

HSENI's Draft Corporate Plan 2018 - 2023

ANALYSIS AND SUMMARY OF CONSULTATION RESPONSES AND HSENI COMMENTS

1. This is a summary report of the outcome of the HSENI's formal statutory consultation on a draft corporate plan (2018-2023). HSENI launched its draft corporate plan on Friday 6th April 2018. The consultation period closed on Friday 29th June 2018.
2. Letters were issued to approximately 232 consultees inviting comments on the proposals. The details of the thirteen responses received are set out in the table overleaf.
3. The responses received were almost unanimously encouraging and supportive of the strategy, the direction and the partnership approach which underpins this corporate plan.

Consultee	Comment	HSENI Response
NI Safety Group	<p data-bbox="528 241 978 488">Welcomes the commitment to raise workplace health as a priority issue during inspections in sectors where known health risks exist. Also welcomes inclusion of mental wellbeing activities/ promotional events as a measured output.</p> <p data-bbox="528 533 978 779">Welcomes the focus on the most serious workplace health and safety issues; high risk industries and activities; sensible and proportionate risk management; effective regulation; and supporting businesses and the economy.</p> <p data-bbox="528 824 978 925">Welcomes the sectoral approach, acknowledging challenges and defining priorities.</p> <p data-bbox="528 969 978 1104">Consider including an average cost to an employer in NI of a case of ill-health, reportable injury, fatality and minor injury.</p> <p data-bbox="528 1149 978 1171">Welcome partnership approach.</p> <p data-bbox="528 1216 978 1317">We ask that the Board, SMT and other influences resist further budget cuts.</p> <p data-bbox="528 1361 978 1496">We fully support the plan's contents and considers it to be broadly in line with the values, aims and objectives of NISG.</p>	<p data-bbox="1003 241 1326 275">HSENI notes the response.</p> <p data-bbox="1003 533 1326 566">HSENI notes the response.</p> <p data-bbox="1003 824 1326 857">HSENI notes the response.</p> <p data-bbox="1003 969 1399 1025">This information is not currently available.</p> <p data-bbox="1003 1149 1326 1171">HSENI notes the response.</p> <p data-bbox="1003 1216 1326 1238">HSENI notes the response.</p> <p data-bbox="1003 1361 1326 1384">HSENI notes the response.</p>

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<p>Roy Coulter Consulting Limited</p>	<p>The outcomes are both sound and pragmatic. There are further opportunities to reinforce the Health & Safety message using social media beyond the current use.</p> <p>Delighted to see that mental well-being at work is highlighted.</p> <p>It would be nice to have the resources to work on all areas but we must focus on the immediate issues and priorities on farming and construction whilst not ignoring the other industries. Perhaps an 'Earned autonomy' status could be afforded to responsible employers.</p> <p>I see poor examples of practice in the construction sector especially where there is work (excavation) near to gas and electricity pipes and cables. Would like an initiative (joint with HSENI) to reduce cable and pipeline strikes. A start would be to attempt to measure through RIDDOR and Reg32 ESQCR reports.</p> <p>Missed an opportunity to learn from RIDDOR reports that have not resulted in injury i.e. near miss reports. Could we anonymise these for education? I assume there is under-reporting of RIDDOR near misses for fear of enforcement. Perhaps this would partially allay some fears if we published anonymous examples.</p>	<p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>'Earned autonomy status' is not considered to be appropriate in health and safety but the CP sets out that we will target our activities to areas of greatest risk.</p> <p>This will be considered by the relevant operational group as part of its Annual Report submission.</p> <p>This will be considered by the relevant operational group as part of its Annual Report submission.</p>

