

How much is known about the contents of the Action Plan

Those who knew of the Action Plan’s existence were asked how much they knew about its contents. The chart below is ranked on the combined ‘a great deal’ and ‘a fair amount’ proportions. Again, low base sizes should be noted as some proportions are represented by very few people.

Chart 14: Q24 And how much do you know about the contents of the Action Plan?



Base: all who know about the existence of an Action Plan

Table C.6 again looks at distribution by sample type. Since it is not possible to put a four part scale on 3 samples in one table, Table 6 uses mean scores where A great deal = 3 and Nothing at all = 0 so the higher the mean score the more respondents are aware of the contents of the Action Plan. A similar pattern in awareness of the existence of the Action Plan is apparent here. With three exceptions the company employees are the most likely to have knowledge of the contents of the Action Plan compared with either of the inspector groups. With the exception of Tesco where LA and HSE inspectors have an equally low level of knowledge, the HSE inspectors know more than their LA counterparts.

Table C.6 Knowledge of contents of the Action Plan by sample type.

	HSE inspectors		LA inspectors		Company employees	
	(Base)	Mean	(Base)	Mean	(Base)	Mean
Asda	(2)	2.5	(21)	0.7	(2)	2.0
Astra Zeneca	(6)	2.2			(3)	2.3
B&Q	(2)	2.0	(31)	1.2	(3)	3.0
BAA	(7)	1.7			(4)	2.0
BAE Systems	(25)	2.0			(10)	2.1
BOC Group	(5)	2.4			(5)	2.0
Grampian	(10)	2.3	(1)	1.0	(18)	1.9
Greggs	(7)	1.1	(12)	0.8	(13)	2.1
HBOS			(3)	1.3		
N. Foods	(13)	1.6	(1)	1.0	(5)	2.4
Rolls Royce					(2)	2.0
Royal Mail	(6)	2.0	(23)	1.1	(16)	2.3
Tesco	(5)	1.2	(46)	1.2	(9)	2.4

Base: all who know about the existence of an Action Plan

Knowledge of what's in the Action Plan

All who knew a great deal or a fair amount about the contents of the Action Plan were asked which of a number of different topics were covered in it. We are now looking at only a few people so base sizes are very low indeed as very few respondents are aware of the contents of the Action Plan, and findings should be treated with caution. From these findings it is clear that most who know about the contents of the Action Plan say that it contains priority topics for health and safety in the organisation or company. In four companies no respondents think the Action Plan contains a programme of general inspections.

Table C.7: Q25 And which of the following topics does the Action Plan cover?

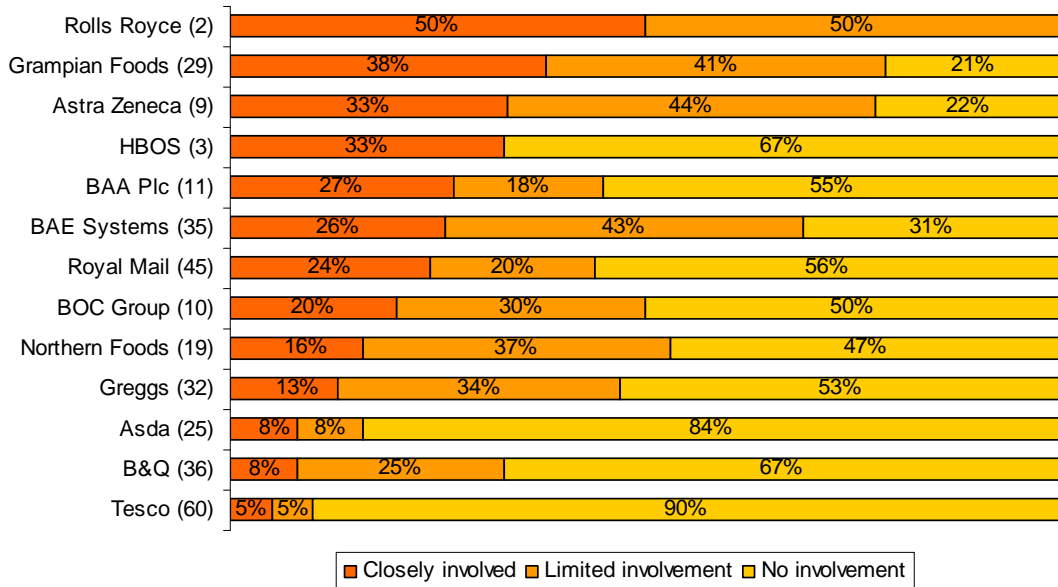
	Priority topics for health and safety in the org.	Prog. of general inspections	Prog. of specific topic based inspections	Regular meetings between company and inspectors	Other
Asda (2)	100%		50%	50%	
Astra Zeneca (5)	100%	40%	60%	60%	20%
B&Q (2)	100%			100%	
BAA (4)	100%		50%	50%	
BAE Systems (19)	89%	16%	95%	53%	5%
BOC Group (4)	100%	50%	100%	50%	25%
Grampian (8)	88%	13%	100%	38%	
Greggs (3)	100%	33%	67%	67%	
N. Foods (6)	100%	67%	67%	50%	17%
Royal Mail (4)	100%	25%	25%		
Tesco (1)	100%		100%	100%	

Base: all who know a great deal or fair amount about the contents of the Action Plan

Extent to which respondents were involved in the development of the Action Plan

Those aware of the existence of an Action Plan were asked to what extent they were involved in or consulted on the development of the Plan. Chart 16 is ranked by close involvement.

Chart 15: Q26. To what extent were you involved or consulted in the development of the Action Plan?



Base: all who know about the existence of an Action Plan

Table C.8 looks at distribution by sample type. This table has 'yes' and 'no' where 'yes' is close or limited involvement and 'no' is no involvement.

Table C.8 Involvement in the development of the Action Plan.

	HSE inspectors			LA inspectors			Company employees		
	(Base)	Yes	No	(Base)	Yes	No	(Base)	Yes	No
Asda	(2)	50%	50%	(21)	5%	95%	(2)	100%	
Astra Zeneca	(6)	83%	17%				(3)	66%	34%
B&Q	(2)	100%		(31)	23%	77%	(3)	100%	
BAA	(7)	57%	43%				(4)	25%	75%
BAE Systems	(25)	64%	36%				(10)	80%	20%
BOC Group	(5)	60%	40%				(5)	40%	60%
Grampian	(10)	70%	30%	(1)		100%	(18)	89%	11%
Greggs	(7)	29%	71%	(12)	17%	83%	(13)	85%	15%
HBOS				(3)	33%	67%			
N. Foods	(13)	46%	54%	(1)		100%	(5)	80%	20%
Rolls Royce							(2)	100%	
Royal Mail	(6)	33%	67%	(23)	9%	91%	(16)	100%	
Tesco	(5)	20%	80%	(46)	7%	93%	(9)	22%	78%

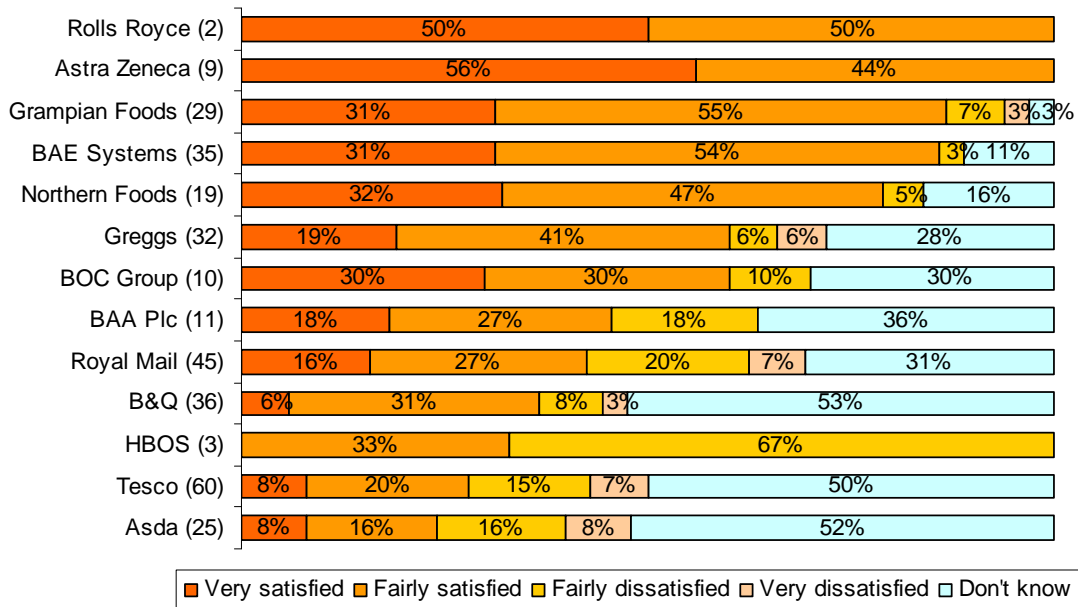
Base: all aware that an Action Plan exists

Those without any involvement were asked why that was the case. The primary reason given was that it was someone else's responsibility.

Satisfaction with involvement in the Action Plan's development

Satisfaction with involvement or consultation respondents had was mixed. Again we are dealing with quite small sample sizes so large proportions equates to only a few people in some cases.

Chart 16: Q27. Were you satisfied or dissatisfied with the amount of involvement or consultation you had?



Base: all who know about the existence of an Action Plan

We can provide a breakdown by sample type based on mean scores where very satisfied = 3 and very unsatisfied = 0 so the higher the mean score the more satisfied respondents are with the amount of consultation or involvement they had in the formulation of the Action Plan. While sample sizes are indeed small it is the LA inspectors who are aware of an action plan who are least likely to be satisfied with the amount of consultation or involvement they had in what went into it.

Table C.9 Satisfaction with the amount of consultation in the Action Plan by sample type.

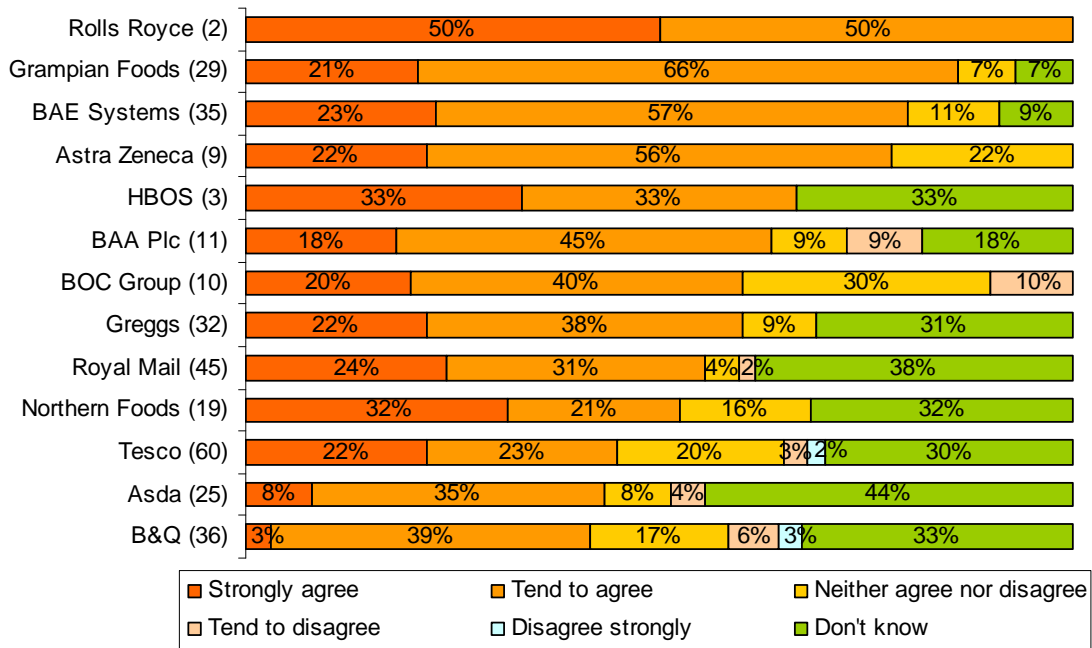
	HSE inspectors		LA inspectors		Company employees	
	(Base)	Mean	(Base)	Mean	(Base)	Mean
Asda	(2)	1.5	(21)	1.3	(2)	3.0
Astra Zeneca	(6)	2.5			(3)	2.7
B&Q	(2)	2.5	(31)	1.6	(3)	2.3
BAA	(7)	1.8			(4)	3.0
BAE Systems	(25)	2.4			(10)	2.2
BOC Group	(5)	3.0			(5)	1.8
Grampian	(10)	2.4	(1)	2.0	(18)	2.1
Greggs	(7)	2.2	(12)	1.4	(13)	2.2
HBOS			(3)	1.3		
N. Foods	(13)	2.5	(1)	2.0	(5)	2.0
Rolls Royce					(2)	2.5
Royal Mail	(6)	2.3	(23)	1.3	(16)	1.8
Tesco	(5)	2.3	(46)	1.2	(9)	2.4

Base: all who know about the existence of an Action Plan

Whether the topics in the Action Plan are right for the company

The next chart looks at respondents' agreement that the topics in the Action Plan are the right ones for the company concerned. Again the base is the minority of respondents who are aware that an Action Plan exists and there are a high level of 'don't knows' since clearly not all will know what is in the Action Plan. The chart is ordered by the combined 'strongly agree' and 'tend to agree' scores.

Chart 17: Q28. To what extent do you agree or disagree that the topics in the Action Plan are the right ones for the organisation concerned?



Base: all who know about the existence of an Action Plan

Looking at different sample types by mean score has the added advantage of excluding 'don't knows' since the mean is only calculated on the precodes given. The mean score is calculated by awarding +2 to Strongly agree and -2 to Disagree strongly, so any positive mean score means a higher proportion agree than disagree and the higher the positive score, the more the respondents agree that the topics in the Action Plan are right. All mean scores are positive but again, company employees are more positive than inspectors and in all but Tesco the HSE inspectors are the same or more positive than their LA counterparts.

Table C.10 Agreement that the topics in the Action Plan are the right ones, by sample type.

