

2026

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2025 Consultation Report

PUBLIC CONSULTATION RESULTS

Health and Safety Inspectorate

Version Control

1	Health and Safety Inspectorate	26/05/2026	Initial
2	RIDDOR Regs 2025	01/06/2026	Review

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2025 Consultation Report

<https://consult.gov.im/environment-food-and-agriculture/riddor-regulations-2025>

This report was created on Tuesday 26 May 2026 at 11:54

The activity ran from 21/11/2025 to 31/03/2026

Responses to this survey: **6**

EXECUTIVE SUMMARY OF RESPONDENT COMMENTS:

Responses indicated strong support for aligning the IOM's reporting framework with UK RIDDOR standards, with stakeholders recognising the benefits for consistency, clarity, and cross-jurisdiction working. However, this support is accompanied by a clear expectation that alignment should be coherent and intuitive in practice, particularly through closer alignment of structure, numbering, and key thresholds.

A central theme emerging from the consultation is the importance of clarity in how reporting requirements are to be defined and applied. While many respondents were comfortable with the overall framework, concerns focus on specific areas where differences from UK arrangements, particularly around incapacity thresholds and definitions, may create confusion for duty holders. This was seen as a potential risk to consistent reporting and could contribute to misinterpretation or under-reporting if not clearly explained.

The proposed implementation approach is generally considered reasonable and achievable, with respondents indicating that the lead-in period should allow organisations to prepare. However, the effectiveness of implementation was seen as dependent on clear communication and sufficient awareness-raising, ensuring that changes are well understood across industry before coming into force.

There was a consistent message that practical support and guidance would be important, although views differed on the extent required. Suggestions focused on training, transitional arrangements, and sector-specific engagement, alongside broader communication efforts to ensure clarity of obligations and reporting expectations.

Finally, respondents highlighted the importance of minimising unnecessary administrative burden while maintaining effective reporting, with particular emphasis on ensuring that thresholds and definitions support meaningful data collection without creating confusion. Overall, stakeholders supported the direction of travel but emphasised that clear, aligned rules and effective communication would be critical in achieving accurate and consistent reporting in practice.

We asked:

The Department of Environment, Food and Agriculture (DEFA) has been reviewing specific UK Health and Safety legislation to form a judgment on whether the Island would benefit from greater alignment with UK Health and Safety Executive (HSE) standards. As part of that process, consideration has also been given to whether this UK HSE legislation would enhance public and worker safety for offshore energy developments. This process has culminated in public consultation of specific draft legislation, with the starting point for most of the legislation being existing UK legislation.

DEFA has welcomed stakeholder and public feedback on the proposed health and safety legislation, and where appropriate any associated guidance documentation, through this public consultation process.

You Said:

Responses showed strong support for aligning the IOM's reporting framework with UK standards, recognising benefits for consistency, clarity, and cross-jurisdiction working. However, stakeholders emphasise that alignment must be clear and practical, particularly through closer consistency in structure, numbering, and key thresholds. A key theme was the need for clarity in reporting requirements, with concerns that differences from UK arrangements, especially around incapacity thresholds and definitions, could lead to confusion and potential under-reporting if not clearly explained.

The proposed implementation approach was generally considered appropriate, but its success will depend on effective communication and awareness-raising to ensure industry understanding ahead of introduction. Respondents also highlighted the importance of proportionate support, including guidance, training, transitional arrangements, and communication, to support consistent application. Overall, while the direction of travel is supported, stakeholders stressed that clear, aligned rules and strong communication would be critical to ensuring accurate, consistent, and meaningful reporting in practice.

We did:

The DEFA Health and Safety at Work Inspectorate (HSWI) is grateful to all those who took the time to consider and respond to this consultation. Due to the December 2025 holiday period and the limited number of initial responses received, it was decided to extend the closing date of the outstanding health and safety legislation consultations to 31 March 2026.

The consultation process and responses received informed the Department's assessment of the benefits of the proposed legislation. All consultation responses were considered in detail, alongside direct engagement with relevant Manx businesses. The consultation process has therefore informed the Department's decision making. Having considered all available information, the Department has decided to pause the introduction of this tranche of legislation until further notice.

Further engagement between DEFA HSWI and the UK Health and Safety Executive (HSE) will take place in June 2026. Should the Department subsequently decide to proceed with the introduction of any of the draft legislation, this will first be reviewed against the latest position of the relevant UK legislation and updated where necessary. If any substantive changes are made as a result, a further public consultation exercise may be undertaken.

