



NATIONAL AUDIT OFFICE

Report by the Comptroller and Auditor General

Health and Safety Commission and
Executive: Operations and Administration

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Comptroller and Auditor General

National Audit Office
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Health and Safety Commission and Executive: Operations and Administration

Summary and conclusions

1. This Report records the results of an investigation by the National Audit Office (NAO) of the operations of the Health and Safety Commission (HSC) and the Health and Safety Executive (HSE), which were established by the Health and Safety at Work Act 1974 (the 1974 Act) and spent some £90 million in 1984–85. The aim of the investigation was to see how effectively the two bodies were pursuing their objectives of securing the health, safety and welfare of persons at work, and of protecting the public against risks arising from work activities; and whether they were doing so with due regard for economy and efficiency.

2. The investigation showed that HSC and HSE had been working steadily and systematically to meet the objectives of the 1974 Act, despite a number of difficulties, including a hiatus in accident statistics, staff constraints and the partial dispersal of their Headquarters to Merseyside. The main points of concern raised by the Report are, in regard to HSC's and HSE's operations, whether they have acted promptly enough to ensure continuation of their supply of information on areas of risk and to introduce effective management information and performance measurement systems; and on their administration, whether their fee charging practice recovers all the costs it should, and whether HSE's accommodation arrangements could be more cost effective.

Functions and organisation of HSC and HSE

3. HSC is a Commission of nine members which is responsible for advising the Secretary of State for Employment on health and safety policy and legislation and for issuing guidance to employers and the public. HSE acts as the Commission's secretariat and executive arm, and deploys over 3,600 staff in three policy, four inspectorate, one medical and one research divisions. Its inspectorates enforce health and safety legislation, investigate serious and other selected accidents and generally provide advice to industry, commerce and the public sector on their health and safety performance. The 1974 Act allocates responsibility for health and safety in some widespread activities to local authorities under guidance from, and in liaison with, HSC (paragraphs 1.1 to 1.9).

Identification and analysis of risks

4. HSE assesses risks in various ways, including the use of occupational injury and disease statistics, information from inspections, research, and advice from national and international committees, and by its own safety assessments, especially for large major hazard installations. In 1981 HSE introduced a computerised record of information on establishments, accidents and inspections which it is now extending into a national network (paragraphs 2.1 and 2.2).

5. A vital source of statistical information has been the reports made to the Department of Health and Social Security to support industrial injury benefit

claims. This source was removed in April 1983 with the discontinuation of industrial injury benefit, and although HSC embarked during 1983 on a consultative process aimed at the introduction of regulations requiring the submission of accident statistics from January 1984, consultation has taken longer than expected and there have been further delays so that implementation will not be possible until the beginning of 1986 at the earliest. In the meantime HSE has found its detection of risks seriously hindered (paragraphs 2.3 to 2.6).

6. HSE informed NAO that in the case of accidents the proposed new regulations were designed to enable HSE to secure sufficiently comprehensive information upon which to base their identification and analysis of risks. In the case of occupational disease, any reporting provision which might be included in the regulations could only partly satisfy their needs and the whole question of occupational health surveillance was therefore under review (paragraph 2.7).

Control of risks to health and safety

7. In controlling hazards HSC aims to select the most effective package of controls and/or other measures (for example, publicity campaigns). It has to decide on the extent to which the hazard in question should be covered by regulations, which need to be precise and may be expensive to enforce, and by codes of practice or guidance; and on the reliance to be placed on the general provisions of the 1974 Act. HSE's inspectorates examine both compliance with regulations and the effectiveness of self-regulation in regular programmes of inspection which HSE monitors with the aid of its computerised database. Information from both the Factory Inspectorate and local authorities suggests that in recent years economic circumstances have deterred many smaller businesses from maintaining good health and safety standards. HSE enforces regulations through enforcement notices and, if necessary, prosecution: in 1983 the Executive issued 8,700 notices and instigated 1,377 prosecutions (paragraphs 3.1 to 3.6).

8. HSC's and HSE's operations are based on the Commission's plans of work prepared every two years and setting objectives for each main activity, and on divisional plans prepared annually. The plans are dependent among other things on the expected need to respond to external developments, such as European Community directives, and on expected trends in the demands on the various inspectorates. The inspectorates' annual basic inspection programmes are based on their own judgement of priorities within the overall priorities set by the Commission and Executive; and the Factory and Agricultural Inspectorates, which cover large numbers of premises, use a sophisticated hazard rating system to select their visits (paragraphs 3.7 to 3.11).

9. HSE began in 1980 to use cost benefit analysis in considering proposals for new regulations. NAO noted that although HSE had considered thoroughly the general theory, it had in practice found considerable difficulty in quantifying the costs and benefits of new regulations to industry and the community. HSE has also recently started a programme of evaluating the effects of existing regulations with a view to modifying those where the intended effects were not achieved (paragraphs 3.12 to 3.14).

10. One aim of the 1974 Act was to provide for the progressive revision of the complex legislation dealing with the control of risks to health and safety. HSC has not approached this task as a comprehensive exercise, which it considered unlikely to produce balanced and coherent systems of control; it has preferred to deal with particular major areas of hazard in turn, according to set criteria and priorities, with the aim of securing maximum improvements in health and safety rather than a large number of legislative changes. However NAO noted that

omission to revise outdated regulations dealing with explosives, mines and quarries necessitated the use of HSE resources to issue 3–4,000 exemption certificates a year; and that statutory consultation processes and associated work could cause years of delay in securing revisions (paragraphs 3.15 to 3.19).

11. In the main the boundaries of responsibility for control between HSE and government departments are well-defined, but NAO noted that there had been examples of apparent duplication of investigations between HSE's Nuclear Installations Inspectorate and the Department of the Environment's Radiochemical Inspectorate. Further discussions are now taking place between these inspectorates (paragraphs 3.20 to 3.24).

12. HSE and the local authority associations have set up machinery designed to achieve a consistent and co-ordinated national approach to the improvement of health and safety standards. Though it is not a formal requirement, 90 per cent of local authorities supply HSE with statistical information about their inspection activities. These figures tend to suggest that the frequency of inspections is greater, and the incidence of accidents much lower, in the local authorities' field of responsibility than in HSE's; but HSE has pointed out that local authorities inspect more frequently because they are required to do so for other purposes (paragraphs 3.25 to 3.28).

13. During the past two years HSE has started to devise means of measuring the performance of its inspectorates: not in terms of the effects of their activities on standards of health and safety, since these are difficult to separate from the effects of other factors, but by measuring and costing the time spent by inspectors on particular activities. HSE proposes to improve its costing information; to establish indicators of performance; and to quantify workload and incorporate the information in its planning and management information systems. HSE is introducing the new arrangements over the period to April 1987 (paragraphs 3.29 to 3.31).

