



The business people – an extension to your team

Health and Safety Panel Report

May 2012

Introduction

The Forum of Private Business is a proactive, not-for-profit organisation providing comprehensive support, protection and reassurance to small businesses. We add value to businesses through the collective voice for members in local, central and European government, and the provision of tailored solutions that promote business success.

Our Health and Safety Panel comprises approximately 130 members who have volunteered to provide feedback to us on health and safety matters. Traditionally, we have contacted panel members on an *ad hoc* basis to gather feedback on specific issues, however, we now engage more regularly with the business owners on our member panels to better understand and collect evidence of their real life experiences, to more effectively reinforce our policy and campaigns activities. This is the third report from the Health and Safety Panel.

Note: as panel figures refer to just over 100 businesses, they should be treated as indicative of rather than representative of all small and medium-sized businesses.

Key findings

"I feel that any improvement will only be small as we need to get rid of the USA-style court approach and force people to take responsibility, or at least partial responsibility, for their own actions." *Health and Safety Panel member*

- 87% of panel members agreed with the strategic aims proposed by the Löfstedt review, with the focus on common sense and streamlining of laws particularly welcomed. Overall 42% of businesses felt that the HSE should be given authority over local enforcement activity as this would lead to greater consistency, citing the expertise at the HSE together with geographical inconsistencies in enforcement.
- Cynicism among businesses remain around the impact the recommendations may have on their business in terms of reducing costs of, or time required for, compliance. However, some businesses did indicate it would be easier to expand if the recommendations are implemented. Importantly, no business felt that the recommendations overall would have a negative impact.
- Panel members reported that the advantages internationally of a good health and safety policy were marginal at best and some reported that the benefits did not give a good return on investment for exporters. In the UK, a higher proportion of businesses felt that there were advantages both nationally and locally, as good policies allowed a more level playing field.
- Just over half the panel members wanted to see both business size and seriousness of breach taken into account in the new 'Fee for Intervention' proposals. Overall, two in three businesses want the size of business taken into account and four in five want the seriousness of the breach to impact on the level of cost recovery.
- Panel members felt that the goal of a 'risk intelligent society' would require a change of attitude in society at large with individuals taking responsibility for their own actions.
- Businesses believed there should be more support in lieu of more regulation. Some businesses felt that the Forum's Health and Safety Guide should be distributed free and others felt more guidance documents should be available from the HSE. Free site visits and better internet resources would also help alongside the reintroduction of the HSE's information line.
- Overall there has been a slight jump in the burden of health and safety regulation from 4.0 to 4.3 out of 10, however taking into account the relatively small sample the change is not statistically significant.

Recommendations

- The Health & Safety Executive must ensure that guidelines on what constitute a material breach are easily accessible and easily understood. Members of the Forum of Private Business are clear that they want the Health and Safety Executive to help them achieve - and maintain - compliance, not simply punish them when they fall short. We welcome recent attempts to simplify the health and safety guidance available to businesses (Health and Safety made Simple) but believe more must be done to ensure that businesses trust inspectors to support - not penalise - their efforts. If a business can demonstrate it applied health and safety policy according to a reasonable understanding of a material breach this should be taken into account in rectifying the breach.
- Increased flexibility must be introduced into proposed 'fee for intervention'. At present, the fee is set at £124 per hour. Without flexibility, the smallest businesses will be disproportionately hit by the policy, as recognised by the Impact Assessment at the time. Such inflexibility not only fails to take into account individual circumstances, but places an unnecessary burden on businesses that have strived but fallen just short of health and safety requirements on the same footing as businesses who have wilfully disregarded their obligations.
- Current payment arrangements for 'Fee for Intervention' are too inflexible and will cause some businesses problems as a result. We call on the HSE to ensure a service that would allow businesses to pay costs over a more sympathetic period of time if necessary, a period that can be negotiated once the fee has been accepted by the business. In most cases this will not be necessary, but the capacity should still exist to help those businesses afford payment to the HSE.
- Local regulators should ensure certainty of advice to businesses. Of all the recommendations in Lord Young's report on health and safety, businesses were overwhelmingly positive about consolidating health and safety regulations into a single set of accessible regulations. Small firms pay almost £6 billion per year to outside consultants in exchange for support on complying with regulations - more than a third of their £16.8 billion annual red tape bill.
- We urge the HSE and Government to continue to work towards health and safety policy that is focused on ensuring a workplace is safe but that the balance of risk is shared between employers and their staff.
- Schools should introduce more classes that teach young people the basics of health and safety. Certification of first aid abilities, or understanding the basics of lifting heavy loads, would save businesses significant training costs in the future, by allowing them to see evidence of a basic level of common sense and knowledge of health and safety.
- In order to bring regulators and businesses closer together we recommend use of the Business Buddy scheme, placing parliamentarians and regulators in local businesses for half day sessions, creating valuable insights into the day-to-day operation of businesses and better understanding of their experiences of being regulated.

