
Health and Safety Executive (HSE)

Various Technical Updates and Amendments to HSE Guidance

RPC rating: Validated

Description of proposal

The assessment outlines thirteen alterations to HSE guidance and webpages over the reporting period and the introduction of two new pieces of guidance. All changes and pieces of new guidance were introduced to either correct out-of-date information or provide clearer or more concise details.

Amendments to web-based guidance were as follows:

- updating and simplifying guidance on occupational safety for apprentices;
- the removal of out-of-date information on electro-plating and powder-coating and its consolidation into one online location;
- the consolidation of information on common workplace chemical exposures to one online location;
- alterations to clarify guidance on the Petroleum Regulations 2014;
- updating two pieces of guidance on skin protection;
- updating and clarifying guidance on managing risks faced by temporary staff;
- additional health information for online content on controlling the exposure to lead.

Changes to substantive, PDF-formatted guidance documents entailed:

- updating and restructuring guidance on safety at motor sport events;
- the introduction of guidance on carbon monoxide exposure in catering environments;
- consolidation of an information sheet on the use of slurry in agricultural work;
- clarifications to guidance on metal-working;
- updates to guidance on the safe handling of metal stock in storage;
- the introduction of guidance on hybrid vehicles for the automotive repair sector;
- minor updates to guidance on temporary traffic management to reflect changes in working practices.

None of these changes alters any regulatory requirements.

Impacts of proposal

The assessment notes that each change will result in an initial familiarisation cost for businesses and a recurring annual cost from referring to documents. For both cost types, the assessment assumes that all guidance documents would be reviewed by production managers, each with uprated wage costs of £30.51 per hour (based on ASHE 2016 data). One manager per firm is expected to familiarise his or herself with all materials. A reading speed of 200 words per minute is also assumed (in line with BRE advice). Using ONS data, the assessment also assumes that 17% of all staff reviewing documents will be based within the public sector. This exclusion rate and the two assumptions are applied in the cost calculation of all guidance changes.

In calculating the familiarisation costs associated with webpage-based guidance and PDF-formatted guidance, the submission assumes that familiarisation is done by one production manager. It used its own website analytics data on the number of visitors to guidance pages to calculate the number of visitors who familiarise themselves with changes. The assessment calculates the number of visitors familiarising themselves with guidance as the “peak” number of visitors minus the baseline number of visitors.

The recurring cost associated with changes to website guidance is calculated with the above reading speed and wage rate, multiplied by the average number of seconds per visit on new pages minus the seconds spent reviewing the previous page. This figure was drawn from the regulator’s website analytics. The recurring cost for PDF-formatted guidance was estimated by establishing the difference in word counts between new and old guidance documents, multiplied by the baseline number of visits prior to documents’ revision.

Across all measures, the costs of familiarisation and the cost of future engagement with guidance is found to round to zero under the Business Impact Target. The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0million for all measures.

Quality of submission

The submission is clear, concise and proportionate to the small scale of the measures under consideration. It takes a sensible tabulated approach to a series of small guidance changes.

The submission assumes only one production manager would review guidance measures, despite noting guidance measures are aimed “*at workers, managers and technical specialists*”. It could have been improved by a brief explanation of why HSE believes this assumption is applicable across the range of sectors discussed.

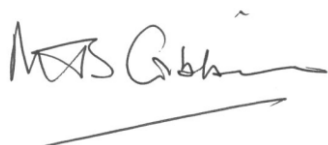
Additionally, the regulator notes that numerous guidance changes came at the request of industry. The submission would have benefitted from including more detail on the number of requests and on which measures received such support from business.

Departmental assessment

Classification	Qualifying regulatory provisions
Equivalent annual net direct cost to business (EANDCB)	Zero
Business net present value	Zero

RPC assessment¹

Classification	Qualifying regulatory provisions
EANDCB – RPC validated	Zero
Business impact target score	Zero



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANDCB and BIT figures to the nearest £100,000