14. HSE has also set up a study group to carry out research into the effectiveness of HSC and HSE activities in contributing to improvements in health and safety at work. Their research so far has suggested a strong causal link in particular cases between inspection and improvement (paragraphs 3.32 to 3.34).

Charging of fees

15. The Treasury have stipulated that HSE should charge fees for licences and for regular inspection and enforcement requiring a large input of resources, although it would be inequitable to do so for random, policing activities. HSE acts generally in accordance with these criteria but NAO noted several aspects of HSE's practice which seemed questionable:

(a) a number of licence fees did not include an element to cover the cost of post-licence inspection;

(b) HSE made no charge for granting exemption certificates, for various reasons based on equity or practicability;

(c) HSE did not charge the Manpower Services Commission for work done by its medical advisory service, although this conflicted with normal policy in the Employment group of agencies;

(d) HSE did not charge the National Coal Board or British Rail for regular inspection work, on the grounds that this would be inequitable since no charge was made in the case of more fragmented industries.

HSE informed NAO that the Commission, at the Secretary of State's request, was reviewing all areas of its work to see whether it would be appropriate to levy any additional charges (paragraphs 4.1 to 4.9).

16. HSE relies considerably on estimated apportionments in calculating its charges, and NAO noted an apparent flaw in the apportionment in one area. HSE told NAO that where better information became available from its new time recording and accounting systems, the method of calculating charges would be revised (paragraphs 4.10 to 4.11).

Administrative economy and efficiency

17. HSC submits annual financial estimates for approval by DE, but the value of DE's supervision appears to be reduced by their practice of considering only the total resources sought in comparison with previous years. DE see no need to reconcile the estimates with HSC's plan of work and HSE's internal plans. However, in general DE pursue questions of control and the deployment of resources through monitoring of reports which HSC is required to make regularly on its implementation of the Government's Financial Management Initiative (paragraph 5.1).

18. HSC and HSE are subject to an overall ceiling on staff numbers agreed by DE and the Treasury, although they are free to vary, within that ceiling, the numbers in grades below Assistant Secretary. The staff ceiling has been reduced by 14 per cent since 1979, and until 1984–85 staff actually in post were kept consistently below the ceiling figures, partly because higher than average pay increases for professionally qualified staff made financial provisions inadequate for achieving those ceilings (paragraphs 5.2 to 5.5).

19. Staff inspection is carried out by HSE's own manpower audit section, but this has not yet achieved the five to six year cycle of inspections prescribed by the Treasury—in the last two years through loss of staff on dispersal to Merseyside (see paragraph 20). Staff inspection has not so far been applied to inspectors or doctors, although inspectors will be covered in the 1985–86 programme. NAO noted an upward trend in inspectorate gradings since 1976, but HSE explained that there were specific reasons for this (paragraphs 5.6 to 5.8).

20. HSE is in the process of dispersing some 850 headquarters staff to Bootle in accordance with a government decision in 1979, leaving 350 to 400 posts in London. HSE's only estimate of the initial cost of the dispersal made in 1982, was £18 million, with a recurring net annual cost of £1.2 million. The dispersal has given rise to extra staff travelling time and communication difficulties (paragraphs 5.9 to 5.12).

21. Underestimation of HSE's accommodation needs in Bootle caused a late change in the choice of buildings. The change resulted in £0.5 million being spent on refurbishing a building which was too small for HSE's needs and in some additional costs through delays of up to six months to some dispersal moves (paragraphs 5.13 to 5.14).

22. HSE's space needs in London after dispersal will fall from 252,000 square feet to about 75,000 square feet. HSE is examining the possibility of obtaining accommodation outside the civil service estate which would be more suitable than any of its existing buildings. Meanwhile, HSE has extended the leases of three of its five buildings in order to save the disruption of moving staff into accommodation vacated by the dispersal. HSE has, however, recently vacated

the second largest building, seven months before the expiry of the lease. HSE informed NAO that any further moves in advance of a move to its eventual headquarters would disrupt work to an unacceptable extent (paragraphs 5.15 to 5.16).

23. HSE has taken some steps to rationalise the accommodation of its local office network, although this has been hampered by the fact that for operational reasons area boundaries for different inspectorates do not coincide (paragraph 5.17).

Health and Safety Commission and Executive: Operations and Administration

Report

Part 1: Functions and Organisation of the Health and Safety Commission and Executive

Functions

1.1 In 1972 the Committee on Safety and Health at Work (the Robens Committee) recommended the establishment of a new national authority in which to centralise fragmented departmental responsibilities for countering risks to health and safety. The Health and Safety at Work Act of 1974 (the 1974 Act) accordingly redefined health and safety responsibilities and established the Health and Safety Commission (HSC), consisting of a chairman and eight members, and its supporting organisation, the Health and Safety Executive (HSE). The Commission and Executive (HSC/E) are financed jointly by a grant-in-aid from the Department of Employment (DE) (some £90 million in 1984–85).

1.2 The 1974 Act is based on the concept that primary responsibility for promoting occupational health and safety lies with those who create or work with risks, and it imposes general duties on employers, manufacturers, suppliers and employees. The Act empowers the Secretary of State to make health and safety regulations on the advice of, or after consulting, HSC. It also enables HSC to approve and issue codes of practice which provide practical guidance on health and safety matters.

1.3 Under the Act HSC is responsible for developing policies to secure the health, safety and welfare of persons at work and to protect the public against risks arising from work activities, including the keeping and use of dangerous substances and the emission of noxious and offensive substances. It is also responsible for providing an information and advisory service and has the power to carry out research. These responsibilities impinge on the work of a number of government departments and although HSC comes under the general control of DE, altogether it works in conjunction with nine Secretaries of State. HSC may delegate any of its functions to HSE over which it has general oversight.

1.4 To help it fulfil these responsibilities HSC has established a number of advisory committees, each comprising members with relevant expertise and experience and, in some cases, representatives of employers and trade unions.

1.5 HSE is responsible for enforcing health and safety legislation and regulations in accordance with the general directions of HSC (although HSC may not give HSE direc-

tions about the enforcement of any specific case). HSE advises HSC on policy matters and on the production or withdrawal of regulations and codes of practice and it may issue guidance notes. It also provides advice on the implementation of European Community Directives related to health and safety and industrial air pollution and its officials often form part of United Kingdom negotiating teams dealing with these matters.

1.6 For some industries HSC has agreed with Government Departments and others that they should act as its agents, subject to general HSC oversight; in other sectors HSC acts as an agent of departments for various matters including the issue of statutory licences.

