Unite Response to the HSE Consultation on Reform of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

This response is made by Unite, one of Britain and Ireland's largest unions with well over one million members across all sectors of the economy including manufacturing, financial services, transport, food and agriculture, construction, energy and utilities, information technology, service industries, health, local government and the not-for-profit sector. Unite also organises in the community, enabling those who are not in employment to be part of our union.

Unite broadly supports the proposed legislative and non-legislative changes contained within this consultation. Clarifying definitions, expanding the list of reportable occupational diseases, broadening diagnostic pathways, updating dangerous occurrences, and improving the reporting process are positive and proportionate steps towards modernising the reporting framework.

However, for these reforms to deliver meaningful impact, they must go beyond technical amendment and address the underlying realities of how harm is experienced, interpreted, and reported in the workplace.

At present, the system remains:

• Inconsistently applied due to ambiguity in key definitions.

• Overly focused on acute events, with insufficient visibility of occupational ill health.

• Heavily employer-driven, with limited integration of worker voice and experience.

• Less effective at identifying harm experienced by vulnerable, isolated, or otherwise under-represented groups of workers.

Addressing these issues is essential if RIDDOR is to function as an effective tool for prevention rather than a retrospective record of harm.

Proposal 1 – Clarifying Definitions

Unite supports efforts to clarify the definitions of "work-related" and "routine work". However, revised guidance should explicitly recognise that work-related harm may arise not only from physical equipment, substances, and workplace conditions, but also from how work is organised, supervised, and performed.

The consultation correctly recognises that work organisation and supervision can be causal factors in work-related incidents. Unite believes this principle should be applied consistently to psychosocial hazards, including excessive workload, long working

hours, fatigue, lack of control, inadequate staffing levels, bullying, harassment, and inappropriate management practices.

Clear recognition of these factors would improve consistency in reporting and better reflect contemporary understandings of workplace health and safety.

Proposal 3 – Broadening Diagnostic Pathways

Unite supports widening the range of healthcare professionals able to diagnose reportable occupational diseases.

In addition to the proposed changes, consideration should be given to the inclusion of Registered Occupational Psychologists and Clinical Psychologists where work-related mental ill health is concerned.

Current arrangements often create barriers to recognising occupational stress, burnout, and other psychological injuries, particularly where workers rely on brief GP consultations that may not fully explore workplace causation. Expanding diagnostic pathways would improve reporting accuracy and provide a more realistic picture of the health impacts arising from work.

Proposal 4 – Dangerous Occurrences

Unite supports the review and updating of Schedule 2 dangerous occurrences.

Particular consideration should be given to sectors such as energy and utilities, where workers are routinely exposed to high-consequence hazards including electrical flashovers, pressure-system failures, confined spaces, remote lone working, and major infrastructure failures.

Consideration should also be given to the transport sector, where a significant number of workers spend much or all of their working time travelling. Bus drivers, lorry drivers, delivery workers, rail workers and others whose duties involve driving or travelling are exposed to risks arising from road traffic collisions, near misses, fatigue, vehicle defects, adverse weather conditions and interactions with members of the public. The reporting framework should ensure that serious transport-related incidents and precursor events are appropriately captured where they provide valuable learning opportunities and indicate emerging risks.

Unite further believes that the exclusion of many work-related road traffic incidents from RIDDOR creates a significant gap within the reporting framework. Millions of workers drive as part of their employment, and work-related driving remains one of the most significant causes of occupational fatality and serious injury. Where driving is undertaken in the course of work, the resulting fatalities and serious injuries should be reflected within national health and safety reporting systems. Failure to do so risks underestimating the true burden of work-related harm, limits opportunities for

prevention and enforcement, and reduces visibility of risks faced by workers and other road users alike.

More broadly, the dangerous occurrence framework should recognise that high-potential incidents occur across all sectors of the economy. Whether in manufacturing, construction, healthcare, logistics, retail, utilities, agriculture, transport or service industries, there is value in capturing events that may not result in immediate injury but nevertheless reveal significant weaknesses in risk controls.

The reporting framework should therefore ensure that significant precursor events and near misses are captured where they provide valuable intelligence regarding emerging risks. Effective prevention depends not only on understanding incidents that cause harm, but also on identifying and learning from events that had the potential to result in serious injury, ill health or loss of life.

