

22 October 2001

Dr Laurence Golob  
Health & Safety Executive  
Risk Assessment Policy Unit  
Strategy & Analytical Support Directorate  
Room 704, Rose Court  
2 Southwark Bridge  
London SE1 9HS

Dear Dr Golob

**Prioritising the Work of the Health & Safety Commission and Executive**

I am writing on behalf of the Association of Personal Injury Lawyers (APIL) in response to the HSC's consultation on the above. APIL was formed as a membership organisation in 1990 by claimant lawyers committed to providing the victims and the potential victims of personal injury with a stronger voice in litigation and in the marketplace generally. We now have around 5,000 members across the UK and abroad, and membership comprises solicitors, barristers, academics and legal executives.

APIL has consistently raised its concerns about the under-resourcing of the Health and Safety Commission and Executive. The safety of all members of society should be a priority in Government policy and resource allocation. In view of current limited resourcing, however, we agree the work of the HSC/E should be prioritised on the basis of clear and objective criteria. This would assure the public that the HSC/E was addressing the most important safety issues.

We do not agree, however, that prioritisation on the basis of societal concerns would necessarily address the most important safety issues. Members of the public do not, or choose not to, gain access to the wealth of information available on safety issues or the statistics relating to them. Public perceptions are often led by the media which may have its own criteria for prioritising certain safety issues within television programmes and the press. This means that public concern may not, in fact, be directed at the most dangerous activities or the most hazardous risks. Prioritisation on the basis of societal concerns would be conducted on a subjective basis, i.e. the HSC/E's perception of the public's perception.

APIL believes that prioritisation should be conducted on the basis of an assessment of:

- The potential for harm caused by a particular activity or risk;
- The likely group to be affected by that activity or risk.

Drawing on the wealth of information collated by and available to HSC/E on the above would allow for the identification of:

- The most hazardous risks/activities; and
- The risks/activities most likely to result in injury to the most vulnerable members of our society.

It is the risks/activities most likely to cause most harm to the most vulnerable groups that should be prioritised at the outset. Whilst public opinion should be considered, therefore, it should not influence the activities of the HSC/E to the extent suggested in the consultation paper.

Please do not hesitate to contact me if I can be of any further assistance.

With kind regards.

Yours sincerely

Annette Morris  
Policy Research Officer