1.7 The 1974 Act leaves local authorities with substantial responsibilities in the field of health and safety, notably for the inspection of offices, shops, warehouses, hotels, catering and petrol stations and for related enforcement. But it enables HSC to offer guidance to local authorities and a liaison committee has been formed to aid the achievement of common standards of inspection and enforcement.

Organisation of HSE

1.8 HSE is organised into nine divisions comprising three policy divisions (hazardous substances, safety policy and information services, resources and planning); four inspectorate divisions (factory and agricultural, mines and quarries, nuclear installations, and industrial air pollution); a medical advisory service division; and a research and laboratory services division.

1.9 The main policy divisions concern themselves principally with hazards that affect either the whole of industry or several industries, and matters which involve wider policies of government or demand international negotiations. The Inspectorate Divisions carry out both regular and pre-emptive inspection programmes targeted at particular health and safety risks which have been identified in their plans of work. In some cases they provide certificates which indicate that certain safety regulations have been complied with and in others they approve premises for certain types of activity, for example, those which require control over noxious emissions. The Inspectorates also investigate serious accidents which occur in their fields of responsi-

bility. The Nuclear Installations Inspectorate's work is mainly influenced by developments in the nuclear industry and is aimed at ensuring that new and existing installations are designed, built, operated and maintained at the required safety standards. The Employment Medical Advisory Service provides occupational medical and nursing advice to industry as well as to the inspectorates and also arranges for statutory medical examinations to be carried out where this is required by regulations, for example, for asbestos workers.

Audit arrangements and NAO investigation

1.10 The 1974 Act requires the annual accounts of HSC/E to be laid before Parliament after examination and certification by the C&AG. The NAO has recently completed, under Section 6 of the National Audit Act 1983, an investigation of the operations of HSC/E to determine how effectively they have pursued their objectives and whether they have done so with due regard to economy and efficiency. The results are set out in the further Parts of this Report.

Part 2: Identification and Analysis of Risks

2.1 There are three main categories of risk to health and safety from work activities: risk of immediate injury, risk of long term damage to health and the potential risk of disaster from low probability events, such as major explosions or the release of large quantities of hazardous substances. HSE assesses these risks by a variety of methods which include an analysis of statistics of industrial injuries and occupational diseases and of information from inspection visits; in-house and academic research into health and safety matters; and a scientific assessment of risk probability. The views of employers and trade unions expressed in the advisory committees also form part of the risk assessment as do those of the European Community and international liaison committees.

2.2 In January 1981 HSE introduced a computerised system of recording information on establishments, accidents and inspection. The system is now being extended into a national network linking all HSE's area and local offices and there are plans to expand considerably the variety of information held on the database. In addition to producing national statistics of industrial accidents the system is used primarily to identify basic inspection visits due (from a combination of elapsed time and inspection rating); to prepare workplace profiles; to provide management and progress reports on programmes of inspections and the state of enforcement notices; and to marshal information as a basis for planning and policy formulation.

2.3 An HSE study in May 1982 of the use of existing information concluded that although there were defects, particularly delay in receipt of source material, the statistics represented a major contribution to HSE's information on occupational accidents and ill-health; and they were vital to the efficiency and effectiveness of HSE's work.

2.4 When the statistical information system was introduced, it drew accident information from reports of fatalities, major injuries and dangerous occurrences made direct to HSE, and from copies of reports made to the Department of Health and Social Security to support industrial injury benefit claims. However, in 1982 HSE became aware of

proposals, eventually implemented, to abolish industrial injury benefit from April 1983, so removing a major source of information.

2.5 In July 1982 HSC agreed that new regulations were needed to ensure that HSE continued to receive reports of incidents. The Commission issued a consultative document proposing this in the Summer of 1983, and sought responses by the end of October with a view to introducing new regulations to be implemented by early 1984. However, the consultative process took longer than expected to complete and there has been continuing discussion on whether the new regulations should require ill health, as well as accidents, to be reported. The earliest date for implementation of the regulations is now expected to be early 1986.

2.6 A review by HSE in May 1984 indicated that the reduced flow of accident information was having a serious effect on operational activities, particularly for the Factory Inspectorate. While inspectors continued with their normal work, the reduced information meant that low standards, safety risks and breaches of the law were less likely to be detected, there were fewer "reactive" inspections (10,153 in 1983 compared with 13,010 in 1982), and fewer unregistered premises were likely to be identified.

2.7 In reply to NAO's enquiry whether HSC/E considered that they would be able to secure sufficiently comprehensive information upon which to base their identification and analysis of risks, the Commission stated that in the case of accidents this was what the proposed new regulations were designed to achieve. In the case of occupational disease, any reporting provision which might ultimately be agreed for inclusion in these new regulations could only partly satisfy their needs, because it could not be designed to produce information, for example, on new, previously unknown, occupationally related ill health conditions. For this and other reasons they had requested their Medical Advisory Committee to review by the Spring of 1985 the whole question of occupational health surveillance and in doing so to consider both statutory and voluntary information gathering arrangements.

Part 3: Control of Risks to Health and Safety

Methods

3.1 Having determined areas within its broad remit which warrant attention the Commission has to strike a balance between the introduction of regulations and the issue of approved codes of practice or guidance notes which provide more detailed guidance on the requirements of either particular regulations or the general duties imposed by the 1974 Act on those who create or work with risks. Regulations are necessary, for example, to deal with serious risks, to govern licences and prohibitions, to require notifications and in some cases to implement European Community directives. But they have disadvantages: they can inhibit progress, particularly in the face of rapid technological development; if cast in specific and detailed terms they can easily become out of date; they can require substantial effort in enforcement and exemption procedures; and they require Parliamentary approval to amend. Approved codes of practice have a number of advantages in that they may be detailed and complex and can contain technical drawings; they may be written in a more liberal and explanatory style; they can be tailored to cover a wide range of circumstances; they are less likely to become out of date; and they are easier to amend if necessary.

3.2 The balance between regulations, approved codes and guidance thus depends on circumstances, the risks involved, the effect it is desired to achieve and the Commission's purpose for taking action. The decision is largely a matter of judgement based on the advice of the HSE divisions involved. All such initiatives would be included in the work plan of the divisions concerned and be subject to planning controls and procedures.

3.3 Since HSC was established, about 100 sets of regulations have been introduced to revise earlier provisions or to deal with new situations, although many have covered relatively minor matters. Twenty approved codes of practice are in use and numerous guidance notes have been issued.

3.4 The programmes of inspection referred to in paragraph 1.9 form part of HSE's process of monitoring the application of health and safety regulations and codes of practice at places of work. The achievement of the programmes is itself monitored at both divisional and local level by the Factory and Agricultural Inspectorates from the information supplied by the computerised monitoring system (see paragraph 2.2). The other inspectorates at present have their own monitoring systems.

