

An tÚdarás Sláinte agus Sábháilteachta Health and Safety Authority

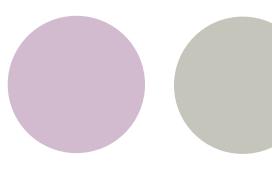
Programme of Work 2022











Our Vision:

Healthy, safe and productive lives and enterprises



Contents

01	Foreword	4
02	Vision, Mission, Mandate, and Values	5
03	Strategic Priorities	7
04	Programme of Work	8
05	Key Actions: Occupational Safety and Health	11
06	Key Actions: Chemicals	12
07	Key Actions: Market Surveillance	13
80	Key Actions: National Accreditation Body	14
09	Key Actions: Operational Effectiveness	15
10	Measuring Performance	16



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Foreword

This is the first year of implementation of the Authority's Strategy Statement for the period 2022-2024. This strategy will be implemented in an Ireland that is in the process of recovering from the COVID-19 pandemic and its unprecedented impact on society, workplaces and employment. There are also changes in work practices, technology and innovation both in the near and longer term in addition to the continued uncertainties arising from the UK's exit from the European Union. This published document connects some of our key programme activities to support and progress the goals set out in our strategy.

This is also the first year of implementation of the Government's National Strategy for Accreditation. Accreditation is an essential enabler for trade and facilitates market access for Irish products and services. As part of this Programme of Work, we will continue to promote and advance the benefits of accreditation to companies, enterprises and regulators in order to improve the competitiveness and productivity of Ireland's economy.

This programme of work will be implemented in an Ireland that is in the process of recovering from the COVID-19 pandemic

As part of our risk-based approach to targeting of sectors, hazards and risks, we will undertake a comprehensive programme of proactive and reactive inspections across our occupational safety and health (OSH), and chemical mandates. In response to the UK's exit from the European Union, this programme of work will see us enhance our activities in market surveillance of products coming into Ireland to ensure full compliance with all EU regulations within our mandate. We will also be actively engaging in EU decision making to ensure that Ireland and Irish interests continue to be met.

Following an extensive re-organisation, we will continue to build our organisation in a manner which allows us to deliver most effectively across all areas of our broad and varied mandate. This will involve continued recruitment throughout the year, and further enhancements of our own internal ways of working. In recognition of our over-arching goal to become an evidence-based, data-driven organisation, this year will see significant progress in the development of a core ICT platform to support the delivery of our OSH, chemicals and market surveillance mandates and optimise our core businesses processes while enabling future access to accurate complete data and better insights.



Dr. Sharon McGuinness Chief Executive Officer

Vision, Mission, **Mandate and Values**

Vision

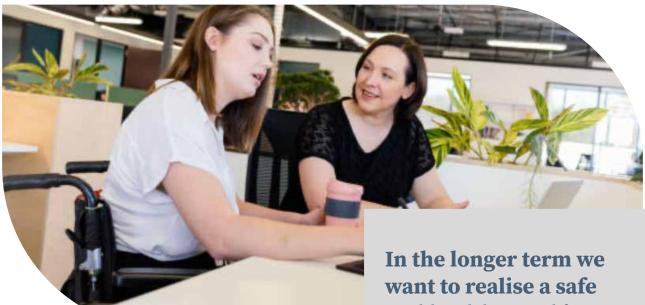
Healthy, safe and productive lives and enterprises.

Mission

We regulate and promote work-related safety, health and welfare and the safe use of chemicals and products. We provide the national accreditation service.

Mandate

- To regulate the safety, health and welfare of people at work and those affected by work activities.
- To promote improvement in the safety, health and welfare of people at work and those affected by work activities.
- To regulate and promote the safe manufacture, use, placing on the market. trade, supply, storage and transport of chemicals.
- To act as a surveillance authority in relation to relevant single European market legislation.
- To act as the national accreditation body for Ireland.



Values

Our CORE Values:

Collaboration

We listen, consult and collaborate with employees, employers, stakeholders and partners.

Openness

We embrace diverse perspectives while striving to be inclusive in all that we do. We encourage open and honest communication.

Responsiveness

We adapt to changing circumstances and drive continuous improvement through innovation. We use data to inform what we do, and we evaluate and share learnings.

