

**Health and Safety Commission**  
**‘A stronger voice for health and safety’**  
**The merger of the Health and Safety Commission and**  
**Health and Safety Executive**  
**Consultation Reply Form**

(please type or write in block capitals)

**Part 1 : Your Details**

Your name *(if responding as an individual)*

If responding as an individual, what is your area of interest?

Name of your organisation

**British Occupational Hygiene Society**

Nature of your organisation / business sector

**Learned Society**

How many people does it employ?

0 - 50

51 - 250

251 - 500

500+

Address

**5/6 Melbourne Business Court  
Millenium Way  
Pride Park  
Derby**

Postcode

**DE24 8LZ**

Name of contact

**Dr John W Cherrie**

Position held

**President Elect**

Telephone number

**0131 449 3032**

Email address

**john.cherrie@iom-world.org**

If you are responding on behalf of a group of organisations or a trade union;

How many companies or workers does it represent?

0 - 50

51 - 250

251 - 500

500+

Are you a:

Employee

Employer

Employer Organisation

Trade Union representative

HSE employee: Inspector  Other

Local authority employee: Inspector  Other

Health and safety professional:  Other (please specify)

Please indicate if you are happy to be contacted about your comments

Yes  No

If you have read the consultation document and have no comments, please tick the box and return the form.

## Part 2 : Questions

**Question 1** – Do you agree with our proposals for merging HSC and HSE into a new single authority for regulating health and safety at work in Great Britain?

Yes  No

Comments:

**We see advantages in there being a single authority regulating health and safety. In particular we think the main benefit will come from the non-executive board more directly influencing the work of the executive. It will also be clearer for employers and employees to understand the relationship between the two entities. We are not sure that the proposed new structure will deliver greater accountability but in our view it should be at least as good as the present arrangements. Finally, we believe that it is important for the proposed new board to retain close connections to ministers so that the HSE retains influence in government and has the authority to undertake its work.**

**Question 2** – Do you agree with the overarching governance principles for a new merged health and safety authority?

Yes  No

Comments:

**We particularly value the proposal that the governing body will be committed to actively engage with stakeholders and that stakeholders views will have an important role in informing the work of the board.**

**Question 3** – Do you agree that the governing body of the new merged health and safety authority should consist entirely of non-executive directors?

Yes  No

Comments:

**We don't accept the arguments set out in the consultation paper concerning the composition of the governing body. We feel that it is important to have the Chief Executive and other senior members of the executive as a member of the Board to ensure executive input to decision-making and thereby ensuring that policy formulation and operational implementation are closely aligned. This outweighs the concerns about perceived lack of independence and accountability. Providing the non-executive directors are of the right calibre they should be able to effectively scrutinise the performance of the executive, as is the case in most public companies.**

**Question 4** – Do you agree that the governing body should have the scope to increase in size to 11 independent members should the need arise in future?

Yes  No

Do you have views on the right size?

Yes  No

Comments:

**BOHS believes that increasing the size of the governing body offers an opportunity to include a greater number of members who have an interest in occupational health and occupational hygiene matters. These areas are a very important part of the work of the Executive and the governing board should have the ability to draw on relevant expertise and knowledge, for example using representatives from professional bodies such as BOHS. We have no strong view as to the optimum size of the board.**

**Question 5** – We would welcome your views on whether we should be doing more to enhance our relationship with stakeholders

Comments:

**Opportunities for stakeholders to make an input at the early stages of policy development are not always clear and rely to some extent on personal contacts. A wider electronic network of stakeholder contacts would be one way of achieving this. It is sometimes difficult to contribute to events centred on London venues and it may be helpful to organise more regional programmes.**

**Question 6** – Do you agree that prosecution and individual enforcement decisions within a merged health and safety authority should continue to be taken by officials?

Yes  No

Comments:

**The perceived independence of the current system is widely respected and works well.**

**Question 7** – Do you agree that the merged body should be known as the Health and Safety Executive?

Yes  No

Comments:

**Changing the name of the merged body could be confusing for stakeholders.**

**Question 8** – In your view, how well does this Consultative Document represent the different policy issues involved in this matter:

Very Well  Well  Not Well  Poorly

Comments:

**Question 9** – Is there anything you particularly liked or disliked about this consultation exercise?

Comments:

**No**

**Please note: all responses will be placed in HSE Information Centres unless you state specifically that this response, or part of it, should be treated as confidential. To treat your comments on a particular section as confidential, please insert bracketed text 'treat as confidential' within that section's response.**

Treat as confidential?

Yes  No

How did you hear about this consultation?

|                         |                          |                            |                                     |   |                          |
|-------------------------|--------------------------|----------------------------|-------------------------------------|---|--------------------------|
| HSE consultation letter | <input type="checkbox"/> | HSE website                | <input checked="" type="checkbox"/> | HELA extranet                               | <input type="checkbox"/> |
| LAU newsletter          | <input type="checkbox"/> | LACORS website             | <input type="checkbox"/>            | Word of mouth                               | <input type="checkbox"/> |
| HSE Inspector/Official  | <input type="checkbox"/> | Local Authorities Official | <input type="checkbox"/>            | Trade press article <i>(please specify)</i> | <input type="checkbox"/> |

Other *(please specify)*

Thank you for taking time to respond to this consultation

Please email this form to: [governance@hse.gsi.gov.uk](mailto:governance@hse.gsi.gov.uk)

Alternatively, you can post or fax the form to:

Ami Badmus  
Health and Safety Executive  
Rose Court

2 Southwark Bridge  
London  
SE1 9HS  
Fax: 020 7717 6670

**Your response should arrive no later than the 5<sup>th</sup> March 2007**