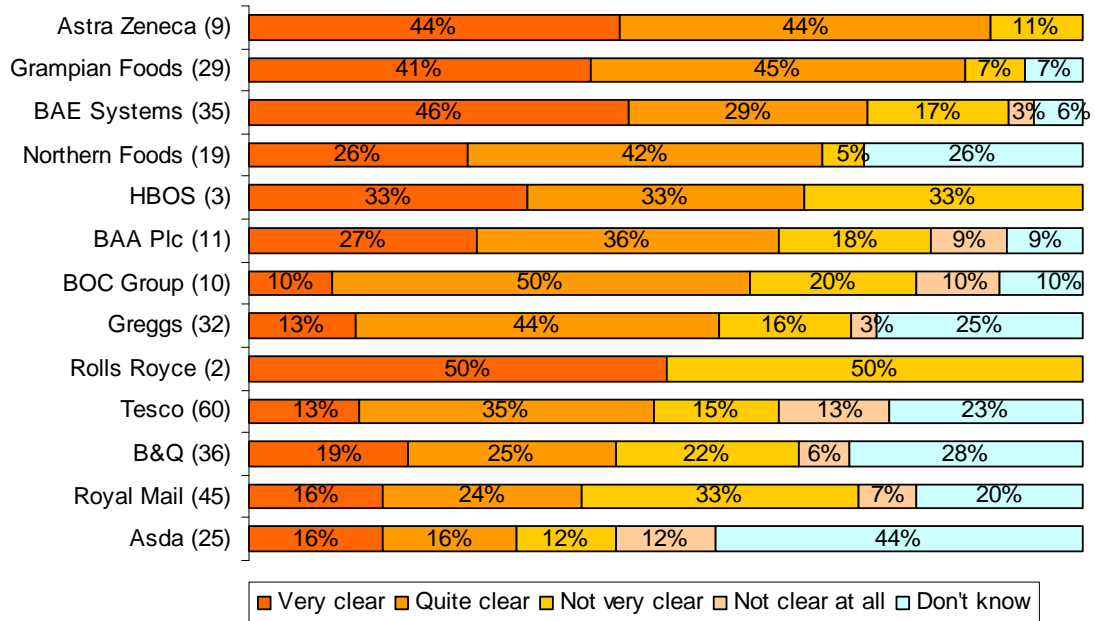
	HSE inspectors		LA inspectors		Company employees	
	(Base)	Mean	(Base)	Mean	(Base)	Mean
Asda	(2)	1.0	(21)	0.8	(2)	1.0
Astra Zeneca	(6)	0.8			(3)	1.3
B&Q	(2)	1.0	(31)	0.4	(3)	0.7
BAA	(7)	0.7			(4)	1.3
BAE Systems	(25)	1.0			(10)	1.4
BOC Group	(5)	0.6			(5)	0.8
Grampian	(10)	1.1	(1)	1.0	(18)	1.2
Greggs	(7)	1.3	(12)	0.8	(13)	1.3
HBOS			(3)	1.5		
N. Foods	(13)	1.0	(1)	1.0	(5)	1.8
Rolls Royce					(2)	1.5
Royal Mail	(6)	1.3	(23)	1.1	(16)	1.3
Tesco	(5)	0.3	(46)	0.7	(9)	1.6

Base: all who know about the existence of an Action Plan

Clarity in respondents' roles in relation to the Action Plan

Most are more positive than negative about the clarity of their own role in relation to the Action Plan.

Chart 18: Q29. How clear is your own role in relation to the Action Plan?



Base: all who know about the existence of an Action Plan

Table C.11 looks at clarity of role in the Action Plan by sample type using mean scores where very clear = 3 and Not clear at all = 0 so the higher the mean score the greater the clarity. In the main LA inspectors are again the least likely to think their role in the Action Plan is clear.

Table C.11 Clarity of respondents' roles in the Action Plan, by sample type.

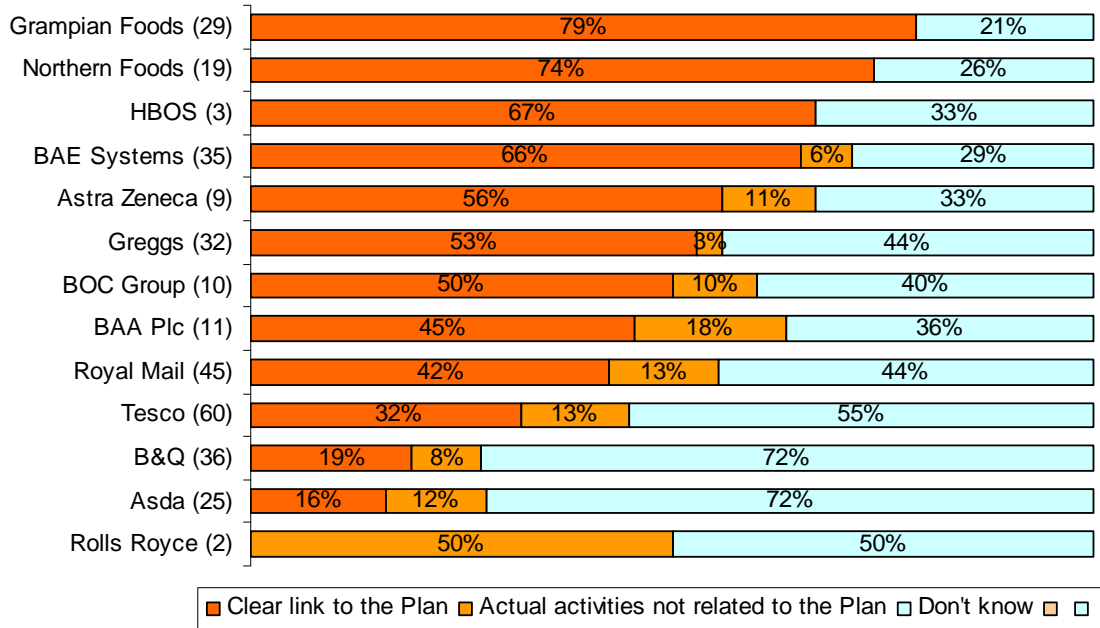
	HSE inspectors		LA inspectors		Company employees	
	(Base)	Mean	(Base)	Mean	(Base)	Mean
Asda	(2)	3.0	(21)	1.5	(2)	2.0
Astra Zeneca	(6)	2.3			(3)	2.3
B&Q	(2)	2.0	(31)	1.7	(3)	2.3
BAA	(7)	2.0			(4)	1.8
BAE Systems	(25)	2.2			(10)	2.4
BOC Group	(5)	2.0			(5)	1.4
Grampian	(10)	2.3	(1)	2.0	(18)	2.4
Greggs	(7)	2.5	(12)	1.4	(13)	2.1
HBOS			(3)	2.0		
N. Foods	(13)	2.2	(1)	2.0	(5)	2.5
Rolls Royce					(2)	2.0
Royal Mail	(6)	1.7	(23)	1.6	(16)	1.6
Tesco	(5)	0.3	(46)	1.5	(9)	2.4

Base: all who know about the existence of an Action Plan

Whether there is a clear link between the Action Plan and what actually happens

The final question regarding Action Plans sought to find out whether what actually goes on has a clear link to what is set out in the Action Plan. Only a small proportion of respondents suggest there is no link between the two but there are a high proportion throughout who don't know enough to give a view.

Chart 19: Q30. Is there a clear link between the Action Plan and what is actually happening in the organisation?



Base: all who know about the existence of an Action Plan

The link between Action Plan and action is looked at by sample type in Table 10. If the 'yes' and 'no' don't equal 100%, the shortfall is accounted for by 'don't knows' which are not shown in the Table 10 due to lack of space. Company employees are more likely than either the HSE or LA inspectors that the Action Plan reflects what actually happens.

Table C.12 Whether there is a clear link between the Action Plan and what actually happens, by sample.

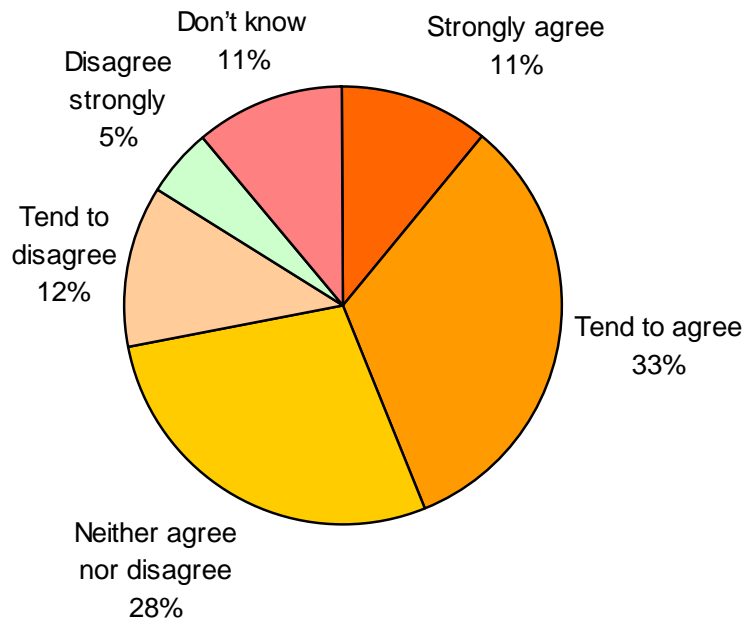
	HSE inspectors			LA inspectors			Company employees		
	(Base)	Yes	No	(Base)	Yes	No	(Base)	Yes	No
Asda	(2)			(21)	14%	14%	(2)	50%	
Astra Zeneca	(6)	50%					(3)	67%	33%
B&Q	(2)		50%	(31)	16%	3%	(3)	67%	33%
BAA	(7)	43%	29%				(4)	50%	
BAE Systems	(25)	56%	4%				(10)	90%	10%
BOC Group	(5)	20%					(5)	80%	20%
Grampian	(10)	70%		(1)	100%		(18)	83%	
Greggs	(7)	43%		(12)	25%	8%	(13)	85%	
HBOS				(3)	67%				
N. Foods	(13)	69%		(1)	100%		(5)	80%	
Rolls Royce							(2)		50%
Royal Mail	(6)	50%	17%	(23)	26%	4%	(16)	63%	25%
Tesco	(5)	20%		(46)	22%	17%	(9)	89%	

Base: all who know about the existence of an Action Plan

The Impact of LOPP

Everyone aware of LOPP was asked to what extent they agreed that LOPP has significantly improved relationships between the inspectors and the companies. As the chart below shows, more agreed than disagreed but more than a quarter (28%) neither agreed nor disagreed and the remainder didn't know.

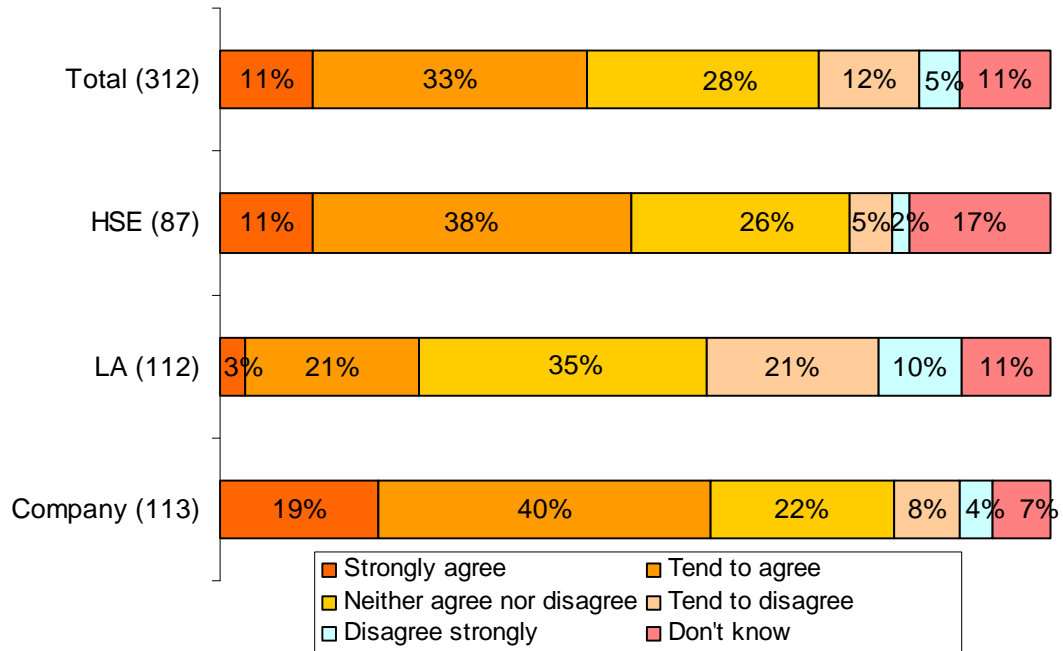
Chart 20: Q31 Overall to what extent do you agree or disagree that LOPP has significantly improved relationships between regulators and large organisations?



Base: all who are aware of LOPP (312)

When looked at by sample type, company employees are more positive than HSE or LA inspectors with the latter being the most likely to disagree.

Chart 21: Q31 Agreement that LOPP has significantly improved relationships between regulators and large organisations, by sample type



Base: all who are aware of LOPP

Towards the end of the survey respondents were presented with a number of statements and asked to think back to before LOPP was launched in the large company that they inspect or work for and indicate to what extent they agreed with each of the statements. The table below indicates net scores, that is the proportion either agreeing strongly or tending to agree (having removed those not applicable) minus the proportion tending to disagree or disagreeing strongly. Thus a positive net score means more agreement than disagreement, a negative net score more disagreement than agreement and a zero score an equal amount of agreement and disagreement. The 'don't knows' are not factored in to net scores but they form a high proportion of responses so the net scores are sometimes based on only a few people.

Table C.13 Agreement with statements about LOPP (net scores)

	Asda (56) %	Astra Zeneca (10) %	B&Q (67) %	BAA (17) %	BAE Systems (36) %	BOC (18) %	Grampian (25) %
Inspections under LOPP are more frequent than they were before LOPP.	-34	30	-31	-41	28	-28	24
Inspections under LOPP are less structured.	-36	-50	-28	-41	-61	0	-48
LOPP inspections tend to concentrate on specific issues when they occur.	20	50	13	41	11	11	48
The coordination of visits by LA and HSE inspectors is worse under LOPP.	-18	-10	-7	-41	-31	-22	-36
There is an effective single channel of communication between the regulator and the company	-4	60	-4	24	50	61	68
LOPP has worsened relationships between the organisations and the regulators.	-21	-60	-21	-24	-61	-33	-56
LOPP has improved partnership working	13	40	6	24	53	39	76

Base: All aware of LOPP except not applicables

Table C.13 Agreement with statements about LOPP (cont.)

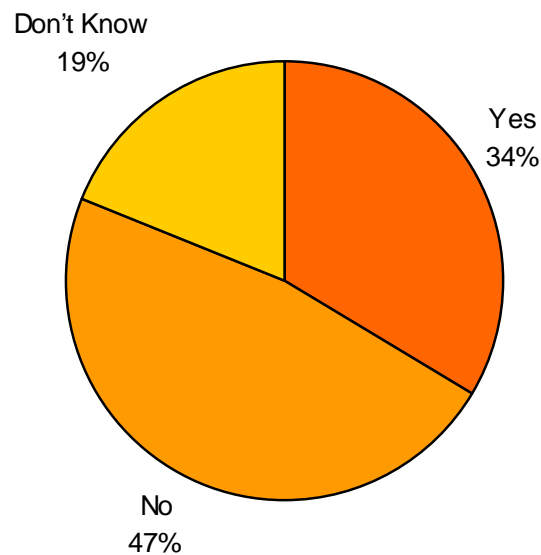
	Greggs	HBOS	Northern Foods	Rolls Royce	Royal Mail	Tesco
	(55) %	(26) %	(19) %	(18) %	(80) %	(89) %
Inspections under LOPP are more frequent than they were before LOPP.	-20	-19	-5	-28	-21	-38
Inspections under LOPP are less structured.	-29	-15	-63	0	-38	-31
LOPP inspections tend to concentrate on specific issues when they occur.	13	0	42	6	25	26
The coordination of visits by LA and HSE inspectors is worse under LOPP.	-5	0	-37	-11	-21	-4
There is an effective single channel of communication between the regulator and the company	9	0	32	17	0	-9
LOPP has worsened relationships between the organisations and the regulators.	-16	-15	-42	-33	-19	-9
LOPP has improved partnership working	18	4	47	6	23	2

Base: All aware of LOPP except not applicables

The base sizes become too small to look at the agreement with these statements by different sample group.

To round up the questionnaire a key question was left to last, asked only of company employees, about whether the company has changed its health and safety management system (organisation and arrangements) in response to LOPP? Clearly if a company was already working with the HSE or LA inspectors in a way that is similar to LOPP not much change would be needed, but in many cases it would. As the chart below clearly shows while a third indicate that changes have occurred, nearly half say the this has not happened and a fifth do not know.

Chart 22: Q33 Has your company changed its health and management system (organisation and arrangements) in response to LOPP?



