



Chartered
Institute of
Environmental
Health

The Health and Safety of Great Britain Be part of the solution

Response by
Chartered Institute of Environmental Health
to Health and Safety Executive
strategy consultation

27 February 2009

The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

Any enquiries about this response should be directed in the first instance to:

Andrew Griffiths
Acting Director of Policy
Chartered Institute of Environmental Health
Chadwick Court
15 Hatfields
London
SE1 8DJ

Telephone: 020 7827 5838
Email: a.griffiths@cieh.org

1.0 CIEH response to HSE Strategy

1.1 Introduction

The CIEH welcomes the Strategy as a timely statement of the key principles for ensuring the protection of workers through the effective use of the resources of many agencies. This response identifies a range of ways in which the CIEH is and, will continue to be, part of the solution.

- 1.2 The CIEH addresses this issue from a unique perspective with members actively involved in health and safety working in regulation (in local authorities), in government, in business, as consultants and as trainers.



- 1.3 This response to the Strategy takes into account the views of this wide range of professionals.

- 1.4 The close working relationship that the CIEH has with the Board and officers of the HSE together with active participation in HELA augurs well for continued partnership working towards delivering effective solutions. This is in addition to a similar working relationship with LACORS.

- 1.5 The core Health and Safety strategy of the CIEH is to reduce risk in the workplace through active and purposeful partnership with government agencies, the private sector, and other professional bodies and organisations.

- 1.6 The CIEH will continue be part of the solution by communicating with our members through Environmental Health News (weekly), Environmental Health Practitioner (monthly), Journal of Environmental Health Research (quarterly) and electronic updates. In addition the CIEH is a full member of POOSH (Professional Organisations in Occupational Safety and Health).

- 1.7 Between 2003 and 2008, the CIEH had over 3,500 trainers delivering 16 fit for purpose health and safety courses which resulted in the award of over 800,000 certificates.

- 1.8 The CIEH has adopted the following principles in respect of the whole issue of health and Safety
- 1.8.1 That the health and safety of people connected with work and workplace activities (occupational health and safety) is a core contributor to the environmental health discipline.
- 1.8.2 That significant reduction of occupational health and safety risks is most likely to be achieved through a combination of:
- The ongoing education of workers, supervisors, managers and employers in all workplaces
 - Access to authoritative and professional advice, training and consultancy services
 - Firm but fair regulation and enforcement from a competent, appropriately resourced regulatory workforce
 - The education of the public, especially young people, in understanding risk and how to manage it as a life skill.
- 1.8.3 That all CIEH members should act responsibly and professionally by promoting the delivery of high standards of occupational health and safety standards as employees, supervisors, managers or employers themselves.
- 1.8.4 That people going to work or to workplaces have a right to expect to be able to leave that work or workplace as fit and healthy as when they arrived.
- 1.8.5 That CIEH members who have current occupational health and safety competence, should seek opportunities to educate others, out with of any formal job role, such as through the CIEH regional structure, and in voluntary organisations.
- 1.8.6 That environmental health practitioners should continue, upon qualification, to hold an underpinning knowledge and skill set in the fundamentals of occupational health and safety.
- 1.8.7 That the most effective overarching strategy for the CIEH (and its members) is to be able to reduce risk in the workplace will be through active and purposeful partnership with government agencies, the private sector, and other professional bodies and organisations.
- 1.8.8 That work related injuries and cases of work related ill-health should be regarded as preventable, through the application of readily available advice and the application of sensible risk management

2.0 Overview

- 2.1 There should be a greater acknowledgement in the strategy of the role of good quality education and training in promoting commitment to health and safety within an organisation and encouraging a sensible and workable approach to its management.
- 2.2 The CIEH believes that Environmental Health Practitioners have skills that lend themselves very well to supporting a pragmatic and integrated approach to health and safety within organisations – from the perspective of both the enforcement and commercial sectors.
- 2.3 Leadership skills are referred to in the strategy, but the importance of properly implemented occupational health and safety management standards in helping organisations improve their health and safety performance needs to be stressed. This approach has been recognised by the Environment Agency which has made positive statements with regard to environmental management standards within their strategy and on their website.
- 2.4 Similar statements should be made within the HSE strategy; supporting documentation should refer to BS18001, 2 & 4, and outline the way in which they can be used sensibly, and how they can help.
- 2.5 Investigation and securing justice is included as the first goal, which is consistent with enforcement being a core activity of HSE and local authorities. However, this emphasises a reactive approach, rather than a proactive one. The contribution of inspection programmes and preventive interventions should come first, and be clearly stated within the goal. It is noted that there is no mention of inspections and inspection programmes within the goals.
- 2.6 There is inadequate acknowledgement in the Strategy of the government's 'Better Regulation' agenda. The proposals in particular for the establishment of Primary Authorities and the Retail Enforcement Pilot will have significant effects on the delivery of health and safety compliance activities by local authorities. Such activity has for many years been the poor relation when compared with work to secure food safety due in large part to the plethora of targets and performance indicators placed on local authorities and which have tended to mitigate against adequate health safety regulatory activity.
- 2.7 The CIEH would have wished to have seen in the strategy a greater commitment to help and support businesses (e.g. by the promotion of available information) together with more co-ordination of planning projects with Primary Care Trusts, Local Area Agreements, Local Strategic Partnerships etc in the "customising approaches" section.
- 2.8 Once the consultation process has been completed, the CIEH would urge that tailored versions of the Strategy be produced targeted at various sectors (businesses, workers etc) in plain English. In addition an introductory section which outlines the Health and Safety enforcement structure in the UK so that duty-holders are fully aware of the respective role of HSE and local authorities as enforcing authorities in their own right would be useful.

