

## Workplace (Health, Safety and Welfare) Regulations 2025 Consultation Report

### PUBLIC CONSULTATION RESULTS

Health and Safety Inspectorate

#### Version Control

|   |                                       |            |         |
|---|---------------------------------------|------------|---------|
| 1 | Health and Safety Inspectorate (HSWI) | 26/05/2026 | Initial |
| 2 | HSWI                                  | 01/06/2026 | Review  |
|   |                                       |            |         |
|   |                                       |            |         |

## Workplace (Health, Safety and Welfare) Regulations 2025 Consultation Report

<https://consult.gov.im/environment-food-and-agriculture/workplace-health-safety-and-welfare-regulations>

This report was created on Tuesday 26 May 2026 at 14:16

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

Responses to this survey: 10

## **EXECUTIVE SUMMARY OF RESPONDENT COMMENTS:**

Consultation responses indicated strong overall support for aligning the IOM's health and safety framework with UK standards and processes, recognising the benefits for consistency, clarity, and cross-jurisdictional working. However, respondents consistently emphasised that such alignment should remain proportionate and adapted to the Island's scale, resources, and operational realities.

While the draft legislation was generally considered clear, stakeholders highlighted the need for greater practical guidance, particularly on application in older buildings, public-sector estates, and complex workplace settings. Clarification was also sought on the status and applicability of UK guidance and ACOPs, and on key legal concepts in a local context.

The proposed implementation timetable was broadly supported but viewed by some as ambitious, given capacity constraints, funding processes, and the scale of potential upgrades required. Respondents stressed the importance of sufficient lead-in time, phased implementation, and alignment with governance and budget cycles.

There was clear demand for additional support to aid compliance, including tailored guidance, training, workshops, and sector-specific examples, alongside clarity on competency requirements and increased occupational health capacity. Some respondents also noted the potential need for financial assistance where significant capital investment is required. Across the responses, there was a consistent emphasis on practical delivery: ensuring that regulation is clear, proportionate, and enforceable, and that implementation reflects the constraints of existing infrastructure and local capacity.

Views on regulatory approach were not uniform, ranging from calls for stronger enforcement and worker protections to objections to further regulation, but the overall position supported improved standards, provided they are to be introduced with realism, clarity, and adequate support.

**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 broadly supported aligning IOM health and safety standards with the UK, while stressing the need for a proportionate, Island-specific approach. Respondents asked for clearer, practical guidance, particularly for complex and older workplaces and more certainty on how UK guidance and ACOPs would apply locally.*

*Respondents felt that the proposed timetable was generally reasonable but potentially ambitious, highlighting the need for phased implementation aligned with funding and capacity constraints. Also identified was a need for targeted support, including guidance, training, and sector-specific examples, with some noting potential financial and resource pressures.*

*Overall, improved standards were supported, provided they were clear, practical, and deliverable, with realistic expectations on enforcement and implementation.*

**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.*

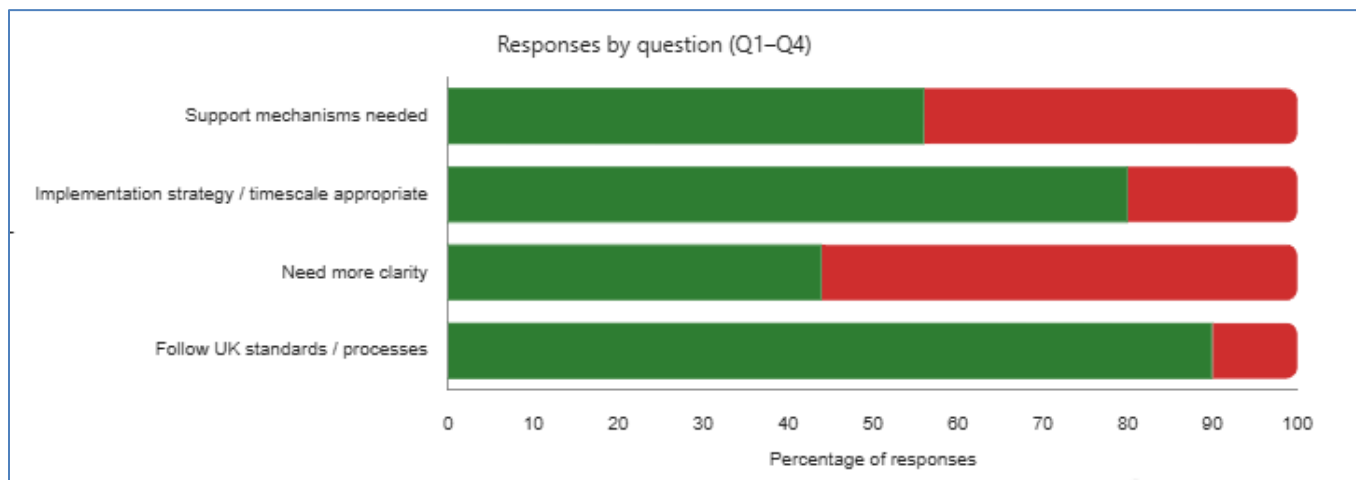
*The consultation process and responses received informed the Department's assessment of the benefits of the proposed legislation. All consultation responses were considered in detail, alongside direct engagement with relevant Manx businesses. The consultation process has therefore informed the Department's 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.*

