

Comments received from the consultation exercise on HSENI's Draft Corporate Plan 2023 – 2028

Summary of consultation

1. The consultation exercise ran from 16 August 2022 to 10 October 2022.
2. There were approximately 460 consultees;
 - a. 166 Equality related;
 - b. 18 MPs;
 - c. 40 NICS consultees;
 - d. 11 political parties;
 - e. 11 Councils;
 - f. 90 MLAs; and
 - g. 124 HSENI standard consultees including individuals and bodies representative of section 75 of the Northern Ireland Act 1998 and other organisations with an interest in equality related issues.
3. 25 responses – (23 online + 2 by email):
 - a. 18 industry;
 - b. 3 representative bodies
 - c. 1 trade union;
 - d. 1 District Council;
 - e. 1 private individual; and
 - f. 1 political party.

1- ANON-7PZJ-Z62E-J – Food production / abattoir			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	<p>I do feel the proposed measures provide a realistic goal - will this be assess in NI as a whole or per sector?</p> <p>How will HSENI address over 3 day accidents where the IP could return to work but has decided to stay off in the view to claiming? This is something which occurs regularly within our business - meaning our over 3 day injury rate is higher than it should be.</p> <p>If there is a spike within a particular reporting period - how to HSENI propose to address this?</p>	<p>NI as a whole but our annual report gives greater sectoral detail.</p> <p>HSENI's main purpose is to help dutyholders prevent accidents and ill health. It is accepted the issue you describe could distort the figures but it is a medical and employment issue.</p> <p>HSENI monitor all categories of accidents and deploy a number of strategies, within current resources, in response to particular circumstances.</p>
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Yes - offering speaking engagements within industry would be beneficial also to get the buy in of teams and management	HSENI will continue to engage with dutyholders across all media including speaking events where this is possible.
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes - also considering feedback from sectors in relation to the issues faced / challenges to help influence topics and materials for the themes.	Noted.
4	Are there particular themes you would like to be considered for years three and five?	Health - and Wellbeing.	Noted – we expect that given the importance of health and wellbeing that this will be one of our three themes.
5	What industry / work sector are you from?	Food production - abattoir	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Somewhat	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes - accredited training and information sessions are very useful.	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	No - not enough focus is on Occ. Health. However this an industry wide issue	<p>It is anticipated that one of our three annual themes will be health which will include occupational health.</p> <p>Workplace health will feature in most sectors in this corporate plan.</p>
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	I cannot stress enough how beneficial training sessions and proactive engagement is with teams - I believe the focus needs to change from 'scary enforcement' to 'approachable guidance and support'. In the private sector this works better and drives engagement. Simple as the HSENI officer asking 'what are your issues and how can I help?' this supports the internal Safety team and portrays the caring side of the organisation	<p>Noted.</p> <p>HSENI inspectors utilise a range of approaches depending on the situation and where they have an opportunity to advise and help they will.</p>

2 - ANON-7PZJ-Z62K-R - Utilities			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Yes (and it's only right that we promote the fact that all accidents are preventable!)	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Yes-but 'site visits' must include streetworks and not just targeted and or CDM notified projects.	Noted – This will be brought to the attention of our construction and utility teams.
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes. I believe that HSENI need to also look at reported and other obvious dangerous occurrences such as excavations not in accordance with HS(G)47 and particularly utility strikes. Recent gas strikes have caused evacuations and disruption but, thankfully no injuries. There are a lot of streetworks in NI associated with Broadband and Gas extension.	Noted – This will be brought to the attention of our construction and utility teams.
4	Are there particular themes you would like to be considered for years three and five?	Engaging with the 'small' builders.	We will look for opportunities to engage with and provide information and advice to all sectors. As far as it is possible we must select themes which will have relevance across all work sectors.
5	What industry / work sector are you from?	Utilities Consultant.	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Streetworks needs development.	Noted – This will be brought to the attention of our construction and utility teams.
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Not only the most serious outcomes but also the potential most serious outcomes if a similar incident was repeated.	Noted.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes	Noted.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	None	

3 - ANON-7PZJ-Z62B-F - Manufacturing			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	The proposed measures appear to me to be a realistic goal.	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	It would be good to know how these figures compare to current figures. Are they higher or lower, pro rata against available resources?	In our current corporate plan we set a site visit target of 5,000 per annum. Due to the pandemic and resource issues it was not possible to make this every year. We believe the target remains stretching.

		I find, certainly since the pandemic, the increased online information sessions, such as those through the NISG are of great help, and also help support the professional development of health and safety advisers.	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	I believe this is a sensible approach.	Noted
4	Are there particular themes you would like to be considered for years three and five?	I think the sector specific themes are very useful, in particular, for me in manufacturing (occupational lung disorders, musculo-skeletal issues and work related stress). Being able to use this information to influence senior management is very useful	Noted
5	What industry / work sector are you from?	Manufacturing	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Yes, I agree with these main health and safety issues.	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Absolutely agree	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes. The fact that there are sector specific priorities and also general workplace priorities means that all the main serious issues are being addressed.	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	I think the rollout of the plan should have a higher profile, not just being made available via the website. There should be an 'announcement' of the corporate plan detailing the goals and the sector specific nature. Presentation through the Northern Ireland Safety Group and perhaps webinars should raise the profile and allow health and safety professionals to take this information back into the workplace and use it a tool for improvement.	It is our intention to speak at the NISG and to the Trade Unions. We did some media for the launch of the consultation exercise. We will look to use any opportunities to launch the final document.

4 - ANON-7PZJ-Z627-4 - Recycling industry, manufacturing, construction			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	I agree the objective to measure the success on the basis on a reduction of incidents. Another potential KPI could be an increase of near misses reported to the HSENI.	Near miss incidents (NMIs) are a valuable source of information. They are not required to be reported under the reporting regulations. HSENI encourage organisations to record all NMIs and use them to reassess risks, develop safe systems of work and inform staff etc.
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	The KPI set at an output of 80,000 interventions and 25,000 site visits sounds ambitious although each intervention may be advantageous to employers. Is it valuable identifying a KPI for interventions that are advice based to encourage buy in from employers.	Noted.

3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	I agree on the basis on identifying cross cutting themes to tackle high risk work activities. I appreciate the additional information provided relating to the workplace transport inspection campaign and found this valuable.	Noted. Noted.
4	Are there particular themes you would like to be considered for years three and five?	Fire prevention and response- hazards of Li batteries. I believe there is a gap in knowledge on how these batteries are hazardous. Explosive cloud vapour when damaged. The chemical reactions that occur as the Lithium is highly reactive. Appropriate means of suppression. Working at height campaign. Machine interactions for cleaning and maintenance.	New technologies will be addressed in the new corporate plan. It is a challenging area for regulators. Noted. This subject features across a number of sector priorities. Noted. This subject features across a number of sector priorities.
5	What industry / work sector are you from?	Recycling industry, manufacturing, construction.	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Yes, I generally believe the corporate plan will focus on the main safety issues.	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	I agree the plan to focus on the work activities that are associated with the most serious outcomes we are working to prevent.	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	I do believe the plan is hitting a balance between safety issues and occupational health aspects.	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	I appreciate the advice, co-operation and transparency of the HSE in this co-operate plan. I had attended the HSE first open annual general meeting and found this valuable. I believe that this may be an advantageous endeavour to further improve the collaboration between key stakeholders and the HSENI and that this may improve the reach of the HSENI. Perception of advice and guidance available should open the door to improved communication with industry insiders and HSENI.	Noted

5 - ANON-7PZJ-Z62S-Z - Aviation			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	We include, lost time injury rate (LTIR), Severity Rate (SR), Accident Frequency Rate (AFR). Would these indicators be part of the reporting system and be matched against similar organisations?	LTIRs / SR / AFR are all valuable sources of information. They are not required to be reported under the reporting regulations. HSENI encourage organisations to record all these and use them to reassess risks, develop safe systems of work and inform staff etc.
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	These figures would indicate a high level of output, are they realistic and achievable based on the staffing levels and who would undertake these activities. At this time, are you looking at only employees of HSE(NI)	We are basing those outputs on our expected staffing levels throughout the corporate plan. We believe the outputs are challenging and would be prone to some risks in terms of staff retention and unforeseen issues (e.g. pandemic).