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<p>Construction Employers Federation</p>	<p>Outcomes achievable overall. Important to recognise however that figures can be impacted by activity level and are likely to be under-reported in relation to the major and over 3 day accidents. Should work towards full reporting to get more meaningful statistics to enable construction companies to learn lessons and improve health and safety performance.</p> <p>When presenting statistical trends, should distinguish between safety and occupational health related.</p> <p>Welcomes increased focus on occupational health. CEF would welcome the opportunity to discuss the production of uniform guidance to assist the construction industry including SMEs on matters including mental health awareness. Education and raising awareness is key in relation to promoting the benefits of management of occupational health, particularly among smaller companies. HSENI should play a co-ordinating role to ensure the various advice services available provide a clear and consistent message.</p> <p>Agrees it is important to focus on serious issues.</p> <p>The plan focuses on the main issues regularly highlighted by the construction statistics.</p> <p>CEF is keen to partner with HSENI to promote key messages throughout the construction industry in NI and fully supports the collaborative approach suggested in the draft CP.</p> <p>It is also important that the plan is subject to regular interim reviews to monitor progress against the outcomes throughout the duration of the plan. Also need to take</p>	<p>HSENI notes the response.</p> <p>Reporting of incidents etc. is limited by legislation, however HSENI will look at how it can continue to explain, promote and enforce RIDDOR to industry to try to increase reporting levels.</p> <p>The feasibility of this will be considered.</p> <p>The feasibility of this will be considered.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p>

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Northern Ireland Electricity (NIE)	<p>flexible approach so that plan can be amended if appropriate.</p> <p>In agreement with the proposals and note that these reflect NIE objectives with regards zero harm (as opposed to zero incidents).</p> <p>Support the proposals and recognise the importance and impact of aiming to achieve a balance between occupational health and safety.</p> <p>‘Challenges’ and ‘priorities’ defined in the Utilities section – good to see key risk areas and associated strategy are aligned with these.</p> <p>Satisfied this represents a comprehensive approach in NIE’s sector.</p>	<p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p>
Lisburn & Castlereagh City Council	<p>Key outcomes are achievable with joint working with local government health & safety enforcement. Collaborative working with private industry, business employers and employees on educational based initiatives to highlight the importance of health & safety well-being.</p> <p>The Council welcomes and supports the increased focus towards the health aspect of health & safety. With an ever increasing demand on our health service, the need to work with employers to reduce, manage and support employees affected by ill health at work is most crucial. By tackling ill health at work will greatly assist with meeting the targets outlined within the plan.</p> <p>The Council fully supports the focus towards ‘Serious’ issues. Serious issues may highlight areas of concern and need for action, which have may not have been identified previously. However, this may result</p>	<p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p>

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Southern Health & Social Care Trust	<p>in further pressures on other resources and demands on other sectors.</p> <p>The plan identifies the main issues in the local authority sector and the need to work with other Public Services to help deliver and tackle/manage issues surrounding mental health issues.</p> <p>In agreement that the targets are achievable and can be delivered through partnership and working collectively.</p> <p>Given the historical focus on physical safety, the Trust welcomes a move towards a more balanced approach with occupational health.</p> <p>The Trust agrees with this approach. The issues are in line with our own internal intelligence and strategy.</p> <p>The SHSCT is supportive of the Corporate Plan 2018-2023. An improved web-based resource 'Hub' is welcomed, but should reflect the needs of NI to gain maximum benefit.</p>	<p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p>
Warrenpoint Harbour	<p>The reduction of 5% in over 3 day accidents appears slightly unambitious.</p> <p>Welcome the focus on health and any material you can provide to support the awareness/ education on this front would be welcomed, especially re the damage dust can do.</p> <p>Under 'Docks' the addition of slips, trips and falls, manual handling/ repetitive strain injuries and traffic management to the challenges. Also make reference to severe weather conditions (wind and rain</p>	<p>The figure is stretching as it represents a target which has rarely been achieved over the past twenty years.</p> <p>HSENI notes the response.</p> <p>It is not possible to capture every sector challenge or hazard. HSENI considers the main hazards in Docks are included in the Corporate Plan and HSENI is working with the Harbour on operational issues.</p>

