

HEALTH AND SAFETY COMMISSION (HSC)

**REGULATION AND RECOGNITION
TOWARDS GOOD PERFORMANCE IN HEALTH AND SAFETY**

**A RESPONSE BY THE ASSOCIATION OF PERSONAL INJURY LAWYERS
(APIL24/04)**

DECEMBER 2004

The Association of Personal Injury Lawyers (APIL) was formed by claimant lawyers with a view to representing the interests of personal injury victims. APIL currently has around 5,000 members in the UK and abroad. Membership comprises solicitors, barristers, legal executives and academics whose interest in personal injury work is predominantly on behalf of injured claimants.

The aims of the Association of Personal Injury Lawyers (APIL) are:

- To promote full and prompt compensation for all types of personal injury;
- To improve access to our legal system by all means including education, the exchange of information and enhancement of law reform;
- To alert the public to dangers in society such as harmful products and dangerous drugs;
- To provide a communication network exchanging views formally and informally;
- To promote health and safety.

APIL's executive committee would like to acknowledge the assistance of the following in preparing this response:

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REGULATION AND RECOGNITION

Executive Summary

1. APIL welcomes the opportunity to put forward its comments in response to the Health and Safety Commission (HSC) consultation – ‘Regulation and recognition: Towards good performance in health and safety’. In summary, APIL would like to make the following points concerning the HSC’s proposed methods to influence workplace health and safety standards.
 - In order for the HSC to achieve “*workplace health and safety that leads the world*”, APIL believes it needs to concentrate on safety strategies or techniques which work successfully in other countries.
 - APIL suggests that the technique of ‘naming and shaming’ companies which breach workplace health and safety should be more widely used, in parallel with a policy of ‘naming and praising’ companies which succeed in having world class health and safety.
 - APIL feels the more transparent the operations and business activities of a company, the more likely that company will change its procedures and policies to avoid bad publicity and press.
 - APIL suggests that an Employers Insurance Bureau (EIB) should be established. The by-product of establishing such an agency is that it would allow greater transparency in relation to the insurance employers hold.
 - APIL continues to assert that it is vital for effective health and safety that the policy of inspection and enforcement is retained, and funds and resources are not diverted to other less successful intervention techniques.
 - The linking of employers’ insurance premiums to health and safety records, APIL suggests, will act as an incentive for businesses to concentrate on the health and safety of their workforce as a priority.

- APIL believes that health and safety information should be more user-friendly in order for small and medium size businesses to be able to gain access to guidance which is directly relevant to them.
- Finally, APIL proposes that the role of the employee safety representative should be strengthened to include the provision of health and safety information in the workplace as well as enforcement powers.

2. Please see Appendix A for APIL's completed '*Regulation and recognition – Electronic Response Form*'.

Health and safety around the world

3. APIL is fully supportive of the HSC's aim to achieve "*workplace health and safety that leads the world*"¹. Yet while the HSC states that the consultation document's intention is to "*explore ways to improve standards of work-related health and safety*"² in order to achieve this aim, it is vague about the exact details. For instance, APIL feels that the consultation document does not give enough examples of health and safety strategies or techniques which work successfully in other countries to fully determine what steps are needed to make the UK a leader in workplace health and safety. The consultation document talks about the Voluntary Protection Programme operated in the USA by the OSHA, yet dismisses this model as being "*resource-intensive and bureaucratic to administer*"³. In addition, it mentions a similar scheme is soon to be trialled in Ireland but fails to give further details. APIL feels that if the HSC is to achieve its aim, there needs to be more discussion of jurisdictions where health and safety schemes work well.

4. APIL feels one such example of effective health and safety in another jurisdiction is the 'naming and shaming' of companies which commit health and safety breaches in Canada. While the HSC proposes the use of 'name and shame' within the consultation document, it fails to describe how such a scheme would operate in practice. The use of naming and shaming in Canada works to both punish the offending organisation or person, as well as build a sense of community outrage when a health and safety breach occurs. Once an organisation has been charged, its name appears in newspapers and on the radio. This naturally has a significant impact on that organisation's image and reputation, and may lead to a loss of trust amongst consumers. The publishing of these details, and the transparency which results, influences people's perception and behaviour and helps to cultivate a culture of community

¹ Consultation document – page 1

² Ibid

³ Ibid – paragraph 16, page 6

responsibility. Members of the local community are therefore involved in the process of punishment and sanction.