			These outputs will include the many times we will work in partnership with dutyholders and others. This joint working is central to our entire approach in the corporate plan.
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	I think they are a good means of raising the profile taking into account statement 8 above.	Noted
4	Are there particular themes you would like to be considered for years three and five?	How do organisations manage employee ongoing training once their inductions have been completed? Topics may include accidents that have caused a major concern within the departments.	We will look for opportunities to engage with and provide information and advice to all sectors. As far as it is possible we must select themes which will have relevance across all work sectors.
5	What industry / work sector are you from?	Aviation	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Aviation is not one of the included sectors, however on reviewing our incident statistics, they have matched in priority, the same as the annual statistics previously published. 1. MSD 2. STF 3. Manual handling	Aviation (mainly airside) but not on board the plane) falls to HSENI. Aviation is under our transport sector. Noted.
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes, and as a learning point to industry sectors, you may wish to consider the total outcomes, i.e. legal and compensatory findings if known.	Noted – some years ago we did a 'cost of accidents' campaign. We will consider this going forward.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Happy with this outcome	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	Nothing to add at this point.	Noted

6 - ANON-7PZJ-Z63R-Z - Construction			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Yes	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Yes	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes	Noted

4	Are there particular themes you would like to be considered for years three and five?	Construction Dust & Face Fit Testing / Respirable Crystalline Silica (RCS) and wood dust Working at Height	Noted – these issues are addressed in our construction and health sectors.
5	What industry / work sector are you from?	Construction	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	I would like to see a bigger focus on health especially lung health.	It is anticipated that one of our three annual themes will be health which will include occupational health. Workplace health will feature in most sectors in this corporate plan.
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes - deaths from work related health illnesses are far greater than those that die from an accident at work	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Not enough priority on health	It is anticipated that one of our three annual themes will be health which will include occupational health. Workplace health will feature in most sectors in this corporate plan.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	In my opinion, we are not where we need to be with workers breathing in dust and fumes. Face Fit Testing is just not happening on construction sites and health surveillance is not happening either.	Noted

7 - ANON-7PZJ-Z63N-V - NICS			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	No other measures	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Not at the minute	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes	Noted
4	Are there particular themes you would like to be considered for years three and five?	No	Noted
5	What industry / work sector are you from?	NICS Health and Safety	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Yes	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes? - Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	N/A	Noted

8 - ANON-7PZJ-Z6SJ-R - Education			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	None	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Yes, this will of course depend on staffing levels	Agreed
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Good starting point	Noted
4	Are there particular themes you would like to be considered for years three and five?	Responsibilities	Noted – we will always make clear the responsibilities of dutyholders and employees.
5	What industry / work sector are you from?	Education	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Should cover any issues within the sector	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	All covered	Noted

9 - ANON-7PZJ-Z6S8-6 - Mineral Products manufacturing and quarrying			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	The three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success. However, we would suggest that the Executive actively promote the sharing of safety alerts across all industry sectors. Companies should be encouraged to simply share the basic details of an incident, including: 1) What happened? 2) What actions should you consider or learning points from incident to prevent reoccurrence. 3) Photos showing the locations and equipment involved if available. This will still provide valuable learning points without the need for a full root-cause investigation.	Noted – we will take this on board and ask our operational and communications teams to action where possible.
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Given our, the MPANI, experience of working in partnership with HSENI over many years we would strongly recommend close collaboration with Industry Trade Bodies.	Noted – Partnership is a central theme to our new corporate plan and this will build on our long tradition of joint working.
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising	Yes, we would commend the HSENI for these outputs. In terms of the mineral products and quarrying sectors we will want to work closely with the Executive and align our own "Vision Zero" targets and "fatal 6" priorities	Noted

	the profile and tackling high profile issues across all work sectors?	with that of HSENI. More information on the fatal 6 areas can be found at https://www.safequarry.com/fatal-6.aspx .	
4	Are there particular themes you would like to be considered for years three and five?	As stated in Q3 above the current Mineral Products Association Fatal 6 areas cover, FATAL 1 - Contact with moving machinery and isolation FATAL 2 - Workplace transport and pedestrian interface FATAL 3 - Work at height FATAL 4 -Workplace Respirable Crystalline Silica FATAL 5 - Struck by moving or falling object FATAL 6 - Road traffic accidents	Noted – this is very useful. A number of these issues have cross sectoral relevance so we will consider these when deciding on the themes for years three and five.
5	What industry / work sector are you from?	Mineral Products manufacturing and quarrying.	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Yes, but as highlighted in Q4 our industry priorities, as identified by the fatal 6 are; FATAL 1 - Contact with moving machinery and isolation FATAL 2 - Workplace transport and pedestrian interface FATAL 3 - Work at height FATAL 4 -Workplace Respirable Crystalline Silica FATAL 5 - Struck by moving or falling object FATAL 6 - Road traffic accidents	Noted – We.
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes. However, we believe that the HSENI cannot do everything. There are numerous organisations around the UK offering advice on occupational health and mental health. Construction Industry organisations in NI, like MPANI, CEF and FMB are working with the NI Safety Group to provide a one stop shop directing businesses and individuals to sources of advice and assistance.	Noted. Agreed – we cannot do it all alone and partnership is a central theme to our new corporate plan and this will build on our long tradition of joint working.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.		

10 - ANON-7PZJ-Z6SD-J - Construction			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	<p>These three measures are realistic and use existing data sets to track improvement. However, the 3 day can be spurious in nature skewing the trends on occasion.</p> <p>With workplace related stress rising and poor mental health becoming the leading cause of absence and death in young men in construction specifically through suicide, this is an area which should be included within the measures to give focus. At this time this data is already collected through the GP route and should be used as a data set to give a basis for a measure to reduce the number of work related deaths as a result.</p>	<p>Noted – this is an issue we are aware of but the long term trends provide a useful indicator.</p> <p>Suicide is not RIDDOR reportable and as such would not be investigated by HSENI. We are aware of the issues regarding suicide and the devastating impact that it can have on families and colleagues. HSENI assists in various suicide awareness programs such as PL2, chaired by the PHA and includes various stakeholders from across all health trusts and also the Build Mental Health Alliance which launched on 10th October 2022 which looks at</p>

			<p>offering help and assistance to those suffering from distress within the construction sector.</p> <p>HSENI's mental well-being advisor service continue to work with organisations to promote the management standards approach and fatigue and burnout to help reduce stress within the workplace.</p>
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	In my response I have assumed the numbers are for the full 5year period. 5000 visits per year - this equates to circa 19 visits per day working on a 5 day week with no leave included. With limited staff numbers across the province and each visit requiring a report or follow up it would appear to be a significant stretch for the team when they have the other activities to complete. What is the value add from the number of visits being increased, targeted visits may be more appropriate to get the best learning. The variety of engagement types is really good.	<p>We are basing those outputs on our expected staffing levels throughout the corporate plan. We believe the outputs are challenging and would be prone to some risks in terms of staff retention and unforeseen issues (e.g. pandemic).</p> <p>These outputs will include the many times we will work in partnership with dutyholders and others. This joint working is central to our entire approach in the corporate plan.</p>
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	This is good way to focus on key themes to be proactive, leaving space for reactive actions which will arise.	Noted
4	Are there particular themes you would like to be considered for years three and five?	<p>Early careers - getting the foundations of H&S in the workplace at the beginning, training, coaching and mentoring</p> <p>Wellbeing - how to provide the right environment for staff / colleagues to thrive and as individuals how we can take ownership of our working practices</p>	<p>Noted.</p> <p>HSENI provides targeted information and advice for groups on its website. This includes 'older workers' 'young people' 'children on farms' etc. In addition we have always engaged with colleges where the opportunities arise to provide lectures on health and safety.</p>
5	What industry / work sector are you from?	Construction	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	The focus is good but does not cover mental health, from workplace related stress. This could be measured using the GP Thor data set. This is based on the construction industry losing over 300 colleagues every month to suicide. Not all are related to work related stress but this is a major component to the cause.	<p>Suicide is not RIDDOR reportable and as such would not be investigated by HSENI.</p> <p>We are aware of the issues regarding suicide and the devastating impact that it can have on families and colleagues. HSENI assists in various suicide awareness programs such as PL2, chaired by the PHA and includes various stakeholders from across all health trusts and also the Build Mental Health Alliance which launched on 10th October 2022 which looks at offering help and assistance to those suffering from distress within the construction sector.</p> <p>HSENI's mental well-being advisor service continue to work with organisations to promote the management standards approach and fatigue and burnout to help reduce stress within the workplace.</p>

		There is also a possible misunderstanding of the Workplace Transport Safety terminology, in the expanded document glossary should include definition and parameters of usage. For instance driving for work, be that to a construction site or an office which is not your 'home' office should be included as work related. Also with such a large proportion of the construction industry travelling for work long hours and fatigue should be part of the focus on how we manage this as this impacts on decision making for all.	Noted – HSENI recognise the differentiation that you make in terms of workplace transport. It is based on those factors we know to be associated with the workplace. This would not exclude some sectors looking wider into the issues you mention – this will be passed to our construction and transport teams to consider. <i>(Please note HSENI has a very limited vires for activities on a public road where the PSNI have primacy).</i>
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	The collection of data on life changing injuries/ diseases should be the basis of action and the work activities listed are key. In this instance measures should be set up in addition to the RIDDOR based ones already in this document	Noted - We are limited by what we must be informed under RIDDOR.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	There is still too much focus on safety and not enough to health in the construction sector (copied from my response above). The focus is good but does not cover mental health, from workplace related stress. This could be measured using the GP Thor data set. This is based on the construction industry losing over 300 colleagues every month to suicide. Not all are related to work related stress but this is a major component to the cause. Fatigue and its impact on decision making in all areas is not covered, difficult to measure this but is a leading cause in human error.	See earlier response. HSENI's mental well-being advisor service continue to work with organisations to promote the management standards approach and fatigue and burnout to help reduce stress within the workplace.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	The plan is well constructed but could go further in scope to focus on behaviours and culture to stem the cause of incidents to complement the on reactive solutions through barriers and rules on sites	Noted – this is something that HSENI encourages companies to examine as part of their internal accident investigations. It would be challenging for HSENI to commit the resources at company level to look at behaviours and culture but we will continue to look at company and sector accident trends.