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<p>Institute of Occupational Safety and Health (IOSH)</p>	<p>specifically) which make the working environment more hazardous.</p> <p>Would there be any sectoral accident/ near miss stats available to enable me to benchmark Warrenpoint harbour/ dock against others?</p> <p>Is it worth mentioning the Port Marine Safety Code which deals largely but not exclusively with the marine risks?</p> <p>Budget constraints may result in insufficient resources to achieve key proposed outcomes.</p> <p>Would like to see how many site visits per sector are planned and how stakeholders can assist.</p> <p>Would like to see targets for reducing exposures to occupational health hazards, including work-related carcinogens and psychosocial risk.</p> <p>Welcome the aim of ensuring awareness and enforcement action related to tackling occupational lung disease, cancer, mental health at work and MSDs.</p> <p>Suggest that ill health should be considered as the first priority while still working to improve safety.</p> <p>Should be more assistance provided to duty holders who struggle to pick out the occupational health requirements threaded throughout the various regulations to help small firms to comply.</p>	<p>HSENI does not have this information. HSENI is working with the Harbour on operational issues.</p> <p>This should be a reference document for docks and ports. It is not necessary to include in HSENI's Corporate Plan.</p> <p>HSENI notes the response.</p> <p>This information is given on an annual basis in our Operating Plan and is subject to our available resources.</p> <p>Targets for specific occupational health issues will come further down the road and will stay under consideration.</p> <p>HSENI notes the response.</p> <p>HSENI will significantly promote the need for effective management of workplace health, we feel the balance of 'health' and 'safety' outlined in the new Corporate Plan is appropriate</p> <p>HSENI will endeavour to deliver this through the following output (page 14 of CP) - Develop a website-based information resource which gives essential workplace safety, workplace health and</p>

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	<p data-bbox="528 349 963 629">IOSH would like the plan to outline how it will measure/ monitor whether there has been a reduction in exposures to serious health hazards in order to prevent long-latency diseases, such as occupational cancers and chronic obstructive pulmonary diseases.</p> <p data-bbox="528 674 963 913">We suggest the uptake of the ‘small business packs’ for lower risk companies and non-profit organisations is more actively promoted and we support proportionality from inspectors for lower-risk enterprises.</p> <p data-bbox="528 958 916 1093">Inspections – reduction of 1,000 inspections and advisory visits is regrettable and would urge it is reconsidered.</p> <p data-bbox="528 1279 938 1413">It would be helpful to have no of inspections/ visits per sector per year and methods for stakeholder involvement.</p> <p data-bbox="528 1458 975 1559">Agriculture – there needs to be more focus on tackling the serious health and safety risks famers’ face.</p> <p data-bbox="528 1850 963 2018">Highlight the cost to employers of a case of work-related ill health, reportable injury, workplace fatality and minor injury to incentivise more preventative action.</p>	<p data-bbox="1003 241 1331 309">mental health at work information for businesses.</p> <p data-bbox="1003 349 1374 517">Targets and measurements for specific occupational health issues will come further down the road and will stay under consideration.</p> <p data-bbox="1003 674 1321 696">HSENI notes the response.</p> <p data-bbox="1003 958 1385 1238">This information is given on an annual basis in our Operating Plan and is subject to our available resources. HSENI feels the target set is challenging in the context of the likely available resources over the 2018-2023 period.</p> <p data-bbox="1003 1279 1374 1413">This information is given on an annual basis in our Operating Plan and is subject to our available resources.</p> <p data-bbox="1003 1458 1385 1805">Since 2012 significant resources have been invested in this sector by HSENI and through the Farm Safety Partnership (FSP). Subject to future funding it is anticipated this will be maintained. The current FSP Action Plan covers the main safety and health issues identified by the sector.</p> <p data-bbox="1003 1850 1321 1872">HSENI notes the response.</p>