5. APIL proposes that any 'naming and shaming' campaign should also include placing offending companies onto a publicly available register or 'black list'. Similar to the current use of the NHS Charter, a company's health and safety records would be assessed against clearly defined and transparent criteria. With the growing importance of rehabilitation, and the increasing role it plays in getting people back to work, APIL feels that it would be worthwhile including it as a possible criteria when assessing the success of a company's health and safety arrangements. Once a company has been assessed with reference to the various criteria, its details could then be placed on a league table, indicating how companies compare with each other and also highlighting any particularly consistent offenders. By virtue of this league table being available to the public, companies would hopefully feel pressurised into improving their workplace health and safety.

6. APIL suggests, in addition to there being a 'name and shame' blacklist, a parallel list of companies which have excellent health and safety records could be established; a 'name and praise' list, if you will. In order to reinforce and emphasise the possible business benefits of such a 'name and praise' list, the HSC could produce a discretionary award or kite-mark indicating that a particular company has an excellent health and safety record. This idea closely reflects the suggestion in the consultation document concerning the establishment of a formalised 'earned autonomy'⁴. Any such award could be used in promotional material by the company, ideally leading to more customers and staff being attracted to the firm. The strength of such a concept, however, needs to be based on regular re-accreditation and the removal of any such award if serious health and safety breaches are subsequently identified.

⁴ Ibid - paragraph 62, page 15

Transparency

7. The benefits of transparency that the 'name and shame' blacklist provides, APIL suggests, should be further extended to include as many details as possible concerning the operation of a company. The more transparent the operations and business activities of a company, the more likely the company will change its procedures and policies to avoid bad publicity. While APIL is supportive of the consultation document suggestion "*[e]ncouraging those at the top of the supply chain ... to use their influence to raise standards further down the chain, e.g. by inclusion of suitable conditions in purchasing contracts*"⁵, we feel that it is unlikely in today's cost driven international business environment for this to be a realistic proposition. APIL feels that a more realistic proposition is for there to be transparency in how services and products are chosen and purchased. This transparency would allow some companies to use their means of purchasing as a positive selling tool – for example, Fair Trade tea and coffee. In addition, APIL would like to see more transparency in the provision of insurance information.

Employers Insurance Bureau (EIB)

8. APIL has for many years supported the establishment of an Employers Insurance Bureau (EIB) to record and monitor employers' insurance provision and also to act as insurer of "last resort". The primary function of the EIB would be to allow for a negligent employer's insurer to be traced. This is particularly important in cases of occupational disease, such as those involving asbestos, where the negligent injury may have been caused many years previously. In addition, the EIB would pay-out compensation to injured claimants as a 'last resort' in the event that their employer and/or insurer have subsequently closed or ceased trading.
9. APIL believes the establishment of an EIB and corresponding database would, as a by-product of its primary functions, allow for there to be more

transparency in respect of the insurance held by employers. For example, it would allow workers to find out whether their employer had adequate insurance cover for its workforce. It would also allow for the effective recording of claims. By recording these claims, and their corresponding facts, it would be possible to supplement the aforementioned 'name and shame' blacklist with further information.

10. In order to make such a scheme effective, insurers would be compelled to give details of a company's insurance cover to a central database and/or centralised agency. A similar scheme is currently in operation for motor car insurance with the Motor Insurance Bureau (MIB). The scheme works via insurers supplying motor insurance details to the MIB. This information is then available in order to ascertain who is currently operating without insurance and it also allows for the effective location of insurers whose clients have been involved in accidents.

11. APIL sees no reason why an organisation such as the EIB could not be quickly and effectively established. As has been demonstrated by the MIB, such a scheme and governing organisation can be run effectively and efficiently. The fact that the MIB deals with approximately 22 million motor insurance policies demonstrates that a similar organisation should be able to deal with the far fewer employers' insurance policies involved.

