

GENERAL PURPOSES AND LICENSING COMMITTEE – 15 JUNE 2012

HEALTH AND SAFETY INTERVENTION PLAN FOR 2012/2013

1. INTRODUCTION

- 1.1 This report seeks approval of the Health and Safety Intervention Plan for 2012/2013.

2. HEALTH AND SAFETY INTERVENTION PLAN FOR 2012/2013 (APPENDIX 1)

- 2.1 The Health and Safety at Work Act 1974 requires all local authorities to perform their duties as enforcing authorities in accordance with mandatory Section 18 requirements which set out the arrangements we should make in relation to the regulation of health and safety. As part of this requirement the Health and Safety Intervention Plan for 2012/2013 is presented to the Committee for Member approval. The Plan proposes a full range of work for the current year and additionally reviews the work of the Service during the previous year.

3. FINANCIAL IMPLICATIONS

- 3.1 The Health and Safety Intervention Plan for 2012/2013 contains proposed work for the current year and a review of work completed the previous year which is based on existing budgets. Therefore there are no financial implications as a result of this report.

4. ENVIRONMENTAL, CRIME AND DISORDER & EQUALITY AND DIVERSITY IMPLICATIONS

- 4.1 There are no environmental, crime & disorder or equality and diversity implications as a result of this report.

5. RECOMMENDATION

- 5.1 That the Health and Safety Intervention Plan for 2012/2013 as set out in Appendix 1 to this report be considered for approval.

For Further Information Please Contact

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Background Papers:

The Section 18 Standard

**NEW FOREST DISTRICT COUNCIL
ENVIRONMENTAL HEALTH (COMMERCIAL)**

**HEALTH AND SAFETY INTERVENTION PLAN
2012/2013**

1 INTRODUCTION

1.1 The health and safety intervention plan for 2012/2013

- 1.1.1 This health and safety intervention plan sets out the work of the health and safety service for the present year. It has been developed to satisfy the requirements of mandatory guidance issued under Section 18 of the Health and Safety at Work etc Act 1974.
- 1.1.2 This intervention plan aims to provide the right interventions aimed at where they are best placed to reduce workplace injury and ill health. Our working priorities are shaped by current HSE strategy. We deliver these priorities through work which focuses on local needs, as well as regional and national plans.

1.2 New Forest District Council as a health and safety enforcing authority

- 1.2.1 This Authority is designated as an enforcing authority under the Health and Safety at Work etc Act 1974, and as such has a statutory duty to enforce the appropriate health and safety legislation. This regulatory role is shared with the Health and Safety Executive (HSE) who also enforce health and safety legislation in certain businesses in the District. Whether a business is regulated by a local authority or the HSE is defined in the Health and Safety (Enforcing Authority) Regulations 1998.

2 SERVICE AIMS AND OBJECTIVES

2.1 The Aim

- 2.1.1 The aim of the Service is to prevent the death, injury and ill health of those at work and those affected by work activities.

2.2 The Objectives – Key Delivery Priorities

- 2.2.1 To manage the risk in high risk and poor performing businesses. This is a targeted approach to risk in line with the Better Regulation agenda;
- 2.2.2 To carry out a range of risk based interventions which support the Council's corporate plan through the choice of local priorities;
- 2.2.3 To undertake work defined as a priority at a regional and national level;
- 2.2.4 To investigate major injury incidents and fatalities, which meet the investigation criteria;
- 2.2.5 To investigate complaints and respond to other service requests;
- 2.2.6 To work in partnership with local, regional and national bodies when it is relevant to do so;
- 2.2.7 To promote the principle of 'sensible risk management';
- 2.2.8 To ensure enforcement decisions are consistent with our Enforcement Policy, the Health and Safety Commission's Enforcement Policy Statement, and the Enforcement Management Model, and;

2.2.9 To have competent staff through training and development.

3 THE GOVERNMENT REVIEW OF HEALTH AND SAFETY

3.1 The Government review of health and safety

3.1.1 The subject of health and safety has been under Government review for the past two years. The first step in this process was the publication of the Government commissioned report 'Common Sense Common Safety' in October 2010. The Government accepted all of the report's recommendations, which included measures for improving the public perception of health and safety and reducing the burden of bureaucracy on businesses. Two specific recommendations with implications for this service were;

- Local authorities should continue to combine separate intervention programmes e.g. food hygiene and health and safety. Additionally, if during another type of visit a matter of evident concern on health and safety is found then this should be dealt with accordingly,
- A strengthening of the Primary Authority inspection plans which set out the subjects to be covered during inspection.