3.5 HSE, through the Inspectorates, has a variety of powers available to remedy breaches in regulations identified during inspection visits and in other ways. These powers are applied mainly through enforcement notices but prosecutions are used in the more serious and persistent cases. In 1983 8,700 notices were issued and 1,377 prosecutions were instigated. However, in most cases compliance with the law is achieved by persuasion and the co-operation of employers without the need for formal enforcement procedures.

3.6 It is difficult to measure the extent of compliance with acceptable health and safety standards in areas not subject to specific regulations. But HSE has expressed concern at the effect which economic circumstances in recent years

have had on health and safety standards. Although activity has declined in some areas, the Factory Inspectorate has reported an increase in the number of small firms and subcontracting businesses, some of which fail to achieve acceptable health and safety standards. This has imposed an additional workload on HSE's field force, particularly the Factory Inspectorate, at a time when their numbers have been falling (Table 1). Similarly, local authorities have reported that many smaller firms have been unable to maintain the level of priority accorded to health and safety and have needed additional attention from the authorities' inspectors.

Operational planning

3.7 The 1974 Act requires HSC to submit its work proposals to the Secretary of State for Employment for approval. HSC now embodies these proposals in a biennial Plan of Work covering the next two years in some detail and looking further ahead in more general terms. The plan sets objectives for each of the main activities of HSC/E, in line with their general responsibilities.

3.8 DE, as the sponsor department for HSC/E, examine these proposals in relation to their own responsibilities and strategy and consult other interested departments before forwarding the document to the Secretary of State. The most recent Plan of Work was approved in January 1985.

3.9 HSE is responsible for the allocation among HSE's divisions of the resources provided annually, within the framework of the Commission's agreed Plan of Work. Each summer the divisions draw up detailed plans of work for the following financial year, with bids for resources: these are examined by the Executive with heads of divisions individually in the autumn, and the allocations then made to the divisions form the basis of HSC/E's estimates bid. Progress on the past year's plans is reviewed by the Executive each spring.

3.10 Priorities are to some extent dependent on factors outside the control of HSE. For example, the priorities of the branch of Nuclear Installations Inspectorate that deals with future developments are largely dependent on the nuclear programme agreed between the Department of Energy and the CEBG and other licensees. Similarly, the policy divisions have to give priority to the negotiation and implementation of European Community directives and the Inspectorates give priority to investigating serious accidents. However, once the resource requirements of these prior claims have been estimated, the Executive is able to allocate resources and to allow divisional heads considerable flexibility in managing their budgets.

3.11 Where the Inspectorates are responsible for routine and reactive inspections at a large number of premises, (for example the Factory and Agricultural Inspectorates), the premises that merit basic inspection are identified by a hazard rating system. This covers the existing standard of health, safety and welfare of each workplace; the size and nature of the worst problem that could arise for employees or the public, whether in terms of a single incident or a long term health hazard; management's ability to maintain

acceptable standards; and the length of time since the last inspection. These factors are individually weighted to give a rating for each workplace, and those with a rating above a level set during the annual planning process are inspected.

Use of cost benefit analysis

3.12 Only since 1980 has HSE carried out cost/benefit assessments of proposals for new regulations and associated guidance etc, as an aid to decision making. The intention is that the depth of these analyses should vary from a qualitative assessment when the need for a new regulation is first considered to a detailed evaluation at the consultative stages. They are carried out by the relevant policy staff using general guidance notes, but advice and if necessary technical assistance is available from specialist HSE economists.

3.13 In its assessments HSE aims, in principle, to take account of relevant direct and indirect costs based largely on surveys and advice from policy branches and inspectorates, augmented by the results of consultation. Benefits are more difficult to quantify but comprise objective elements (reductions in output losses and damage, and savings in administrative time and medical treatment) and subjective elements (reduced pain, grief and suffering). NAO noted that although HSE had considered thoroughly the general theory, it appeared to have found in practice that while the cost to itself of introducing regulations could readily be quantified, it was difficult to assess the costs and benefits likely to accrue to industry and, still more, the community. For example, in the cases of the Classification and Labelling of Explosives Regulations 1984 and the Classification, Packaging and Labelling of Dangerous Substances Regulations 1984, HSE had analysed the expected costs to itself of implementing the Regulations; but had not found it possible to estimate the benefits likely to be obtained and had been unable to determine the costs to industry.

3.14 HSE has recently embarked on a programme of evaluations of the effectiveness of regulations once they have been implemented. None has yet been completed but the Commission told NAO that it would be prepared to revise regulations which turned out not to have had the intended effect.

Review of long-standing regulations

3.15 The Robens Report considered that the piecemeal development of health and safety legislation had led to a haphazard mass of law which was intricate and difficult to comprehend and had serious omissions. The Report recommended a thorough revision of the law in order to provide a framework for better self-regulation. The subsequent 1974 Act expressed the intention that much primary and subsidiary legislation should be replaced progressively by new regulations and codes of practice.

3.16 There are currently some 500 separate pieces of health and safety legislation, including regulations and orders. Relevant parts of earlier law are examined and removed or subsumed as new provisions are developed. HSE set up a small working part in 1979–80 with the task of identifying obsolete and unnecessary provisions which were burdensome to employers without benefit to working conditions. The Commission subsequently decided, however, that it was generally more suitable to deal with topics as they

arose in connection with areas of hazard selected for review, and the working party was disbanded in 1983.

3.17 HSC told NAO that it had decided not to treat the review of legislation as a separate exercise, as it considered this unlikely to produce the balanced and coherent system of controls for the protection of workpeople and the public which Parliament had intended.

Increasing resource constraints and the growth of other priorities had also restricted HSC's action. The Commission's approach had been to deal with particular areas of hazard one at a time, selected according to set criteria and priorities, including new or newly recognised problems inadequately covered by earlier legislation. The Commission's overall aim had been to achieve a real improvement in health and safety rather than to record a high tally of legislative changes.

3.18 NAO noted some evidence that delay in reviewing and replacing certain of the older legislation was causing appreciable resources to be devoted to granting exemption certificates. Among the oldest extant legislation is the Explosives Act 1875 which now has some 80 subsidiary instruments. It is difficult to understand and therefore to comply with. Regulations relating to mines and quarries are similarly out-dated and cause HSE to issue some 3–4,000 exemption certificates each year, including over 1,000 relating to the custody and use of explosives: exemptions apply only to a single mine or part of a mine, require individual attention and are expensive to administer both for employers and HSE. Electricity regulations are also outmoded and protect only one-third of persons at work.