The business view of the Löfstedt strategy

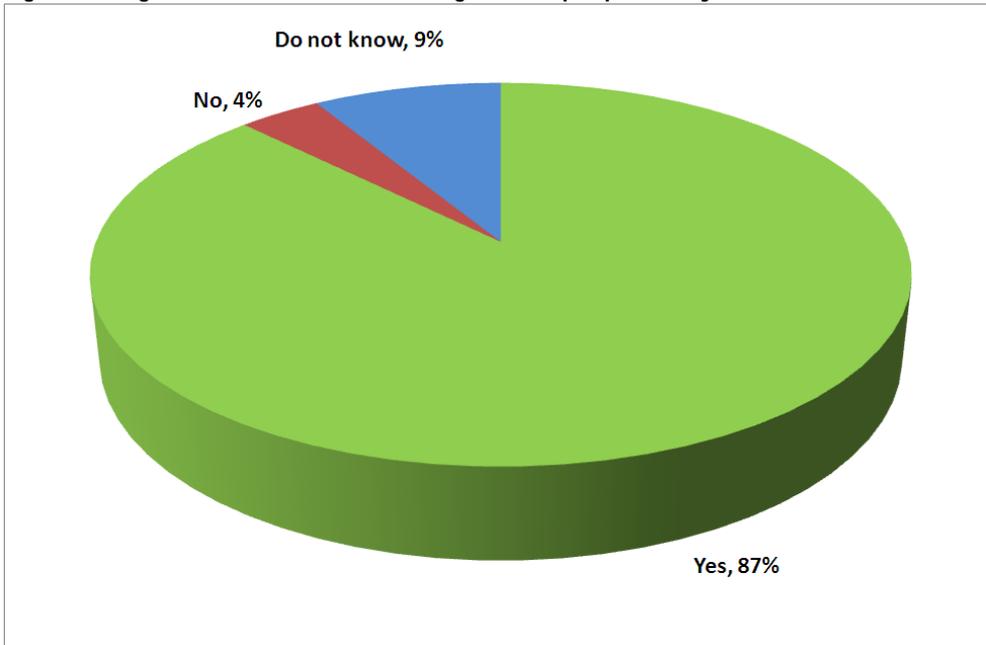
"Health and safety regulations should be focussed fairly yet also in areas that pose the most risk to employees and others." *Health and Safety Panel member*

In November 2011 the Löfstedt review was published. It noted the problem of health and safety misapplication and set out the following objectives to tackle that problem:

- Streamlining the body of regulation, in particular through sector consolidation,
- Redirecting enforcement activity toward businesses where there is the greatest risk of injury or ill health,
- Rebalancing the civil justice system by clarifying the status of pre-action protocols (the rules about how businesses approach a dispute, before issuing legal proceedings) and reviewing strict liability provisions so that businesses who have acted reasonably can defend themselves.

We asked panel members if they felt that broadly this was the right stand point to adopt, with 87% agreeing it was.