Inspection and enforcement

12. APIL is a keen supporter of the 'carrot and stick' approach to the promotion of health and safety in the workplace. For example, we believe that inspection and enforcement (the 'stick') should be used in conjunction with lower insurance premiums (the 'carrot') for companies with good health and safety records. APIL therefore firmly believes that inspection and enforcement should be the primary method used by the HSC to police workplaces. While other suggested interventions should be considered and used, if appropriate, no resources should be diverted

⁵ Ibid - paragraph 38, page 12

away from the use of inspection and enforcement. Indeed APIL supports an increase in funding for the HSC so as to increase the number of health and safety inspectors and consequently the number of inspections being undertaken. A recent Work and Pensions Select Committee report indicated that there is a significant need for more money to be provided for front line inspectors and inspections, stating it was “*concerned both at the low level of incidents investigated and at the low level of proactive inspections and recommends that resources for both are increased*”⁶.

13. In relation to the use of inspection and enforcement by the HSC, one of APIL’s primary concerns - which echoes a similar concern raised in APIL’s response to the ‘*Workplace health and safety in Great Britain to 2010 and beyond*’⁷ consultation – is that use of it will be restricted, so that funds and manpower can be employed elsewhere. APIL firmly believes that any such move would severely restrict the ‘carrot and stick’ approach which APIL believes works well. Indeed, this view was recently echoed by the Work and Pensions Select Committee which stated: “*The evidence supports the view that it is inspection, backed by enforcement, that is most effective in motivating duty holders to comply with their responsibilities under health and safety law. We therefore recommend that the HSC should not proceed with the proposal to shift resources from inspection and enforcement to fund an increase in education, information and advice*”⁸.

14. APIL considers that there is a real need for inspection to be more widely used, especially considering the shocking statistic that the estimate for the level of reporting under the compulsory Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)⁹ is only 41.3 per cent. This indicates that over 50 per cent of non-fatal injuries are not reported. It is therefore essential that the HSC investigates as many

⁶House of Commons Work and Pensions committee – The work of the Health and Safety Commission and Executive (Fourth Report of Session 2003-04 Volume I) HC 456-I, page 46, paragraph 150

⁷(Jan 2004) See www.apil.com – press and parliamentary / Consultation papers for copy of APIL response

⁸House of Commons Work and Pensions committee – The work of the Health and Safety Commission and Executive (Fourth Report of Session 2003-04 Volume I) HC 456-I, page 43-44, paragraph 142

⁹Based on the Labour Force Survey

workplaces as possible as some high risk workplaces may be seen as low risk due to under-reporting. More widespread inspection should also drive up reporting standards leading to more accurate health and safety figures.

Companies' insurance premiums linked to health and safety performance

15. While sanctions act as the 'stick', APIL considers that there is a business case to be made for safe work environments being rewarded (the 'carrot') with lower employers' liability compulsory insurance (ELCI) premiums. This would require the ELCI market to operate in a similar way to the motor insurance market. Good health and safety performance would attract lower premiums. This view is supported by a variety of different institutions and commentators. It is by visiting the consequences of negligence on those who have caused it that health and safety standards will be driven to improve; an improvement in health and safety intrinsically means fewer negligent injuries and deaths. The DWP have stated *"We think there is a strong case for making the improvement of health and safety practices an explicit objective of the compensation system."* The report went on to conclude that *"a key challenge is to improve the link between health and safety practices and EL premiums"*¹⁰.

16. This suggestion by the DWP has subsequently been taken up by the insurance industry. In a press release from the Association of British Insurers (ABI) on the 8th September 2003, John Parker (ABI's head of general insurance) said *"Business will understand the health and safety practices insurers are looking for, while insurers will be able to reflect good health and safety in the terms they can offer. Hopefully, we will see rising standards of health and safety across the small business sector."* There has, however, been mixed reports regarding the success of the ABI's *'Making the Market Work'* scheme – to which John Parker is

¹⁰ Department of Work and Pensions – Review of Employers' Liability Compulsory Insurance (First Stage Report) (June 2003)

referring above – yet the National Federation of Roofing Contractors¹¹ has said that it has seen a slight premium reduction in 2004 and expects a 10 per cent reduction in 2005.

Health and safety education and information

17. While APIL agrees that education is fundamental to the ongoing effectiveness of health and safety procedures, in order to provide this information more efficiently the delivery of advice needs to be strengthened. APIL feels that advice should be more user friendly and directed to the individual business and its individual business needs. For a small to medium sized employer – commonly referred to as a small-to-medium sized enterprise (SME) – one of the biggest problems is the quickly changing and continually expanding state of health and safety law. Often these SME employers do not have the time to go through the considerable amounts of guidance which are provided by organisations such as the HSC. APIL believes that it would be extremely helpful if SMEs were provided with directed and relevant advice, which related directly to the health and safety aspects of their business.