3.19 Most aspects of these areas are included in the current Plan of Work but revision work can take many years to complete: for example, work to revise the Coal Mines (Explosives) regulations began in 1968, but had to be re-started after the 1974 Act came into force. This new approach was for some time not acceptable to the industry and as a result the work is not now expected to reach a conclusion until 1986.

Co-operation and Co-ordination with other authorities

(i) Government Departments

3.20 In the main the boundaries of responsibility between HSC/E and Government departments dealing with health and safety matters have been well-defined. There is however overlap in one area. Under the 1974 Act the Nuclear Installations Inspectorate became part of HSE, and HSC became responsible to the Secretary of State for Energy for licensing and monitoring nuclear installations. But the Radiochemical Inspectorate remained part of the Department of Environment (DoE) with responsibilities for radioactive nuclear waste management and for authorising such waste disposal.

3.21 In 1979 HSE and DoE concluded an agreement on a broad division of responsibilities and on liaison arrangements between the Nuclear Installations and Radiochemical Inspectorates in order to minimise the areas of overlap and duplication of effort. The agreement was revised in 1982 to reflect changes in the two inspectorates' resources and organisation.

3.22 In practice the inspectorates have set up detailed channels of communication and hold periodic joint meetings; in areas of mutual interest a meeting between one inspectorate and a licensee will normally be attended by an observer from the other inspectorate; joint letters may be sent; and in some instances organisations must supply detailed information to both inspectorates.

3.23 Despite these arrangements there are examples of duplicated effort. In 1982 both inspectorates appraised proposals by British Nuclear Fuels Ltd for its Thorp Project; and in 1983 each inspectorate examined the release of nuclear waste at Sellafield. Although efforts had been made to establish a boundary between the two inspectorates the investigations in both cases clearly covered the same ground and produced similar recommendations.

3.24 The Nuclear Installations Inspectorate has become increasingly concerned at the inefficiency of the liaison arrangements and has found it impracticable to conduct all aspects of its relations with a licensee jointly with the Radiochemical Inspectorate. Further discussions are taking place between the two inspectorates to define areas of overlap and minimise duplication.

(ii) Local Authorities

3.25 The Robens Committee commented on the unevenness of standards and performance in health and safety inspections both amongst local authorities and as between local authorities and central enforcing agencies. Recognising that there must be some sharing of responsibilities between local and central government, the Committee recommended that there should be a clear delineation of duties based on respective expertise. The Health and Safety (Enforcing Authority) Regulations 1977 later defined the areas of local authority responsibility.

3.26 HSE and the Local Authority Associations seek to achieve a consistent and co-ordinated national approach through the Local Authority Enforcement Liaison Committee; through HSE's Local Authority Unit (jointly staffed by HSE and local authorities), which provides technical advice to local authority inspectors and issues published guidance; and through day-to-day advice and contact provided by liaison officers stationed in HSE's area offices.

3.27 There is no requirement for local authorities to provide HSE with statistical returns about their inspection activities, but some 90 per cent of the 461 enforcing authorities in Great Britain generally provide information on a voluntary basis. In 1982 the data showed that local authorities were responsible for the inspection of more than $\frac{3}{4}$ million premises with $4\frac{1}{2}$ million employees. A comparison with data for HSE's Factories Inspectorate is given in Table 2.

3.28 Table 2 shows that local authorities devote, nationally, a similar level of manpower to health and safety inspection as the Factories Inspectorate, but that the incidence of accidents in their field of responsibility is much lower. HSE does not have details of the number of employees on premises subject to its inspection but Table 2 suggests that its visits and inspections are less frequent than those of local authorities. HSE has pointed out, however, that the greater frequency of inspection in the local authority sector is partly

due to the requirement to visit premises in connection with other duties.

Performance measurement

3.29 During the past two years HSE has launched three major initiatives towards the measurement of its own performance. First, HSE examined in 1983 the methods it used to assess the performance of its inspectorates. It concluded that in the absence of any way of relating evidence of improved occupational safety and health to particular factors, it was difficult to measure systematically the ultimate results of inspectorate activities. HSE therefore decided that it should concentrate primarily on measuring the work done by the inspectorates and comparing this with the relevant input. It proposed to develop further its management information systems to place particular emphasis on time recording and the incorporation of recognised performance indicators. To this end HSE also saw a need to quantify workloads, to improve the information base by relating input more closely to work done, and to define clearly responsibilities within management with delegation to the lowest practicable level.

3.30 HSE's second initiative is to incorporate quantified workloads against which performance can be measured into its planning and monitoring system. It has yet to determine precisely how workloads will be quantified but expects them to be based on trends in the numbers in employment, in the number of work places and in accident statistics. By April 1985 HSE had established a system of recording use of time by the field divisions. Depending on computer resources, the new system should be fully introduced by April 1986 and use of the outputs fully operational a year later; a comprehensive review of the arrangements is then planned for 1987-88. As yet there are no plans to apply these procedures outside the inspectorates.

3.31 As a third initiative HSE has been reviewing its financial control systems as part of the Government's Financial Management Initiative. It is improving its budgetary and monitoring arrangements within line management by introducing a financial and management accounting system and a more detailed register of projects with improved definition of priorities; and also by developing performance indicators for use at all appropriate management levels.

Effectiveness of HSC/E's control of risks

3.32 Despite variations in the availability of accident statistics over the years (paragraphs 2.3-2.5), there has been a discernible downward trend in the rate of accidents since 1974 (Table 3). However, HSE informed NAO that statistics going back to the beginning of the century showed that this improvement was a continuation of an even longer trend. As indicated in paragraph 3.29, HSE acknowledges that it is impossible to know with any certainty the extent to which its or its predecessors' activities have contributed to this improvement as compared with other factors. There has been a marked improvement in particular industries (coal mining, construction and factory processes), but much of this may well have come about through improved technology and employers' greater attention to employee safety, only part of which may have arisen from the efforts of HSE and its predecessors.

3.33 In an attempt to gain a clearer idea of the effectiveness of HSC/E activities HSE set up a study group in 1982 to assess their contribution. The group identified several possible factors affecting improvements in health and safety: legislation and standards for which HSC/E and their predecessors were responsible; the influence of enforcement work; changes in the nature of industry and technology; changes in social expectations; and improvements in safety awareness.

3.34 The group attempted to isolate the effects of the first two factors, which arose directly from HSC/E activities,

while recognising that it was a difficult and imprecise distinction. It was impossible to attempt a global measure of HSE's effectiveness and the group therefore examined evidence of the effectiveness of a selection of enforcement measures. They concluded that although no all-embracing formula could be devised, there was evidence that several varieties of enforcement measure, and of other forms of HSE activity, such as safety propaganda, appeared to be effective in specific cases. The Deputy Director General has assumed oversight of HSE's continuing programme of work on effectiveness.