Appendix C – Analysis of COIN/FOCUS Data

The aim of this part of the evaluation was to look at the data HSE collect on their activities, to see if there is any evidence of the impact of LOPP on how they regulated the relevant companies. The relevant database is COIN, which also contains data migrated from the previous database, FOCUS.

Selection and Extraction of Data

The first question addressed was: how are the LOPP companies represented in COIN. COIN has fields with company names and site names. Sometimes these refer to the company as a whole and sometimes to subsidiaries. For each company, we decided which of the names belonged to it – these may be approximations, but we believe that we have produced representations of the company that allow us to get a good picture of the associated regulatory activity. Based on the company definitions, we produced COIN outputs, the form of Excel spreadsheets for the nine LOPP companies whose Account Managers were provided by the HSE: BAE Systems, Grampian Foods, BAA, AstraZeneca, Greggs, BOC, Northern Foods, Rolls Royce, and Royal Mail.

We then decided it would be useful to have at least two non-LOPP companies as controls. For this purpose we selected Associated British Foods (ABF) and Corus. ABF is broadly similar to the food companies in the LOPP sample: Grampian Foods, Greggs and Northern Foods. Corus is somewhat comparable to the manufacturing companies BAE Systems and Rolls Royce.

The data extracts for the different companies were carried out on different dates. The later extracts contained data extending to later dates than those for the earlier extracts. However all extracts included data up to 31 March 2008, and this was chosen as the cutoff point for inclusion in the analyses described below.

Choice of Data for Analysis

Within the datasets, regulatory activities were represented in two ways: as “cases” and as “service orders” (SOs). Within the cases we used the COIN field HSE_CAT_DESC to identify the type of activity associated with each case. The descriptors used in this field are the following:

- complaints
- enforcement
- inspection
- partners/stakeholders
- permissioning
- poor performer
- project
- non-RIDDOR
- RIDDOR

In looking for the effect of LOPP, we looked at the cases categorised as “inspection”, these being the majority of the proactive activities of the HSE. We found that the “inspection” category was used only in the last two financial years: 2006/7 and 2007/8, apart from three cases in the latter half of 2005/6, the earliest of which was opened in November 2005. The beginning of the use of cases to record inspections therefore coincides with the start of LOPP in October 2005 – although the restriction of inspection cases to the last two years also applies to the two non-LOPP controls.

We classified the SOs recorded in COIN by the descriptors in the field, HSE_SERVICE_TYPE. These are:

- assessment
- enforcement
- investigation
- miscellaneous
- inspection
- IRF other
- IRF construction.

“IRF” stands for “Inspection Report Form”. We chose as our measure of HSE proactive activity the number of SOs under the descriptors “inspection”, “IRF other”, or “IRF construction”.

Within COIN, a single SO identifier number can be represented by a number of lines, each line corresponding to a separate activity within the SO. When counting numbers of inspections recorded against SOs, we count the identifier numbers and not the individual lines.

There is some overlap between the SO and case lists. Some, but not all, SOs have cases associated with them. Several SOs can be associated with one case, but each SO is associated with at most one case. Not all cases are associated with SOs. A small number of case identifiers found in the SO data do not occur in the case data.

Table C.1 below shows the breakdown of all cases, across all nine companies, into the case types and into whether or not they are associated with SOs. Overall about as many cases are associated with SOs as are not. However within the “RIDDOR” type (comprising just over half the total) the majority are associated, whereas the opposite is the case for all the other types. When a similar breakdown was made by company rather than case type, no pattern emerged. The split was scattered apparently randomly around 50:50. This table also shows which case types have been used often, and which have been used only rarely.

Case Type	Associated with at least one SO?		Type Total
	No	Yes	
Complaints	202	74	276
Enforcement	238	115	353
Inspection	135	107	242
Non-RIDDOR	7	1	8
Partners/Stakeholders	7	3	10
Permissioning	110	46	156
Poor Performer		1	1
Project	6	2	8
RIDDOR	449	895	1344
Total	1154	1244	2398

Table C.1. Breakdown of Cases, Across all Companies

Table C.2 shows similar figures for SOs. Overall around 66% of SOs are not associated. For the most used type, namely inspection, this rises to around 95%, while for investigations the figure drops to 36%.

SO Type	Associated with a Case		Type Total
	No	Yes	
Assessment	185	225	410
Enforcement	349	413	762
Inspection	4243	235	4478
Investigation	1360	2459	3819
IRF Construction	9	1	10
IRF Other	600	135	735
Miscellaneous	5	14	19
Total	6751	3482	10233

Table C.2. Breakdown of SOs, Across all Companies

In the analysis that follows, the measure of the amount of regulatory activity of a particular type is the number of cases or SOs. We would have liked to look at the time spent on activities, particularly inspections, for evidence that LOPP is making them more focussed and less time-consuming. However, with the exception of IRF discussions, COIN has not been used to keep time-recording data, so this analysis was not possible.

Instead our measure of activity was the number of inspections carried out. This was defined by first adding together, for each financial year and for each company, the number of inspection SOs and the number of inspection cases. From this number we then subtracted the number of inspection cases associated with one SO or more – to avoid double counting. Therefore if, say, five inspection SOs were associated with an inspection case, this would count as five inspections (but not six). An inspection case without associated SOs would count as one inspection.

Numbers of Inspections

The numbers of inspections defined as described above are shown on Figure C.1, broken down by FY, and then within each year by company. (Note BAE Systems is represented as BAe in the figures).

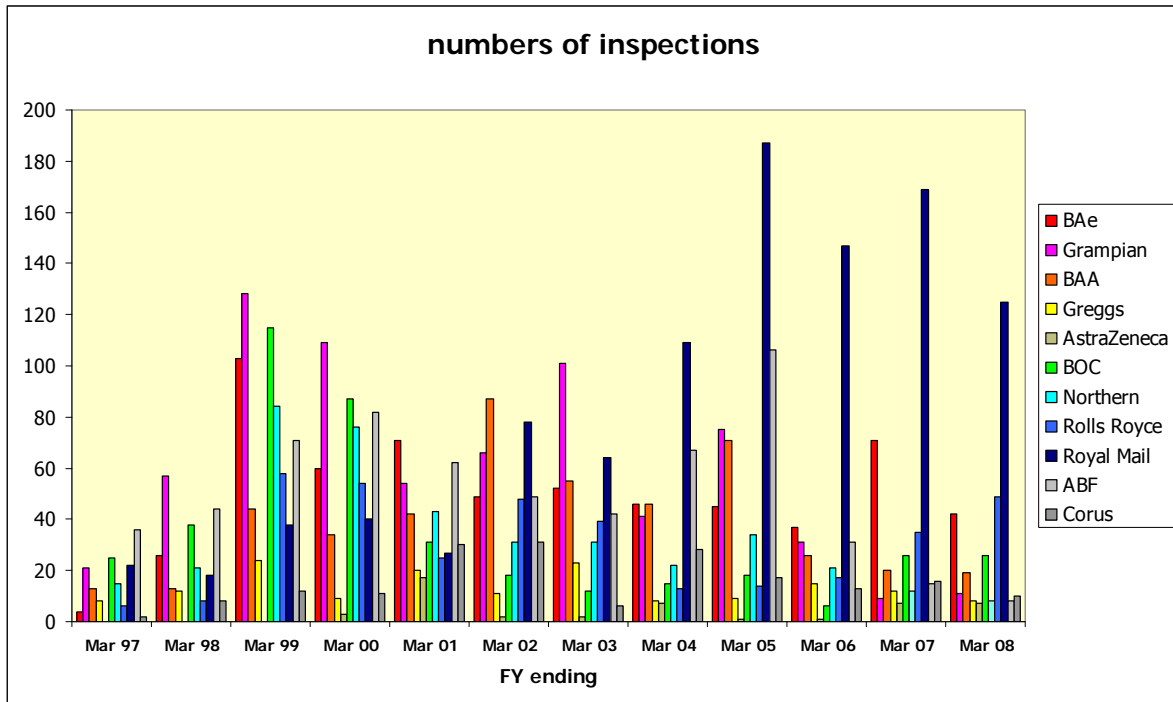


Figure C.1 Numbers of Inspections – by FY

Another way of looking at the same data is shown on Figure C.2, broken down first by company and then by year.

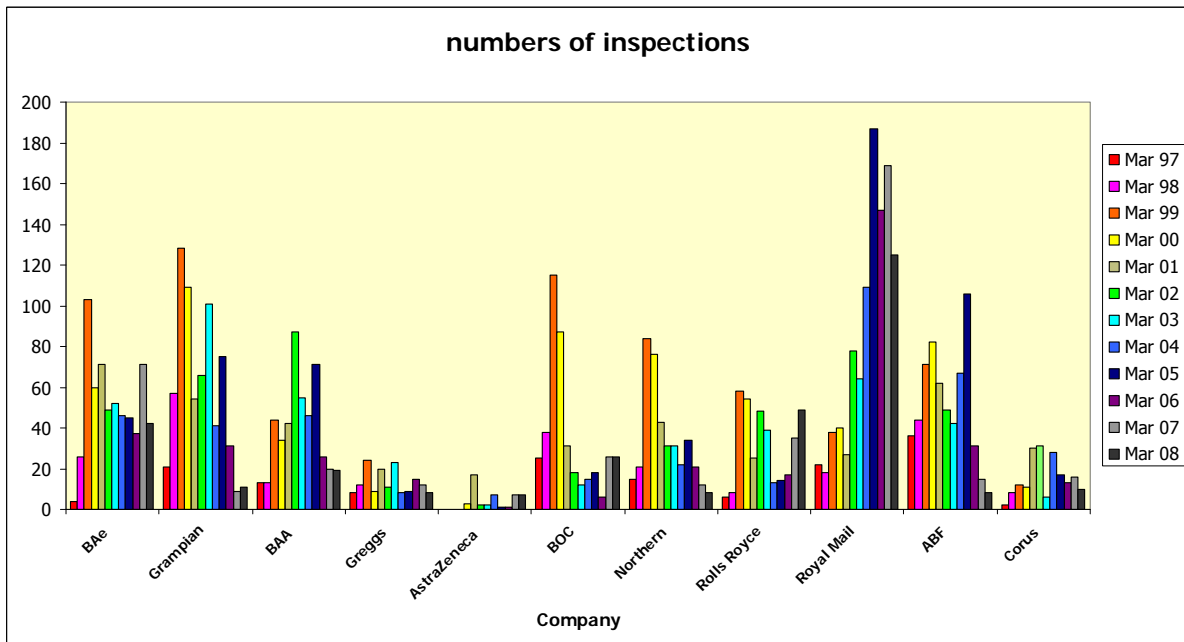


Figure C.2 Numbers of Inspections – by Organisation

These graphs show there is much diversity between organisations, both in the total number of inspections and in how these are spread over the years. To separate these factors, Figure C.3 shows the total number of inspections per organisation, summed over all years.

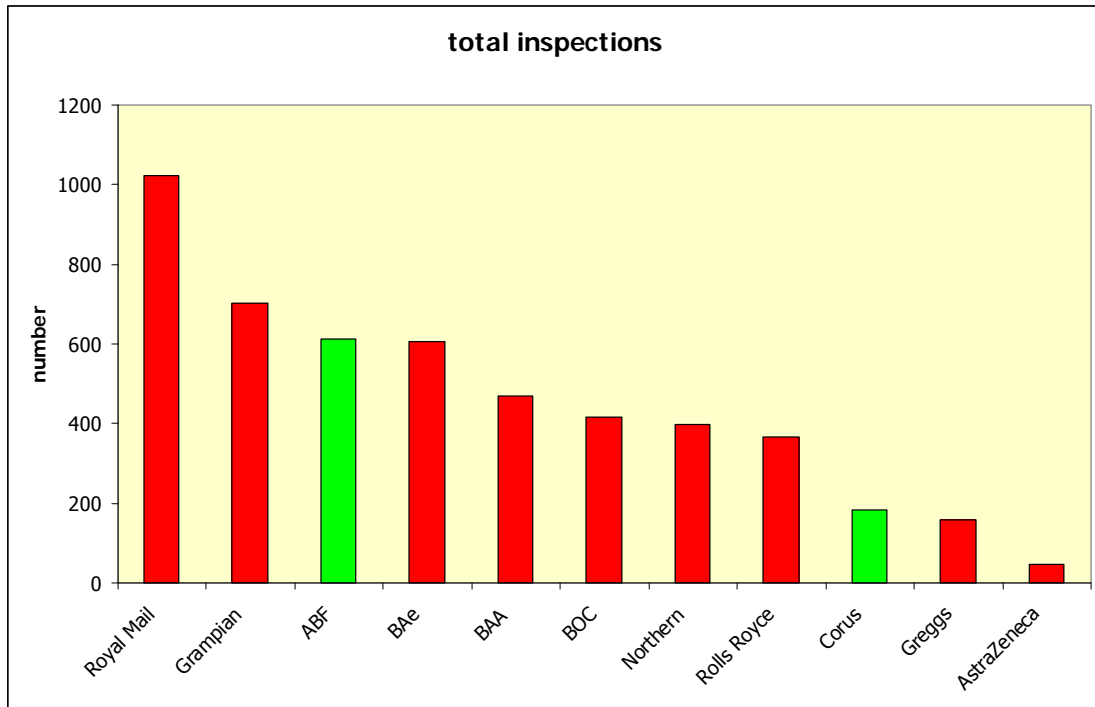


Figure C.3 Numbers of Inspections – by Organisations, All Years

The numbers range from around 1000 for Royal Mail down to around 50 for AstraZeneca. The two control companies fit into the distribution: ABF is a typical high-end organisation, and Corus is a typical low-end organisation. This is not surprising, because these sums are dominated by pre-LOPP years, but it does show that they are good controls in the sense of having a similar behaviour to the LOPP companies before LOPP began.

To compare how inspection numbers changed over time, we divided the numbers per year for each organisation by the sum over all years. Plotting the resulting curves on the same figure leads to a confusing picture. So we used the technique of cluster analysis to divide the patterns into three “clusters”, or “families” of similar patterns. These are shown in the next three figures. In each case the black curve is the mean of all the other curves shown on the figure (except of course where there is only one curve).

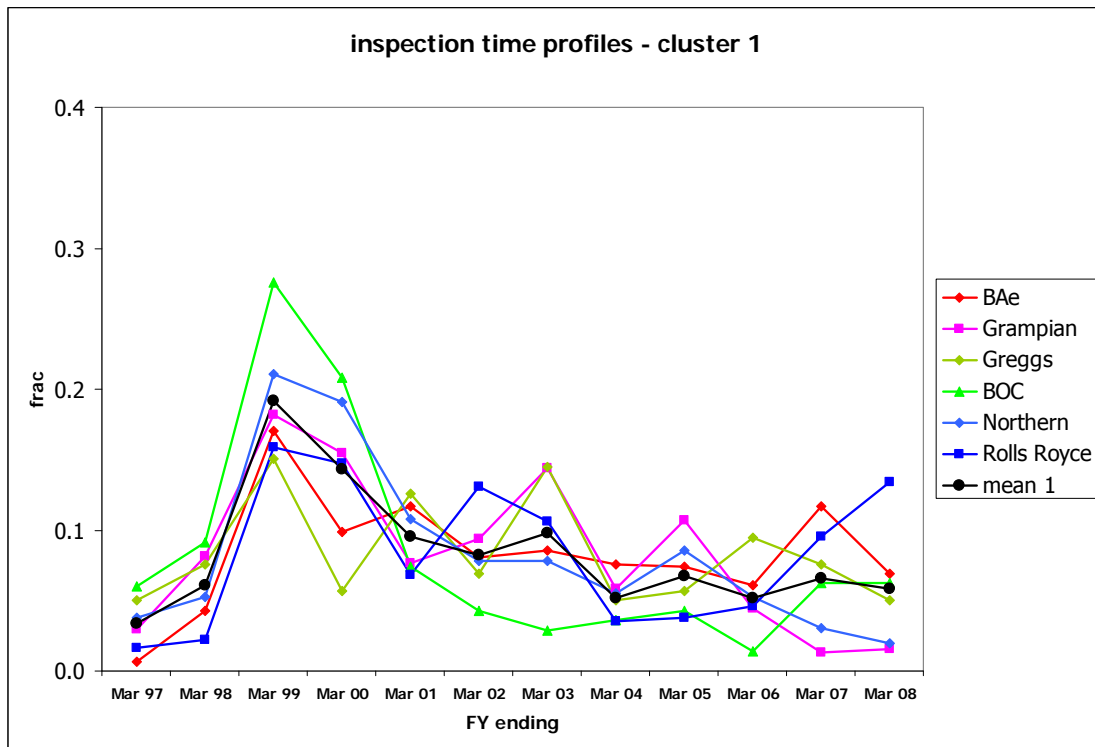


Figure C.4 Time Profiles – Cluster 1

The first cluster consists of profiles with a pronounced peak in financial year 1998/99, and then a tendency to level off. BOC has the highest peak there, then runs below the mean line until the last couple of years, when it rises to close to the cluster mean.

