

The Society for Radiological Protection

Response dated 1 December 2003

to

A Strategy for Workplace Health & Safety in Great Britain to 2010 and beyond.

Health and Safety Executive

A Strategy for Workplace Health & Safety in Great Britain to 2010 and beyond

Thank you for including the Society for Radiological Protection in the distribution of your Draft Document. The policy which the Council of the Society follows in relation to Discussion, Draft and Consultative Documents is that it only responds on those matters which have a bearing on the professional activities and status of its members and those for whom they have responsibilities. This is on the basis that the firms and institutions from which our members are drawn are able to comment in their own name on the complete range of issues addressed in any such documents.

However, on this occasion the document was passed to our Topic Group on Practical Radiation Protection to review and their comments are included in the response form.

The Society for Radiological Protection (SRP) has examined HSE's document "A Strategy for Workplace Health & Safety in Great Britain to 2010 and beyond". We recognise that we live in a rapidly changing world with new challenges. We also accept that;

1. no government body has unlimited resources,
2. there is a need within modern society to target resources in the most effective manner,
3. there is a need to challenge traditional views and ways of working.

In this respect we welcome to openness of the document and the opportunity afforded to comment.

SRP represents the interests of professionals in the various fields of radiation protection. Our interests therefore are very much centered on health protection and management of risks to workers and the general public. Our members, some of whom hold appointments under Health and Safety at Work Act and Environmental Legislation, are drawn from a wide spectrum of the large nuclear industry companies, government bodies, defence, education, health service and a range of small industrial users. We believe that this large group is very much within the spectrum of organisations at the heart of the debate you propose.

There are a number of features of your strategy document that have a significant impact on SRP its members and the industry base with which it is involved. The key aspect is your statement on page 7:

“HSE will move away from the automatic presumption of producing general written guidance towards specific, targeted support and advice directed to the areas of greatest need. much of this (guidance) will be produced or distributed by others rather than by HSE”. “

SRP believes that this would represent a significant shift and impact upon our members. To expect "others" to produce the guidance is the wrong approach and is perceived as very "negative". HSC should give a strong lead on this important area and is ideally placed to continue to produce the necessary guidance that will underpin

regulation. There are a number of regulations in the radiation protection area that may change in the near future for which guidance will be required. It is imperative that good quality guidance should be available from government bodies to ensure compliance with government legislation. This forms part of the overall communication strategy that will help to establish common standards to which all should aspire.

SRP believes it has a role with respect to non-statutory guidance as a consultee and would be prepared to be involved in production of such guidance for major legislation. However it cannot be accountable nor does it have executive responsibility for the resource to fulfill this task. HSE is sighting resources as one of the drivers for change. Pushing the burden to others does not solve this problem but only moves it round UK plc.

We support the initiatives of greater dialogue to promote communication of good practice. HSC must however still take the lead in this area as it would have more gravitas to get people to meetings to discuss the drafting of the guidance. Organisations like the SRP cannot coordinate such activities. In particular you have mentioned the changing nature of the work place with a greater emphasis on small business and employers. This is an issue that impacts on SRP as the make up of our membership has changed in just the way that you mention. To expect small users to produce guidance will at best place a burden on them and at worst lead to lack of understanding and a drift towards the lowest common denominator in terms of safety standards.

HSE has a good reputation in many areas including the quality of some of its guidance. If "others" produce the guidance who will vet this? It may become one groups interpretation rather than a peer reviewed standard and not be in accordance with HSC's view.

I hope these comments are useful and please do not hesitate to contact me if there is any other matter in which we can be of assistance.