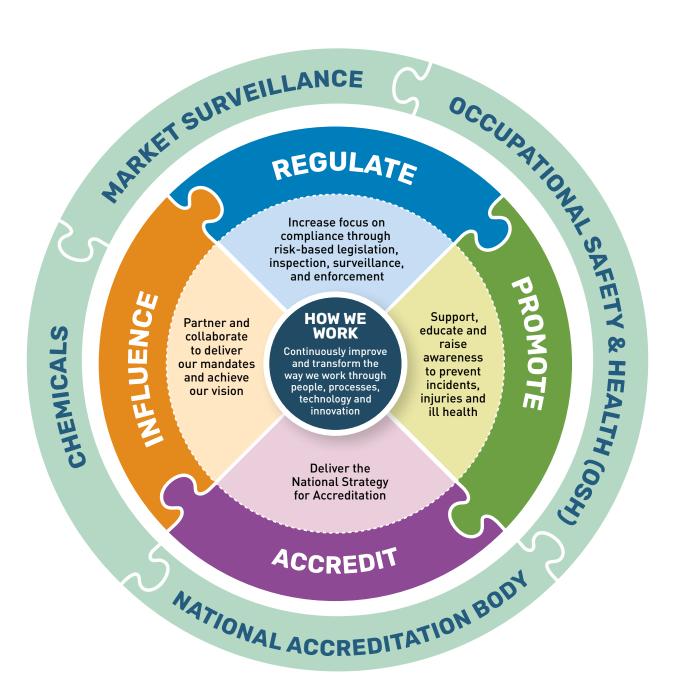
Ethics

We uphold the highest professional, governance and ethical standards. We will earn trust by being accountable and delivering our services in a fair, independent and transparent manner.

and healthy working life for people in Ireland and to foster an environment where businesses can grow and prosper



Strategic Priorities



Programme of Work

For our annual programme for 2022, our efforts will focus on our strategic priorities and mandates as follows:

Occupational Safety and Health

We will address the changing needs of worker protection brought about by new forms of work and the COVID-19 pandemic while continuing to address the traditional occupational safety and health risks associated with incidents and exposure to hazardous agents and products in the workplace. In our promotion and inspection activities we will focus on the specific health hazards and risks associated with psychosocial and ergonomic issues, biological agents and chemical agents including process generated chemicals (e.g. silica dust). We will promote new EU occupational exposure limit values within the relevant sectors to which they apply. We will provide occupational medical advice and ensure guidance is up to date. This work will be co-ordinated through the Authority's new occupational health division.

We will implement the objectives of the Farm Safety Partnership Action Plan and the Construction Safety Partnership Action Plan. We will continue to engage and partner on the work programme with the Road Safety Authority (RSA), An Garda Síochána and other key stakeholders on work-related road safety priorities outlined in the future Road Safety Strategy 2021-2030. This multi-stakeholder approach will involve actions under each of our Regulate, Promote and Influence strategic priorities.

We will publish a comprehensive review of workplace injury, illness and fatality statistics in Ireland. We will promote and encourage uptake and participation by medical practitioners to the THOR reporting system for occupational illnesses.

Chemicals

Through our active participation in the European Commission and the European Chemicals Agency (ECHA) committees and working groups, we will support the Minister and Department of Enterprise, Trade and Employment (DETE) in the development of new policy and legislation, with a particular focus on the review and update of the EU REACH and CLP Regulations which is a priority of the new European Chemical Strategy for Sustainability towards a Toxic-free Environment and a fully functioning Circular Economy.

Through our membership of ECHA's Scientific Committees we will support developing scientific opinions for new chemical substances of very high concern (SVHC), draft recommendations for the authorisation list (Annex XIV), applications for authorisations, new restriction proposals and draft decisions on dossier and substance evaluations. We will continue to collaborate with ECHA, the EU Commission and Member States on the management and use of chemicals in consumer products and participate in 2022 EU chemical enforcement projects.

Market Surveillance and UK exit from EU

We will continue to support and advise businesses importing products from Great Britain as they work to meet EU regulatory requirements and product standards post the UK exit. We will also provide guidance and advice to businesses to ensure they understand the requirements for placing safe products on the Irish market. We will also raise awareness amongst consumers and workers to highlight the importance of ensuring that chemical and industrial products are safe for use before purchase.