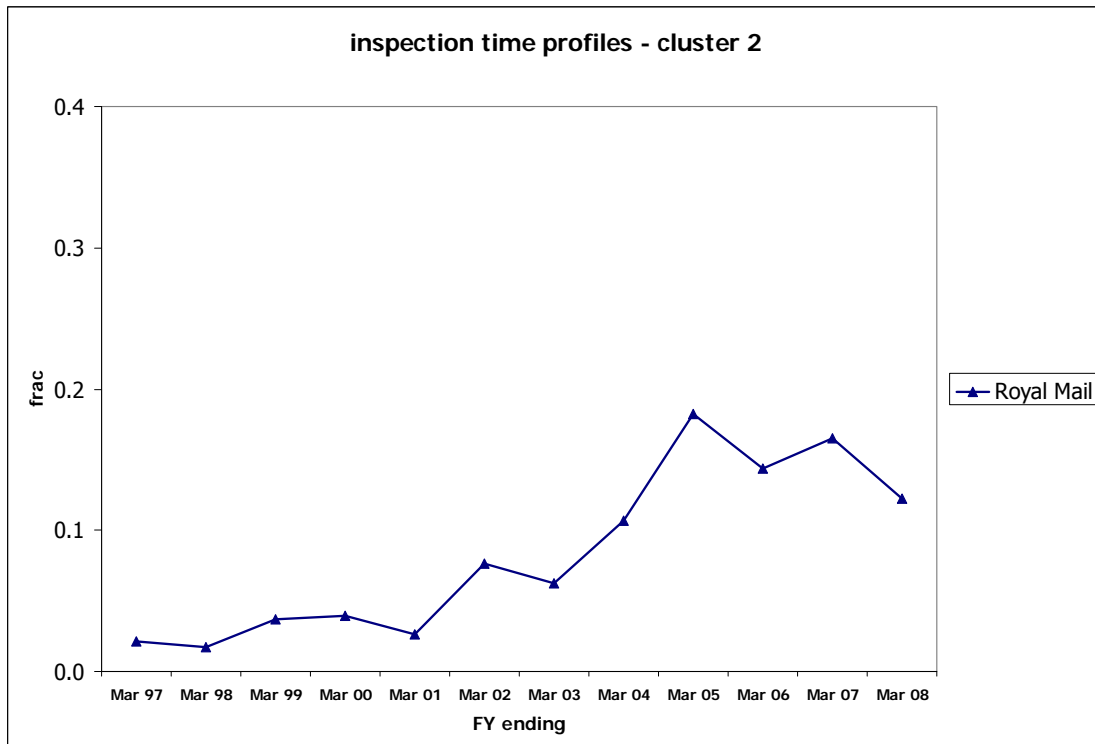


Figure C.5 Time Profiles – Cluster 2

The second cluster consists of just one member, Royal Mail. It is characterised by comparatively few inspections earlier on, with a rising profile in the second half of the period. Recall that this was also the organisation with the largest absolute number of inspections.

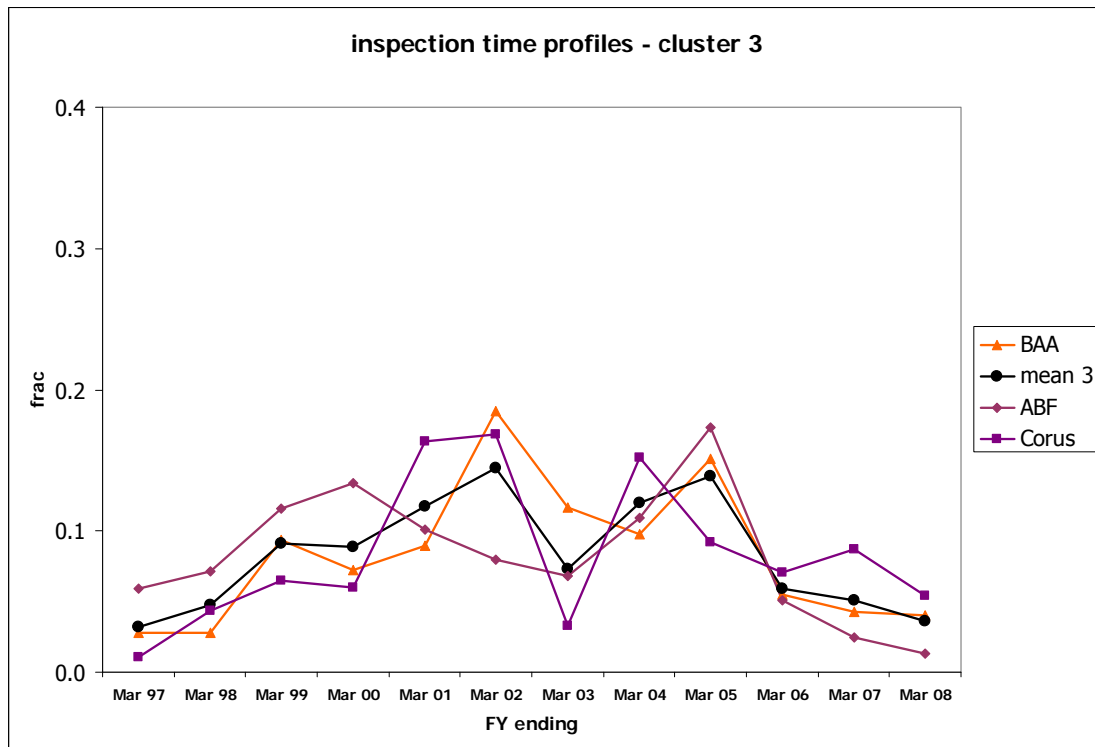


Figure C.6 Time Profiles – Cluster 3

The third cluster is characterised by a rising trend in the first years, followed by two minor peaks around 2001/02 and 2004/05, and then a falling trend thereafter. The cluster consists of BAA and the two control organisations.

To have a closer look at any changes LOPP may have had in terms of the number of inspections, we redid this analysis for the last four years only. These are the year before LOPP, the year in which LOPP started half way through and the two full LOPP years. The numbers for each of these years was divided this time by the total for the organisation over these four years. Once again, cluster analysis was used to detect common patterns. The three new clusters have different membership from the three described above, because they are based on different data.

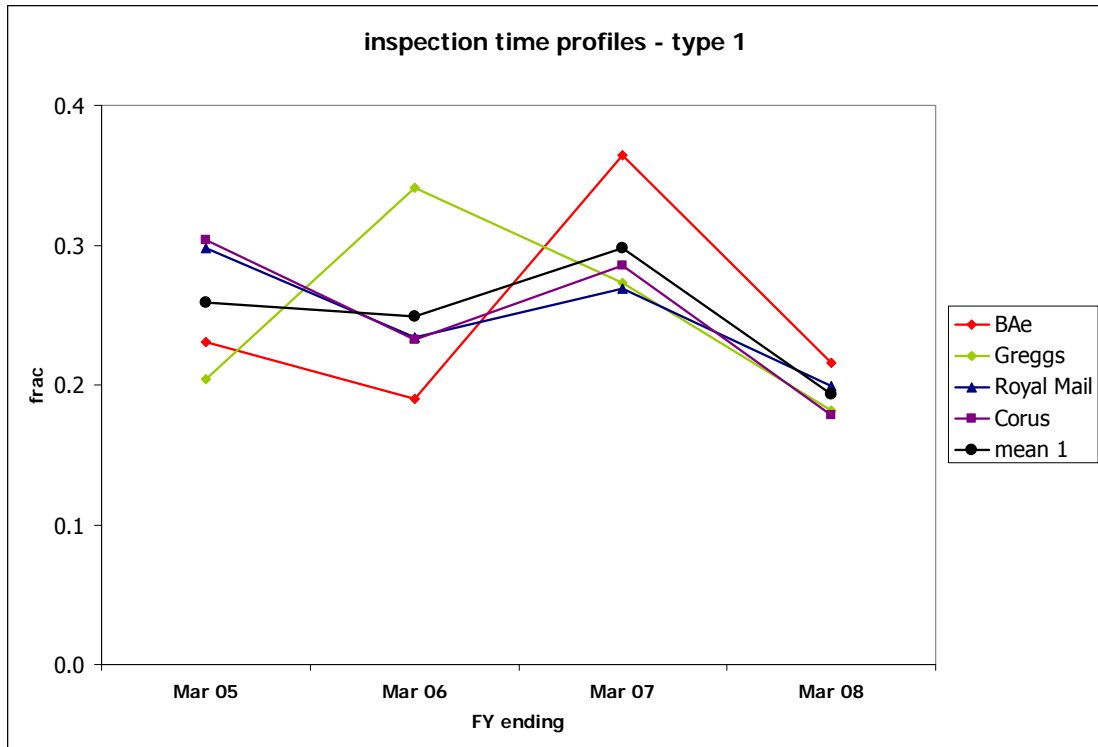


Figure C.7 Time Profiles for Last Four Years – Cluster 1

The first cluster shows a comparatively flat profile over the four years. Royal Mail and Corus are close to the cluster mean, while BAE and Greggs show some deviation from it.

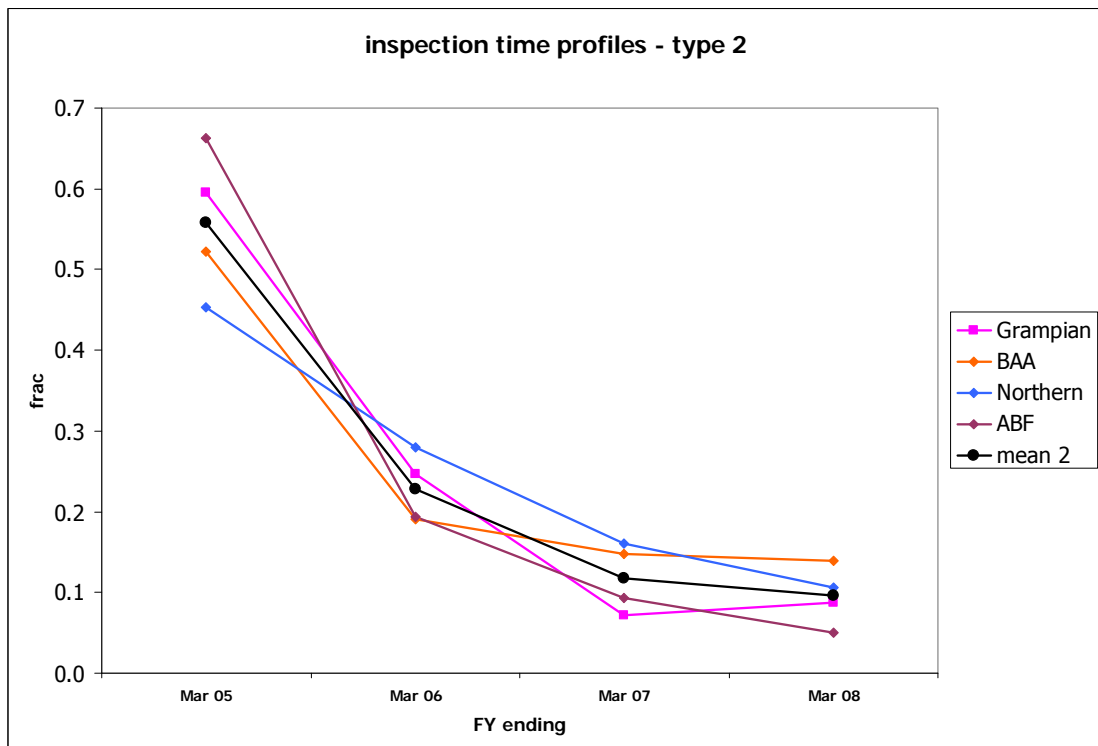


Figure C.8 Time Profiles for Last Four Years – Cluster 2

The second cluster shows organisations where the numbers of inspections have fallen steeply over the last four years. This may be an effect of LOPP for Grampian, BAA and Northern, but note a similar pattern is found for the control organisation, ABF.

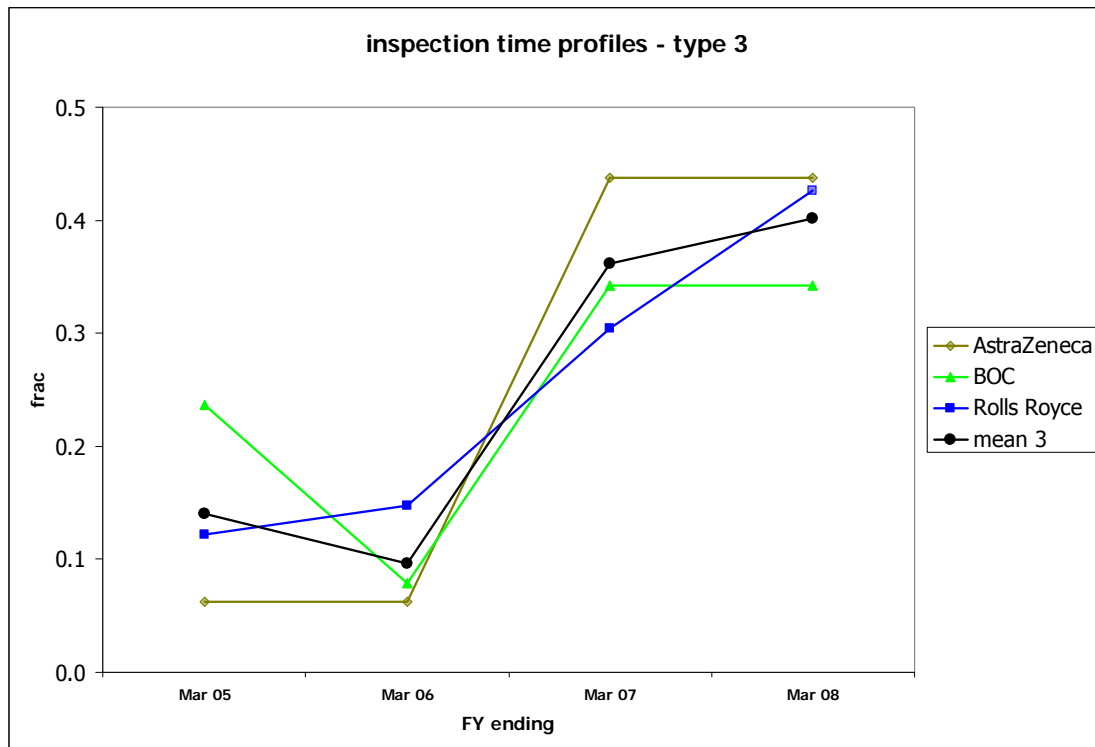


Figure C.9 Time Profiles for Last Four Years – Cluster 3

To complete the picture, cluster 3 contains three organisations for which the numbers of inspections increased at the same time as LOPP came into effect. The sharpest rise is for AstraZeneca, but recall that this profile still represents a small absolute number of inspections.