11 - ANON-7PZJ-Z6SN-V – Private individual			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	No, you must include the following: Your inspectors/investigators must attend the scene of every fatality at the time of the incident and investigate it immediately and impartially. This did not happen in my son's death on 19.09.2018.	It is not possible to discuss an individual case.
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Yes attend the scene s of all fatalities at the time and investigate impartially.	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes but there is no point if you do not attend the scene of a fatality on site and refuse to investigate an obvious serious breach of health and safety offences and a potential criminal offence of corporate manslaughter.	Noted

4	Are there particular themes you would like to be considered for years three and five?	Robust enforcement of offences and investigations into fatalities.	Noted
5	What industry / work sector are you from?	I am retired but my son worked in the construction industry. He was killed on site on 19.09.2018 while working in a forest during storm Ali an amber warning storm by a tree blown down in the storm but you refused to attend the scene and investigate it immediately. What is the point with all this enforcement and CP when you do not investigate this obvious breaches immediately?	It is not possible to discuss an individual case. It is important that the corporate plan sets out our approach to enforcement.
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Yes and No	
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	You didn't in my son's case.	It is not possible to discuss an individual case.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	No	We have attempted to provide a balance between health and safety across the majority of groups and within current and projected resources.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	As I said there is no mention about your failure to attend the scenes of fatalities and investigate them and this is not the only case this has happened. It's all very good having a CP but when it comes your failure to attend the scene and investigate there is nothing included in the CP stating that you will attend and investigate. You also failed to include my son's case in your annual report. No mention of that either, strange, so you can really do what you want without any repercussions.	It is not possible to discuss an individual case.

12 - ANON-7PZJ-Z6R1-X – Public sector			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Yes, the 3 measures provide a realistic goal of incidents reductions Near misses could be included.	Near miss incidents are valuable sources of information. They are not required to be reported under the reporting regulations. HSENI encourages organisations to record these and use them to reassess risks, develop safe systems of work and inform staff etc.
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Agree, the proposed output of 80,000 interventions may demonstrate a high-level commitment.	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Agree, the delivery of 3 annual cross cutting themes may tackle work activities known to cause fatalities, serious injury and ill health.	Noted
4	Are there particular themes you would like to be considered for years three and five?	Fork lift trucks Work Related Stress	Fork lift trucks will be a feature of our 'workplace transport' campaign. We are committed to continue 'Stress/Mental well-being at work and

			musculoskeletal disorders (MSDs)' as one of our workplace health topics.
5	What industry / work sector are you from? - What industry / work sector are you from?	Public Sector	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Yes - Slips, trips and falls, workplace transport, violence /assaults MSD and machinery are all common causes of injury in our sector.	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes, most serious to be prioritised	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes, both safety and occupational health have been covered	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	This corporate plan shows measures which show a commitment to a continued reduction in fatalities and major incidents and better reflects the collective nature of the efforts required. It will track trends rather than set targets for reduction.	Noted

13 - ANON-7PZJ-Z6RK-R - Natural Gas Distribution Company			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Yes	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Yes	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes	Noted
4	Are there particular themes you would like to be considered for years three and five?	As is discussed in the Sectoral Priorities section of my submission to this survey.	Noted
5	What industry / work sector are you from?	Natural Gas Distribution Company	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	In part yes, in relation to ill health and the risks associated with the construction and maintenance of our natural gas network. However, the natural gas/energy sector in NI is undergoing a change in relation to energy transition (biogas/biomethane & the use of hydrogen in the future). We all need to keep abreast of these changes to ensure that the transition takes place safely.	Noted. HSENI is aware of the developments that you mention in this sector and acknowledge that this is, and will be, a key area of work within the life-cycle of this Corporate Plan. The transition to new sustainable energy sources such as hydrogen, etc. has

			<p>ramifications in terms of suitability of gas infrastructure, compatibility of gas appliances, maintenance, training, public and employee health and safety. HSENI will continue to engage with the industry (TNOs and DNOs, etc.) in this regard. There are several key objectives for the sector that are relevant to this specific topic -</p> <ul style="list-style-type: none"> ➤ Safety management systems to appropriately monitor, assess and maintain infrastructure; ➤ Working with partner organisations to ensure preparedness and prevention of major incidents; and ➤ Working with co-regulators and engagement with renewables sector to ensure adequate health and safety standards in respect of evolving technologies in the gas sector.
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	<p>In relation to my comments above, I would like to add the following comments, again drawing reference in relation to energy transition:</p> <ol style="list-style-type: none"> 1. Ongoing liaison with TNO's & DNO's on all aspects of safe business operations, including energy transition. Knowledge transfer continues to be developed between all parties in line with industry best practice. 2. Continued collaboration with the UK TNO's & DNO's in relation to emerging technologies and energy transition, particularly the introduction of hydrogen (its production, transportation and storage), and the required competencies to ensure that this is implemented safely within the timelines required to meet the emissions targets set out in the NI Climate Change Act 2022. <p><u>Sectoral Priorities Comments:</u> <u>Agriculture:</u> 1) Farmers diversification into renewable energy production markets as part of the overall NI Energy Transition programme. Increasing numbers of production facilities being developed in the private sector and injecting carbon-neutral biomethane into the natural gas distribution and, potentially, transmission networks. 2) Ensuring that new and innovative farm based digestate management techniques (inc. storage, road transportation and land application) are implemented safely in a possibly disparate sector (covering individual farmers to large private firms). 3) Ensuring new and innovative AD plant based biogenic carbon dioxide capturing & utilisation processes (inc. storage & road transportation) are implemented safely.</p>	<p>This is very useful additional feedback. New technologies and the associated health and safety challenges that they present in the sectors that you have mentioned will be addressed in the new corporate plan.</p>

	<p><u>Construction:</u> 1) Continued engagement with DNO's and 3rd parties in relation to reducing damages to existing infrastructure during works. 2) Construction of new gas infrastructure as part of energy transition i.e., biomethane producing AD plants, hydrogen electrolyzers, in-grid gas compression units, renewable gas injection hubs, hydrogen blending units, renewable gas storage units.</p> <p><u>Gas:</u> 1) Safe storage of renewable gases (hydrogen & biomethane). 2) Blending – safely managing an initially low hydrogen blend rate (<5%) and increasing this to a blend of up to 20% hydrogen as time, research and safe working practices are developed and implemented. 3) Conducting research and building competencies to safely operate a 100% Hydrogen distribution and/or transmission network(s) from 2030 onwards.</p> <p><u>Major Hazards:</u> 1) Introduction of new renewable energy sources and associated storage.</p> <p><u>Product safety market compliance:</u> 1) Gas appliances and their safe use of renewable energy i.e., biomethane/<20% hydrogen blend/100% hydrogen supply.</p> <p><u>Utilities:</u> 1) Continued engagement with DNO's and 3rd parties in relation to reducing damages to infrastructure during works. 2) Energy transition using renewables as discussed above including associated infrastructure.</p> <p><u>Cross Sectoral:</u> 1) Working with TNO's & DNO's in relation to the introduction of hydrogen and renewable gases and ensuring that the relevant competencies are developed and implemented</p> <p><u>Transport:</u> 1) The emerging use of renewable energy in fuelling vehicles e.g., hydrogen & biomethane fuelled buses/HGV's, along with the associated infrastructure required.</p>	
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14 - ANON-7PZJ-Z6R8-5 – Trade Union – Unite			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve	These measures while laudable are mostly reactive - we need to see greater emphasis on encouraging management to be proactive in addressing H&S issues before they become a problem. Part of that is a more robust approach to assessment and inspections.	These measures are there to show a commitment to a continued reduction, but which better reflect a collective nature of the effort required. The achievement of this reduction