Part 4: Charging of Fees

Charging policy

4.1 The 1974 Act empowers the Secretary of State to make regulations enabling fees to be charged for any function performed by the Commission or the Executive. HSC/E currently charge for a number of activities, mainly related to licensing and testing, and in 1983–84 the fee income amounted to some £5 million (Table 4).

4.2 The Treasury provide general guidance on how to set fees and charges, based on the principle of recovering full economic costs. The guidance does not, however, define the circumstances in which fees are appropriate: this is left to be decided as a matter of policy in different classes of case. In relation to HSC/E the Treasury have stated that charging should be based on the principle that the costs of ensuring standards acceptable to society should wherever practicable be borne by those who put those standards at risk; and that where inspection or enforcement is necessary in connection with the production of goods or services the costs should be reflected in prices rather than in general taxation.

4.3 The Committee of Public Accounts, in their Ninth Report of 1976–77 (paragraphs 91–95), noted HSC's view that charging for inspection and enforcement would be inequitable since visits were often conducted on a random basis; but considered that fees should be levied to the greatest practicable extent. The Treasury accepted HSC's view on the inequity of charging for inspection and enforcement where this was of a random, policing nature, but reiterated their opinion that charges should be levied for licensing activities and for inspection and enforcement carried out on a regular basis which required a large and specific input of staff and equipment.

Charging practice

4.4 HSE makes charges for a range of activities in accordance with the Treasury's criteria, but NAO noted a number of areas where HSE's omission to charge seemed questionable.

(i) Licensing

4.5 HSC is empowered under a number of statutes to grant licences, for example for the storage of petroleum and explosives and for asbestos contracting. HSC/E aim to recover full economic costs, including any initial inspection needed before granting a licence but, on grounds of equity, not to make further charges for any subsequent visits; nor does HSE allow in the licence fee for the cost of future inspection visits. Different arrangements apply to nuclear installations where HSE charge for the cost of regular monitoring visits. In reply to NAO's enquiry whether HSE had considered including an element in non-nuclear licence fees to cover monitoring visits, the Executive stated that they had looked at this but had concluded that it would not be appropriate to make a charge because visits were not made on a regular, monitoring basis once these licences had been issued, but were part of the normal inspection programme.

(ii) Exemption certificates

4.6 HSE does not charge for granting certificates of exemption from compliance with regulations. HSE told

NAO that there were various reasons for this: in some cases the need arose from out of date legislation; in some the certificates related to an activity rather than an individual operator; and in others they had to be granted as a matter of urgency, for example for a pit disaster, for which there could be no question of charging.

(iii) Medical advisory service

4.7 HSE makes no charge for the work carried out by its medical advisory service for the Manpower Services Commission. When the question was last considered, in 1979, HSE concluded that the cost of establishing and making a charge outweighed its benefits as it would only be an inter-departmental transfer. This decision was contrary to HSC's general policy of charging government bodies, as notified to the Treasury in 1977, and now conflicts with general practice in the Employment Group of agencies. HSE informed NAO that it would be reconsidering the question of charging for these services in the near future.

(iv) Mine and railway inspections

4.8 Mines owned by the National Coal Board are inspected regularly and require a significant input of resources. NAO found no separate estimate of the cost of this work, but it forms a large part of the Mines and Quarries Inspectorate's activities, the cost of which in 1982–83 was some £5 million. Similarly, much of the Railways Inspectorate's work, the total cost of which is about £400,000 a year, relates to British Rail. HSE makes no charge to either the National Coal Board or British Rail, the predominant employers, and told NAO that this was because it would be inequitable to charge some operators and not others. HSE also pointed out that British Rail provided the Executive with certain technical services free of charge. In response to further NAO enquiries DE expressed the view that there were difficulties about charging employers who dominated an industry while not charging for selective inspection in industries where ownership was more fragmented.

4.9 In reply to NAO's enquiry whether HSE proposed to review the consistency of its fee charging practice against the Treasury criteria, HSE stated that the Commission, at the Secretary of State's request, was reviewing all areas of its work to see whether it would be appropriate to levy any additional charges.

Calculation of charges

4.10 In calculating recoverable costs only HSE's Electrical Testing Section bases its apportionments on the use of time sheets. Other Inspectorates make considerable use of estimated apportionments. For example, the Nuclear Installations Inspectorate base their invoices on an estimated apportionment between chargeable and non-chargeable activities. HSE considers that inspectorate staff are sufficiently experienced in assessing the apportionment of their resources to make the introduction of time recording and a full costing system unnecessary. NAO examination showed however that a flaw in the method by which the Nuclear Installations Inspectorate's extramural costs had been apportioned had resulted in a potential under-recovery of £100,000 in the charge for one licence.

4.11 NAO enquired whether HSE intended to refine the costing arrangements underlying the calculation of fees once its new time recording and accounting systems (para-

graph 3.29) had been introduced. HSE stated that where these resulted in better information being available the method of calculation would be revised.

Part 5: Administrative Economy and Efficiency

DE supervision

5.1 Each year HSC submits to DE estimates of expenditure which are based on its own Plan of Work and HSE's internal plans, but which do not show how the plans are translated into expenditure, and DE do not attempt to reconcile the estimates with the activities planned, in either cash or manpower terms. Instead DE concentrate, as they do when considering HSC/E's financial proposals as part of the Public Expenditure Survey, on total staff numbers and cash resources as compared with previous years' estimates and outturn. The Department informed NAO that the Plan of Work was a strategic document not suited to the detailed determination of financial or manpower resources. They preferred in general to pursue questions of control and deployment of resources through arrangements which they had recently set up to review the Commission's implementation of the Government's Financial Management Initiative. These required the Commission to report to DE on the actual and expected achievements of its financial management systems in delivering better value for money, involving the setting of performance targets for as many activities as possible against which actual performance could be checked. It appeared to NAO however that DE's inability to link HSC/E's resource requirements with their operational plans tended to reduce the value of the Department's supervision.

Control of manpower

5.2 The 1974 Act enables HSE to appoint staff subject to the approval of the Secretary of State for Employment and the Minister for the Civil Service as to numbers and conditions of service. The Treasury require all departments to make the most efficient use of manpower and to keep their activities under constant review with the aim of eliminating non-essential services, overstaffing and overgrading. They therefore expect departments to have adequate arrangements for determining manpower needs and monitoring staffing levels, including an effective staff inspection system.