3.1.2 In March 2011, the Minister for Employment announced the next steps in the Government's plans for the reform of the health and safety system with the publication of 'Good Health and Safety, Good for Everyone'. This set the aim of reducing the inspection burden on business by focussing on better health and safety outcomes through the following;

- Refining intervention strategies by further improving the targeting of relevant and effective interventions,
- Reserving full inspection for higher risk businesses, leading to a reduced number of proactive inspections,
- Reducing the aggregate numbers of proactive inspections by a third across all local authorities freeing up capacity for more effective outcome focussed interventions.

3.1.3 In November 2011 an independent review into the operation of health and safety laws by Professor Löfstedt, 'Reclaiming Health and Safety for All' was published. It made recommendations that will;

- Reduce regulatory requirements on business where they do not lead to improved health and safety outcomes,
- Remove pressures on business to go beyond what the Regulations require, enabling them to reclaim ownership the management of health and safety.
- Give the HSE the authority to direct all Local Authority health and safety inspection and enforcement activity to create a more consistent approach, targeted towards those businesses that present the greatest risk.

3.1.4 The full implication for Local Authorities of this review is yet to become apparent. This is likely to become clearer in April 2013. In the meantime, our work is based upon the following national policy;

- LAC 67/2 rev3 Advice/Guidance to Local Authorities on Targeting Interventions was published in November 2011. This sets overall priorities for the work plan,
- LAC 22/13 rev1 Incident Selection Criteria Guidance was published in February 2012. This sets the approach for selection of reactive work.

4 THE RESPONSE OF THE SERVICE

4.1 Revision of Guidance for the Targeting of Interventions

- 4.1.1 The HSE guidance on targeting interventions is based upon a system for defining the risk presented to employees and others affected by the work activity of a business. It separately considers the performance of a business against a specified rating system, based upon confidence in management, health performance, safety performance and welfare standards. This is in line with better regulation principles as it clearly identifies those businesses which are high, medium and low risk.
- 4.1.2 This information is used to identify businesses that are a priority to receive an intervention and to determine the appropriate type of intervention which may range from a full inspection to an advice letter.
- 4.1.3 The latest revision of this guidance reflects the shift in emphasis brought about by the reforms. In following this guidance we will target those businesses that are poor performers and not meeting the requirements under health and safety legislation. We therefore plan to only inspect the highest risk businesses. This allows for greater emphasis to be placed on reactive work - dealing with complaints, accidents and incidents. This has been included in the development of this intervention plan.

4.2 Selection Criteria For Accident Investigation

- 4.2.1 Guidance has been issued for use by all local authorities for the selection of Reporting of Injuries, Deaths and Dangerous Occurrences Regulations 1995 (RIDDOR) notifications. It provides a common proportionate, transparent and targeted procedure for the selection and investigation of accidents and incidents. Its risk based approach to selecting accidents requiring investigation is designed to assist with the targeting of resources.
- 4.2.2 Adoption of the guidance or its equivalent is considered by the HSE to be compliant with the duty under Section 18 of the Health and Safety at Work etc Act 1974. It is also consistent with the Health and Safety Executive's activities.
- 4.2.3 The existing selection criteria used by the Service has been reviewed in the light of the HSE's guidance and the new accident selection criteria for the service is attached as ANNEX 1. This selection criteria will be published on the Council's website

5 STAFF RESOURCES

5.1 Staff undertaking health and safety work

- 5.1.1 EH Commercial staff undertake a full range of duties, including non health and safety work. The Section 18 Standard which sets out the arrangements

we should make in relation to health and safety requires that enforcing authorities have sufficient capacity to carry out their intervention plan. The amount of time available for each member to undertake Health and Safety work has been quantified.