Figure 1: Agreement with the strategic aims proposed by the Löfstedt review



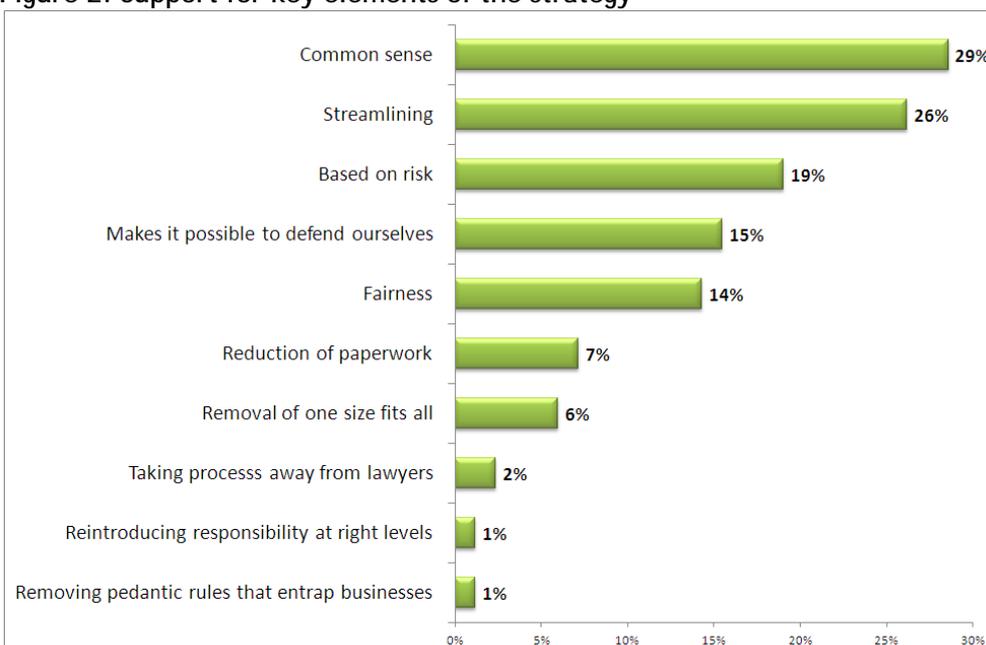
“At least it is some way towards common sense.” *Health and Safety Panel member*

An analysis of why panel members liked the approach is shown in Figure 2. Mainly support came for the common sense approach to health and safety, in particular a rebalancing of the legal system that would mean business owners are less likely to need to second guess as many potential, future causes of litigation.

“I have long felt that health and safety regulation was becoming far too complicated and most small companies in particular struggle with paperwork let alone the compliance.” *Health and Safety Panel member*

The streamlining of laws and the reduction of paperwork were also a key element in panel members being positive about the strategic approach adopted. One business felt that taken together these steps would mean that they were less likely to be caught out by minor rules of which they had never been made aware.

Figure 2: Support for key elements of the strategy



“Although health and safety is necessary in many industries it has been applied in a totally inappropriate ‘one size fits all’ manner that puts unnecessary constraints on small business. Anything that simplifies it and reintroduces a common sense element is welcome.” *Health and Safety Panel member*

Fairness and focusing risk where it is really needed were both popular suggestions - one owner contrasted the pursuit of small businesses on the ‘working at height regulations’ with the excessive risks that were taken by rail companies and other large businesses. Panel members also wanted to get away from the “one size fits” all approach to a more deep-rooted and effective method of assessing workplace safety, taking into account the more informal approach that smaller companies prefer to take and which is often more effective than a very formalised, documented approach.