The overall picture here is that there is no single pattern of how inspection numbers changed with LOPP. Some rose, some fell and others remained broadly constant. Moreover the two controls have patterns similar to some of the LOPP organisations.

Patterns of IRF Topics Covered

All the SOs of the type "IRF Other" or "IRF Construction" have associated with them information on which of the IRF topics were discussed. These topics are:

- asbestos
- asthma
- dermatitis
- falls from heights
- hand arm vibration syndrome (HAVS)
- musculoskeletal
- noise
- other respiratory disease
- slips and trips

- stress
- transport

The total numbers of IRF SOs is shown in Figure C.10 below

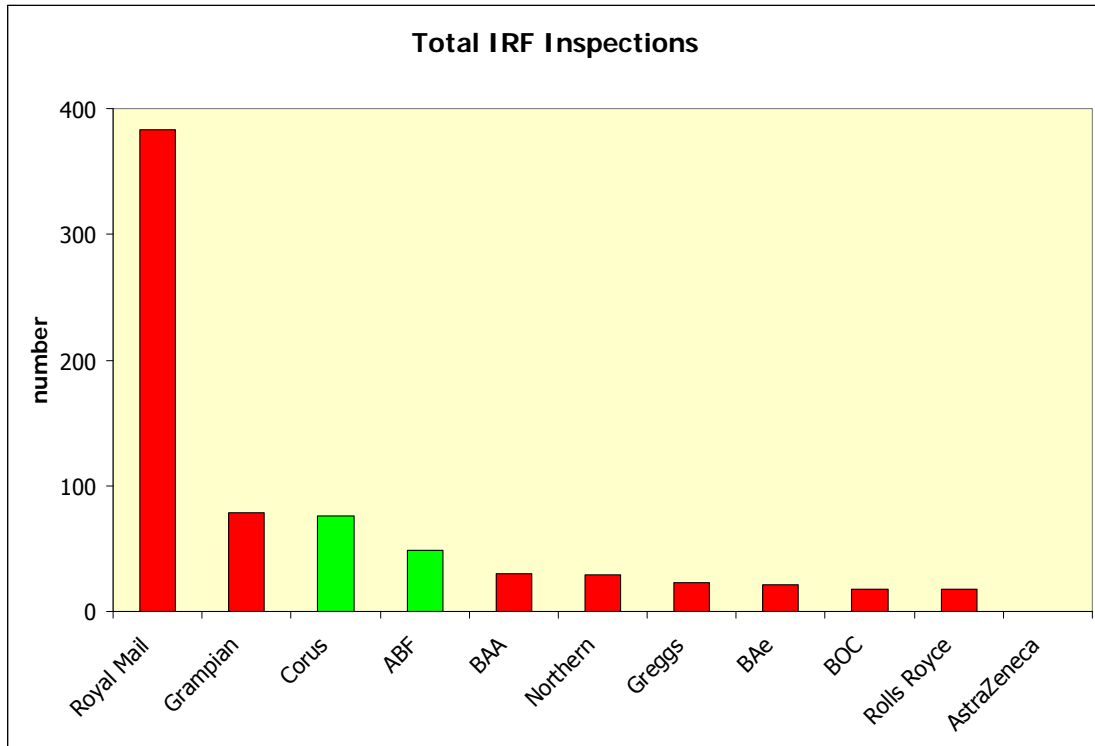


Figure C.10 Total Numbers of IRF Inspections

As with the total number of all inspections, the highest number here is that for Royal Mail, having around four times the next highest number (for Grampian). The control organisations have numbers typical of some LOPP organisations.

The information on the mix of topics discussed in each company is summarised in the following eight figures. (There are no IRF SOs recorded for AstraZeneca.) The bars show the fractions associated with each topic, that is the total number of times the topic appears in an SO in that year, divided by the total number of all topics summed over all SOs. The number above the bar is the total number of IRF SOs for that company for that year. Each figure is then followed by bullet points summarising the main features of the pattern for each company.

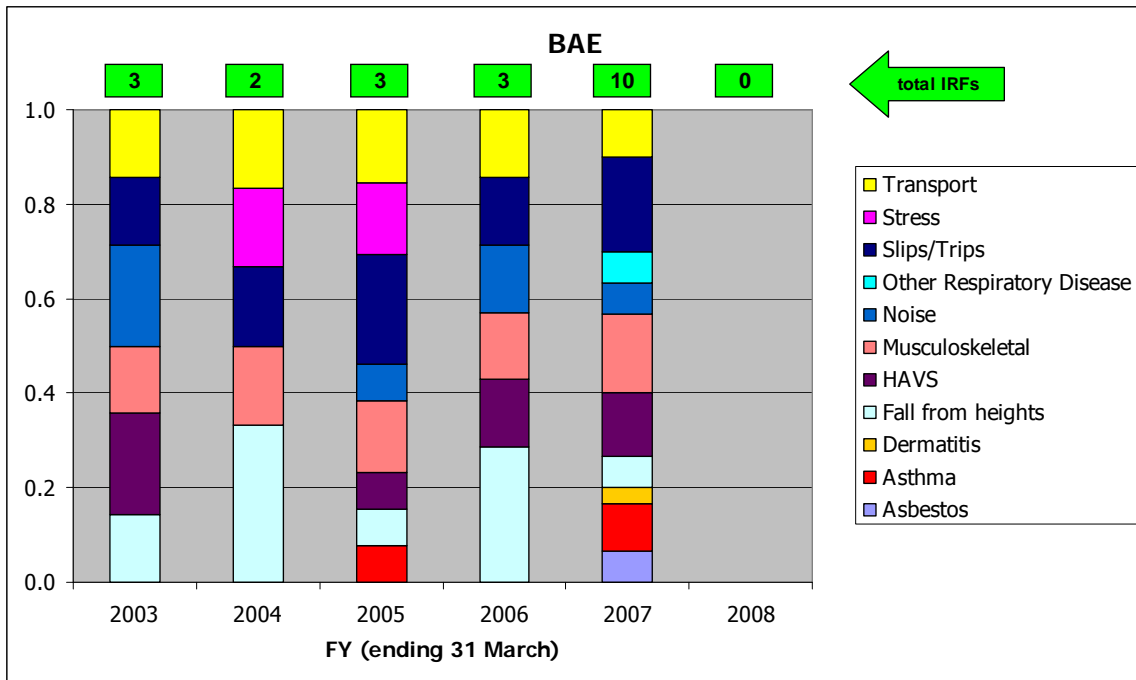


Figure C.11 IRF Topics for BAE Systems

- Peak of activity in 2007, with all topics covered, except stress.
- No IRFs in 2008.
- Stress covered in 2004 and 2005 but not thereafter

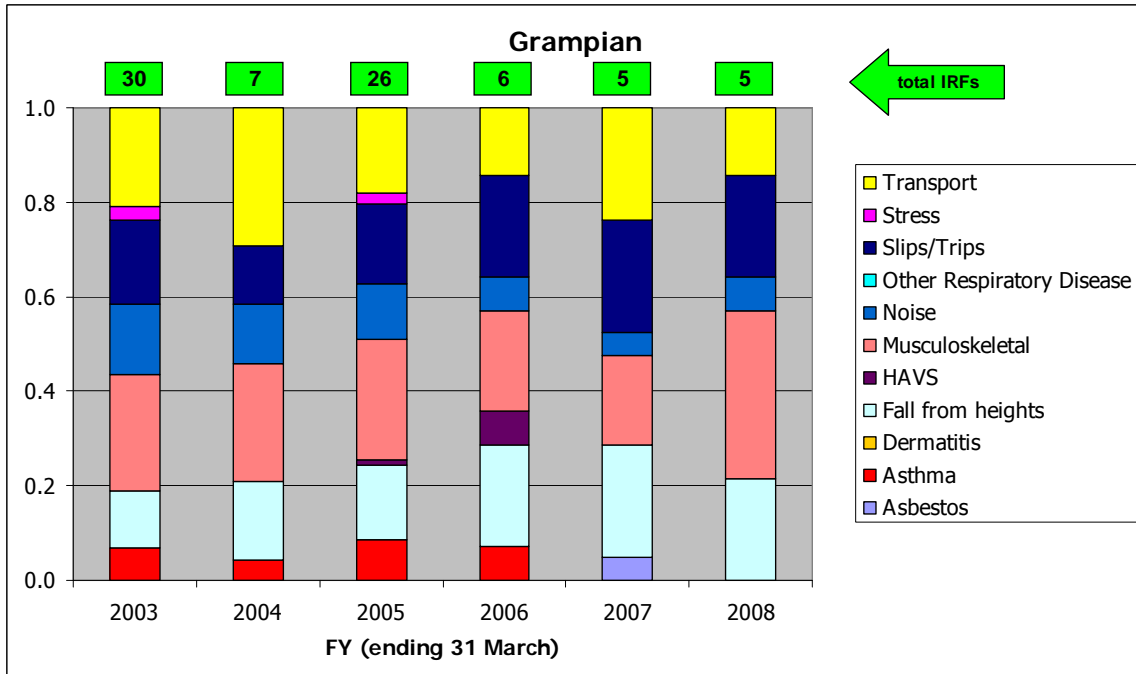


Figure C.12 IRF Topics for Grampian

- Similar pattern throughout whole period.
- Asthma drops out after 2006.
- HAVS treated in 2005 and 2006, but not thereafter.

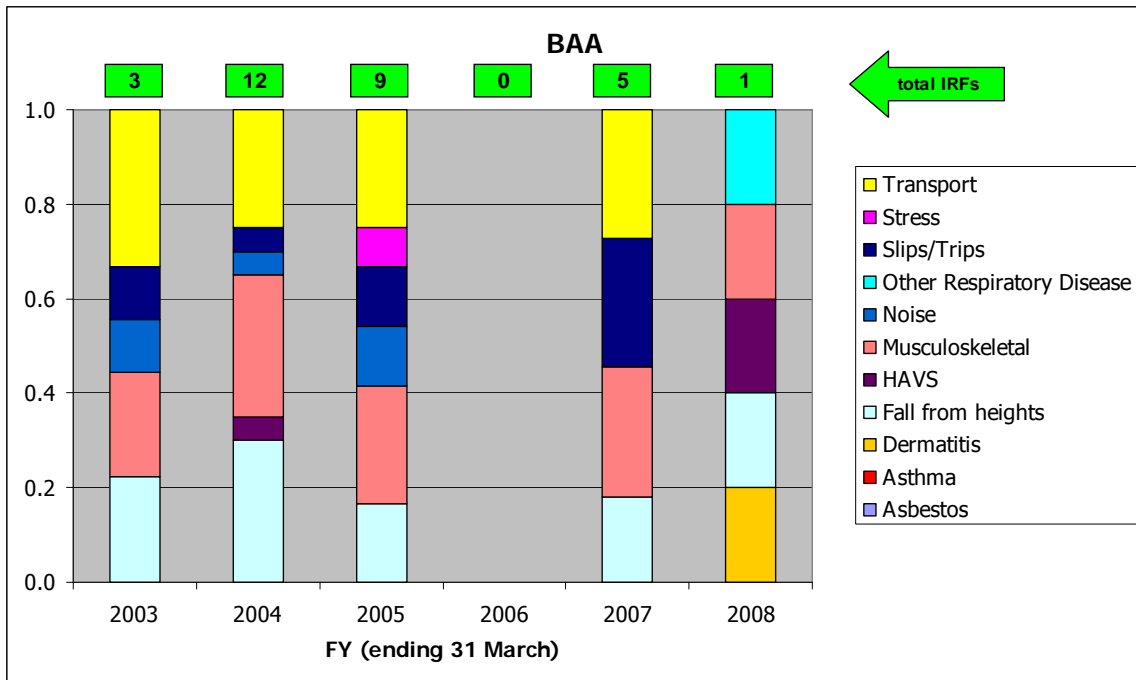


Figure C.13 IRF Topics for BAA

- No IRFs in 2005, resumed in 2007, but only one in 2008.
- Pattern dominated by falls, musculoskeletal, slips/trips and transport, but different in 2008.

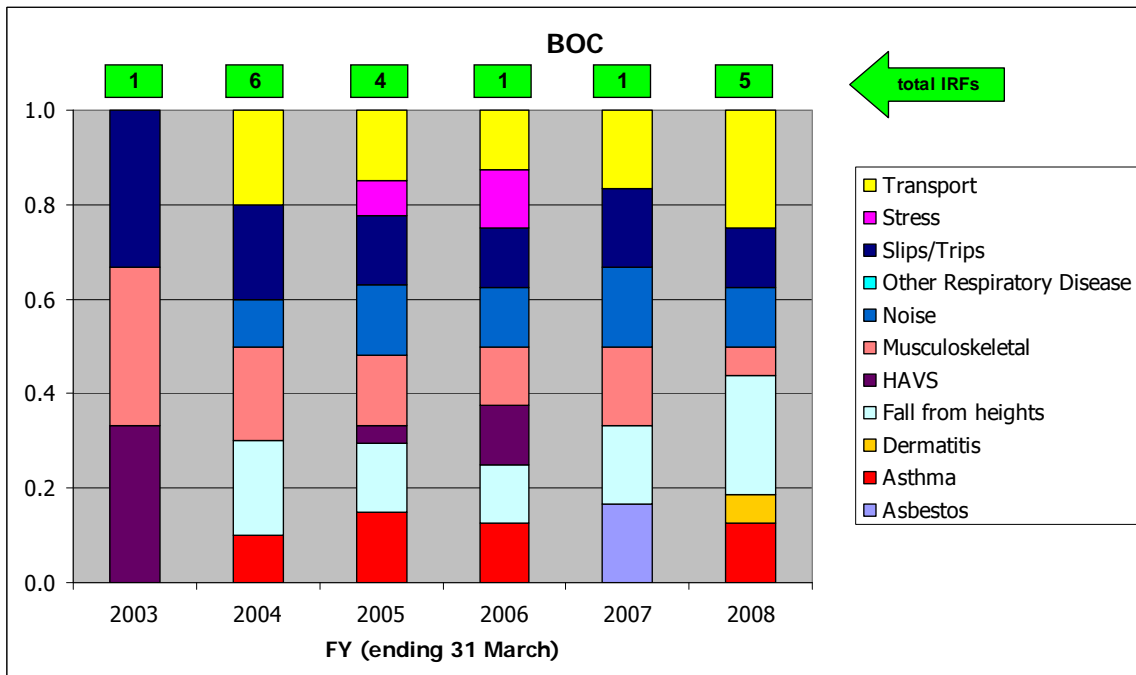


Figure C.14 IRF Topics for BOC

- Similar pattern across the years, except for the 1 in the first year.
- Broad range of topics covered.

