

# SME update

➤ **RoSPA's** occupational safety adviser, **Roger Bibbings**, provides a progress report on the National Occupational Safety and Health Committee's major inquiry into the various forms of H&S assistance which are currently available to small and medium size enterprises in the UK.

**R**egular readers will recall that **RoSPA's National Occupational Safety and Health Committee (NOSHCH)** is conducting a **eight-month major inquiry into health and safety and SMEs (see: Parting shots July 2007)**.

The inquiry is very wide ranging, looking not just at the help that is available from HSE and local authorities but at a very much wider spread of actors including major clients, funded trainers such as colleges, local H&S groups, consultancies, bodies like RoSPA and IOSH, trade associations, small firm advisory bodies, schemes such as Workplace Health Connect (WHC) and even providers of PPE or deliverers of first aid training.

NOSHCH's terms of reference for the inquiry are as follows:

- To identify and evaluate good practice, barriers and missed opportunities associated with current work by intermediaries aimed at promoting, developing and sustaining effective health and safety management in small firms (less than 50 employees).
- To make recommendations for action.

The work is being overseen by a Steering Group (SG) chaired by Paul Reeve, H,S&E adviser to the Electrical Contractors Association. The SG is composed of representatives of key bodies such as HSE, the Federation of Small Businesses and important initiatives such as the Contractors' Health and Safety Assessment Scheme (CHAS) and WHC. RoSPA provides the secretariat.

The Group's task in a nutshell is to review everything that is going on at present to help SMEs to tackle H&S and to reach conclusions about what is out there, what's working, and what could be done better.

While there will be a number of interim reports, the timescale commits NOSHCH to making a final report in October 2008.

### Why small firms?

In many ways Britain has a two-tier H&S regime. There is now a major gap between the health and safety management regime, culture and performance found in most large organisations and similar arrangements which should be in place (but are often missing) in the 3.5 million businesses that make up the rest of the UK economy.

SMEs now employ about 45% of the entire UK workforce. How to bring them up to the level of the 5,600 or so private sector businesses that now employ more than 250 people is **the** \$64,000 question in H&S. It's the last big one in H&S to be cracked, a challenge made all the more urgent, for example, by the sad news that fatal injuries were up again in 2006/7 – with many of these being in SMEs and micro-businesses.

Of course there are many small firms that handle H&S very professionally and many, of course, have only a light hazard burden meaning that they only need to take quite simple steps to control their risks. (That said however, most firms whatever their size will face problems such as slips and trips, manual handling and other ergonomic issues, work-

related stress and of course occupational road risk.) In general, however, serious accident rates in small firms (less than 50 employees) are roughly twice the rate of those in very large firms (1,000 plus).

There are many reasons for this such as ignorance of and suspicion about H&S (there is even hostility in some cases), and time poverty to be able to engage with the subject. And SMEs face many other problems such as information overload (too many sources of guidance, online tools, software etc) and not enough face-to-face advice. Although many trade associations offer H&S services and advice, and SMEs can join local networks such as their local H&S group, many do not know where to go for entry level advice (especially guidance from competent professionals who are sensitive to SMEs' needs).

While there is insufficient enforcement to bear down on 'cowboy' firms, increasingly more and more SMEs are working as contractors or suppliers for large organisations who are subjecting them to pre-qualification health and safety assessment.

Colleges, schools and training companies are also assessing SMEs' health and safety competence as part of their duty of care to trainees before they are placed in local businesses. This may be helping to guide such firms to upgrade their arrangements but it may also be resulting in unnecessary third party bureaucracy, reinforcing SMEs' negative perceptions of OS&H.

Obviously, there is no silver bullet to



tackle all these issues but finding the right strategic approach offers scope for really cutting accidents and ill health as well as producing many other incidental business/operational benefits to UK PLC. Yet, as the NOSHC inquiry has already shown, it's a big ball of knitting. There are many players and many angles and it is important to remember that, both from the perspective of the SME and of government ministers, health and safety is only one of a number of issues such as sustainability, finance, innovation, business skills etc which have to be tackled if smaller businesses are to survive and prosper.