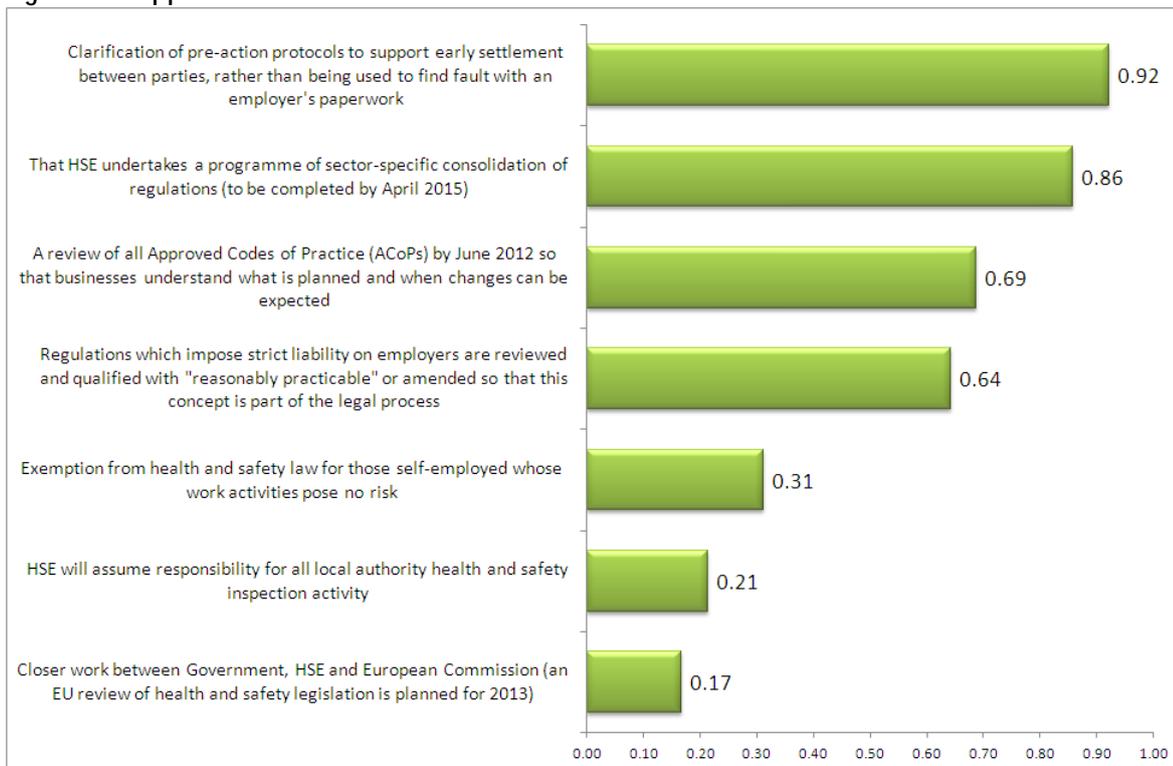
Of the panel members that felt the Löfstedt approach was not right for their business, concerns were the potential loss of the reactive approach to health and safety as well as concerns about industry definition. Those that were unsure were concerned about whether this impact would be acceptable legally, particularly in terms of the EU regulatory framework. Finally, there were some concerns that the approach was only as good as the sector reviews themselves, or outcomes of disputes in the courts.

The business view on the Löfstedt recommendations

“Some of his (Löfstedt’s) recommendations are old rope. The sophistication we are witnessing in the workplace, for example new equipment and state-of-the-art processes, must demand the same in reviews.” *Health and Safety Panel member*

Panel members were asked whether they felt that the recommendations would, from their perspective, have a positive or negative impact if they were introduced. Responses were scored using a system of +1 for a positive impact, 0 for no impact and -1 for a negative impact.

Figure 3: Support for the Löfstedt recommendations



The clarification of pre-action protocols to support early settlement between parties, rather than being used to find fault with the employer’s paperwork, was overwhelmingly supported by panel members, as was a programme of sector specific consolidation of regulations by the HSE. For many businesses this personifies the ‘common sense’ approach to health and safety they have been looking for, ensuring that it is based on the needs of the workplace environment rather than form-filling that may or may not be relevant to their safety needs. These recommendations in particular were seen as logical steps from the overall approach that Löfstedt outlines.

“For the most part I think the recommendations made would be a positive step. As to whether they are the solution depends on how they are implemented. Civil servants do have an amazing ability to mess these things up!” *Health and Safety Panel member*

There was broad support for a review of ACOPs (intended to be published by June 2012) so that businesses understand requirements, when any changes will be introduced and the review and qualification of regulations that impose a strict liability on employers. The main benefit of having an up-to-date review of ACOPs and advanced warning of changes is greater certainty. Concerns tended to be over the implementation of the recommendations, particularly as previous ‘simplification’ legislation has been interpreted in such a way as to place a greater onus on the business owner. With an EU-wide review also planned for 2013 some concerns were raised that the approach could change yet again. There were also concerns over definition of “reasonably practicable” although the benefits of providing balance through the legal process were generally accepted.