5.1.2 For the year 2012/2013, the capacity for health and safety work within the service is shown in the following table:

Staff	Full Time Equivalentents
Manager	0.3 FTE
Inspectors	3.1 FTE
Administrative Support	0.6 FTE
Total	4.0 FTE

Table 1

6 PLANNED WORK FOR 2012/2013

6.1 How Work is Targeted

6.1.1 In accordance with the requirements of the HSE Strategy document 'Health and Safety of Great Britain – Be Part of the Solution', we have applied the following principles to determine appropriate targeted interventions:

- to maximise the impact of interventions in improving health and safety outcomes;
- to secure action by duty holders to manage and control the health and safety risks of their work activities;
- to focus our work on duty holders who are best placed to control the risks whether they be employers or others;
- to engage with other organisations and stakeholders that can influence risk reduction;
- to direct our attention to activities that give rise to serious risks or situations where hazards are least well controlled;
- to stop those that seek economic advantage from non-compliance;
- to follow national guidance on interventions and priority programmes; and,
- to work in accordance with local, regional and national programmes.

6.2 Introduction to the Work Plan

6.2.1 This section details the work we propose to undertake in the forthcoming year. It has been considered in the light of the HSE guidance and direction concentrating on the national planning priorities.

6.2.2 Maintaining and improving the standards of health and safety in the District is based upon two key aspects of work, proactive and reactive:

- Proactive: the inspection of high risk premises and poorly performing businesses, together with a range of local, regional and national interventions which typically focus upon a particular business type, or identified hazard.
- Reactive: reacting to accidents, complaints and service requests.

6.3 Proactive interventions

6.3.1 The following table details the range of proactive interventions proposed for 2012/2013. It includes HSE priorities for the forthcoming year along with interventions in businesses already known to have a higher risk.

Type of Intervention	Local Implementation
Using the most appropriate form of intervention which may include proactive inspection in category A rated businesses	We will follow guidance contained in LAC 67/2 in relation to high, medium and low risk businesses.
Undertake interventions in line with health and safety inspection plans in those businesses with an agreed Primary Authority. We will inspect only category A businesses	The Primary Authority principle is a means to improve consistency of inspection and to ensure better regulation in multi-site businesses. We will follow inspection plans as published on the 'LBRO' website
Where there is a potentially significant issue within the New Forest – the intervention will be appropriate to the risk rating of the business	Please refer to table 4 for further details.
Where there is a sufficient weight of intelligence over a period of time to indicate poor performance / potential significant breaches of health and safety law	Consideration is given to information from other enforcing authorities, reported accidents over a period of time, recurring complaints etc. This also includes intelligence gathered and shared as part of The Hampshire Better Regulation Partnership .
HSE priorities for 2012 – 2013: <ul style="list-style-type: none"> • Appropriate intervention to prevent or control ill health from animal contact at visitor attractions; • Raising of awareness of the duty to manage asbestos 	All relevant visitor attractions will be inspected during the year 2012 – 2013 to ensure controls are in place to prevent possible outbreaks and the serious effects of illness such as E.coli. This continues previous work in this area and includes raising awareness of recent changes in legislation. It also includes enforcement of the legislation as part of our interventions.

Table 2

6.4 Reactive Interventions

6.4.1 The following table shows the type of reactive interventions proposed for 2012/2013. This is work that we will carry out after it has been brought to our attention from a number of sources. It includes HSE priorities for the forthcoming year.

Type of Intervention	Local Implementation
Investigation of a single complaint, RIDDOR report or adverse insurance report where the nature of the information	We will investigate complaints from the public and employees, accidents or incidents which come to our

indicates poor performance / potential significant breaches of health and safety law	attention. We will establish failures in relation to health and safety law and take action where necessary. This may be in the form of advice, education, and where needed, more formal action. This applies to rated and unrated premises.
Where matters of evident concern / or significant breaches of health and safety law are identified during visits for another primary purpose – e.g. food hygiene inspection	At premises we are visiting for another purpose, we will react to significant health and safety matters which come to our attention. This will be dealt with as detailed above.
To check compliance with a notice	It is essential that we revisit businesses for which it is has been necessary to serve legal notice to ensure that the matters have been addressed.
<p>HSE national priorities for 2012 – 2013</p> <ul style="list-style-type: none"> • Visits to sites as part of the national campaign to address risks associated with LPG underground pipework; • Appropriate intervention in relation to significant risks within the beauty sector 	<p>Old and damaged buried LPG pipework has been shown to present a significant risk of leakage and possible explosion. We will continue to inspect businesses with LPG installations as notified by the HSE to ensure that users (and suppliers) are managing the risk.</p> <p>There are a number of risks associated with the diverse and complex nature of such activities. This sector has historically been largely unregulated, and as a growth industry it is seen as a work priority.</p>
General Service Requests:	Provision of advice to businesses and the public, and internal planning and licensing consultations. Note, this has increased following recent changes to licensing legislation.
Dealing with matters of evident concern in HSE enforced premises	Joint warrants are held by NFDC inspectors allowing them to take enforcement action in HSE enforced premises where there is prior agreement.