	success? Are there other measures you would like to see included?	They fail to take account of non-incident related H&S issues e.g. long-term deleterious practice leading to injuries and stress. Mental health should be a proposed measure on its own and does not configure with HSENI the RIDDOR reporting method. Suicides are non RIDDOR reportable and will be completely missed in the type of measure proposed. A programme of targeted HSENI inspections should be advocated around workplace stress, that align with campaign initiatives connected to this subject. We question how this will be achieved or identified following these proposals	requires a more pro-active approach to management. HSENI work is primarily about prevention through its inspection work and also through the extensive provision of information. Work related stress will continue to be an occupational health priority for the organisation but this will be delivered through different initiatives, which will also include mental wellbeing at work.
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	The issue is not with the number of interventions or site visits but with the habitual failure for interventions to be robust enough. The approach taken is inadequate and failing workers who are bearing the brunt of the roll-back on health and safety. There is currently no interventions around the lack of consultation and involvement with union safety reps, despite health and safety law requiring employers to engage with union reps where this is applicable. The rights and specific roles of union reps are being frustrated and ignored in many workplaces. The enforcement of those rights are equally ignored due to the current risk matrix for interventions used by HSENI. Research points to a hard reduction of serious injury where trade union reps operative successfully with their employers, there for the risk matrix needs to be more flexible allowing an expansion of type of interventions.	The issue of trade union rep. liaison will be brought to the attention of all inspectorate staff.
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes this approach could be useful. The issue is what themes are chosen - we are agreeable with the focus on workplace transport as there are many issues of concern in this area - including in the passenger transport and goods freight sectors. There should be mention of stake holders, and the importance of their involvement in both developing the details of the cross cutting themes and practical involvement in disseminating the campaigns/initiatives and materials.	Noted
4	Are there particular themes you would like to be considered for years three and five?	One theme we would like to be considered include shift rosters, notice and overwork - as these are growing H&S issues for us. Another is H&S related to extreme weather events as these are likely to become major issues and sadly we have already lost members as a result of employers sending them to work in extreme weather events. There appears to be a general roll back on H&S with expenditure avoided or delayed in relation to PPE, cleaning, H&S equipment. It is not clear that these can be dealt with in such a thematic approach.	Noted
5	What industry / work sector are you from?	This response is made by Unite, one of Britain and Ireland's largest unions with well over 1 million and a quarter members across all sectors of the economy. This includes manufacturing, financial services, transport, food and agriculture, construction, energy and utilities, information technology, service industries, health, local government and the not for profit sector. Unite also organises in the community, enabling those who are not in employment to be part of our union.	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	No. There's no reference to air transport, passenger transport or utilities - which are all significant sectors of concern to us.	Air transport – HSENI has airside enforcement which falls under our Transport Group. Gas will be a stand-alone sector.

		<p>Issues of concern reported by our workplace reps in passenger transport include unreasonable shift rosters, notice periods, overwork (stress), ASB attacks, reliance on open windows for Covid safety (non-deployment of CO2 monitors), inconsistent H&S training.</p> <p>Issues of concern reported by our workplace reps in air transport including inadequate, old or absent PPE, old H&S equipment, poor or non-existent cleaning regimes, lifting equipment, inadequate and inconsistent H&S training,</p> <p>A major issue for utilities workers is deployment during extreme weather events but the above issues also apply to an extent. H&S during extreme weather events should be a cross-cutting theme given climate change.</p>	<p>Utilities will be a stand-alone sector.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	<p>Yes although this should not mean no or inadequate attention to less serious outcomes. There is a prevalence of widespread stress from overwork and pressure leading to mental health difficulties. Promoting good mental health through addressing H&S shortfalls should be a cross-cutting theme across your activities. Fatigue is a frequent causation of accidents leading to severe outcomes, HSENI should not lose sight of deep route causes such as fatigue, sleep issues, ill managed shift patterns and rosters and so on.</p>	<p>Noted – we expect to have health as one of our cross cutting themes which will include mental wellbeing.</p> <p>HSENI's mental well-being advisor service continue to work with organisations to promote the management standards approach and fatigue and burnout to help reduce stress within the workplace.</p>
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	<p>The sectoral priorities do not address cross-cutting issues such as overwork, poor shift rosters, inadequate notice of shift changes or mental health challenges resulting from poor H&S practices. Issues set around general wellbeing are also extremely important and relevant to the workplace such as menopause, prostate, breast cancer and sleep Apnoea and so on. Some of these have occupational causation that are not completely understood, and certainly has a massive impact on people's ability to function safely in their workplace.</p>	<p>HSENI's work on mental wellbeing at work will naturally come alongside some of these cross cutting issues where they have impact on psychological occupational risk.</p>
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	n/a	

15 - ANON-7PZJ-Z6R5-2 – NI Safety Group			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Northern Ireland Safety Group (NISG) welcomes HSENI's "commitment to a continued reduction" following trends set by RIDDOR. However, if there is under reporting of accidents, incidents, and major injuries across all sectors in Northern Ireland the trends may well present distorted results due to this under reporting.	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	NISG supports the plan to carry out 80,000 interventions and 25,000 site visits across the five year plan and we would anticipate that our members would welcome such visits. It shows a proactive approach and we very much welcome the "boots on the ground approach."	Noted

3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	NISG believes that the three “cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health” fit well with what we actively promote best practice on and direct our activities towards. We would welcome the chance to feed into those chosen themes for years 3 and 5.	Noted
4	Are there particular themes you would like to be considered for years three and five?		
5	What industry / work sector are you from?	NISG promotes occupational health, safety and wellbeing and as such operates across all sectors.	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	<p>We note the focus on life changing injuries and conditions like asphyxia and blindness but we note that there is no specific mention of mental health throughout the document. We would ask HSENI to support all local groups such as NISG and WHLG etc.in keeping mental health support at the forefront, especially in these trying times we find ourselves in.</p> <p>We also accept that this may be something that HSENI will have already taken cognisance of under workplace health.</p>	<p>HSENI continues to be committed in this Corporate Plan to the proactive prevention of occupational mental ill health. This is embedded within the work of the Occupational Health and Hygiene Group.</p> <p>This will involve partnership work over the course of the Corporate Plan.</p>
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	NISG would support this stance	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	NISG welcomes the strong emphasis on workplace health ensuring it has 'equal billing' with safety. We are confident that promoting this balance is correct.	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	<p>In terms of the plan itself, it is certainly a departure from previous plans and has a very collaborative and inclusive feel about it.</p> <p>NISG fully supports the plan's contents and we consider it to be broadly in line with the values, aims and activities of NISG. We accept that it is a strategic document and appreciate that it will be subject to review on a regular basis.</p> <p>NISG welcomes the fact that “there will be a strong element of partnership throughout this work cycle” and we consider ourselves an important partner in the delivery of this plan and are keen to continue collaborating with HSENI colleagues. We believe our group provides a unique platform to promote the outputs and our programme of events and activities is geared to providing this.</p>	Noted

16 - ANON-7PZJ-Z6SF-M – Construction – CEF			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	CEF recognises the importance of statistics as a target and supports the continued drive to reduce fatalities and injuries. It's noted that HSENI recognise under reporting as an issue and in this context perhaps reviewing the current NI specific RIDDOR regulations with a view to aligning them to the GB regulations would be worth considering.	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all	CEF supports HSENI's commitment to deliver 80,000 interventions including 25,000 site visits across the period covered by the Corporate Plan. Furthermore, the wide range of strategies and interventions proposed is also	We currently address work at height in 70% of our inspections. Other options are always considered. Blitzes have their place but they may not inject the

	sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	welcomed. It is noted that blitzes are included as one of the planned interventions and the cross-cutting themes are proposed but perhaps an increase in clusters of sector specific inspections or inspection campaigns focussing on a particular important area would be an additional benefit. For example, a month long inspection campaign focusing on working at height in the construction industry would concentrate the industry's attention on this very important issue. This could be repeated across the sectoral priorities identified in the plan.	longevity required to target such a significant issue which continues across the industry.
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	CEF agrees that delivering three cross-cutting themes is a good means of raising the profile and tackling high profile issues across all work sectors. The broad nature of workplace transport will be applicable to many industries.	Noted
4	Are there particular themes you would like to be considered for years three and five?	CEF agrees that health would be a useful topic as again it will cover a wide range of sectors. There may be merit in a particular and separate focus on mental health as this is having a growing impact not just on construction but also on the other sectors identified in the Corporate Plan and society as a whole.	HSENI continues to be committed in the Corporate Plan to the proactive prevention of occupational mental ill health. This is embedded within the work of the Occupational Health and Hygiene Group. This will involve looking at its application in particular sectors.
5	What industry / work sector are you from?	Construction. The Construction Employers Federation is the sole certified representative body for the construction industry in Northern Ireland. We represent over 70% of construction in NI and around 800 businesses from all sizes employing over 30,000 staff directly and 65,000 in the wider supply chain.	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	CEF agrees that that the majority of main health and safety issues within construction are focused on in the draft corporate plan. We would suggest that temporary works be added to the list as an area that requires focus within the construction sector. The draft corporate plan lists the areas of focus in rank order and CEF disagrees with the current order. We suggest lung disease should be a higher priority.	Noted - Sectoral priorities are considered at many points throughout the year and addressed operationally and through the annual operating plan process. While we have given our top priorities we will not neglect or take our eye off issues such as temporary works.
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes, CEF agree that HSENI should maintain a focus on those work activities which are associated with the most serious outcomes. Failure to do so would likely result in an increase in issues related to those areas that tend to result in "Serious" outcomes. It is also important that trends are monitored across the outcomes and early intervention/ action taken to prevent minor issues evolving into serious issues.	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	CEF agrees that the proposed sectoral priorities strike a balance between health and safety. As stated previously it is the CEF's view that lung disease should be placed higher up the list of priorities and it would be beneficial if the sectoral priorities and their rank order of importance were reviewed on an annual basis to take account of any emerging trends and ensure the correct areas are concentrated on throughout the duration of the plan.	Sectoral priorities are considered at many points throughout the year and addressed operationally and through the annual operating plan process. We will continually monitor the industry and with our industry partners, we will adapt to changing events as required to insure compliance in the sector.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	CEF supports HSENI in its mission to set and ensure compliance with health and safety standards and are keen to maintain and build on collaboration between the two organisations to continue to make the construction industry a safer place to work.	Noted

17 - ANON-7PZJ-Z6RU-2 - Energy Storage Sector			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?		
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?		
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?		
4	Are there particular themes you would like to be considered for years three and five?	It is considered appropriate to review issues to improve personnel safety in all aspects. However, this may be perceived as a reactive and retrospective review. Given, the impetus to transition energy systems to be low-carbon or hydrogen based, consideration should be given to the HSENI's preparedness for their requirements for a hydrogen economy and the development of a transparent framework for delivery. Furthermore, early industry movers will require clarity of expectations in advance of three-to-five-year time horizon.	A number of regulators have a remit in relation to new technologies across a range of sectors. HSENI's role is one of safeguarding enabler. Whilst HSENI is already involved with new technologies, it is important to continually horizon scan and be prepared for those that are potentially coming on stream whilst dealing with those that currently exist across a range of sectors in Northern Ireland. HSENI will continue to work with other regulators and industry, impartially and independently. The deployment of many emerging technologies is still conditional on the successful completion of research, testing and/or demonstration programme to mitigate health and safety risks.
5	What industry / work sector are you from?	Energy Storage Sector.	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	The plan focuses upon those occupational safety aspects related to health and safety.	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?		
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	The above proposals are targeted upon occupational health and safety. Consideration should also be given to more process safety requirements.	Process safety requirements are considered where they are relevant for the sector.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.		

18 - ANON-7PZJ-Z6RZ-7 - District Council			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Causeway Coast and Glens Borough Council does not have any comments on whether the measure's goals are realistic and reflect the collective effort required to achieve success. Causeway Coast and Glens Borough Council has no recommendations on other additional measures at this stage.	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Causeway Coast and Glens Borough Council agrees. Causeway Coast and Glens Borough Council would like to see partnership working with other enforcement agencies (such as District Councils) and trade bodies included.	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	1) Causeway Coast and Glens Borough Council agrees. 2) Causeway Coast and Glens Borough Council is of the view that when choosing annual cross-cutting themes consideration should be given to themes from the joint strategy with District Councils and issues within the District Council enforced sectors. 3) Causeway Coast and Glens Borough Council welcomes the commitment given to focusing on workplace health and would recommend seeking input from the Workplace Health Group on this aspect.	Noted – we will look at opportunities to work in partnership with Co-enforcers such as local authorities.
4	Are there particular themes you would like to be considered for years three and five?	Causeway Coast and Glens Borough Council would suggest that manual handling/musculoskeletal disorders be considered as a theme.	Noted
5	What industry / work sector are you from?	District Council	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Yes	Noted
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Causeway Coast and Glens Borough Council agrees however going forward there should be an effort made to measure long-term ill-health caused by work activities, so that it is not only injuries and fatalities that are considered.	The gathering of relevant work related ill health statistics continues to be a challenge. HSENI is committed to continuing this work, including with other agencies, in exploring how these statistics can be gathered and used to highlight the extent of the impact of work related ill health in Northern Ireland.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Causeway Coast and Glens Borough Council agrees.	Noted
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	In terms of Product Safety/ market compliance Causeway Coast and Glens Borough Council is of the view that consideration should be given to the types of market surveillance/ initiatives which could be included. Council believes it is important to co-ordinate this area of work with District Council co-enforcers. Joint training and shared learning in this area could be beneficial. Causeway Coast and Glens Borough Council is of the opinion that there should be some mention of good partnership working with District Councils within the proposed Corporate Plan. HSENI works with Councils through the Local Authority Health and Safety Liaison Group and Joint Strategy to achieve greater promotion of safety and health themes to workplaces across all sectors.	Noted Noted

19 - ANON-7PZJ-Z6RT-1 – Council representative body			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Environmental Health Northern Ireland (EHNI) welcomes the opportunity to comment on the proposals for the next HSENI corporate plan. EHNI do not have any comments on whether the measure's goals are realistic and reflect the collective effort required to achieve success. EHNI has no recommendations on other additional measures at this stage.	Noted
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	EHNI agrees. EHNI would like to see partnership working with other enforcement agencies (such as District Councils) and trade bodies included.	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	EHNI agrees. EHNI is of the view that when choosing annual cross-cutting themes consideration should be given to themes from the joint strategy with District Councils and issues within the District Council enforced sectors. EHNI welcome the commitment given to focusing on workplace health and would recommend seeking input from the Workplace Health Group on this aspect.	Noted – we will look at opportunities to work in partnership with Co-enforcers such as local authorities.
4	Are there particular themes you would like to be considered for years three and five?	EHNI would suggest that manual handling/MSDs be considered as a theme.	Noted – we are confident that health will be one of our three major themes and this will incorporate MSDs.
5	What industry / work sector are you from?	Local Government - Environmental Health	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	N/A	
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	EHNI agrees however going forward there should be an effort made to measure long-term ill-health caused by work activities, so that it is not only injuries and fatalities that are considered.	Noted – a considerable amount of work has been undertaken to quantify the numbers and causes of ill health caused by work in NI. This is important data and has shaped our 'health' focus as set out in our new corporate plan.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	EHNI agrees.	
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	In terms of Product Safety/market compliance EHNI is of the view that consideration should be given to the types of market surveillance/ initiatives which could be included. EHNI believes it is important to co-ordinate this area of work with District Council co-enforcers. Joint training and shared learning in this area could be beneficial. EHNI is of the opinion that there should be some mention of good partnership working with District Councils within the proposed Corporate Plan. HSENI works with Councils through the Local Authority Health and Safety Liaison Group and Joint Strategy to achieve greater promotion of safety and health themes to workplaces across all sectors.	Noted

20 - ANON-7PZJ-Z6RC-G - Private Drug and Alcohol Testing Service			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	Yes, I believe the proposed measures offer a realistic goal in achieving success of creating a safe environment whereby individuals can ideally go home safely at the end of each working day. Whilst it is important for every workplace to ensure a safe working environment, this is also something that each employee needs to adhere to as well, ensuring they are minimising the risk they might pose to themselves and their colleagues based on choices made outside of working hours. Unfortunately as a result of Covid for a variety of reasons, some people's habits and lifestyles have changed which can have an impact in the workplace. Whilst the majority of employers will have a Drug and alcohol policy in place, this isn't always active which can lead to potentially avoidable accidents occurring.	Noted. This is a complex area and HSENI will look at opportunities to get messages out to industry.
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	I believe this certainly demonstrates a high commitment. Partnership with local 3rd party providers and supporters who can assist with aiding in safe working environment through educational pieces for business and employee alike.	Noted
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes, I agree. I think there should be focus on not only the physical impact and issues causing a potential risk to individuals, but the mental health aspect which has become more apparent in the years since Covid first began.	Noted
4	Are there particular themes you would like to be considered for years three and five?	The choices and habits we have outside of working hours can have an impact on our work life putting colleagues and ourselves at risk.	Noted. This is a complex area and HSENI will look at opportunities to get messages out to industry.
5	What industry / work sector are you from?	Private Drug and Alcohol Testing Service - There has unfortunately been an increase in the misuse of Drugs and or Alcohol during and after Covid. Thankfully more companies are looking upon the potential misuse as an illness and support is being offered where requested and or required. This is something that impacts across all sectors.	Noted
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	Stress/mental wellbeing should be something to be considered amongst all sectors	Noted – it is not possible to cover all areas but we expect that all sectors will have cover this in the year we have a cross cutting theme on workplace health.
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	Yes	Noted
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Maybe leans a bit more towards the safety aspect	Noted – we believe the balance is right but we will look at exploiting all opportunities to raise health.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	Whilst it is important for every workplace to ensure a safe working environment, this is also something that each employee needs to adhere to as well, ensuring they are minimising the risk they might pose to themselves and	See previous.

