

Safety Representatives and Safety Committees Regulations 2025 Consultation Report

PUBLIC CONSULTATION RESULTS

Health and Safety Inspectorate

Safety Representatives and Safety Committees Regulations 2025-Consultation Report

Version Control

1	Health and Safety Inspectorate (HSWI)	12/05/2026	Initial
2	HSWI	01/06/2026	Review

Safety Representatives and Safety Committees Regulations 2025 Consultation Report

<https://consult.gov.im/environment-food-and-agriculture/safety-representatives-and-safety-committees-regs>

This report was created on Tuesday 12 May 2026 at 09:50

The activity ran from 31/10/2025 to 31/03/2026

Responses to this survey: 8

EXECUTIVE SUMMARY OF RESPONDENT COMMENTS:

Overall, respondents expressed strong support for the proposed Safety Representatives and Safety Committees Regulations 2025 and for aligning IOM health and safety legislation with established UK standards and processes. Alignment was widely seen as good practice that provides clarity and consistency, although several respondents emphasised the importance of retaining proportionate flexibility to reflect the Island's scale, resources and organisational diversity.

Most respondents felt the draft Regulations were generally clear, but a minority highlighted the need for clearer guidance on the scope, limits and practical application of safety representatives' roles, particularly around facility time (paid time off from their normal job to allow trade union or employee safety representatives to carry out their statutory health and safety functions) and the fair treatment of shift workers.

While the proposed implementation strategy and timescale were broadly supported, some public-sector bodies raised concerns about readiness due to budget cycles and governance constraints, suggesting that a later commencement date would better support effective planning.

Where additional support were requested, respondents prioritised clear IOM specific guidance, clarity on the use and status of UK HSE guidance and ACOPs, and robust, proportionate training for safety representatives. Taken together, responses indicated broad endorsement of the Regulations in principle, with successful implementation dependent on clear guidance, realistic timescales and a proportionate, practical approach.

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:

Respondents strongly supported aligning IOM health and safety legislation with UK standards, seeing this as good practice that provides clarity and consistency, while stressing the need for a proportionate, flexible approach suited to the Island. Most felt the draft Regulations were clear, though some asked for clearer guidance on the role and limits of safety representatives, particularly around facility time and the fair treatment of shift workers. While the proposals were broadly welcomed, several respondents highlighted the importance of realistic implementation timescales, clear IOM specific guidance, and appropriate training to ensure the Regulations can be applied effectively without disproportionate impacts on organisations.

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?	8 (100.00%)
2	Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?	8 (100.00%)
3	Is the proposed implementation strategy and timescale for the introduction of the Safety Representatives and Safety Committees Regulations 2025 appropriate for industry readiness?	8 (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?	8 (100.00%)
5	Do you have any other comments on the draft Safety Representatives and Safety Committees Regulations 2025 legislation attached to this stage of the overall consultation process?	5 (62.50%)
6	Is there anything else you'd like to tell us about the proposed changes or the consultation process?	4 (50.00%)

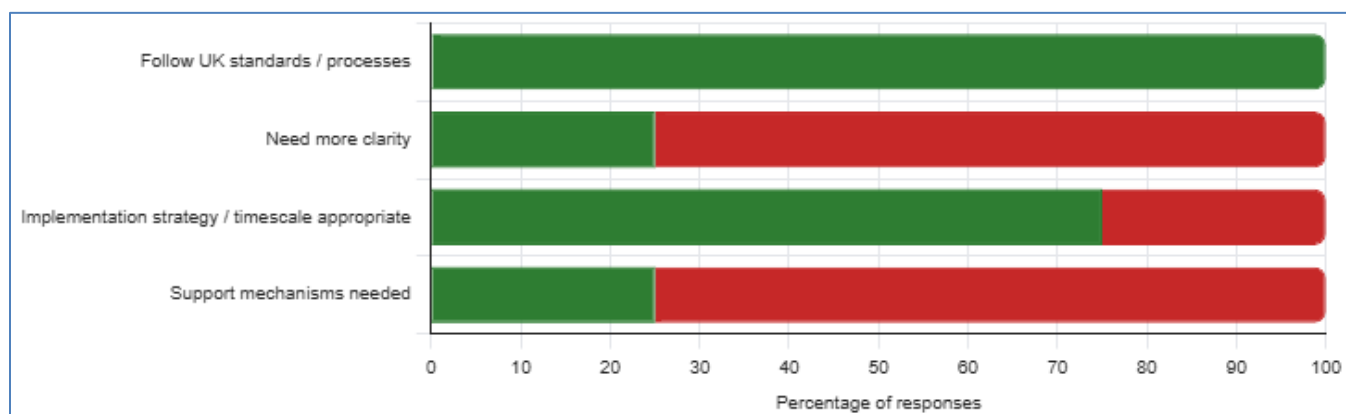


Fig 1:
Question (Q1–Q4) - Percentage of Responses (Yes/Agree, No/Disagree, Not Answered)

CONSULTATION QUESTIONS – INDIVIDUAL SUMMARY OF RESPONSES BY QUESTION

Q1. Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?

Respondents consistently supported alignment with UK standards, describing this as good practice that promotes consistency and avoids ambiguity. A recurring nuance was that, while alignment would be welcomed, the Island should retain some flexibility/proportionality to reflect local scale and resources. One respondent also highlighted a practical drafting point, keeping regulation numbering consistent with UK regulations to aid usability.

Q2. Are there any parts of the legislation that require more clarity to aid understanding and assist with compliance?

While most respondents felt the draft is generally clear, those seeking clarity focused on two themes. The first being facility time, particularly how paid time off/compensation should apply where union/safety representatives are shift workers and meetings fall outside rostered hours; and secondly clearer guidance on the scope, remit and limitations of safety representatives' roles, including expectations that powers are used reasonably, proportionately and constructively, avoiding unnecessary burden or disruption.

Q3. Is the proposed implementation strategy and timescale appropriate for industry readiness?

Most respondents agreed the approach/timescale is appropriate, but two public-sector respondents (local authority / joint board context) considered the proposed commencement date (referenced as 1 Oct 2026) problematic. Their reasoning was largely practical: budget-setting and governance cycles constraining the ability to plan, cost, consult, train and coordinate across organisations, so a later start would support structured implementation and sustainable compliance.

Q4. Are there any specific support mechanisms (e.g. guidance, training, transitional arrangements) that would help prepare for the new legislation?

Where support was requested, respondents prioritised clear IOM specific guidance (including material tailored to public-sector employers and smaller organisations), clarity on the status and use of UK HSE guidance and ACOPs, and opportunities for early engagement/briefings. There was also emphasis on robust training for safety representatives before exercising statutory functions, covering purpose, limits of powers/inspection rights, and expectations around proportionality and constructive engagement. One respondent specifically asked for facility time documentation/guidance, and others suggested consideration of financial support where implementation costs would be difficult to absorb within existing funding constraints.

Q5. Do you have any other comments on the draft Regulations?

Respondents' additional comments largely reinforced operational practicality. Key points included: a detailed request that facility time should explicitly cover union/safety rep duties outside shift hours (with concerns about unfair disadvantage for shift workers); and broader caution that paid time off, training and consultation requirements may have disproportionate operational impacts in small teams or multi-site operational environments. Proportionality, clear guidance, and balancing engagement with service continuity/resilience were stressed.

Q6. *Is there anything else you'd like to tell us about the proposed changes or the consultation process?*

Most respondents simply answered “No”, but two reiterated overarching conditions for success: the Regulations are supported in principle, and effective implementation will depend on realistic timescales, clear guidance, and alignment with public-sector governance, funding and coordination arrangements.