Table 3

6.5 Local Priorities.

6.5.1 The following table shows the planned priority work for 2012/2013. This work reflects local priorities arising from various information sources.

What we intend to do	Why this is important.
To develop information on control of the legionella risk in holiday accommodation. To provide the information to businesses. Sampling will be carried out and follow-up action undertaken for businesses where failures are identified.	The risks arising from Legionella in holiday accommodation are well known. The HPA have made this issue a priority for the Olympic year
To assess and improve levels of compliance with pressure systems legislation for coffee machines at hotels, restaurants and pubs. Our initial approach will be informal.	Pressure vessels present risk of explosion. A previous pressure vessel's project undertaken in Cafe's identified significant non compliance. Therefore the project has been extended to hotels, restaurants and pubs.
To assess the safety of opening windows in hotels in preventing falls from height. Consideration will also be given to management of certain contractors working at height.	The injuries associated with falling from height are significant. A complaint about a lack of controls at a local hotel highlighted this issue.
An audit of health and safety arrangements will be carried out as part of an accident or complaint investigation. As a result we will seek to provide practical solutions to improving health and safety management.	Empirical evidence shows that many accidents and complaints arise due to the failure of businesses to implement proactive controls.
We will inspect cellars as part of a food hygiene inspection, to ensure compliance with health and safety legislation.	There are many safety risks arising from cellar work. Routine cellar inspections already undertaken have highlighted the need to continue with this work.
To provide information and guidance to assist duty holders to plan for, and manage their event safely.	In relation to health and safety, smaller events are largely less compliant than the more organised, larger events. Also duty holders are likely to have less awareness with their obligations.
To provide information leaflets and guidance to residents and visitors to the New Forest on the hazard of Lyme Disease. . Enhance awareness of the disease, precautions and recognition of symptoms.	The HPA has identified a significant increase in the trend of reported cases over the last decade.

Table 4

7 SUMMARY OF PERFORMANCE 2011/2012

7.1 Comparison between planned interventions and actual performance 2011/2012

- 7.1.1 The following table details the work done in relation to planned local intervention work for the year 2011-2012. It details the scope of the work done and the results of that work.

Planned Work	Actual Performance
Caravan and Camping Sites - completion of work started in 2009 to monitor health and safety standards on licensed caravan parks, both static holiday parks and residential sites. Secondary aim is to raise awareness of health and safety matters on such sites.	All appropriate sites were identified and were subject to questionnaire survey, inspection and follow-up action. Action was taken in relation to all identified sites: 12 holiday sites.
Pressure Vessels (i.e. contained within coffee machines) - Work to assess compliance of coffee shops with the Pressure Systems Safety Regulations 2000	Applicable businesses were identified (almost 100) and were contacted by questionnaire in the first instance. Non-responders or those without controls in place were visited to give advice on compliance; appropriate enforcement action where non-compliance of legislation continued.
Laser safety - Assessing compliance of lasers and intense pulsed light treatments with The Control of Artificial Optical Radiation at Work Regulation 2010 in beauty premises.	Initial contact was made with potential businesses, and inspection of those identified, to ensure that they understood and were compliant with the Regulations.
Health and Safety Arrangements - Enhanced audit of health and safety arrangements in businesses subject to accident investigation or complaint.	This was the first year of an ongoing local priority intervention. The purpose of this intervention in the first year was to prepare resources which would enable a more thorough audit of businesses health and safety management. A questionnaire and resources have been prepared and tested.
Pub Cellar safety - Inspection of cellars as part of food hygiene inspection and preparation of follow-up information sheet	This ongoing work focussed on the inspection of pub, restaurant and hotel cellars as part of routine food hygiene inspections. Premises not subject to recent intervention were identified and inspected. Advice was given to educate dutyholders, or enforcement was undertaken as deemed necessary.
Sunbeds – Provision of information on new legislation.	This intervention focussed on the education of businesses to the requirements of the Sunbeds (Regulation) Act 2010. All applicable businesses were identified, and resources prepared which were provided to all businesses.
Swimming Pools (follow-up to 2010 project) – Visits, sampling and possible re-visits to 9 premises and any necessary enforcement action.	This was the conclusion of an ongoing intervention which focussed upon the health and safety compliance of swimming pools in the District. The work focussed upon completing action in relation to poor performers, particularly in relation to pool water quality and the management of pools.