18. One possible way of achieving this, APIL suggests, is for the HSC to provide a telephone help-line to provide directed advice to businesses. This phone line would work along similar principles to NHS Direct, with individual advice being offered to businesses by experienced members of staff. This phone line could offer advice and suggestions to both employers and employees. It could also be a mechanism by which potential criticism of the health and safety regime could be fed back to the HSC. This feedback would hopefully enable the identification of growing health and safety concerns, the further definition of the HSC's enforcement remit in relation to problematic areas and would make the HSC seem more approachable.

¹¹ Post Magazine (30 September 2004) page 2 - 'Insurers dismiss EL failure claims'

19. APIL suggests, and supports, the use of trade organisations to distribute relevant health and safety information to their respective members. For example, the National Federation of Fish Friers could provide health and safety advice and information to all its members based on the health and safety requirements necessitated by its trade. The distribution of this information could be via the association's website or via information leaflets. APIL feels that many trades have similar small trade organizations which would be able to provide an invaluable outlet for directed health and safety information. APIL believes that worker representatives should also be able to provide health and safety information directly in the workplace, with this information being effectively distributed amongst both workers and employers.

Worker / employee representatives

20. APIL proposes that the role of employee safety representatives should be expanded so as to include the distribution of health and safety information and enforcement powers. Research conducted by academics in Northern Ireland and Republic of Ireland has illustrated that safety representatives have a significant impact on health and safety in the workplace¹². APIL acknowledges that the person doing the job is often most aware of the risks involved in the job. The appointment of, and consultation with, worker representatives should therefore be encouraged.

21. While there is currently legislation governing safety representatives and safety committees in the workplace, these regulations are not being used. For example, under the 1977 Safety Representatives and Safety Committees Regulations¹³ as of January 2000 there had been only one improvement notice served by an HSC inspector – that's one in 22 years. In addition, since April 2001¹⁴, there have only been 24 enforcement

¹² Safety Behaviour in the Construction Sector, Nick MacDonald and Victor Hrymak, 2002

¹³ Statutory Instrument 1977 No. 500

¹⁴ House of Commons Work and Pensions committee – The work of the Health and Safety Commission and Executive (Fourth Report of Session 2003-04 Volume I) HC 456-I, page 66, paragraph 234

notices issued under the Health and Safety (Consultation with Employees) Regulations 1996¹⁵. Prospect – the union for professional engineers, including health and safety inspectors – has stated that the reason for the HSC’s reluctance to use the regulations is that the HSC see it as *“an industrial relations issue, and the instructions given to inspectors since 1977 are basically to steer well clear of them”*¹⁶. Essentially while these regulations have created safety representatives within workplaces, these safety representatives have been given no actual power or authority.

22. APIL believes that safety representatives within workplaces should be given the power to enforce health and safety standards, and this power should be enshrined within legislation. By employing safety representatives to actually enforce health and safety legislation a considerable burden will be removed from the HSC in terms of inspection and enforcement, as well as allowing each workplace to be governed with the same standards but on an individual basis. APIL is encouraged to note that this view is echoed in the recent select committee report which suggests that HSC resources would be maximized if *“safety representatives were empowered to enforce health and safety law in the workplace, we believe this would have a powerful effect in improving standards. We also believe this power to take action, should include not just criminal prosecutions but also improvement and prohibition notices, subject to the usual right of appeal to the Employment Tribunal and as to terms on legal costs”*¹⁷.

23. APIL is aware that there may be instances where a safety representative could be over-zealous in his duties and proceed against a genuine employer with either a vexatious or frivolous claim or a claim that is plainly unfounded. The ability to appeal a decision, in conjunction with

¹⁵ Statutory Instrument 1996 No. 1513

¹⁶ House of Commons Work and Pensions committee – The work of the Health and Safety Commission and Executive (Fourth Report of Session 2003-04 Volume I) HC 456-I, page 66, paragraph 234

¹⁷ Ibid, page 52, paragraph 176

possible costs sanctions, will hopefully act as a safety valve for any such over zealous action.