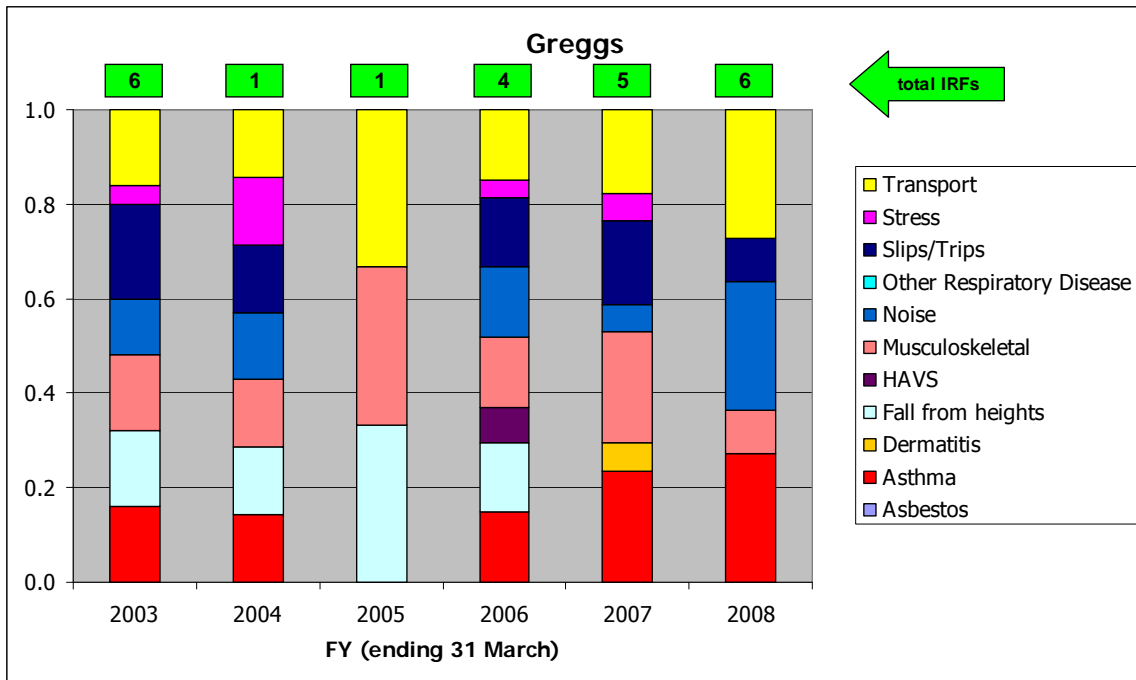


Figure C.15 IRF Topics for Greggs

- Similar pattern across the years, except for the 1 in the 2005.
- Asthma a bigger concern than in most other companies – flour dust.

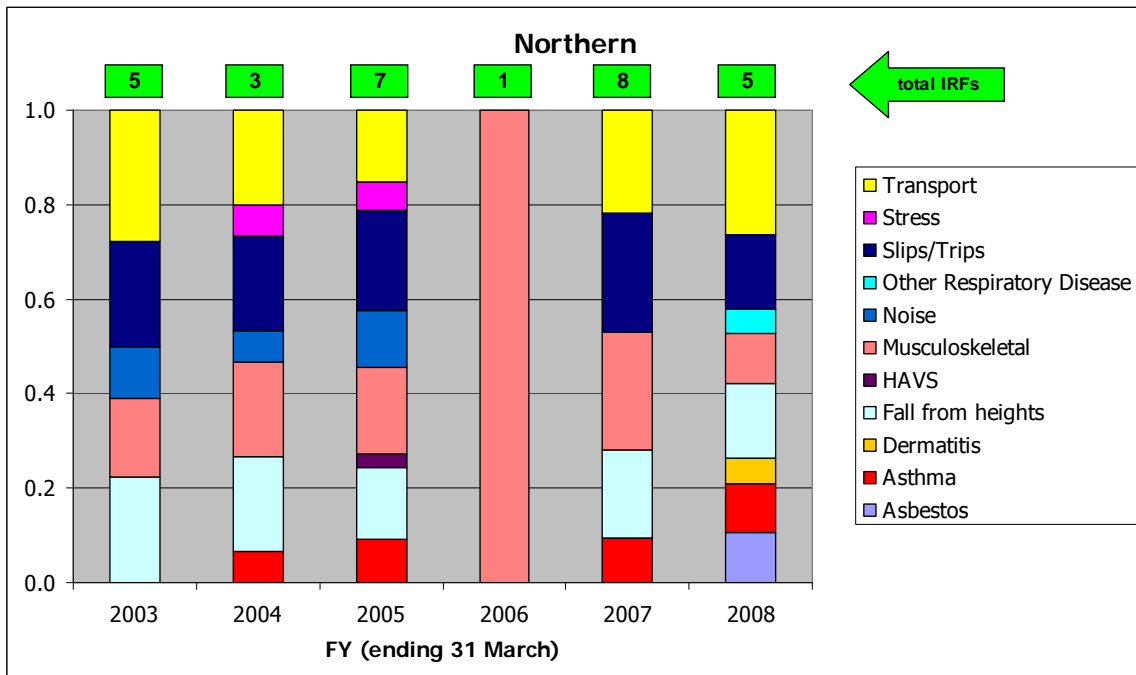


Figure C.16 IRF Topics for Northern

- Similar pattern across the years, except for the 1 in the 2006.
- Broader range of topics covered in 2008, with transport done more often.
- Stress covered in 2004 and 2005 but not thereafter.
- Pattern similar to BOC.

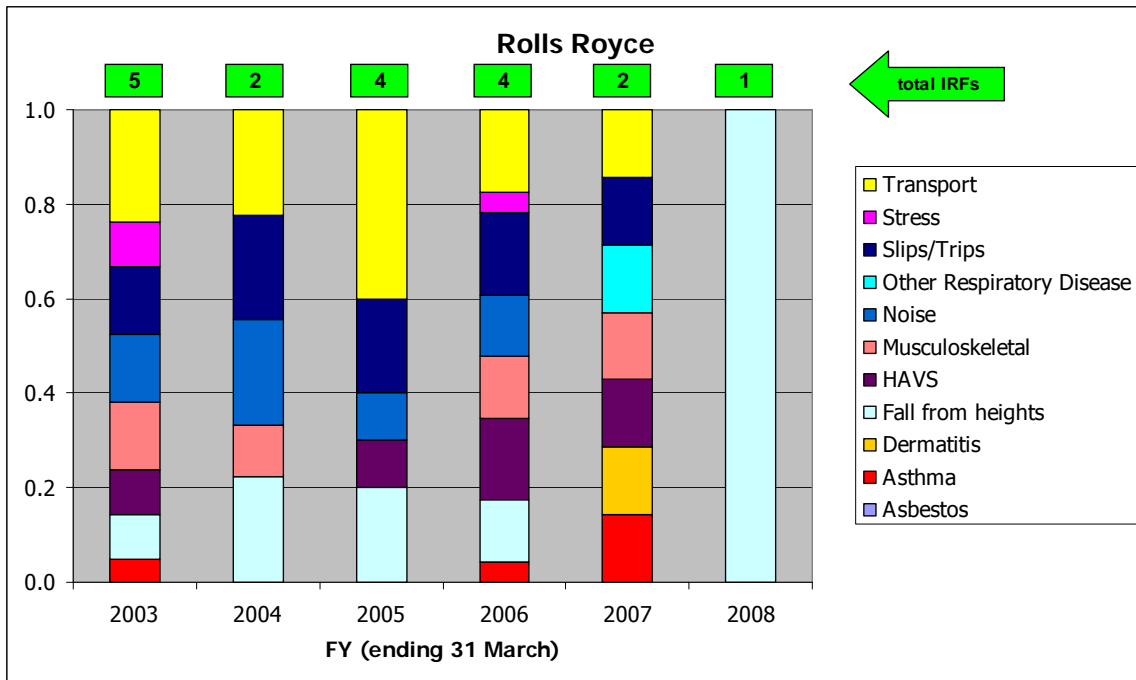


Figure C.17 IRF Topics for Rolls Royce

- Broad range of topics in 2003, 2006, 2007.
- Narrower in 2004, 2005, dominated by transport, slips, noise.

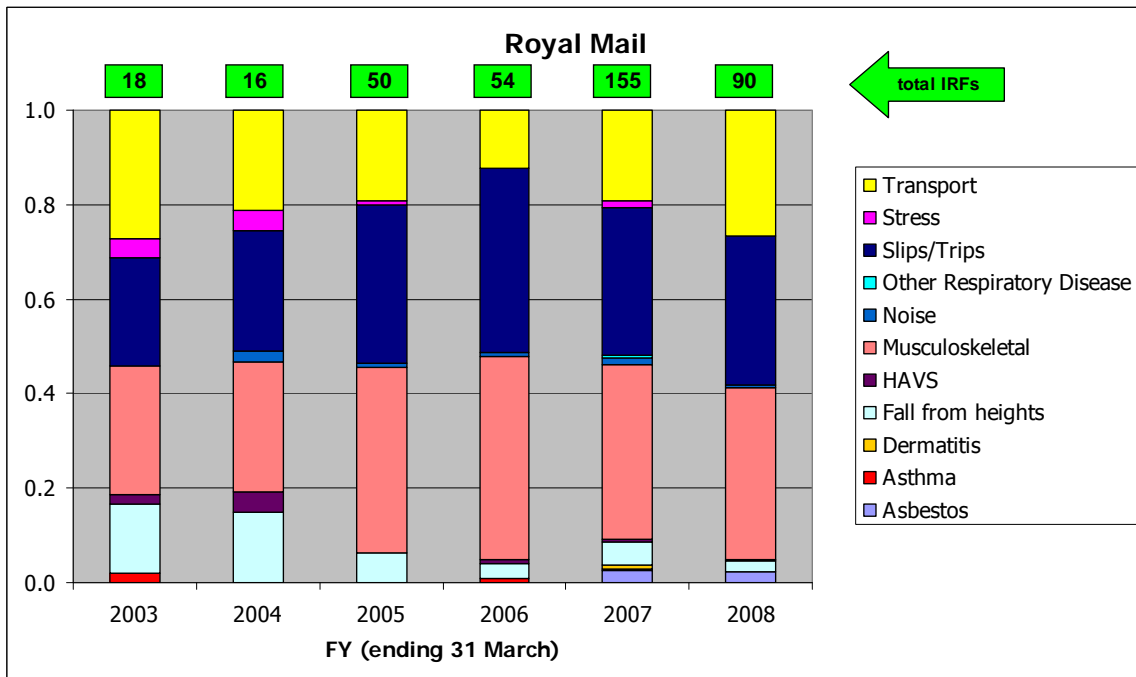


Figure C.18 IRF Topics for Royal Mail

- Constant pattern across period.
- Dominated by transport, slips, musculoskeletal.

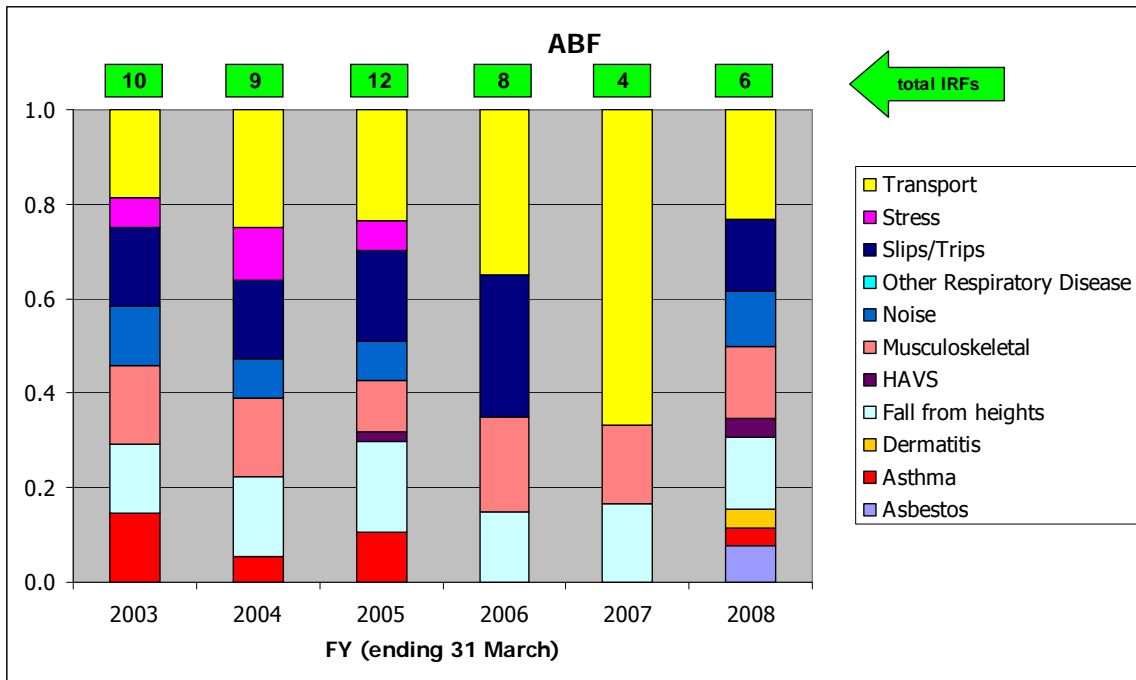


Figure C.19 IRF Topics for ABF

- Dominated by transport, slips and trips, musculoskeletal and fall from heights.
- Similar to the other food companies.

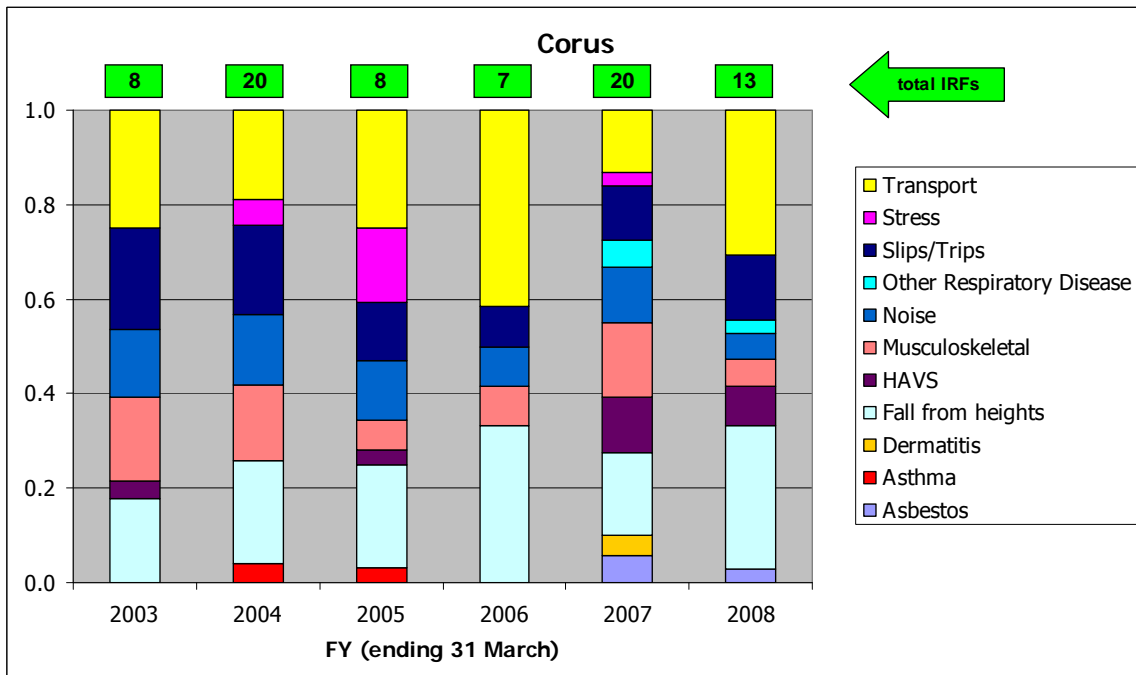


Figure C.20 IRF Topics for Corus

- Dominated by transport and fall from heights.
- Broadly similar to Northern Foods.