<p>Noise at Work in the entertainment industry – Continuation of ongoing project: includes a combination of noise assessments, monitoring and provision of information.</p>	<p>This ongoing intervention focused upon seeking compliance with legal notices served upon a non-compliant premises, and following up any notifications received of noise complaints from our colleagues in Environmental Protection. Where applicable, businesses were educated in requirements of The Control of Noise at Work Regulations 2005.</p>
<p>Bakeries - Research of relevant health and safety issues and preparation of resources to provide to businesses in the area.</p>	<p>All bakeries in the District were identified and a letter and information leaflet highlighting the importance of, and practical guidance on, the safe use of bakery equipment was issued. During routine food hygiene inspections of bakeries officers audited compliance with the Regulations by use of a questionnaire. Advice or enforcement action was given as necessary. Note: These interventions will be completed during routine food hygiene inspections in the coming year.</p>
<p>Roll Cages – Examination of how, when and where they are used, as well as assessment of staff training, repair and maintenance.</p>	<p>This rationale behind this intervention was the number of accident notifications received relating to the use of roll cages. It focussed largely on smaller supermarkets and involved visiting relevant premises, focusing on how roll cages have been risk assessed, the environment in which they are used, the monitoring and maintenance of them and a survey undertaken of roll cages in use onsite for any noticeable defects.</p>
<p>Business advice and support – Preparation of targeted business, advice identifying new legislation, guidance and other resources.</p>	<p>Current key health and safety topics relevant to the majority of local businesses were identified and an information leaflet was produced for circulation in the District. This document is awaiting input from another Council Service to ensure that it meets the corporate standard.</p>
<p>Mechanical Lifting Equipment – Identification and inspection of premises with regulated lifting equipment. Assessment of management and enforcement where necessary.</p>	<p>All potential premises with lifting equipment were identified and were provided with advice to ensure that they are aware of their duties under the Lifting Operations and Lifting Equipment Regulations 1998. It should be noted that inspection of premises was not undertaken, but known premises will be reviewed when visited for another purpose, e.g. food hygiene inspection or accident investigation.</p>

Inspection and audit of horse riding establishments.	Establishments were visited as part of their annual licensing checks. Horse riding accidents were investigated and where appropriate advice and information was given to improve the health and safety management within this sector.
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Table 5

8 CONCLUSION

- 8.1.1 The intervention plan for the year 2012/2013 has been designed to be wide reaching and relevant for the businesses in the New Forest District whilst following national policy for the regulation of health and safety.
- 8.1.2 It should be noted that there has been a reduction in resources allocated to inspections in favour of reactive work. This is a direct result of changes to national policy. The HSE has instructed local authorities to reserve proactive inspection for the highest risk premises and use other non-inspection techniques for lower risk premises. Additionally, to concentrate on reactive work involving the investigation of accidents and complaints and responding to requests for advice from businesses.
- 8.1.3 Our accident selection criteria has been reviewed against the HSE's Incident Selection Criteria. The proposed accident selection criteria for the service is attached at Annex 1
- 8.1.4 This plan seeks to maintain the effectiveness of the service by the careful use of appropriate interventions, and by concentrating resources where the risk is greatest. The plan has been shown to be realistic and achievable with the current staff resources; naturally, any changes that occur in relation to these resources will necessitate a review of targets.
- 8.1.5 Last year the Service used a range of interventions to promote and regulate Health and Safety compliance. A review of the work undertaken showed that it was carried out in accordance with last year's plan, and was largely a success. Results have been used to shape this year's work plan.

ANNEX1

INCIDENT SELECTION CRITERIA – INVESTIGATION OF WORKPLACE ACCIDENTS, DANGEROUS OCCURRENCES AND WORK RELATED ILL HEALTH

The following selection criteria will be applied to all incidents received by NFDC. It is based upon Local Authority Circular LAC 22/13 rev1 Incident Selection Criteria issued by the HSE as guidance to Local Authorities.

