



Andy McGrory
Health and Safety Executive
5.S.G Redgrave Court
Bootle

29 November 2012

Dear Andy

PROPOSALS TO REVISE THE HEALTH AND SAFETY (FIRST-AID) REGULATIONS 1981 (as amended)

Thank you for the opportunity to comment on HSE's proposals to revise the Health and Safety (First-Aid) Regulations 1981. I am responding on behalf of the Office of Rail Regulation (ORR), which is the safety regulator for railways. These regulations apply to railway duty holders and are enforced by ORR in respect of the operational railway. Our comments, therefore, reflect our views as a co-regulator.

ORR would support the removal of the requirement for all first aid training and qualifications to be approved by HSE, providing there were other arrangements in place to enable employers to select appropriate, high-quality training with confidence. We would expect HSE's revised guidance to address this. Options for maintaining standards in training provision might include the expansion of the accreditation arrangements for the EFAW course using Ofqual and The Scottish Qualifications Authority. Additionally, HSE could encourage the use of online feedback and rating of courses which would inform employers' selection of courses and providers.

We would support the ACoP wording being incorporated in guidance.

The four-level framework could be simplified to reflect the nature of modern workplaces and improvements in ambulance response times. The arrangements should continue to reflect the need for additional skills/knowledge for particular environments/hazards or circumstances such as remoteness. The basic one day course would probably suffice for most workplaces, with higher risks workplaces or remote workplaces requiring consideration of more in-depth or specific training.

The selection of a training provider would be assisted by quality assurance arrangements combined with access to reviews/feedback, to give reassurance and inform selection decisions. Providers for specialist/additional skills training would need to be identifiable.

We would welcome the opportunity to contribute to new guidance in this area and would consider developing a rail specific case study. Please contact me in the first instance when you are ready to take this work forward.

If you would like to discuss this response please contact me directly at dawn.russell@orr.gsi.gov.uk .

Yours sincerely

Dawn Russell
Railway Safety Policy