	<p>their colleagues based on choices made outside of working hours. Unfortunately as a result of Covid for a variety of reasons, some people's habits and lifestyles have changed which can have an impact in the workplace. Whilst the majority of employers will have a Drug and alcohol policy in place, this isn't always active which can lead to potentially avoidable accidents occurring.</p>	
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21 - ANON-7PZJ-Z6RB-F - Construction			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	<p>Our view is that these three measures are realistic and use existing data sets to track improvement. However, the 3 day can be spurious in nature skewing the trends sometimes.</p> <p>With workplace related stress rising and poor mental health becoming the leading cause of absence and death in young men in construction specifically through suicide, we believe this is an area which should be included within the measures to give focus. At this time this data is already collected through GP route and should be used as a data set to give a basis for a measure to reduce the number of work related deaths as a result.</p>	<p>Suicide is not RIDDOR reportable and as such would not be investigated by HSENI.</p> <p>We are aware of the issues regarding suicide and the devastating impact that it can have on families and colleagues. HSENI assists in various suicide awareness programs such as PL2, chaired by the PHA and includes various stakeholders from across all health trusts and also the Build Mental Health Alliance which launched on 10th October 2022 which looks at offering help and assistance to those suffering from distress within the construction sector.</p> <p>HSENI's mental well-being advisor service continue to work with organisations to promote the management standards approach and fatigue and burnout to help reduce stress within the workplace.</p>
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	<p>With limited staff numbers across the NI and each visit requiring a report or follow up it would be a significant stretch for the HSE team when they have the other activities to complete. It is not clear what the proposed value added would specifically be from the increase in the number of visits - targeted visits may be more appropriate to get the best learning, if resources are limited.</p> <p>The variety of engagement types is positive.</p>	<p>We believe that it is important to use a mix of approaches to reach a wide audience but we place great importance on site visits. We want to set challenging targets in our new corporate plan.</p>
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	<p>Yes.</p> <p>This is good way to focus on key themes to be proactive, leaving space for reactive actions which will arise.</p>	<p>Noted.</p>
4	Are there particular themes you would like to be considered for years three and five?	<p>Early careers - getting the foundations of H&S in the workplace at the beginning, via a combination of training, coaching and mentoring. This should include students on placement and apprentices.</p> <p>Wellbeing - how to provide the right environment for staff / colleagues to thrive and as individuals how we can take ownership of our working practices.</p>	<p>Noted.</p> <p>HSENI provides targeted information and advice for groups on its website. This includes 'older workers' 'young people' 'children on farms' etc. In addition we have always engaged with colleges where the opportunities arise to provide lectures on health and safety.</p>
5	What industry / work sector are you from?	Construction	

6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	There is much on safety and could be more on health. The focus is good but does not cover mental health, from workplace related stress. This could be measured using the GP Thor data set. This is based on the construction industry losing over 300 colleagues every month to suicide. Not all are related to work related stress but this is a major component. There is also a possible misunderstanding of the Workplace Transport Safety terminology, in the expanded document glossary should include definition and parameters of usage. For instance driving for work, whether to a construction site or an office which is not your 'home' office should be included as work related. Also with such a large proportion of the construction industry travelling for work long hours and fatigue should be part of the focus on how we manage this as this impacts on decision making for all.	Noted – HSENI recognise the differentiation that you make in terms of workplace transport. It is based on those factors we know to be associated with the workplace. This would not exclude some sectors looking wider into the issues you mention – this will be passed to our construction and transport teams to consider. <i>(Please note HSENI has a very limited vires for activities on a public road where the PSNI have primacy).</i>
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	The collection of data on life changing injuries/ diseases should be the basis of action and the work activities listed are key. In this instance measures should be set up in addition to the RIDDOR based ones already in this document.	RIDDOR is a statutory reporting scheme but we always engage with industries to be alert to trends and developments.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	There is still much focus on safety and could me more on health and wellbeing in the construction sector. As noted above, the focus is good but does not cover mental health from workplace related stress. Fatigue and its impact on decision making in all areas is not covered, difficult to measure this but is a significant cause in human error.	HSENI's mental well-being advisor service continue to work with organisations to promote the management standards approach and fatigue and burnout to help reduce stress within the workplace.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	The plan is well constructed but could go further in scope to focus on behaviours and culture to stem the cause of incidents to complement the on reactive solutions through barriers and rules on sites.	Noted – this is something that HSENI encourages companies to examine as part of their internal accident investigations. It would be challenging for HSENI to commit the resources at company level to look at behaviours and culture but we will continue to look at company and sector accident trends.

22 - ANON-7PZJ-Z6RY-6 - Renewables sector - Green hydrogen			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	N/A	
2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	N/A	
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising	N/A	

	the profile and tackling high profile issues across all work sectors?		
4	Are there particular themes you would like to be considered for years three and five?	N/A	
5	What industry / work sector are you from?	The renewables sector - green hydrogen	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	<p>Hydrogen NI would point to the exclusion from The HSENI's draft Corporate Plan for 2023-2028 of any mention of a future focus on renewable gases, particularly green hydrogen.</p> <p>The Executive's Energy Strategy places great importance on the development of hydrogen as key part of the future energy mix. Hydrogen NI welcomes the 80% renewable energy by 2030 target as set out by the new Climate Change Bill, but the scale of that challenge and timeframe cannot be underestimated. To achieve this target by the end of the decade, it will be critical that in the intervening years (particularly the period of 2023-2028) that the HSENI is actively working with the other relevant stakeholders to do all the necessary work to realise the full potential hydrogen offers and achieve the Executive's ambitious targets as outlined in the Energy Strategy and Climate Change bill.</p> <p>Existing health and safety regulations and legislation will have to be updated to facilitate all elements of a hydrogen economy from production and storage to transport, distribution and end-use.</p> <p>In GB, the potential for blending hydrogen with natural gas in the existing gas networks is being trialled. BEIS is currently working with HSE England and industry to conduct testing to increase the hydrogen blend up to 20% and if successful, the regulations will need to be amended to allow for this higher blend. By contrast, this is not taking place in Northern Ireland.</p> <p>Blending new gases into the existing gas network requires evidence gathering and approval from the Health and Safety Executive prior to deployment, and in order to meet 2030 targets, these workstreams should already be ongoing.</p> <p>For example, the HyDeploy demonstration project at Keele has been permitted an exemption by the Health and Safety Executive from the 0.1% limit in the GB gas network (as permitted under the Gas Safety (Management) Regulations 1996).</p> <p>Such projects are not only vital to explore the pathways to the commercialisation of hydrogen, but similar community trials in the networks here would confirm proof of viability of green hydrogen in NI, attracting the necessary investment to scale up production of hydrogen, and enhance public buy-in, which will be a crucial enabler of future hydrogen development and achievement of NI's net-zero goals.</p>	<p>HSENI recognise that hydrogen is one of the rapidly emerging energy solutions and is expected to play a central role in reducing NI's reliance on fossil fuels and decarbonisation across several sectors including utilities (heating, etc.) and transport. HSENI has been working with and will continue to work with relevant stakeholders in this regard.</p>

7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	N/A	
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	N/A	
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	Development of policy and updating legislation and regulation must be imminently prioritised to facilitate the development of a hydrogen economy here in NI	Noted. New technologies will be addressed in the new corporate plan. HSENI's role is one of safeguarding enabler. It is a challenging area for regulators. There are various uses for hydrogen including transport and infrastructure applications. It is important that the evidence base underpins the regulations, codes and standards required to enable safe decarbonisation.