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<p>Quarry Products Association Northern Ireland (QPANI)</p>	<p>A number of other operational recommendations were made which will be passed on to relevant Heads of Group to consider.</p> <p>QPANI suggests that the website based information resource acts as 'communication hub' where best practice from various industry sectors can be communicated across all industry. In particular we would highlight the 'Safe Quarry' App and its MPA Safety App.</p> <p>QPANI welcomes this approach. We propose that HSENI sets up a strategic forum that would include H&S reps from a number of industry sectors deemed 'high risk' to discuss and agree a strategy and plan to reduce incidents on the main high risk areas.</p> <p>The proposed targets in the key outcomes appear challenging, based on previous trends. Some text on how these will be achieved would have been useful.</p> <p>The shared vision approach could be extended to appoint a group of capable and proven H&S practitioners, HSENI inspectors and knowledgeable senior managers from the various industrial sectors and tasking them to devise a suitable and sufficient strategy to achieve the targets through a collaborative approach. This could extend to having a network of special interest groups to examine specific issues.</p>	<p>Links to other useful health and safety resources will be considered as the web based information hub is developed.</p> <p>This will be considered by the Principal Inspector of the relevant operational group.</p> <p>HSENI notes the response.</p> <p>This will be considered by the Principal Inspector of the relevant operational group in the context of operationalising the Corporate Plan.</p>
<p>HAE & PASMA (Hire Association Europe and Prefabricated Access Suppliers' and</p>	<p>We agree with the focused areas in relation to Construction but would advocate adding noise and vibration to these priority areas given the life-long and irreversible nature of resultant health conditions.</p>	<p>This will be considered by the Occupational Health and Hygiene and Construction Groups.</p>

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Manufacturers' Association)	<p>We also assume that occupational lung disease will include construction dust and action to manage this risk.</p> <p>We encourage HSENI to view reducing falls from height as industry-wide rather than a construction sector challenge.</p> <p>We support enhanced reporting as a method of identifying accident prevention methods and would welcome enhanced reporting regarding falls from height, detailing the type of equipment used and injuries sustained.</p> <p>Re web-based information, can we ask that good practice and examples are drawn from the widest possible base, not just NI, as this will assist those businesses operating at a UK-wide level and also inward investors to GB and NI?</p>	<p>This is included under challenges in the Construction sector.</p> <p>HSENI notes the response.</p> <p>HSENI notes the response.</p> <p>This will be taken forward as the website based hub develops.</p>
Northern Ireland Public Service Alliance (NIPSA)	<p>NIPSA welcomes the broader emphasis on occupational health and in particular mental health at work. NIPSA would like to see stress and the mental health problems it can trigger as a top priority to be addressed within the plan, especially in the public sector. HSENI should ensure proper resources are allocated and the annual operating plans set out clear targets on how HSENI will address this serious health risk and ensure that appropriate enforcement action is taken against employers who do not comply with their statutory duty in this regard.</p> <p>NIPSA welcomes reference to the protection of vulnerable groups in the workplace. We would like to see sufficient resources allocated to protect the most vulnerable workers, given the increase in levels</p>	<p>HSENI notes the response.</p> <p>In the field of health and safety HSENI staff will consider vulnerable workers against hazards and risks associated with the work activities.</p>

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Trevor Bailie	<p>of hate crime and threats and abuse against minority groups and the rise in suicide rates esp among young men and LGB&T community.</p> <p>Raised issue of corruption. Suggested that PSNI should take on role of enforcement to prevent risk of this.</p>	Noted. There is no evidence of corruption provided.
Northern Ireland Master Plumbers Association	<p>The NIMPF response lists a number of areas where they are not happy with the current Gas Safe Register contract and procurement of the new UK contract. The response lists many areas where the Association is very critical of HSENI's approach to managing gas safety in Northern Ireland and HSENI's management of its resources. The response is critical of the relationship between HSENI and the industry and lists 25 specific points they would like taken into consideration in the corporate Plan.</p>	<p>HSENI notes the response and the comments which are all on operational issues being taken forward by the operational group in HSENI.</p> <p>Gas Safety remains a priority in the draft 2018-2023 Corporate Plan</p>