Conclusions from the COIN Analysis

There are no systematic changes in pattern across the companies marking the advent of LOPP. In some companies, such as Royal Mail and Grampian, the pattern is broadly unchanged before and after LOPP. In others, such as Northern Foods and BAE Systems, there is some evidence of the choice of topics becoming more diverse in the LOPP years.

There is no systematic change in the numbers of IRF inspections, or in the pattern of the topics chosen, as LOPP came into effect. The individual organisation patterns for the last two years may reflect decisions made under LOPP, but this would have to be tested against each organisation's engagement plan.

Comment on the Utility of COIN

COIN is not optimised for recording data in a way that makes it easy to evaluate initiatives like LOPP. After the analysis we were told that for some LOPP organisations, "master cases" were being set up such that each record of a LOPP-related activity should be linked to the master case. However it appears that this development was not in place when we began our data extraction from COIN.

Appendix D – BAE Systems Case Study

BAE Systems is a global company engaged in the development, delivery and support of advanced defence and aerospace systems in the air, on land and at sea. It employs about 100,000 people across five continents and in over 100 countries. It employs about 24,000 staff in the UK.

BAE Systems operates at over 60 separate sites in the UK. The following table characterises the main businesses that are based in the UK:

Business	UK Staff	Locations
Military Air Solutions	17,000	Warton, Samlesbury (Lancashire) Brough (Wesey Yorkshire) Woodford (Cheshire) Farnborough (Hampshire) Chadderton (Greater Manchester) Malvern (Worcestershire) Yeovil (Somerset)
Submarine Solutions	4,100	Barrow-in-Furness (Cumbria) Devonport (Devon) Filton (South Gloucestershire) Faslane (Argyle & Bute) Farnborough (Hampshire) Waterlooville (Hampshire) Derby (Derbyshire) Weymouth (Dorset)
Land and Armaments (Land Systems UK)	???	About 20 sites including: Barrow-In-Furness (Cumbria) Glascoed (Monmouthshire) Leeds (Yorkshire) Leicester (Leicestershire) Newcastle (Newcastle upon Tyne)
Integrated Systems Technologies (Insyte)	3,500	Frimley (Surrey)
Shared Services	800	All sites
Regional Aircraft	700	Prestwick (South Ayrshire) Hatfield (Hertfordshire) Weybridge (Surrey)
CS&S International	300	Farnborough (Hampshire)

For the purposes of this depth study it was agreed that we would visit five sites which were regarded as representative of the range of activities undertaken by BAE Systems. These were:

- Warton (Military Air Solutions) 9 June 2008
- Samlesbury (Military Air Solutions) 10 June 2008
- Newcastle (Land Systems) 12 July 2008
- Govan (Surface Fleet Solutions) 22 July 2008
- Barrow-in-Furness (Submarine Solutions) 28 August 2008

The site visits were coordinated by the BAE Systems Corporate Safety Health and Environment (SHE) Team with individuals selected for interview left up to local discretion.

32 people were interviewed during the site visits (~6 people per site). These included:

- Heads of Health and Safety
- SHE Advisers
- TU Safety Representatives
- General/Ship/Area managers
- Operations managers
- Sub-contractor

The following text box shows the script that was sent out to interviewees prior to meeting them, and subsequently followed during the interviews:

Objectives

We have completed the breadth survey of all LOPP participating organisations. This has flagged up some common themes that we wish to explore in more detail. We will determine how a couple of organisations (BAE Systems and Tesco) manage health and safety currently and explore how LOPP has been accommodated in these arrangements. We are particularly keen to establish whether or not LOPP is perceived to have contributed positively to the relationship between the organisation and the relevant H&S regulators and how this, in turn, has contributed to the company's H&S performance. We hope to establish what the perceived strengths of LOPP have been, identify any areas where experience to date can inform future thoughts on where LOPP should be heading and any key milestones along the way. Finally we will explore how the LOPP Engagement/Action Plan has been developed and how the associated activities are being implemented.

The overall objective from the depth study is to establish whether or not LOPP is making a difference to the way the organisation is regulated and if so whether or not this is a good thing.

Proposed Structure for Interviews

The following list is not exhaustive – it is intended to provide an indication of the type of material I hope to cover in the interviews.

1. Introductions / Background
2. Role of the individual being interviewed
(how it fits into the overall H&S management system)
3. Exploration of their experience of working with the HSE
(Over how long? Has there been any noticeable change in last couple of years?)
4. Exploration of their knowledge/awareness of LOPP
5. Exploration of knowledge/awareness of LOPP Engagement/Action Plan
6. Exploration of how (if at all) LOPP has impacted on their H&S responsibilities
7. Perception of the contribution that LOPP has made to relationship with HSE
8. Any specific experiences/lessons that can be drawn upon that informs how well LOPP has worked?
9. Any specific thoughts on how LOPP could be improved
10. Any specific thoughts on how relationships with the HSE could be improved?
11. Any company specific issues /experience that may not be general for other large organisations?
12. Anything else?

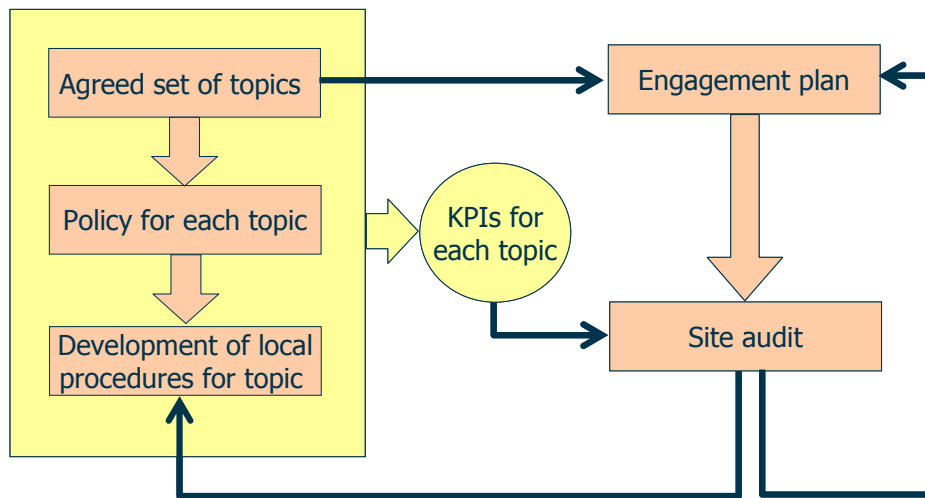
BAE Systems is a group of large businesses in their own right with quite different legacies in terms of ownership, and history. Some of the sites have seen major restructuring and reorganisation and some sites have an ageing workforce where large numbers on the shop floor have never worked anywhere else. Consequently there are quite different cultures and levels of safety management maturity within the Group. The challenge for BAE Systems is to encourage all sites to start to manage health and safety on a consistent basis and to raise standards across all sites up to a common Group standard.

LOPP followed on from an initiative called the Multi-Site Large Organisation (MSLO), that had been led by the first HSE Account Manager for BAE Systems. For this initiative a set of 'intervention plans' had been developed for addressing key health and safety priorities on BAE Systems sites. LOPP was essentially an evolution of the MSLO initiative so BAE Systems were able to migrate seamlessly over to LOPP.

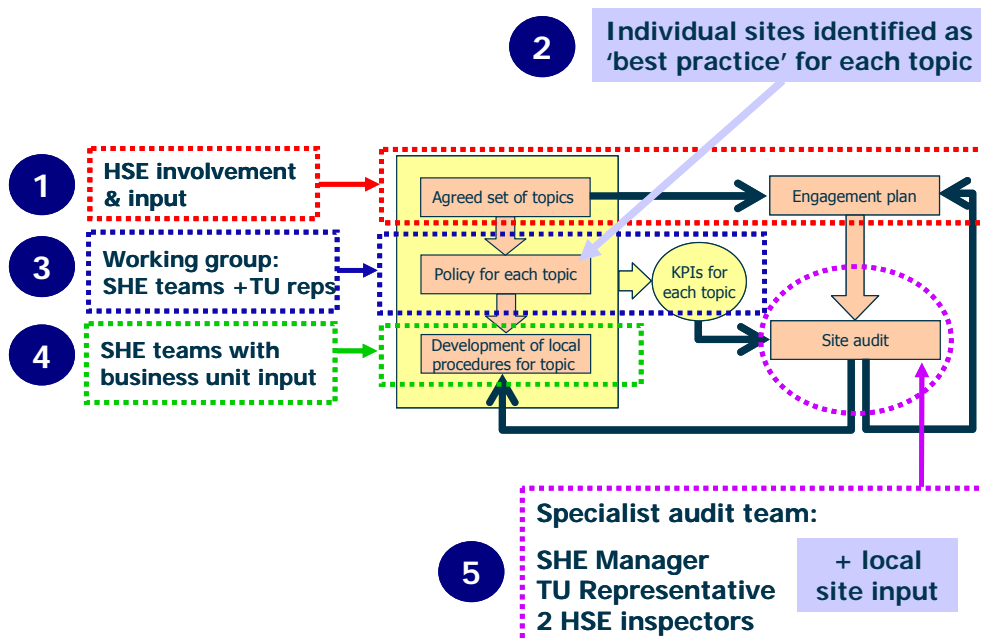
The following description of how BAE Systems has organised itself to address LOPP should therefore be seen in the context of an evolution from the MSLO initiative.

Organising for LOPP

The following schematic summarises how BAE Systems has organised itself to address LOPP:



The following schematic indicates who is involved at each stage in the process with the associated descriptive text relating to the identifiers 1 – 5 in the diagram:



1. Agreeing Priority Topics

BAE Systems and the HSE jointly agree which health and safety topics should be the focus for attention. In fact the topics had pretty much already been agreed during the development of the intervention plans as part of the Multi-site Large Organisation (MSLO) initiative. This is reflected in the contents of the engagement plan which describes which sites will be audited, which topic will be considered, and in which year. Up until recently these audits have been single topic audits. At the time of writing two audits have been undertaken where multiple topics have been audited at the same time.

2. Identifying 'Best Practice' Sites

For each of the agreed sets of priority topics a lead site was identified which would take responsibility for developing the BAE Systems policy for each topic and identify an associated set of Key Performance Indicators (KPIs) for each topic, that would form the basis for an audit against compliance with the agreed policy. The sites were selected not necessarily because they were recognised as 'best practitioners' in the group, but because they were judged to have considerable experience in the area already, and because they would have the resources to ensure progress was ensured. These judgements were made by the SHE Policy Board, chaired by the Deputy MD, Corporate Responsibility, and attended by all the Heads of SHE from across the BAE Systems group.

The following list shows the health and safety topics currently being addressed in the LOPP initiative by BAE Systems, and the lead site which was responsible for developing the policy and associated KPIs.

Health & safety topic	Topic lead site
➤ Work at height	Warton (Military Air Solutions)
➤ Hand-arm vibration	Govan (BVT Surface Fleet)
➤ Slips and trips	Brough (Military Air Solutions)
➤ Control of contractors	Warton (UK and Rest of the World)
➤ Work in confined spaces	Barrow-in-Furness (Submarine Solutions)
➤ Manual handling	Radway Green (Land & Armaments)

3. Setting Policy for Each Topic

Once a site had been identified as the lead for a particular topic it established a Steering Group to develop the policy and supporting KPIs. This Steering Group was typically chaired by one of the SHE team from that site and also involved local TU safety representatives. As the policies and KPIs were drafted they were sent up to the SHE Policy Board for final approval before rollout to all business areas.

4. Developing Local Procedures

BAE Systems is a complex organisation with highly differentiated site layouts and work activities at different sites. As a consequence, in order to develop procedures for how to comply with the policy and KPIs for each health and safety topic, it is necessary to develop site specific and often area or building specific operational procedures. This was managed by the site SHE teams who would work with TU representatives as well as local managers and team leaders to develop a suite of procedures that were practical and reflected local environmental circumstances. Involving the 'coal-face' staff in this way ensures buy-in to the procedures.

5. Executing the 'LOPP' Audits

These are the audits that are undertaken at each site against a particular topic, in line with the agreed engagement plan. The audits are 'led' by BAE Systems (typically represented by a member of the SHE team and a TU representative from the topic lead site) with the HSE LOPP Account Manager and a local inspector (or topic specialist) in attendance as 'observers'. The normal format has been to have a collective briefing at the start of the audit, a couple of days auditing the topic under scrutiny,

followed by a debrief at the end of the audit. They have lasted 2-3 days and can involve up to 18 staff and managers from the site being audited.

The audits are quite resource intensive and the intention is to broaden them to cover more than one topic. This introduces a possible tension in that it will not be possible to undertake an audit of six topics to the same level of detail as one topic in the same time. Consequently either more time will need to be spent on the audits (with resource implications) or they will have to rely on spot sampling. To date two multi-topic audits have been undertaken.

The LOPP 'Experience' in BAE Systems

It is useful to structure the discussion of our findings from the interviews across all five sites by considering how LOPP has impacted on the following areas:

- Health and safety management in BAE Systems
- Interactions with the HSE
- Interactions with other large organisations
- Interaction between BAE Systems sites
- Interaction and engagement with staff.

Health and Safety Management in BAE Systems

The complexity of the business in conjunction with the different historical backgrounds (e.g. ownership by Vickers, Kvaerner, Yarrow, Marconi, BAe SEMA, British Aerospace etc) means that as business/sites have been acquired, they have brought different levels of safety management maturity to the Group. This has posed a significant challenge to BAE Systems as it tries to align the safety management performance of businesses that have different cultures and are starting at different places on the page.

In the early 2000's, BAE Systems started some major corporate initiatives to improve its business processes and management systems. Some of this has involved extensive restructuring of the business. Improving health and safety performance was seen as one part of this overall desire to 'raise the game' and the Air Systems business had started developing a partnership with the HSE via the Multi-site Large Organisation (MSLO) initiative and had started to develop intervention plans for key health and safety topics.

In July 2004, Dick Olver was appointed as Chairman of BAE Systems. He had previously worked for BP and his experience from the Texas City refinery explosion meant that the Board paid particular interest to safety performance. This perception of additional focus or support from the Board, in conjunction with announcement of the LOPP initiative meant that BAE Systems was able to 'brand' LOPP in such a way as to ensure that the business took it more seriously than it may otherwise have done. This is not to say that safety was not taken seriously before but it is well known that if you shine a bright light on certain activities, you start to change the behaviours of the individuals. In this sense 'LOPP' has been a powerful catalyst for change in BAE Systems.

At the shop floor level, the workers interviewed consistently suggested that health and safety management is much better than it was before citing the prevalence of the Safety, Quality, Cost, Delivery, People (SQCDP) talks every Monday morning, toolbox talks, empowerment of safety representatives as well as management support for additional PPE where appropriate, as evidence of this.

The result of all this is that BAE Systems can demonstrate that they are indeed 'raising their game' on the health and safety management front.

Interactions with the HSE

During the LOPP initiative, BAE Systems has had two HSE Account Managers. Both inspectors are extremely well regarded by the BAE Systems staff who dealt with them. They were both seen to be helpful and constructive in their interactions with BAE Systems and "seemed to understand what partnership is all about." This is an important point because it highlights the importance of individuals at the sharp end of the partnership development. The characteristics of a good inspector do not necessarily immediately translate to the characteristics of someone able to develop a partnership based relationship.