23 - ANON-7PZJ-Z6R7-4 - Energy (Gas Transmission, HVDC Electrical interconnector)			
	Question	Comment	HSENI Response
1	Do the three measures provide a realistic goal of incident reduction and also reflect the collective nature of the effort required to achieve success? Are there other measures you would like to see included?	<p>Mutual Energy agree that the collective effort of all parties contributes to health and safety success. However, 'successful' delivery of such effort, including HSENI's remit, is not always easily measurable, particularly across limited periodic bases (e.g. annual), or even across the (proposed five-year) period of HSENI's next Corporate Plan for certain matters.</p> <p>For example, across the coming years, early work in the consideration and establishment of an appropriate future health and safety regulatory framework to facilitate the energy transition, consistent with the NI Executive's Energy Strategy – including gas network decarbonisation (via biomethane and hydrogen) – should be a key (and likely somewhat new / increasingly wide-ranging and important) strategic objective of HSENI to commence in the near-term, but which will likely not contribute to significantly reduced accidents etc. across the period out to 2028, and – if designed and subsequently implemented right from the outset – would only translate to reduced accidents etc. against a hypothetical counterfactual of deficient design/implementation, due to an oversight in early focus in the coming years, which should clearly be avoided.</p> <p>Mutual Energy therefore recommend that a qualitative, strategic 'measure' of success be added, to the effect of HSENI delivering actions conducive to facilitating the long-term, safe delivery of the energy transition, consistent with NI energy policy. What this means at a more specific level could then be defined in actions in HSENI's Annual Plans, giving flexibility to adapt according to policy updates and/or emerging risks, priority in line with necessary delivery timelines, etc.</p> <p>More generally, consideration may be given to tracking of dangerous occurrences, as inherently fewer dangerous occurrences should result in fewer injuries and fatalities. Asides that comment, Mutual Energy consider the proposed measures provide a good metric to track and compare levels of compliance in industries.</p>	Noted. New technologies will be addressed in the new corporate plan. HSENI's role is one of safeguarding enabler. It is a challenging area for regulators. There are various uses for hydrogen including transport and infrastructure applications. It is important that the evidence base underpins the regulations, codes and standards required to enable safe decarbonisation.

2	Does the output (80,000 interventions which will include 25,000 site visits) demonstrate a commitment to a high level of output across all sectors delivered through a wide range of activities? Are there other outputs you would like to see included?	Mutual Energy consider the proposed output does demonstrate a high level of commitment from HSENI, as this is equates to just short of 100 site visits a week. The wide range of strategies also provide several avenues to ensure effective intervention.	Noted.
3	Do you agree that the output (Deliver three annual cross-cutting themes to tackle a work activity known to be a cause of fatalities, serious injury or ill-health) is a good means of raising the profile and tackling high profile issues across all work sectors?	Yes, in areas that see a high trend of incidents and fatalities it is important to proactively take action to try and reduce these. Looking at years 3 and 5, there's a possibility that figures may remain high for workplace transport, and that it may be the obvious choice again, but similar campaigns in other areas might yield better results. There may also be a particular "blindness" to new areas of industry for which little data exists.	Noted – we will look to use the materials and knowledge developed in the campaigns for future years. Our aim with the three themes is to use them to bring a collective sea change in knowledge and approach which will have a positive legacy.
4	Are there particular themes you would like to be considered for years three and five?	Mutual Energy recommend consideration be given to a targeted campaign on safe digging practices with regards to utility strikes and ground works. This is especially prevalent in the west of the region, where gas distribution and fibre roll out are occurring at a high rate. A growing concern is emerging whereby the formation of RAMS by contractors in this area are losing value and may be seen more as a 'paperwork exercise' rather than an actual control measure.	Noted – this will be passed to out utilities and construction teams to consider in their annual operating plans.
5	What industry / work sector are you from?	Energy (Gas Transmission, HVDC Electrical interconnector)	
6	Do you think the draft Corporate Plan focuses on the main health and safety issues within your sector?	<p>It is proposed (at paragraph 16) that the new Corporate Plan continues, as with the current Corporate Plan, to focus on those activities which are known to be associated with fatal and serious outcomes. While that is clearly understandable and prima facie reasonable, in terms of best management of key current / known risks, it is not suitably forward looking in terms of emerging needs for HSENI to have a comprehensive role in in future, in relation the energy transition and gas network decarbonisation, consistent with the NI Executive's Energy Strategy – note, while not explicitly noted in the online consultation, we anticipate that HSENI are very aware that efficiently facilitating the safe delivery of this will place changing needs on the organisation and therefore expect HSENI will have already planned to reflect this (if even only at a high-level) in the actual Corporate Plan publication. We would, however, comment that across the period of the next Corporate Plan, energy policy will evolve and come from different sources than the NI Energy Strategy – for example, the Climate Change Act (Northern Ireland) 2022 calls for Sectoral Plans (in energy, infrastructure, industrial processes, waste management, agriculture, fisheries and transport) and an overarching Climate Action Plan. We suggest therefore, that any commitment in the final Corporate Plan to facilitating delivery of energy transition related matters uses a more generic description, such as 'NI energy policy' or similar.</p> <p>For the purposes of providing context and aligning on expectations of what delivering on any such high-level commitment to help deliver energy policy (including gas network decarbonisation, etc.) may mean in practice, MEL wish to note some further specifics we are aware of in this regard, which may assist with future corporate/resource planning and inform engagement with</p>	<p>Noted.</p> <p>HSENI is aware of the developments that you mention in this sector and acknowledge that this is, and will be, a key area of work within the life-cycle of this Corporate Plan. The transition to new sustainable energy sources such as hydrogen, etc. has ramifications in terms of suitability of gas infrastructure, compatibility of gas appliances, maintenance, training, public and employee health and safety. HSENI will continue to engage with the industry (TNOs and DNOs, etc.) in this regard. There are several key objectives for the sector that are relevant to this specific topic -</p> <ul style="list-style-type: none"> ➤ Safety management systems to appropriately monitor, assess and maintain infrastructure; ➤ Working with partner organisations to ensure preparedness and prevention of major incidents; and ➤ Working with co-regulators and engagement with renewables sector to ensure adequate health and safety standards in respect of evolving technologies in the gas sector.

		<p>MEL (and the wider gas industry, including renewable gas producers and our NI Gas Network Operator (“NI GNO”) counterparts) on such matters.</p> <p>Listed below are some examples as to such further considerations with regards to the 'proposed sectoral priorities':</p> <ul style="list-style-type: none"> ➤ <u>Agriculture</u> – consider biomethane supply chain issues and increased Anaerobic Digestion deployment; ➤ <u>Gas</u> – gas network decarbonisation (biomethane and hydrogen), and downstream appliance and installer certification, safety legislation amendments as necessary; ➤ <u>Major hazards</u> – networks and (large-scale) storage; ➤ <u>Manufacturing</u> - Supply of gas appliances – needing to be 100% 'hydrogen-ready'; ➤ <u>Utilities</u> – (see 'Gas' above); ➤ <u>Waste</u> – Anaerobic Digestion supply chain, including biomethane production; and ➤ <u>Cross sectoral</u> - New and emerging technologies – hydrogen production, transport, storage and consumption applications. <p>We note that, in GB, BEIS are “engaging closely with HSE regarding any impacts [their] work may have on health and safety legislation... [including] helping to build the necessary evidence base to determine whether hydrogen blending (up to 20% by volume) meets the required safety standards to be enabled into gas networks, as well as broader engagement through the [Hydrogen] Regulators Forum. HSE also aims to provide a comprehensive assessment of the safety of 100% hydrogen for heating in 2025 and options for a future health and safety regulatory framework. This will include work to review evidence on the safety of hydrogen, such as for wider scale transmission within the gas network and starting to engage key stakeholders on potential changes to HSE regulations to support industry”.*</p> <p>Similar close co-operation between the NI GNO and HSENI's in the development of a suitable programme of work, with appropriately structured governance to oversee will be important. HSENI can play an essential role in ensuring this is efficiently delivered, by setting out how safety frameworks being developed in GB may be transferable to NI and in engaging in how evidence being produced by trials ongoing in GB is applicable to NI operators. Certain trials and demonstration projects will be required in NI, and the NI GNO's anticipate these commencing in 2023, in which HSENI input and collaboration will be needed to guide expected requirements and processes for safety considerations to be appropriately accounted for in the design and operation of any such trial. Alongside this, a review of any legislative changes needed to facilitate gas network decarbonisation, early identification of process and timelines to do so, can usefully guide and supporting evidence HSENI may first require of industry, or preparatory work industry may be required to deliver (e.g. training, etc.). Ensuring close communication with government (via the Department for the Economy and</p>	
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		<p>the Utility Regulator on all of this will be essential, and MEL propose such engagement commence immediately.</p> <p>* https://www.gov.uk/government/consultations/proposals-for-hydrogen-transport-and-storage-business-models</p>	
7	Do you agree that we should maintain a focus on those work activities which are associated with the most 'Serious' outcomes?	<p>Yes, for present / known risks which are expected to remain being associated with the most 'serious outcomes', with a view to emerging risks and / or any change in trends in risks which are causing the most 'serious outcomes'.</p> <p>There may be some other "low hanging fruit" that could also have a good impact of safety across the board that should be considered.</p>	Noted.
8	Do you believe that our proposed sectoral priorities strike a balance between safety and occupational health?	Yes	Noted.
9	Please provide any additional comments or feedback on the proposed Corporate Plan.	None	