The Reporting of Injuries, Deaths and Dangerous Occurrences Regulations 1995 (RIDDOR) as amended requires specified types of accidents, dangerous occurrences and causes of occupational ill health to be reported. NFDC may receive these notifications from the incident contact centre (ICC) or from a person contacting the service directly.

Statement of Policy

Incidents are selected for investigation with consideration to NFDC's Enforcement Policy Statement. When deciding which incidents to investigate and the level of resource to be allocated to the investigation, account is taken of the:

- severity and scale of potential or actual harm;
- seriousness of any potential breach of the law;
- duty holder's known past health and safety performance;
- enforcement priorities;
- practicality of achieving results; and
- wider relevance of the event, including serious public concern national guidance on targeting interventions (LAC 67/2) [<http://www.hse.gov.uk/lau/lacs/67-2.htm>]

Not every incident reported to NFDC will require investigation. The criteria for selecting incidents suitable for further investigation are detailed below.

If the RIDDOR report does not contain sufficient information to allow a decision to investigate to be made, the injured party/employer/member of the public will be contacted.

Mandatory investigations

The following defined major incidents should always be investigated:

- Fatalities

All fatalities as a result of an incident arising out of or in connection with work activities. This specifically excludes suicides* and deaths from natural causes.

*In some circumstances e.g. in health or social care, the risk of suicide may arise from the work activity, in which case HSC/E guidance on the application of HSWA section 3 should be applied. Please see: Health and Safety at Work, etc Act 1974 section 3: Enforcement [<http://www.hse.gov.uk/enforce/opalert.htm>]

- Injuries to all persons, including non-employees, irrespective of cause that meet the following conditions:
 1. all amputations of digit(s) past the first joint;
 2. amputation of hand/arm or foot/leg;
 3. serious multiple fractures (more than one bone, not including wrist or ankle);
 4. crush injuries leading to internal organ damage, e.g. ruptured spleen;
 5. head injuries involving loss of consciousness;
 6. burns and scalds covering more than 10% of the surface area of the body;
 7. permanent blinding of one or both eyes;
 8. any degree of scalping; and
 9. asphyxiations.
- RIDDOR (Schedule 1) defined major injuries arising from working in a confined space or an electrical incident.
- All reports of cases of occupational disease which meet the criteria of reportability under RIDDOR, except those arising from circumstances/situations which have already been investigated.
- Serious breach of health and safety law including incidents likely to give rise to serious public concern where, in accordance with the Enforcement Management Model, the national enforcement expectation would determine a notice or a prosecution.
- Incidents likely to give rise to serious concern. This reflects the views of the public at large not just those of an individual e.g. Dangerous Occurrences with the potential for directly causing the death of anyone or major injuries to a number of people.

Non–investigation of a mandatory incident

For any mandatory incident that is not investigated, a record will be made to explain the reasons for non-investigation.

The grounds for not investigating incidents that would normally be investigated may include:

- where an investigation is impractical, e.g. unavailability of key witness(es), key evidence is no longer available;
- no reasonably practicable precautions available to prevent the incident\accident or its recurrence;
- investigating the accident will mean that NFDC will be acting ultra vires;
- there is a conflict of interest between the NFDC as a regulator and duty holder, in which case the appropriate enforcing authority should be notified, or
- inadequate resources due to other priorities.

Discretionary investigations

Incidents not falling into the above criteria for mandatory investigation may be investigated taking into account the following factors:

- the incident may not have caused a RIDDOR defined major injury but is either in accordance with HSE's national guidance to LAs on targeting interventions (LAC 67/2) [<http://www.hse.gov.uk/lau/lacs/67-2.htm>] or one which arises from a specific health and safety initiative that may be contained within NFDC Intervention Plan;
- the poor health and safety track record of the duty holder and whether or not there has been a history of similar events;
- the incident has the potential for high public profile\media attention or has received considerable media attention leading to reputational risk through inaction\perceived inaction;
- the incident may give rise to complaint(s). Depending on the circumstances, this should be dealt with as a normal complaint procedure and not necessarily require a full incident investigation unless found to be appropriate, or any incident that has been identified as being useful for –
 - enhancing sector good practice\technical knowledge or
 - training and developing staff as recognised from any Regulators' Development Needs Analysis (RDNA) discussions.