5.3 DE and Treasury limit total HSC/E staff numbers by setting a staff ceiling; this control does not apply to grading within that ceiling, although specific authority is needed for the creation of posts at or above Assistant Secretary level. Within DE's Establishment Division the Complementing Branch is responsible for the scrutiny of HSC/E manpower bids and for monitoring agreed staff levels. DE's Staff Inspection Branch does not examine HSE, which has its own staff inspectors.

5.4 The staff transferred to HSE when it was established numbered some 3,500, including the Agricultural Inspectorate incorporated in 1976-77. As a result of other transfers and increased responsibilities arising from the 1974 Act, the number of permanent staff rose to a peak of 4,170 in April 1979. The approved staff ceiling has been reduced by 14 per cent since then and HSE has had to restrict recruitment until recently; the number of staff actually in post has fallen since 1979 by 13 per cent. A breakdown by staff category is shown in Table 1.

5.5 Staff in post have been consistently below the approved ceiling, sometimes significantly so, largely because the financial provision has been insufficient to meet the cost of staffing up to the ceiling. A high proportion of HSE staff are professionally qualified and some groups have their own pay and grading structure wherein pay settlements, though centrally determined, have exceeded civil service averages. In 1983, however, DE and Treasury agreed that a reduction in the staff ceiling should be coupled with an increase in the provision of funds in 1984-85, in order to redress the imbalance between numbers and finance.

Staff inspection

5.6 Staff inspection is carried out by HSE's own manpower audit section on the basis of annually planned inspections supplemented by specific requests from divisional heads. Its results are monitored by the Executive which submits annual reports to the Treasury and DE. HSE intends that in future annual planning rounds the manpower audit section will comment on the plans of those divisions in which relevant staff inspections have been carried out in recent years.

5.7 The Treasury have prescribed for departments a staff inspection cycle of five to six years. In the period 1980-84 HSE has recorded a falling level of inspections completed (Table 5). The particularly low figure in 1983-84 was attributable to the effects of dispersal, which resulted in the loss of all staff inspectors in post, and to a partly completed large review which will be added to 1984-85 results. DE have been concerned at the falling rate of accepted recommendations on regrading and retrenchment which is now well below the average for the DE Group. HSE told NAO that the staff inspection team was now up to strength and that is expected to cover 25 per cent of posts in 1984-85 and then to achieve a five year cycle.

5.8 Staff inspection within HSE has not yet covered inspectors or doctors (one-third of total manpower), although two groups of inspectors are included in the 1985-86 Manpower Audit Plan. NAO noted in this connection that there had been upward movement in the grading structure in two inspectorates over the last 8 years (Table 6). HSE explained that there had been changes in the grading structure and mix in some inspectorates since HSC/E were formed both as a result of organisational changes and because no junior staff had been recruited to the general factory and agricultural inspectorates between 1980 and 1984.

Dispersal

5.9 In December 1979 the Government announced its decision to relocate some 850 posts in HSE from London to Bootle as part of a broader dispersal programme. HSC held the view that the most effective and economical location for its headquarters was in London and considered that dispersal would have little direct effect on Merseyside employment because many of its staff were specialists, recruited on a national basis.

5.10 However, to meet the dispersal commitment HSE decided to transfer three branches of the Nuclear Installations

Inspectorate, the headquarters sections of other Inspectorates, part of the Medical Division and the main support services, leaving 350 to 400 posts in London. The Industrial Air Pollution Inspectorate's headquarters has since been omitted from the plans at the wish of the Department of the Environment. Dispersal was to be in three phases—the first, involving 250 staff, in 1983, the second, involving most of the inspectorates, in 1984 and the third, involving the Medical Division and the Nuclear Installations Inspectorate, in 1985. The move to Bootle of those Nuclear Installations Inspectorate staff dealing with the Sizewell B inquiry and the pre-licensing work on the pressurised water reactor has since been deferred to 1985–86. A small policy unit of the Inspectorate is now to remain in London in recognition, among other things, of the need for frequent contact with the Department of Energy.

5.11 In 1982 HSE estimated the cost of dispersal at £18 million plus a recurring net annual cost of £1.2 million. The net cost/benefit to the Exchequer or to the economy as a whole was not calculated, and no later cost estimate has been made.

5.12 The first phase of dispersal was completed according to plan in 1983 but dispersal progress reports have indicated some concern at the extent of travelling time and related costs required by visits to London, either to HSE headquarters or to other government departments and bodies; and also at communications problems. These difficulties will have become potentially greater as dispersal has progressed, but HSE is taking steps to minimise them by installing facilities for improved telecommunications, facsimile transmission and remote conferencing.

Accommodation in Bootle

5.13 HSE and the Property Services Agency (PSA) explored two practicable options for leasing offices on the chosen site in Bootle. The first involved two buildings which HSE considered suitable for their needs. The second involved three buildings and permitted a reduction in the size of the civil estate with a saving of some £1 million. Although HSE was concerned about the smaller area of the second option and the additional communication problems it would bring, the Secretary of State for the Environment decided, in July 1981, to adopt the cheaper alternative because it provided substantial positive savings to the Exchequer compared with unquantified economies in HSE's operations.

5.14 HSE had occupied one of the buildings by the end of 1983 and renovation of the other two blocks was completed in 1984. However, towards the end of 1983 HSE carried out a complete reappraisal of its Merseyside accommodation needs. This identified specific requirements over and above those already recognised by PSA, due to increases in staff numbers, space requirements and ancillary accommodation

such as conference and waiting rooms. In consequence HSE agreed with PSA's suggestion that they should give up one of the buildings under renovation and acquire another on the same site. NAO noted that HSE had estimated that £0.5 million had been spent on renovating the block to be given up, and that the cost of refurbishing the new building would be some £1 million. The change in plan has also delayed some dispersal moves, and consequently the realisation of savings in London costs, by up to six months.

Accommodation in London

5.15 HSC/E's London headquarters continue to occupy five separate buildings with a total floor area of nearly 253,000 square feet (Table 7). When dispersal is complete, the space needed for the remaining 350 to 400 staff will be about 75,000 square feet. Two of the existing buildings are large enough to accommodate all these staff but one has serious structural defects and HSE considers that the other, though cheaper, would require refurbishment costing £2.5 million and is badly located. The Executive has therefore decided to examine options outside the civil service estate.

5.16 Meanwhile progressive dispersal is leaving significant areas of the buildings unoccupied. HSE decided in February 1983 not to disrupt work by moving staff into vacant accommodation and it has extended the leases of three of its existing buildings (Table 7). More recently HSE has decided to give up part of the largest building, reducing the occupied area from 106,000 to 85,000 square feet. HSE is negotiating with PSA a reduction in the rent it pays for this accommodation but, because HSE remains responsible for the whole building, it will have to continue to pay the full rates and maintenance costs. HSE has also now vacated the second largest building, seven months before the expiry of its lease. In reply to NAO's enquiry whether HSE was satisfied that its London accommodation arrangements were cost effective, the Executive stated that it had made what savings it could: any further moves in advance of a move to its eventual headquarters would disrupt work to an unacceptable extent.