- 2.9 A system which enables local authorities to upload information on prosecutions to a database managed by the HSE would be of considerable benefit to the process of securing compliance with health and safety legislation.

ANSWERS TO QUESTIONS IN STRATEGY

Question 1 Do you support the goals set out in the strategy and are there any omissions?

- 1.1 More could be done in schools prior to leaving to ensure pupils are familiar with their rights regarding health and safety in their prospective employment or training so that they the workers of tomorrow are better equipped and aware to enter the world of work.
- 1.2 There should be a requirement for Owners/Managers responsible for health and safety in their workplace to be properly trained. Health and safety training needs to be accessible and not too expensive; it needs to be appropriate to the setting and occupation and delivered in a manner in which the importance and processes of health and safety are easily understood by participants at all levels.
- 1.3 There should be a sharper focus on outcomes and measures of success and a greater emphasis on how local authorities and professional bodies like the CIEH can work more effectively in partnership with the HSE.

Question 2 How can you or your organisation help the HSE deliver the goals?

- 2.1 By producing guidance and examples of good practice for members and practitioners
- 2.2 By continuing to offer high quality health and safety training solutions
- 2.3 By contributing to debates and educating not only employers and employees but the general public as a whole.
- 2.4 By encouraging a common sense approach to health and safety.
- 2.5 By continuing our active involvement in, and support, for the development of the health and safety competence framework
- 2.6 By advising Clients on cost effective measures and encouraging them to take steps to comply with their legal obligations, and to involve workers in seeking practical and cost effective control measures.
- 2.7 By developing on-line models and e-learning for developing safety policies and risk assessments.

Question 3 Can you help the HSE to identify others who have a role to play in delivering the goals as set out in the strategy?

- The voluntary sector
- Relevant government agencies (including OFSTED)
- Local education authorities
- Emergency planning officers in local authorities
- Association of Chief Police Officers
- Insurance companies (to tackle the pervasive risk aversion culture)
- Learning and Skills Council
- The broadcast and print media
- Competent consultants
- Primary Care Trusts
- Unwilling duty-holders
- Celebrities willing to become ambassadors for sensible risk management

Question 4 Who else should the HSE and the Local Authorities be engaging with to help deliver the goals in the strategy?

- POOSH (Professional Organisations in Occupational safety and Health)
- Trade Unions
- Volunteers
- Trade organisations
- Training centres
- National Health Service Litigation Authority
- Trainers

Question 5 What should the HSE and Local Authorities do differently to help deliver the goals in the strategy?

5.1 Make greater use of outside training providers

5.2 Greater promotion using broadcast media

- 5.3 Promote road shows in public places such as shopping malls, city centres
- 5.4 Emphasise the role of advisors
- 5.5 Introduce a "safer workplace better business" diary for distribution to SMEs similar to the Food Industry "safer food better business" diary
- 5.6 Advertise local colleges where companies can access training for staff
- 5.7 Use social marketing techniques to increase awareness of roles and responsibilities amongst SMEs
- 5.8 Encourage agencies (including schools) to see health and safety as a basic skill needed for a prosperous modern society
- 5.9 Commit to systematic, monitored improvement in the quality of provision using independent peer review
- 5.10 Establish a whistle blowing campaign to the HSE or local authorities via a free text or phone service
- 5.11 Make approved codes of practice available free for new and existing businesses
- 5.12 Institute award schemes for businesses akin to the scores on doors scheme promoted by the Food Standards Agency
- 5.13 Encourage a change of emphasis away from compliance lead interventions to prevention and education
- 5.14 Develop a national complaints line
- 5.15 Encourage and build more co-operative and collaborative approaches for SMEs to join together and share expertise
- 5.16 Publish the strategy on DVD or interactive media and promote a media campaign, similar to 'Gremlins' and Basic Skills
- 5.17 Promote the free information and advice available on the HSE web site

Question 6 What parts of which goals in the strategy are best delivered by others?

- 6.1 Greater involvement by business in identifying priorities and setting targets
- 6.2 Education and raising awareness by academic institutions
- 6.3 Promotion of worker engagement by trade unions
- 6.4 Reduction in accidents and ill health delivered by private companies and trade organisations undertaking projects on behalf of local authorities and the HSE
- 6.5 Publicity of health and safety by younger people through introductions to health and safety awareness in schools and colleges

- 6.6 Trainers and consultants encouraging clients to train staff including managers
- 6.7 Building competence and involving the workforce can be influenced by training organisations, professional safety bodies and safety professionals

Question 7 What can your own and other organisations do differently to help in the delivery of this strategy?

- 7.1 Promote the contents of the strategy and incorporate the principles into health and safety development plans
- 7.2 Become more involved in local community activities to champion sensible risk management
- 7.3 Enhance the reputation of health and safety enforcement to change public perceptions and demonstrate the real effects of poor health and safety instead of comical trivia or myths