Accreditation

2022 will be the first year of the new National Strategy for Accreditation and INAB will implement and deliver on actions for Year 1. In addition, INAB will continue to focus on awarding new accreditations and monitoring conformance of existing accreditations in the INAB programme. New areas of accreditation will also be developed as necessary. INAB will continue to provide support and expert advice to clients, industry and Government on conformity assessment and accreditation, including the impact of the UK withdrawal from the European Union. INAB will be represented at key European and international committees on technical issues and the application of accreditation, leading where possible. We will continue to discharge all legislative responsibility as the GLP monitoring Authority.

Competent and Designated National Authority Functions

We will fulfil the Authority's Competent Authority (CA) functions across a range of areas including machinery, lifts, personal protective equipment (PPE), EU Directives dealing with potentially explosive atmospheres (ATEX), Pressure Equipment Directive (PED), Gas Appliances Directive (GAD), Transport of Dangerous Goods by Road (ADR), Transportable pressure equipment (TPED), chemicals (REACH, COMAH, CLP, Detergents, Export-Import, Market Surveillance, Dangerous Substances) through engagement with other CAs and the provision of technical advice, approvals and inspections. We will report to the **EU Commission on Export and Import controls** and on infringements and penalties in 2021 from checks on ADR Transport of Dangerous Goods by Road requirements.

Inspections/Investigations

We will complete a programme of proactive and reactive occupational health, safety, chemicals, and market surveillance interventions in a range of sectors especially the hazard and risks within the construction, agriculture, transportation and storage, chemical, health and social care sectors. In addition to focusing on safety and health hazards and risks with duty holders we will also engage with the Safety Representative. We will highlight the need for Safety Representatives to be appointed to ensure that employers and employees understand the regulatory requirement underpinning this important role. We will prioritise investigation activity to hold to account duty holders who expose their employees and others to significant levels of risk while breaking the law.

Employers, Workers and Enterprises

In addition to our inspection of workplaces, we will increase visibility and promote uptake of our supports and advice for employers and their workers, including future workers, through our Contact Centre, Chemicals Helpdesk, reviews and updates to our website, publications, e-tools and educational programmes (farmsafely.com, hsalearning.ie, BeSMART.ie, Work Positive^{CI}, and Choose Safety). In providing these supports and tools, we will take account of the specific needs of particular sectors and SMEs to ensure they understand their legal obligations to keep workers and workplaces healthy and safe. We will continue to provide educational resources to the formal education system for young and future workers.

We will address the particular requirements of Safety Representatives, vulnerable, and migrant workers by ensuring that guidance, advice and support to them and their representative bodies is made available in clear and easily accessible ways.

In addition to our inspection of workplaces, we will increase visibility and promote uptake of our supports and advice for employers and workers

Future of Workers and Work

We will continue to support and provide input to the Government's implementation of its remote working strategy and associated legislation and ensure occupational safety and health requirements are maintained as the world of work changes. We will keep up to date guidance and advice on remote, flexible and home working arrangements.

EU Policy Input

We will continue to ensure that the Authority makes the most effective use of its resources in contributing to EU committees and working groups in the development of policies and new legislation relating to OSH, chemicals, market surveillance and accreditation. We will continue to seek opportunities to assume a lead role in specific committees and working groups prioritised in line with our national and strategic interests.

Support the Minister and DETE

The Authority will also provide technical support to the Minister and DETE in the development of policy and legislative proposals relating to OSH, chemicals, transport of dangerous goods and market surveillance of products nationally, as well as at an EU and international level.

We will keep under review all relevant legislation, and ensure guidance and codes of practice are updated accordingly.

COVID-19

The Authority will continue as required to support the Government in efforts to prevent the spread of COVID-19 in the workplace.

Corporate Governance and How We Work

We will ensure that our governance structures support informed and accountable decision-making underpinned by responsive leadership, risk management processes and compliance with the Code of Practice for the Governance of State Bodies.



We will commence development of our core ICT platform to support the delivery of our OSH, chemicals and market surveillance mandates and optimise our core businesses processes

We will continue our recruitment drive and onboarding of staff to support the establishment of a new occupational health division and the implementation of a new organisational structure. We will develop and implement our HR strategy to ensure that the Authority has the capabilities to deliver its strategic business objectives by ensuring the on-going development of the Authority as an employer of choice with a strong, values-based and inclusive culture. We will have due regard to the need to exceed the target that at least 6% of the Authority's staff should represent persons with disabilities, in line with the Government's Comprehensive **Employment Strategy for Persons with** Disabilities.