An example cited a couple of times of 'partnership in action' has been where the HSE Account Manager has been contacted about a particular, technical health and safety issue. The Account Manager has been able to identify the relevant HSE specialist and broker introductions far more efficiently than if BAE Systems had to track the specialist down by themselves. The existence of this single point of contact is highly valued.

The engagement plan that has been developed for BAE Systems can be shown on a single sheet of paper. This forms the basis for agreed audits of particular sites and the topics that will be addressed whilst at the site. Whilst there have been some inevitable hiccups along the way, mainly to do with the logistical aspects of co-ordinating dates and people for the audits, on the whole the engagement plan is seen to be working well.

In summary then, the joint involvement in developing and modifying the engagement plans is working well and the participation (albeit as observers) in the LOPP audits is seen as constructive, helpful and fully aligned with the partnership concept.

Interactions with other large organisations

The LOPP plenary meetings have facilitated interaction of SHE managers from a range of diverse organisations. Several of the people we talked to valued these sessions and cited two meetings in particular (hosted by BAE Systems and Astra Zeneca respectively) that were felt to be extremely successful events. There was a lot of support for encouraging this sort of interaction and it was suggested that this was something that the HSE should facilitate.

There is clearly a lot of support for more interaction between large organisations to share ideas and good practice. However it is interesting to note that this is something that the large organisations could facilitate themselves without HSE involvement. Is this because the large organisations feel they would need HSE attendance or involvement as some sort of endorsement to justify the efforts associated with organising such events?

Interaction between BAE Systems sites

The way that BAE Systems has organised itself to manage the LOPP initiative has encouraged inter-site interactions. This is universally regarded as a good thing and indeed was often cited as an area where people think additional health and safety performance could be realised through more of it.

One notable exception would be associated with a business that regards itself as one of the poor relations in the group. In this case they feel that they are harshly judged by other businesses which they perceive as having more resources to address certain issues, and do not fully appreciate the local constraints that limit their ability to attain the same standards. However, this point should not be overstated as in our view it is indicative of a business that does not accept change readily. With

time and continuous reinforcement there is no reason why all sites can not be operating to the same level of health and safety performance.

On the positive side, several staff cited examples where a representative from the topic lead site visited another site to do a spot health check and provide advice before the full audit. These visits were well received but were also seen as providing a mechanism for two-way communications such that the visitor from the topic lead site could pick up good practice ideas from the site being visited. All this supports the conjecture that anything that encourages inter-site interactions is a good thing.

Interaction and engagement with staff

BAE Systems has designed its response to LOPP to ensure a tripartite involvement. We have already discussed the HSE's involvement and management is involved through the SHE Policy Board and the site SHE teams. The third leg in the stool is the trade unions and BAE Systems have proactively engaged with the TUs in its response to LOPP. Whilst BAE Systems believes that this is the right thing to do, it also reflects that fact that there is a strong TU influence in the organisation, especially the heavy industrial manufacturing sites. At these sites fairly comprehensive safety management arrangements with strong TU representation on the appropriate committees² already exist. It therefore makes sense to ensure that any key individuals involved in these site committees etc. were also involved in the LOPP initiatives, and this is in fact what has happened.

Having said that, the TU representatives we interviewed have clearly bought into the process. They were complimentary about the level of management support they have been given to participate in the process (both in the topic steering groups as well as participation in the LOPP audits). Those individuals who have been part of the audit team visiting other sites have also been encouraged to undertake training on the topic policies and associated KPIs for those topics that they may not have been originally involved in.

In summary, to date, BAE Systems has encouraged and ensured that there has been strong TU input into the LOPP process.

As far as the workers at the coal-face are concerned there is little or no appreciation of LOPP as a concept. All that local team leaders and managers are concerned about is that they have a set of operational procedures that they can implement. Whilst they will work with the local SHE teams to develop these procedures, they regard it as the SHE team's responsibility to ensure that the requirements to meet the agreed topic policies and comply with the associated KPIs are captured in the procedures. The job of the team leaders/managers is then to ensure that activities on the ground are managed and documented in accord with the procedures. On this basis there is no need for awareness of LOPP to go any deeper into the organisations than the SHE teams.

Next Steps

So far, the LOPP audits have been generally on a single topic. This poses a potential vulnerability to the business in that specialist or lead topic auditors are limited to a small pool of people from the lead topic site and this is not likely to be sustainable. In order to address this BAE Systems are moving towards multi-topic site audits. To support this they are investing in the training of more people in the topic policies and associated KPIs. This should increase the pool of people who are available to act as auditors for future audits.

² A minor observation is that on some sites we visited the prevalence of different safety committees meant that it was unclear where demarcation of responsibilities lay. It was beyond our brief here to understand this properly but our brief exposure suggests that there is scope for rationalisation and simplification of these arrangements.

Two multi-topic site audits have been undertaken to date. We do not know how well these went.

Looking further forward, BAE Systems are already talking to the HSE about how to take the LOPP initiative to the next level of 'partnership'. At this next level, the HSE would need to be assured that it can adopt a lighter touch to proactive inspection of BAE Systems premises. Current thinking along these lines include the need to have:

- Ground rules for the partnership
 - how enforcement relates to LOPP
 - minimum standards/requirements for information exchange
 - robust management systems and self assessment
 - measureable engagement with all levels of staff
 - objective success criteria
- An on-going Governance structure
 - Tripartite Steering Group (BAE, HSE, TU reps), to meet every quarter or biannually
 - HSE LOPP review group (topic leads, others such as HID), to meet annually

Appendix E – Tesco Case Study

Tesco began trading in 1924. It has 1692 stores in the UK and employs 280,373 staff nationwide.

Providing a safe environment for staff and customers is seen as a key aspect of Tesco's business and is a key performance measure for the business. It is referred to in the company annual targets and reports. Data on reportable accidents is collated and monitored by the Trading Law & Technical team and the Compliance Committee of the Tesco Board carries out a detailed review of health and safety performance four times a year. In 2006 Tesco set a three-year target to reduce the rate of reportable accidents in the UK business by 10%. At the end of the first two years a reduction of 14% was recorded.

Tesco has had a lead authority relationship with Dundee City Council for over 15 years. In 1995 this was formalised in a Lead Authority Partnership Scheme (LAPS) relationship. In 2005, Tesco and Dundee entered into LOPP.

This case study is based on interviews with five members of staff. Of these, three were based within Trading Law & Technical – the Operations Standards Manager, a Regional Trading Law and Technical Manager and an Enforcement Liaison Officer – based at Tesco's head office. Two members of staff were also interviewed at the Tesco store at Thurrock Lakeside – this included the Store Manager and Compliance Manager. Each interview lasted one hour and all interviews were carried out in August and September 2008.

For the purposes of reporting the findings from the interviews, we have synthesised them under the following headings:

- Health and Safety at Tesco
- Tesco's Approach to LOPP
- Tesco's Attitudes to LOPP

Health and Safety at Tesco

Health and safety priorities are determined centrally within the Trading Law & Technical team and endorsed through the Company Health and Safety Liaison committee. The role of the trading law and technical team includes:

- Collecting data from stores nationally
- Developing health and safety procedures, messages and campaigns
- Disseminating these to stores
- Providing advice and support to stores and consulting employees through the store Forum process
- Dealing with enquiries, requests and challenges from regulators and other external organisations

The key health and safety priorities for Tesco are slips and trips, roll cage accidents and manual handling. Having determined these priority areas, the Trading Law & Technical team is responsible for developing policies, procedures, messages and campaigns around them.

Store managers and compliance managers are responsible for cascading and implementing these procedures, messages and campaigns within stores as well as other health & safety messages. This involves: delivering training, rolling out advertising campaigns, recording accidents, as well as ensuring the safe running of their store. Store managers and compliance managers are trained to

supervise all areas of legal compliance (including aspects such as fire safety or alcohol sales, as well as health and safety).

Official enforcement of standards is at a local level and stores around the country are frequently inspected by Local Authorities (LAs). The store manager and / or compliance manager would deal with the visiting inspector in each instance. However, any technical enquiries, requests or challenges arising from the inspection would be referred to the central Trading Law & Technical team, which would respond to these.

Internal mechanisms are in place to assess the health and safety (and broader legal compliance) performance of individual stores and depots. These include: independent store audits (completed twice a year) targeted audits in specific areas and data collection of in-store accidents and review of this data both in-store and centrally.

In addition, every Tesco store has a Store Forum on which elected representatives sit. A variety of issues (including health and safety) are discussed in store forums. Where appropriate, these can be escalated to the Store Director Forum (which includes representatives from 20 stores within a given area), which will seek to address the issue and respond to all the stores represented. If necessary, issues and concerns can be escalated further to the National Forum (on which staff representatives sit alongside senior managers). Any health and safety issues raised at this level will receive a response from Trading Law & Technical, which will be disseminated to all stores. Through these democratic structures, Tesco staff has representation at the highest level and can escalate their health and safety concerns.

LOPP is administered by staff within the Trading Law & Technical team at Tesco's head office. In-store staff do not have direct responsibility for LOPP. LOPP is coordinated by Tesco in partnership with Dundee City Council.

Tesco's Approach to LOPP

Tesco has been involved in LOPP for 3 years. The pilot began in 2005 and an Engagement Plan was developed in the same year³. Tesco's Engagement Plan includes the following elements:

- A list of priorities, stipulating a 3% reduction in accidents, year-on-year over three years across the following key risk areas –
 - Slips, trips and falls on the same level
 - Manual handling
 - Being struck by equipment, predominantly roll cages.
- Action required, detailing what action enforcement officers will take in accordance with the plan
- Scope of the plan, specifying which Tesco's sites the plan applies to
- Time period covered by the plan
- Any amendments to the plan
- Contractual details of the plan.

At the outset, it was envisaged that LOPP would build on the existing LAPS relationship Tesco had established with Dundee City Council, formalising this relationship and involving the HSE in it. It was

³ We understand that the Engagement Plan was not published until December 2006 so Local Authorities will not have received guidance on engagement with Tesco before this.

also hoped that LOPP would encourage LAs to regulate Tesco sites in a more consistent manner, by promoting the lead authority relationship and encouraging local authorities to find out about the organisation's activities, priorities and procedures before directing an enquiry, request or challenge at them. Given this, it was hoped that LOPP would reduce the work involved in responding to LA enquiries for staff in the Trading Law team and provide a more timely response to LA requests for information

Within Tesco, awareness of LOPP is limited to members of the central Trading Law & Technical team, who view it as an arrangement formalising their relationship with the lead authority and with the HSE. However, there is a high awareness of the importance of local authority enforcement throughout the business. Unlike at BAE Systems, LOPP has not been used as an internal brand to promote health and safety activity at a local level. In-store staff (such as store managers or compliance managers) are not informed directly about LOPP and, consequently, are not aware of it. (Although only one store was visited in this case study, Trading Law & Technical staff confirmed that this was the case across all stores and depots.) The intention behind this is to keep delivery of health and safety in stores and depots as simple and straightforward as possible.

Priorities and targets are set by the Trading Law & Technical team and rolled out across stores nationwide. As a result, although store managers and compliance managers are not involved directly in LOPP, delivery of health and safety at a local level is closely tied to the priorities and targets set out in Tesco's engagement plan for LOPP. Each year, health and safety activities (such as training or advertising campaigns) are developed around the three priorities set out in the action plan (roll cage accidents, slips and trips, manual handling). These are then distributed to and implemented by staff in store, principally store managers and compliance managers.

Staff responsible for LOPP pointed out that the three priorities identified in the action plan were in line with rates of staff and customer accidents across the organisation and that Tesco's health and safety activities would be based around these priorities whether or not it was involved in LOPP. LOPP is seen as a way of involving regulators more closely in Tesco's health and safety activity, rather than as a means of fundamentally reshaping it.

Tesco's Attitudes to LOPP

Amongst those responsible for the delivery of LOPP in the Trading Law & Technical team, attitudes were very positive and there was a strong desire to continue with LOPP into the foreseeable future. LOPP has had a number of definite benefits and these are detailed below:

- **Formalisation of LAPS**

The long-standing relationship with Dundee City Council (as lead authority) was viewed positively within the Trading Law team. LOPP was seen to have formalised this relationship in two ways – by bringing in the HSE to provide their national perspective on health and safety and by prompting the creation of a formal engagement plan to guide the relationship and shape health and safety priorities and targets. The formalisation of the pre-existing LAPS relationship was seen to have added weight and authority to it.

- **Closer relationship with HSE**

LOPP has enabled Tesco to consult HSE on health and safety issues and receive guidance from them in a more consistent way than previously. HSE staff had attended meetings between Tesco and Dundee City Council and provided advice and guidance. As a result, those responsible for LOPP felt better informed about the HSE's position on the key health and safety issues affecting them and believed the advice and information they were now receiving from HSE was fuller and more consistent than in the past.

- **Greater consistency of regulation**

It was felt that LOPP had prompted greater consistency in the regulation of Tesco stores by LAs. Some local authorities were including Dundee City Council in their enquiries and even going to them for information and advice in the first instance, before directing their request, enquiry or challenge at Tesco.

However, LOPP was not seen to be working as well as it could on the last of these aspects. Sometimes requests for information were being sent directly to the Trading Law & Technical team which Dundee City Council could have dealt with under LOPP arrangements. At the time of interviewing, one LA had contacted Tesco requesting to see evidence of their risk assessment procedures, which could have been obtained directly from Dundee City Council.

In addition, the following criticisms of LOPP were made:

- That LA inspectors may arrive at Tesco sites to carry out inspections without having scrutinised the LOPP arrangements or related documents held by Dundee, which would have given them an insight into the organisation's priorities, policies and activities.
- That many LAs were not fully aware of LOPP and were therefore not operating in accordance with its arrangements.

This raised questions about communication of the scheme, both to LAs and to individual inspectors within them. It was noted that there were no arrangements in place to compel inspectors to comply with LOPP. When the Trading Law team were contacted by LAs about issues that should have been referred to Dundee City Council, Trading Law & Technical team said they would forward the communication on to Dundee and copy Dundee in to any response.

Given the pre-existing successful LAPS relationship in which Tesco was involved, LOPP was not seen as having radically altered the way the organisation approached health and safety or its relationships with regulators. Rather, the shift from LAPS to LOPP was seen as incremental, strengthening and formalising the LA relationship while introducing HSE to it.

Nevertheless, staff in the Trading Law team wanted to see LOPP, or something similar, continue into the future. The benefits identified above were felt to be substantial and there was concern that what had been achieved in the way of more consistent LA regulation would be lost if LOPP was discontinued.

Lessons learned from the Large Organisations Partnership Pilot (LOPP)

The Large Organisations Partnership Pilot (LOPP) was a joint initiative, launched in October 2005, between the Health and Safety Executive (HSE) and the Local Authorities Coordinators of Regulatory Services (LACORS) to explore how engagement with large organisations (defined as having > 10,000 employees in the UK, with multi-site operations), could be improved.

The objectives of LOPP were:

- to present a more coherent and coordinated face to large organisations,
- to secure improvements in health and safety outcomes in the participating organisations, and
- to give participating organisations an early voice in discussions on emerging policy areas such as reward and recognition and alternative penalties.

However, the purpose of this research is not to evaluate the extent to which these objectives have been met. The LOPP community (regulators and organisations involved) recognise that, at the end of three years of LOPP, the pace at which the various partnerships have developed has resulted in a wide variance in the maturity of the different relationships, and this would not provide a useful database for analysing the effectiveness of established partnerships at which the above objectives are aimed. Nevertheless, the experience over the three years provides a useful database for drawing practical lessons, and determining the factors which influence the establishment of LOPP-style relationships, for any future HSE/LA engagement with large organisations. The research findings outlined in this report is intended to help identify these lessons.

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