24. APIL suggests that there should be a power available to safety representatives, in addition to their enforcement capabilities, to publicly 'name and shame' any offending companies. This power would tie in with the previously detailed concepts of a 'name and shame' blacklist and possibly a 'name and praise' award.

Appendix A

APIL'S COMPLETED HEALTH & SAFETY COMMISSION'S (HSC)

REGULATION AND RECOGNITION – ELECTRONIC RESPONSE FORM

DECEMBER 2004

Instructions for completion

You can move between questions by pressing the 'Tab'/'Shift-Tab' or 'Page Up' / 'Page Down' keys or by clicking on the grey boxes with a mouse. Please type your replies within the grey boxes or click on the grey boxes labelled 'Please select' to reveal a drop down list to select an answer. Once you have completed the form please save it with a distinctive name and return by email to:

regulationandrecognition@hse.gsi.gov.uk

Please provide some background information about yourself and your organisation.

Title: Mr	Forename: Miles	Surname: Burger
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Organisation:	The Association of Personal Injury Lawyers (APIL)
Address 1:	11 Castle Quay
Address 2:	
Address 3:	
Town / City:	Nottingham
County:	Nottinghamshire
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Email address: miles.burger@apil.com	Telephone Number: 0115 938 8710	Number employed or represented: 30
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Organisational return: Other	If you are replying on behalf of an organisation please select from the 'Organisational return' list and complete the number employed or represented field.	Individual return: Other
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Organisation (details of 'Other'): Claimant Representative Organisation	If you are replying as an individual please select from the 'Individual return'.	Individual (details of 'Other'): Policy Research Officer
	If none of the offered selections applies please complete the appropriate 'other' field	

Confidentiality:
Please indicate below if you do not wish details of your comments to be available to

the public. (NB if you do not put a cross in the box they will be made public. This takes precedence over any automatic notes on e-mails that indicate that the contents are confidential.)

Please treat my response as confidential. (cross means confidential)

Alternatively, to treat your comments on a particular section as confidential, please insert bracketed text '(Treat as confidential)' within that section response.

To help us consider and analyse the comments from our consultees we would be grateful if you could structure your replies using the following questions. When writing your comments, where possible, please refer to the relevant paragraph numbers in the document and the intervention number (as given on the Matrix on page 10).

Regulation – the methods available to HSE and LAs

1. What are your views on the proposed preferred mix of interventions? (See paragraph 25).

APIL is pleased to note that the proposed preferred mix of interventions includes the continued use of inspection and enforcement. APIL feels it is this policy that offers the best results and would encourage the HSC to continue with it as the primary method of policing workplaces. We also support the idea of working with those at risk, and propose that employee safety representatives should be empowered with enforcement rights. In addition to their enforcement powers, APIL suggests that they should provide health and safety information and education in the workplace to both employers and employees.

2. Assuming that there is no increase in resource available what balance would you advocate amongst the interventions? What should we concentrate on and which should we draw back from? (See paragraphs 24-27).

APIL firmly believes that inspection and enforcement should be the primary method used by the HSC to police workplaces. In addition, in order to ensure this policy is effective, we propose that workplace employee safety representatives should be empowered with the authority to take action over health and safety breaches. This power to take action would include the ability to: impose improvement and prohibition notices; 'name and shame' the business; and bring criminal prosecutions.

APIL also suggests that the provision of health and safety education and information should be more directed to the actual needs of the business. Indeed part of the expanded role of the safety representative should include the distribution of health and safety information. APIL also suggests that a help-line could be established to give advice to businesses and that small trade associations could be targeted in order to provide specific health and safety information to their members.

Finally, while other suggested interventions should be considered and used, if appropriate, no resources should be diverted away from the use of inspection and enforcement.

3. What are your views on the proposed interventions that employers could pursue of their own volition? What other interventions could employers pursue themselves? What (if anything) should we do to encourage this? (See paragraph 26).

Due to the high number of health and safety breaches that occur, APIL believes that many companies are not capable of providing and monitoring effective health and safety interventions. APIL proposals place the burden for appropriate regulation in bodies external to the business.