## Workplace (Health, Safety and Welfare) Regulations 2025 Consultation Report

### 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?                                                     | 10 (100.00%)    |
| 2               | Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?                                        | 10 (100.00%)    |
| 3               | Is the proposed implementation strategy and timescale for the introduction of the Workplace (Health, Safety and Welfare) Regulations 2025 appropriate for industry readiness? | 10 (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?      | 10 (100.00%)    |
| 5               | Do you have any other comments on the draft Workplace (Health, Safety and Welfare) Regulations 2025 legislation attached to this stage of the overall consultation process?   | 7 (70.00%)      |
| 6               | Is there anything else you'd like to tell us about the proposed changes or the consultation process?                                                                          | 8 (80.00%)      |



**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. Many respondents described this as good practice that would improve consistency, clarity, and regulatory compatibility, particularly for employers, contractors, and duty holders working across jurisdictions. Several respondents, including local authority and public-sector bodies, said the UK framework was well understood and provided a familiar basis for implementation. However, this support was not unqualified. Some respondents stressed that alignment should still allow for proportionate adaptation to the IOM context, so that local scale, resources, and business impacts were properly reflected. One respondent was strongly opposed to further regulation in principle, arguing that the Island was already over-regulated, while another public respondent supported stronger standards and enforcement from a worker-protection perspective.

### **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 the draft was broadly clear, while others asked for additional detail in specific areas. A recurring point was the desirability of closer alignment with UK structure and numbering. Several public-sector respondents also asked for clearer guidance on how the regulations would apply in practice to older or legacy buildings, limited-footprint premises, multi-site estates, mixed-use workplaces, and public-sector environments. Other respondents highlighted the need for explicit clarification on the status of UK guidance and ACOPs, including which UK documents should be followed and how concepts such as “so far as is reasonably practicable” should be interpreted locally. One worker representative sought stronger and more explicit wording around employers’ duties to actively consult safety representatives, while another respondent raised the importance of whistleblowing and practical enforceability.

### **3. Is the proposed implementation strategy and timescale for the introduction of the Workplace (Health, Safety and Welfare) Regulations 2025 appropriate for industry readiness?**

Responses were generally supportive, but not unanimous. A number of respondents felt that the proposed commencement date gave enough time for budgeting, planning, estate reviews, and phased implementation, particularly where works need to be programmed over several years with a lead-in period broadly supported with structured compliance planning and alignment with governance and budget cycles. At the same time, some respondents expressed concern that the current timeline may still be too ambitious, particularly given the scale of change, the range of specialist disciplines involved, the likely demand for training, and the Island’s limited capacity in areas such as occupational health and technical support. Some also noted that borrowing approvals, loan petitions, climate impact assessments, and other approval processes might materially affect delivery, even where organisations supported the regulations in principle. A small number of respondents opposed the proposals or implementation timescale outright.

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

There was clear support for additional implementation support, although not all respondents felt it was required. Suggestions included clear guidance, training, practical workshops, checklists, sector-specific examples, briefing opportunities, and transitional or phased implementation support. Douglas City Council suggested an HSWI workshop, while several public-sector respondents asked for IOM specific guidance aligned with UK HSE L24 guidance, together with practical examples relevant to public buildings, operational estates, and local authority settings. A number of respondents also pointed to wider capacity and infrastructure needs. These included clearer definition of what training or qualifications would be considered suitable, increased occupational health capacity, clarification on the status of UK ACOPs versus guidance, and, where appropriate, financial assistance from central government to support compliance, especially where capital works or structural upgrades are needed. A worker representative also stressed the need for training for both employers and safety representatives, particularly around consultation rights, inspections, and safety committees.

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

Additional comments focused largely on practical implementation, proportionality, enforcement, and the realities of existing building stock. Several public-sector respondents emphasised that compliance with provisions relating to welfare, accessibility, rest facilities, and sanitary conveniences may require structural alterations or capital investment, especially in older buildings or premises with limited physical footprints. These respondents argued that guidance and enforcement should allow for phased compliance, interim arrangements, alternative design solutions, and a risk-based approach where full compliance is not immediately achievable. Other comments pulled in different directions. One respondent wanted the rules to be robust and actively enforced, including more frequent visits to local companies. One respondent described the regulations as overdue and emphasised the value of strong, independent safety representation. By contrast, one respondent objected in principle to further regulation and described the wider regulatory approach in strongly negative terms.

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

Not all respondents added points here, but those who did largely reinforced earlier themes. Public-sector and local-authority respondents stressed that effective implementation would depend on clear guidance, realistic timescales, recognition of governance and funding constraints, and proportionate enforcement. Several said that successful delivery would require the regulations to be applied in a way that reflects the practical conditions of Manx public buildings and statutory approval processes. Other respondents used this section to emphasise the importance of worker voice, real enforcement in practice, whistleblowing, and suitable workplace provision, while one respondent restated a broader objection to the direction of travel. Overall, the additional comments reinforced the picture of broad support for improved standards, but with strong emphasis on practical delivery, capacity-building, and clarity about how compliance would be expected and enforced