## Progress

A special web area has been established at [www.rospa.com/occupational\\_safety/sme/index.htm](http://www.rospa.com/occupational_safety/sme/index.htm) to create a focus for the NOSHC inquiry and to call for evidence and funding support.

A major scoping report has been written by Howard Fidderman, which sets out a very comprehensive and unique overview of over 30 different sources of advice and help to SMEs. (This analysis – accessible at [www.rospa.com/occupational\\_safety/sme/map.pdf](http://www.rospa.com/occupational_safety/sme/map.pdf) – is still expanding as more SME H&S initiatives are identified). Much written evidence has been received and members of the Steering Group have had informal talks with a number of key players, including, for example, the government's Better Regulation Executive.

A major 'hearing meeting' to take views from key witnesses was held in May alongside this year's *Safety and Health Expo* at the NEC, with many witnesses speaking from direct experience of engaging with SMEs. A full verbatim transcript has been prepared (now on website) which provides a fascinating series of insights and confirms the scale and nature of the SME H&S problem.

NOSHC see the inquiry as supporting government plans to simplify regulation generally for SMEs, as well as HSE's work with SMEs which is currently focused on simplification of their guidance and improving their communication and consultation with small firms.

In areas like construction, the hope is the inquiry will help support initiatives such as the 'Working Well Together' campaign.

## Next steps

Because the potential scope of the inquiry is so vast, the SG has decided to focus down initially onto H&S pre-qualification (and similar) schemes. The next step is to make a comparative review of the H&S assessment criteria used in five – possibly

more – schemes. These are the Learning and Skills Council's (LSC) 'Safe Learner Framework', trade association schemes within the ABI's 'Making the Market Work' initiative, DWP's Workplace Health Connect pilots, HSE's *SME H&S Indicator* and possibly OHSAS 18001, as well as the core criteria used by CHAS based on findings from the Carpenter Report and the SEC's core criteria. The aim is to assess the scope for defining a common set of essential criteria. (CHAS too are taking an important initiative in creating a forum for consultancies doing H&S pre-qualification work.)

In this context, there will also be a need to review competence requirements for people who actually carry out this kind of assessment work with SMEs. The longer term vision, however, is not just one of establishing effective means to check that SMEs meet essential standards, but of ensuring that SMEs being assessed actually get effective feedback and signposting to help them move forward on health and safety. (Above all, it has to be a positive experience for the SME.)

When the analysis of the various criteria is completed, NOSHC may then convene a major seminar for all SME assessor organisations (run under 'Chatham House Rules') to exchange views find a way forward. Overall objectives which seem to be emerging at this stage include:

- 1) Establishing meaningful 'core' criteria for assessing H&S capability in SMEs.
- 2) Establishing the core competencies of those doing the assessment work.
- 3) In this context, maximising face-to-face engagement between assessors and SMEs to provide effective mentoring, signposting etc.
- 4) Securing mutual acceptance of assessment results by key players – including HSE and LAs.
- 5) Strengthening motivational factors and eliminating barriers.

The inquiry has already generated a lot of interest, for example, from Lord McKenzie, Minister responsible for H&S at DWP, colleagues at the European Agency for Safety and Health in Bilbao and organisations representing small firms.


The SG wants to secure as much support as possible and work in co-operation with others such as IOSH, the trade unions, CBI, Association of British Chambers of Commerce and so on. We need their views on some of the main lessons that are emerging from the 'hearing' and from all the written evidence, and we also need guidance on which people we have yet to engage with.

Is the decision to focus on pre-qualification a good way forward? Is it just a question of assessment criteria or are competence requirements for assessors just as (if not more) important? Will the assessment schemes identified be willing to come together to share, compare, improve and consolidate? Is there further beacon work out there we can point to?

It's an exciting agenda and one with real potential to help meet RoSPA's mission and vision which are respectively 'To save lives and reduce injuries' and 'To lead the way in accident prevention'.

The SME inquiry has so far been funded by very generous donations from BNFL, National Semiconductor and the Learning and Skills Council. Further donations are still needed – and will be gratefully received! Contact Roger Bibbings on tel: 0121 248 2095 or see: [www.rospa.com/occupational\\_safety/sme/sme\\_letter.pdf](http://www.rospa.com/occupational_safety/sme/sme_letter.pdf)

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