We will commence development of our core ICT platform to support the delivery of our OSH, chemicals and market surveillance mandates and optimise our core businesses processes. We will develop our future data strategy to ensure the Authority becomes a data driven organisation. This strategy will address how we collate, report, analyse, share and evaluate information and data across all parts of the Authority.

Key Actions: Occupational Safety and Health

Regulate > Promote > Influence

We will:

- deliver a programme of intervention including 7,500 inspections within construction, health and social care, agriculture, transportation and storage along with other risk sectors with specific focus on:
 - biological, physical and chemical agents, pyschosocial and ergonomics,
 - working at height, livestock safety, machinery safety, violence and aggression, passenger lifts, workplace transport operations,
 - appointments of Safety Representatives, Project Supervisors for Design Process and Construction Stages, and
 - vulnerable workers and migrant workers,
- investigate all fatal incidents reported to the Authority,
- develop strategic links with employee and migrant worker representative bodies to promote occupational safety and health amongst migrant workers,
- participate in the EU review of the Workplaces and the Display Screen Directives, and the development of proposals for new EU occupational exposure limits for lead and asbestos.
- develop online digital resources on farm safety for post-primary students,
- develop three new online hsalearning.ie courses.

- utilise a wide range of relevant communication methods to inform key stakeholders of relevant occupational safety and health matters,
- undertake an awareness campaign to promote the reporting of occupational fatalities, incidents and illnesses,
- review safety and health advice and guidance for meat processing plants,
- prepare a Code of Practice for Industrial Lift Trucks, and
- publish guidance on:
 - farmers as clients in construction projects,
 - laboratories using biological agents,
 - asbestos notifications and reoccupation requirements,
 - health surveillance requirements,
 - hearing checks and audiometry,
 - remote working hubs, flexible and home working arrangements,
 - general health and safety advice for migrant workers,
 - advice for online content moderators, with an emphasis on psychosocial hazards,
 - high visibility personal protection equipment, and
 - safe use of chainsaws.

Regulate Promote Influence

We will:

- deliver 800 inspections targeting high risk chemical activities with a greater potential for exposure to chemicals to ensure the control of hazardous substances, process chemicals and chemicals during transportation, manufacture and use in the workplace,
- prioritise the inspection of high risk chemical use sites (e.g. COMAH and Sub COMAH),
- complete appropriate follow up of reported serious accidents, complaints and ECHA referrals,
- participate in EU expert groups for the review and updating of the Registration, Evaluation, **Authorisation and Restriction of Chemicals** (REACH) and the Classification, Labelling and Packaging (CLP) Regulations,
- complete chemical substance evaluation of methylanisole and progress it to the next stages of the EU evaluation process,
- prepare six scientific opinions for ECHA Scientific Risk Assessment Committee and Socio-Economic Committees on uses of the following substances of high concern chromium trioxide, 4-tert-OPnEO, and 4-tert-NPnEO,
- complete the next stages of the ECHA harmonised classification and labelling (CLH) process for two harmonised classification and labelling proposals (Dibenzoyl peroxide and 7-oxabicyclo[4.1.0]hept-3-ylmethyl 7-oxabicyclo[4.1.0]heptane-3-carboxylate) and prepare and submit one new CLH proposal to the ECHA CLH process,

- submit risk management option analysis reports for two substance groups,
- provide expertise for developing new EU wide enforcement projects on the compliance of safety data sheets and rules for the classification of mixtures,
- host training events for planning authorities and operators of COMAH establishments to assist them in the use of the published Technical Land-Use Planning Advice from 2021 and provide new electronic maps of the land use planning consultation distances for COMAH establishments to planning authorities and the environmental mapping website (enviromap.ie), and
- publish:
 - case studies to support employers undertaking a chemical agent risk assessment,
 - guidance on completing a risk assessment for public tours of distilleries and potable spirits production sites, and
 - guidance for data-centres on managing fuel storage below COMAH thresholds.