Proposal 5 – Improving Reporting Processes and Data Quality

Unite welcomes efforts to modernise and simplify reporting arrangements. However, the current system remains overwhelmingly employer led. Workers often have limited visibility of what has been reported on their behalf and no practical mechanism to challenge inaccurate or incomplete information. To improve transparency and data quality, Unite recommends that the reporting system incorporates a worker verification mechanism. Following submission of a report, affected workers should be provided with access to the information submitted and given the opportunity to raise concerns directly with HSE where appropriate. This would improve confidence in the system, strengthen data quality, and ensure that workers' experiences contribute meaningfully to regulatory intelligence.

Occupational Ill Health and Vulnerable Workers

A modernised RIDDOR framework should better reflect the realities of occupational ill health, particularly where harm develops gradually, is difficult to diagnose, or affects workers who are isolated from traditional workplace support structures. Unite believes particular attention should be given to vulnerable groups, including migrant workers, agency workers, domestic workers, and others who may experience barriers to reporting harm. Domestic workers are frequently excluded from conventional workplace health and safety arrangements despite facing risks associated with hazardous substances, manual handling, fatigue, violence, harassment, isolation, and excessive working hours. The fact that work is undertaken within a private household should not render workers invisible within national systems of health and safety reporting and prevention.

Work carried out within private homes can involve exposure to hazardous substances, manual handling risks, fatigue, violence, harassment, isolation, and poor working conditions. While workplaces differ significantly, the reporting system should ensure

that no category of worker becomes effectively invisible within national health and safety data simply because of the setting in which work takes place.

Effective regulation depends upon visibility of risk wherever work occurs.

Work-Related Violence

Unite believes that work-related violence should be recognised as a preventable occupational health and safety risk rather than solely a behavioural or criminal justice issue. Violence at work is frequently linked to workplace factors including lone working, inadequate staffing levels, excessive workload, fatigue, poor job design, insufficient training, and a lack of appropriate safeguards. Workers in public-facing roles, including those in retail, transport, healthcare, hospitality, care and other service sectors, may be particularly exposed.

The reporting framework should support greater visibility of work-related violence and its causes, recognising the close relationship between violence, stress, mental ill health, harassment and precarious work. Improving the collection and analysis of data relating to workplace violence would support more effective prevention, regulatory intervention and organisational learning, whilst ensuring that employers properly assess and manage violence as a workplace hazard.

Work-Related Suicide Reporting

Unite strongly supports the inclusion of work-related suicides and work-place stress within the reporting framework. HSE's statistics demonstrate:

- Total Cases: 964,000 workers (new or long-standing).
- Working Days Lost: 22.1 million days lost explicitly due to stress, depression, or anxiety.
- Time Away: An average of 22.9 days lost per case

The current absence of any reporting mechanism represents a significant gap in the system, limiting visibility of the most severe outcomes associated with psychosocial risk. This position is consistent with the duties already established under Sections 2 and 3 of the Health and Safety at Work etc. Act 1974, which place obligations on employers to protect both physical and psychological health so far as is reasonably practicable. Any reporting mechanism should include appropriate safeguards. Reporting should not be subject to standard reporting deadlines and should ordinarily follow the conclusion of a Coroner's inquest or equivalent formal determination. This would help ensure that reporting is based on established facts and avoid unnecessary distress to bereaved families. Published data should be anonymised to protect individuals while still providing meaningful information regarding sectors, occupations, and risk factors.

This would support regulatory intervention, research, and prevention activity while maintaining appropriate confidentiality.

Conclusion

A modernised RIDDOR framework should:

- Provide clear, practical, and consistently understood definitions.
- Capture the full spectrum of work-related harm, including long-latency disease and psychosocial risk, workplace violence, sexual harassment and heat stress.
- Enable greater transparency and worker involvement in the reporting process.
- Improve visibility of harm affecting vulnerable and under-represented workers.
- Ensure that all workers, including domestic workers and those working in private households, are visible within health and safety reporting systems and afforded appropriate protection.
- Support high-quality, actionable data that informs regulatory intervention and organisational learning.
- Strengthen the focus on prevention rather than retrospective recording.

Unite further believes that no worker should be excluded from effective health and safety protection simply because their workplace is a private home. Domestic workers, many of whom experience isolation, fatigue, hazardous exposures and barriers to reporting concerns, must be visible within systems designed to prevent harm and promote safe and healthy work.

Ultimately, the effectiveness of RIDDOR should be judged not only by the volume of reports submitted, but by its ability to reveal where harm is occurring, enable timely and targeted intervention, and drive continuous improvement in how risks are managed.

By addressing both structural and cultural barriers to accurate reporting, the Health and Safety Executive can ensure that RIDDOR evolves into a framework that reflects the realities of modern work and supports the shared objective of preventing harm in all its forms. We are calling for a modern framework to capture modern risks.