Responses received by email

Sector – Voluntary / Health / Wellbeing

24 - Health	Comment	HSENI Response
	We noted there was little reference to Health & Social Care sector in the Plan and there may be provision elsewhere for this, but we felt HSENI should have a role to play in terms of incidents, accidents and safety in this arena.	Health and social care currently falls under our Public Sector Group. We have a small number of inspectors working in this sector and we acknowledge it is accounts for a large number of employees. Reportable workplace accidents in this (and all) sector(s) are monitored, prioritised and dealt with within currently available resources. We will continue to use this approach. We will also continue to make the case to increase our inspectorate numbers to better position the organisation for the future and for unexpected challenges.
	We were pleased to see that the move to look at trends across the spectrum rather than specific targets in each area as this should help focus the on the areas that need the highest attention.	Noted
	Transport is mentioned across a wide range of the sector breakdowns, and we welcome this along with machinery for one of the focus areas that is cross cutting.	Noted – machinery safety as a possible theme.
	We do not have any other comments to add, and we hope that you get the responses required to move from the draft stage to full endorsement and implementation	

25 – Political party	Comment	HSENI Response
	<p>Looking back on the 2020-2021 Annual Report a number of targets and outputs were missed.</p> <p>It is important that the HSE has contingency measures in place to achieve its targets in the event that unexpected challenges arise - such as a further outbreak of Covid.</p>	<p>It is acknowledged that a number of targets were missed for a number of reasons. HSENI maintains a business continuity plan and routinely monitors emerging risks and operational pressures and reacts to them taking account of prioritisation and available resources. It takes a minimum of three years (after funding is secured) to recruit and train an inspector. For many years HSENI has operated with a significant number of vacancies. In addition we have a number of inspectors who hold specialisms. In 2022 we secured funding to bring our number of inspectors back to normal compliment (although bringing in new trainees brings extra work for the operational groups in the first two years). This allows us to discharge our statutory functions but does not allow for a lot of flexibility in respect of contingency planning. We will continue to make the case to increase our inspectorate numbers to mitigate the loss of specialist knowledge and experience and to better position the organisation for the future and unexpected challenges. We believe our annual outputs and our delivery of key functions during the pandemic is evidence of our adaptability and flexibility when faced with difficult operating environments.</p>
	<p>Analysing the yearly data one trend that stands out over the last five years is that the majority of fatal injuries have occurred in either the agricultural or construction sectors.</p> <p>The Corporate Plan should prioritise actions to address these trends and the HSE should provide the necessary additional resources to mitigate hazards in the agriculture and construction sectors which are most commonly linked with fatalities and serious injuries.</p>	<p>The main causes of fatalities in agriculture and construction are prioritised. We have campaigns in both sectors to tackle these and they will continue to be front and centre of the work during this plan.</p> <p>In terms of resources we must cover all work sectors and as above we will continue to make the case to increase our inspectorate numbers to provide greater outreach in high risk sectors.</p>
	<p>The list of interventions is quite comprehensive, however we would also recommend that the HSE also utilises web chats and video calls as an additional means of, or option for providing information and advice to those who can access this form of communication.</p>	<p>Noted.</p> <p>HSENI provides a very comprehensive information service through its website and communications work. In addition HSENI provides a Freephone number which can be used to get health and safety advice. We are committed to continually develop and improve our services and will examine all ways to do this.</p>
	<p>In terms of site visits, the HSE is essentially saying it intends to complete 5,000 site visits per year over the five years. Currently HSE enforces health and safety standards in a significant number of industries including Construction, Agriculture, Production, Motoring Trades and Mining and Quarries. In the Construction sector alone there were 11,195 registered businesses in 2022, while there 18,345 in the Agricultural sector and 5,500 in Production.</p> <p>In that context we would be concerned that the number of inspections may not be sufficient to ensure that health and safety standards are maintained across the various sectors.</p>	<p>HSENI use many techniques to provide information and advice across all sectors. It is accepted that a face-to-face visit from an inspector is one of our most important approaches. Whilst we could never get to all business sites we will prioritise as far as possible to ensure our work targets the higher risk activities. We will continue our engagement with trade bodies etc. to build partnership and ensure our messages have the greatest reach possible. As already stated, we will continue to make the case to increase our inspectorate numbers.</p>
	<p>We would recommends that the HSE provides some targeted advice and support to vulnerable and inexperienced workers who might be unaware or unfamiliar with the workplace safety and the mitigations that are in place to minimise hazards.</p>	<p>HSENI provides targeted information and advice for groups on its website. This includes 'older workers' 'young people' 'children on farms' etc. In addition we have an extensive annual campaign with children in the farming community. HSENI publications are available in any language requested.</p>
	<p>As a non-departmental public body within the DfE, there may be a role for HSE to facilitate health and safety training for employers and training providers who offer apprenticeships and traineeships. This would help to give apprentices and trainees an insight into the importance of safety in the workplace and how they mitigate risks and hazards.</p>	<p>HSENI provides advice and guidance through a number of media. We fully support the need for employers to provide quality training.</p>

	HSENI has an enforcement role which may not be compatible with delivering training but we will continue to provide information and advice for those organisations involved in this work.
The Department for Communities (DfC) also provides an Access to Work service which offers people with disabilities practical support to help them access employment. Some of their support includes adaptations to premises and equipment in the workplace to help an employee with disabilities. Again there might be a role for HSE to co-operate and collaborate with the Access to Work service and to provide advice and training that can help to protect workers with specific disabilities in the workplace.	HSENI provides advice and guidance through a number of media which would be of assistance to this service. HSENI has an enforcement role which may not be compatible with being directly involved in the delivery of this service but we will provide any assistance DfC requires that it is possible to provide.
We acknowledge that it cannot monitor each and every hazard and risk in the workplace and responsibility also falls on workplaces themselves to carry out risk assessments and put safety measures in place. For these reasons we understand HSE must prioritise "Serious Outcomes". However, there is an importance, and must be a balance, in monitoring those risks that pose the greatest harm - such as brain injuries; spinal cord injuries; amputations; asphyxia and poisoning; - and those risks which are most common and tend to impact more workers. The 2020/21 annual report provides an insight into the most common incidents that have occurred in workplaces, the report notes that the most common causes for over three day Injuries were; handling (23%) struck by (inc. vehicles) (19%) slips /trips (19%) and fall from a height (11%). In comparison the most common causes of major injuries were slips /trips (45%) fall from a height (20%) and struck by (inc. vehicles) (14%). HSE should aim to reduce these incidents through its various outputs including site visits/inspections, investigations and providing information in addition to employers taking responsibility to limit these hazards and reduce negligence. The intention to focus on workplace transport in the first year of the Corporate Plan would be relevant to reducing the number of incidents that involve workers being struck by vehicle's.	Noted.
The HSE approach to develop additional cross cutting themes on the basis of trends and statistics as they emerge in years three and five of the Corporate Plan is positive. We believe that this approach is beneficial as it allows the Corporate Plan to remain live and evolve and enables HSE to adjust its focus to tackling challenges as they emerge.	Noted
We welcome HSE's intention to collaborate with industry bodies and the Health and Safety Authority (HAS) in the south of Ireland and relevant bodies in Britain. We believe that this joint working would be beneficial in helping to understand and identify health and safety issues that are impacting various sectors.	Noted
In conclusion Sinn Féin welcomes a HSE Corporate Plan for 2023-2028 to maintain safety in the workplace and to protect workers from serious harm or injury. We welcome plans to co-operate with both industry and other health and safety authorities in the south of Ireland and in Britain in order to minimise incidents. We also welcome HSE intention to carry out a number of inspections and site visits over the next five years, however we would like to see evidence that these targets are sufficient to achieve the Corporate Plans goals considering the number of registered businesses in the north. Sinn Fein hope that HSE will consider additional proposals we have made in this submission including targeting health and safety training for apprentices and workers with disabilities; exploring the use of video calls for training as an option; and for greater information sharing between HSE and their counterparts in the rest of Ireland and in Britain.	Noted