4. What are your views on the use of the design and supply intervention? (See paragraph 26)

While APIL is supportive of the consultation document suggestion concerning the use of design and supply intervention, we feel that it is unlikely in today's cost driven international business environment for this to be a realistic proposition. APIL feels that a more realistic proposition is for there to be transparency in how services and products are chosen and purchased. This allows consumers to decide whether they want to purchase from an organisation with good or poor health and safety standards. Indeed this transparency would allow some companies to use their means of purchasing as a positive selling tool – for example, Fair Trade tea and coffee.

5. What are your views on the analysis contained in the intervention matrix? (See page 9).

While the information contained in the matrix is potentially useful, APIL feels in order to make it more understandable there needs to be a clear and concise key attached to it - for example, detailing what N, H, L, B, P and G within the main body of the matrix refers to.

6. Have we overlooked any important intervention techniques? Please provide details of any other approaches we should consider?

APIL feels that the use of 'name and shame' techniques has not been emphasised enough within the intervention techniques. In particular special attention should be given to the use of such techniques within other jurisdictions such as Canada. APIL proposes that any 'naming and shaming' campaign should also include placing offending companies onto a publicly available register or 'black list'.

Furthermore, APIL suggests, in addition to there being a 'name and shame' blacklist, a parallel list of companies which have excellent health and safety records could be established; a 'name and praise' list, if you will. In order to reinforce and emphasise the possible business benefits of such a 'name and praise' list, the HSC could produce a discretionary award or kite-mark indicating that a particular company has an excellent health and safety record.

7. What other criteria should inform the choice or mix of interventions used?

APIL does not wish to comment further on this subject at the present time.

8. Do you have any other comments on the ideas and proposals explored in this

<p>document?</p> <p>APIL does not have any further comments on the ideas and proposals explored in the HSC's consultation document at the present time.</p>
<p>Recognising good performance</p>
<p>9. Should existing targeting arrangements, whereby HSE and LAs direct interventions towards poorer performing organisations be developed and made more transparent?</p> <p>APIL feels this question is answered indirectly with our responses to the following.</p>
<p>10. The corollary of this targeting is that better performing organisations already receive less attention. Should this process be formalised and good performance be publicly recognised by regulators?</p> <p>As mentioned above - in APIL's answer to question 6 - we suggest that a 'name and praise' list should be established, and organisations on this list should be recognised via some type of kitemark or similar award. This idea closely reflects the suggestion in the consultation document concerning the establishment of a formalized 'earned autonomy'. Any such award could be used in promotional material by the company, ideally leading to more customers and staff being attracted to the firm. The strength of such a concept, however, needs to be based on regular re-accreditation and the removal of any such award if serious health and safety breaches are subsequently identified.</p>
<p>11. Other regulators (e.g. the Environment Agency, Food Standards Agency) are also examining how better performance could be assessed and influence the intervention regime for an organisation. Where this implies a withdrawal of proactive intervention it has been termed an 'earned autonomy' scheme. Should the HSE/LA approach to this be developed in conjunction with other regulators or a stand-alone system?</p> <p>APIL does not wish to comment further on this subject at the present time.</p>
<p>12. How should duty holder performance be assessed for such an approach and by whom; are the criteria suggested in paragraphs 65-67 necessary, appropriate, sufficient?</p> <p>APIL agrees with the majority of assessment criteria set out in paragraph 67 of the consultation document. We feel, however, that with the growing importance of rehabilitation, and the increasing role it plays in getting people back to work, it would be worthwhile including it as a possible criteria when assessing the success of a company's health and safety arrangements.</p>
<p>13. What should "not intervening proactively," mean in practice?</p> <p>APIL does not wish to comment further on this subject at the present time.</p>
<p>14. Should public recognition be provided and, if yes, what form should it take?</p>

APIL does not wish to comment further on this subject at the present time.

15. Should our investigation policies and practices for incidents and complaints be altered for better performing organisations and, if so, in what way?

APIL does not wish to comment further on this subject at the present time.

16. What should be the consequences of serious incidents or complaints on the organisation's status?

APIL firmly believes that any serious health and safety incidents or complaints within an organisation should lead to that organisation's 'kite-mark' being removed. It is essential that any type of award for excellent health and safety should be assessed regularly and the results made available to the public.

Please note that names and addresses will be removed before this form is transferred to CD and stored in the HSE library.

Thank you for completing this questionnaire.

**Please save with a distinctive document name and return by e-mail to:
regulationandrecognition@hse.gsi.gov.uk**