Regulate > Promote > Influence

We will:

- check non-compliant products impacting the Irish market which have been notified to the European Rapid Alert System for dangerous non- food products (Safety Gate) or the Information and Communication System for Market Surveillance (ICSMS),
- target importers and importers and distributors of chemicals,
- target PPE distributors and importers,
- check auction houses and machinery hire companies supplying non-compliant construction and lifting machinery to the market,
- assess 1,200 chemical products and 450 Industrial products intended for industrial and consumer use, for compliance with EU requirements,
- provide support and advice to businesses importing chemical and industrial products from Great Britain to meet EU regulatory requirements,

- contribute to the EU Technical Harmonisation discussions on the New Machinery Regulations,
- undertake an awareness campaign relating to motor vehicle parts and accessories (NACE 4531 and 4532) importing chemicals from outside the EU and their duties to provide safe use information,
- inform other Member States (through the ICSMS system) of non-compliant products found on the Irish market impacting EU markets,
- check duty holders under the EU-wide **REACH** enforcement project on substances in articles and restrictions, and
- provide information for consumers on the safe use of chemicals.

Accredit Promote Influence

In respect of our ongoing accreditation programme, we will:

- maintain the programme of accreditation for existing and applicant clients,
- process new applications for accreditation from new and existing clients efficiently,
- introduce new accreditation activity programmes,
- raise awareness on the benefits of accreditation through publications and events,
- continue engagement with key stakeholders,
- maintain INAB's international recognition across all activities through a successful peer evaluation in May 2022,
- fulfil all representation at European and international accreditation committees, and
- discharge all legislative responsibility as the Good Laboratory Practice (GLP) monitoring authority.

In Year 1 of the National **Strategy for Accreditation** 2022-2026, we will:

- commission research and market analysis to inform and influence national policy,
- prepare a communication plan and marketing strategy to underpin the delivery of the national strategy,
- deliver new accreditation activity to the market.
- update and complete improvements in the CRM system for external and internal users,
- prepare an annual report to record progress in delivering the National Strategy for Accreditation.



Key Actions: 09 Operational **Effectiveness**

How We Work

We will:

- embed the new structure and ways of working agreed as part of the organisational review completed in 2021, and further strengthen and build capability through targeted recruitment campaigns and continuous professional development opportunities,
- commence the development of a new ICT platform to optimise our core business processes, bringing benefits such as more efficient ways of working, end-to-end case management, better work planning, improved customer experiences, access to accurate, clean and complete data, and better insights,
- develop distinct HR, Data Management, and Communications strategies to align with, and enable the delivery of the Strategy Statement 2022 - 2024, the National Strategy for Accreditation 2022 - 2026 and the Authority's mandate and business objectives, each including an action plan with clear outcomes and metrics to measure and track implementation,

- adopt a blended working model in line with Government Policy while ensuring best practice regarding safety and health, data protection, ICT security and work efficiencies through the review and development of robust policies and procedures,
- assess the human rights and equality issues relevant to the functions of the Authority and develop an action plan to address those issues, where possible, within our existing mandates,
- undertake an accessibility audit of services, including an accessibility audit of our digital services and our physical premises,
- develop and publish a revised Customer Action Plan and Customer Charter, and
- increase our organisational resilience by enhancing our approach to business continuity and disaster recovery.



Further strengthen and build capability through targeted recruitment campaigns and continuous professional development opportunities

Measuring **Performance**

Progress on this annual programme of work, which represents the first year of implementation of our Strategy Statement 2022-2024, will be monitored using a range of qualitative and quantitative measures.

In our Annual Report we will evaluate and appraise the implementation of each year of our strategy, and will focus not just on measurement of activities but also look to measure the expected strategic outcomes.

We will regularly report on the key performance indicators below to support the achievement of our strategic goals.

Key Performance Indicators	2022 Target
Proactive Inspections (Occupational Safety and Health)	7,500
Proactive Inspections (Chemical Act and Transport of Dangerous Goods by Road)	800
Reactive Inspections	1,000
Market Surveillance Assessments (Chemical Products)	1,200
Market Surveillance Assessments (Industrial Products)	450
New Users of BeSMART	10,000
Organisations implementing Work Positive	500
Scientific opinions prepared for ECHA Committees	6
Accreditation Decisions (New)	25
Accreditation Decisions (Renewed)	320
New or updated guidance published	14



Which includes:

7,500 proactive inspections (OSH), 1,000 reactive inspections, and 800 chemicals inspections

Notes:

Our Vision: Healthy, safe and productive lives and enterprises



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