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CONSULTATION QUESTIONS

Question Number	Title	Total Responses
1	Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?	6 (100.00%)
2	Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?	6 (100.00%)
3	Is the proposed implementation strategy and timescale for the introduction of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2025 appropriate for industry readiness?	6 (100.00%)
4	Are there any specific support mechanisms (e.g. guidance, training, transitional arrangements) that would help you or your organisation prepare for the new legislation?	6 (100.00%)
5	Do you have any other comments on the draft Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2025 legislation attached to this stage of the overall consultation process?	4 (66.67%)
6	Is there anything else you'd like to tell us about the proposed changes or the consultation process?	2 (33.33%)

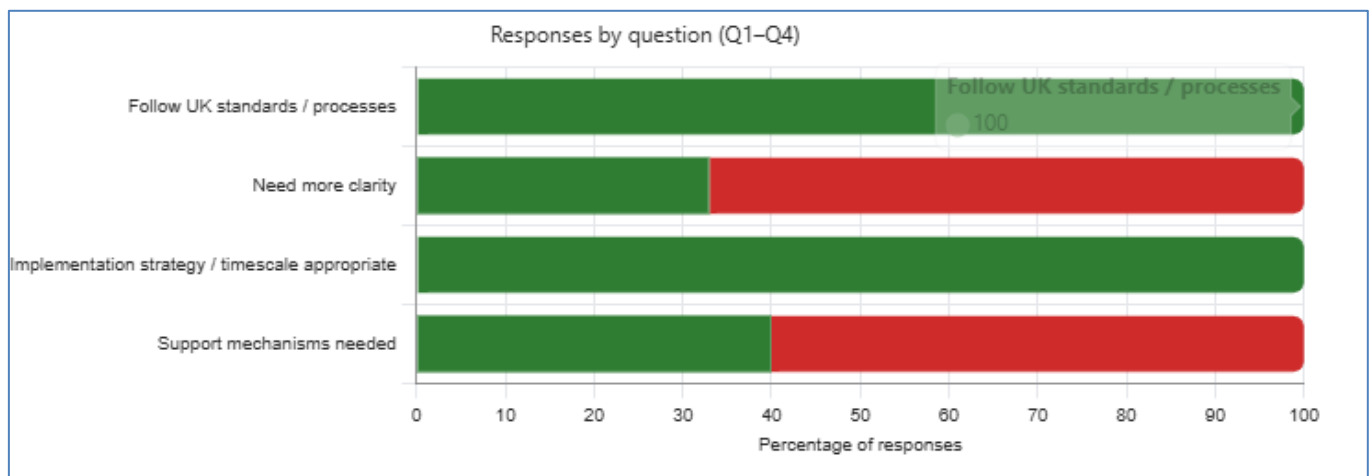


Fig 1:
Question (Q1–Q4) - Percentage of Responses (Yes/Agree, No/Disagree, Not Answered)

CONSULTATION QUESTIONS – INDIVIDUAL SUMMARY OF RESPONSES BY QUESTION

1. Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?

There was strong overall support for alignment with UK standards and processes. Respondents generally saw this as beneficial for consistency, clarity, and reducing uncertainty, particularly for organisations operating across both the IOM and the UK. Construction IOM supported alignment for both onshore and offshore activities, while other respondents said standardisation would help duty-holders understand which rules apply across jurisdictions. Ramsey Town Commissioners also supported broadly consistent standards but welcomed the fact that some flexibility had been retained in the draft, particularly around reporting deadlines.

2. Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?

Views were mixed, with several respondents saying no further clarity was needed, but some raising specific concerns. Douglas City Council and Construction IOM both commented that the numbering and structure should align more closely with the UK RIDDOR format. Construction IOM also recommended adopting the UK over-7-day reporting threshold for non-fatal injuries, rather than retaining the previous over-3-day threshold. One respondent asked for clarification on the meaning of 3-day incapacity due to work-related illness or injury, including whether it applies to all injuries or only specified ones, and whether reports are medically certified or employee-reported. One individual respondent also highlighted the potential for confusion arising from the different 3-7 day incapacity durations and stressed the need to explain how incapacity should be understood in practice.

3. Is the proposed implementation strategy and timescale for the introduction of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2025 appropriate for industry readiness?

Responses were generally supportive. Most respondents who answered this question considered the proposed implementation approach and timescale appropriate. Ramsey Town Commissioners explicitly welcomed the later implementation date, and one individual respondent said the approach was acceptable subject to adequate publicity in good time. However, not all respondents gave further detail, and one respondent left the question unanswered.

4. Are there any specific support mechanisms that would help you or your organisation prepare for the new legislation?

There was some support for additional implementation support, although not all respondents felt it was necessary. Douglas City Council suggested an HSWI workshop to provide a practical overview. Construction IOM asked for training for the sector and clear transitional arrangements for industry. One individual respondent did not request training directly but emphasised that good publicity would be

important to reduce misunderstanding and under-reporting. Other respondents said no specific support mechanisms were needed or did not answer the question.

5. Do you have any other comments on the draft legislation?

Additional comments focused mainly on reporting thresholds and under-reporting risks. Construction IOM repeated its view that the IOM should move to the UK approach for reporting non-fatal injuries involving more than 7 consecutive days' incapacity, arguing that this would improve consistency, reduce administrative burden, and focus reporting on more meaningful data. One individual respondent warned that under-reporting is already high in the UK and said this risk could increase if differences between IOM and UK reporting thresholds are not clearly communicated. That respondent also highlighted common misunderstandings around how incapacity is calculated, including that it covers calendar days, not just working days, and relates to inability to do normal work, not simply absence. Other respondents had no further comments.

6. Is there anything else you'd like to tell us about the proposed changes or the consultation process?

Only limited additional comments were provided. Most respondents either answered No, gave no further detail, or left the field blank. The clearest additional point came from one individual respondent, who stressed that effective implementation would depend on clear explanation and publicity, particularly to avoid unintentional under-reporting caused by misunderstanding of incapacity rules.