Regional accommodation

5.17 The inspectorates, apart from those for Nuclear Installations and Explosives, are organised on an area basis into 20 Area and 30 Local Offices. But, for operational reasons, the areas for different Inspectorates do not coincide so that their local offices may be sited in different towns. However, HSE aims for local inspectorate offices to be co-located wherever possible in the interests of economy, and a review in 1981 resulted in three offices being closed on co-location. A lack of space in nearby offices has so far prevented other closures. HSE has also undertaken an examination of the London area office structure and has decided to reduce the numbers of areas in London from three to two. The third area office will be retained as a local office for outstationed staff.

Glossary of Abbreviations

DE	Department of Employment
DoE	Department of the Environment
HSC	Health and Safety Commission
HSE	Health and Safety Executive
HSC/E	Health and Safety Commission and Executive
PSA	Property Services Agency
1974 Act	Health and Safety at Work Act 1974 (Chapter 37)

Appendix

Schedule of Tables

Table 1 (paras 3.6 and 5.4)
Staff in post

	1979	1984	Reduction %
Inspectorate grades⁽¹⁾			
Factories (general)	743	627	16
Factories (specialist) ⁽²⁾	209	198	5
Agriculture	190	154	19
Mines and Quarries	116	102	12
Nuclear	106	106	—
Alkali/Air Pollution	46	37 ⁽³⁾	20 ⁽³⁾
Explosives	15	15	—
	1425	1239	13
Medical	172	133	23
Scientific	385	359	7
Administration	2096	1750	17
Industrial	92	82	11
	4170	3563	15
Casual	116	167	(44)
	4286	3730	13

⁽¹⁾ These figures do not relate directly to Tables 5 and 6 because of inspectors deployed in other divisions.

⁽²⁾ Fire, engineering, electrical, construction, chemical

⁽³⁾ Distorted because of short term vacancies.

Table 2 (para 3.28)

Local Authorities/Factory Inspectorate comparison

	1982	
	Local Authorities	Factory Inspectorate
Premises	766,394	475,000
Employees	4,560,675	n/k
Inspectors	5,231 ⁽¹⁾	593
Visits	572,000	185,000
Basic inspections	292,685	79,195
Accidents: fatal	32	305
major	1,664	9,431
minor	31,096	287,485

⁽¹⁾ HSE estimates about one-ninth of this manpower is devoted to health and safety at work activities.

Table 3 (para 3.32)

Occupational injuries 1974–1983

Year	Fatal Injuries		Accidents reported directly to HSE		Industrial Injury benefit claims June-May		Injuries reported via DHSS under NADOR	
	Injuries to Employees	Rate ⁽¹⁾	Accidents to Employees	Rate ⁽¹⁾	No	Rate ⁽¹⁾	injuries to Employees	Rate ⁽¹⁾
1974	651	2.92	337,600	1514	623,000	2794		
1975	620	2.79	328,500	1479	577,000	2598		
1976	584	2.65	325,000	1474	n/a	n/a		
1977	524	2.37	327,300	1479	553,000	2499		
1978 ⁽²⁾	499	2.24	328,400	1476	579,000	2602		
1979 ⁽²⁾	492	2.18	299,600	1326	581,000	2572		
1980 ⁽²⁾	440	1.97	253,700	1135	509,000	2277		
1981 ⁽³⁾	449	2.12			407,000	1924	434,792	2050
1982 ⁽³⁾	468	2.30			384,000	1871	389,781	1900
1983 ⁽³⁾	443	2.15						

⁽¹⁾ Injuries, accidents etc to employees per 100,000 persons employed

⁽²⁾ For 1978 to 1980 figure relate to employees and self employed agricultural workers, and include those provided by voluntary reports under the 1974 Act.

⁽³⁾ From 1981 self employed and non employees are also included under the Notification of Accidents and Dangerous Occurrences Regulations (NADOR).

Table 4 (para 4.1)

Revenue breakdown

Revenue from activities	1983–84	
	£000	£000
Licences: nuclear	3,033	
explosives	25	
asbestos	24	
other	5	3,087
Testing: electrical	607	
mining	295	
other	63	965
Advisory: publications/films	480	
specific	60	540
Medical		116
Miscellaneous		10
		<u>£4,718</u>

Table 5 (para 5.7)**Level of staff inspection**

	1980	1981	1982	1983-84 ⁽¹⁾
Posts subject to inspection	4110	3883	3712	3593
Post inspected	569	547	353	177
Inspection cycle (years)	7	7	10.5	20
Number of recommendations	111	67	44	17
Recommendations accepted	79%	69%	64%	59%

⁽¹⁾ Fifteen months.

Table 6 (para 5.8)**Movements in grading structure**

	1976	1979	1984
Factory and Agricultural Inspectorate			
Chief Inspector	1	1	1
Deputy Chief Inspector	1	4	4
Senior Area Director	1	3	2
Superintending Inspector	14	18	17
Deputy Superintending Inspector	21	35	37
Inspector 1A	127	145	129
Inspector 1B	287	486	372
Inspector II	137	0	1
Assistant Inspector	46	16	0
	<u>635</u>	<u>708</u>	<u>563</u>
Nuclear Inspectorate			
Chief Inspector	1	1	1
Senior Deputy Chief Inspector	0	1	0
Assistance Chief Inspector	5	0	0
Deputy Chief Inspector	0	3	4
Superintending Inspector	0	13	16
Principal Inspector	15	60	65
Senior Inspector	63	0	0
Inspector	18	11	14
	<u>102</u>	<u>89</u>	<u>100</u>

Table 7 (para 5.15)**HSC/E's London headquarters office capacity**

	Cost pa ⁽¹⁾ £m	Area Sq Ft	Cost per Sq Ft: £	Lease expiry	Lease extension
1	1.466 ⁽²⁾	106,001	13.83 ⁽²⁾	1992	—
2	1.411	92,784	15.21	Nov 81	Nov 85
3	0.436	25,653	17.00	Mar 85	Aug 86
4	0.050	3,936	12.70		
5	0.340	24,352	13.96	Feb 85/Feb 86	Sept 85/Sept 86
	<u>3.703</u>	<u>252,726</u>			

⁽¹⁾ Rent, rates and maintenance.

⁽²⁾ Includes rent paid to PSA of £475,000 pa. PSA rent the building for £50,000 pa, so the cost to the Exchequer is only £9.82 per square foot.