“Something has to be done over the interpretation of H&S laws so I am not sure this is being tackled. Having (the) EU involved with our domestic H&S is a drawback. Some solutions seem to be answered in respect of Löfstedt goals.” *Health and Safety Panel member*

Although there was an overall positive reaction to the attitude to exemptions for the self employed whose activities pose no risk, the HSE assuming greater responsibility for inspection, and closer work between the Government, the HSE and the European Commission, there were a number of businesses with reservations. There was limited confidence in the ability of European regulatory bodies to provide the appropriate balance between robust workplace processes and unnecessary paperwork, with many taking the view based on the EU’s imposition of costly - and in businesses view unnecessary - employment law changes. Some businesses were also concerned that exemptions for the self-employed may give them a competitive edge in the marketplace or lead to some self employed people to mistake ‘not posing a risk’ as an excuse for implementing no health and safety requirements at all. The role of the HSE in inspections and enforcement is considered in greater detail in the next section of this report.

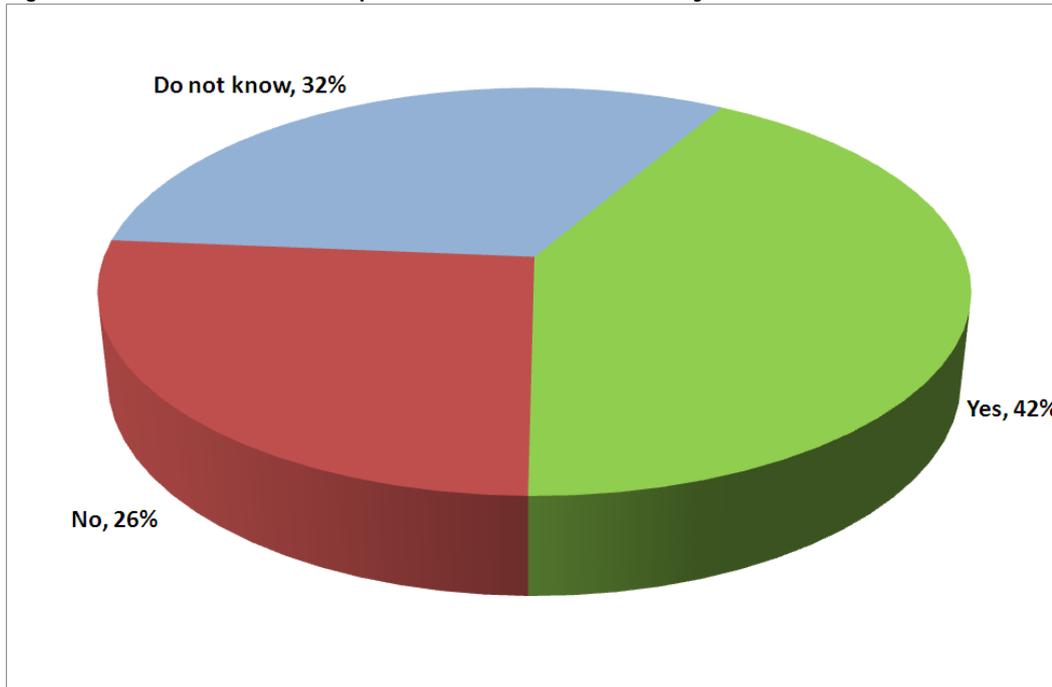
The Health & Safety Executive and local enforcement

“The HSE should provide more consistency but could be [seen as being] more heavy handed as they are used to dealing with major breaches, not the everyday issues of small business”. *Health and Safety Panel member*

Enforcement is a key issue for Forum of Private Business and panel members were asked a specific question about whether providing the HSE with the authority over local enforcement activity will encourage consistency and realistic assessments of risk.

Figure 4 on the next page shows opinions were mixed as to the impact of this change with the panel fairly evenly divided.

Figure 4: Should the HSE be provided with the authority over local enforcement activity



In general businesses felt that the HSE had the skills and professionalism to take control from local authorities but there were real concerns about capacity, whether they would be too heavy handed and whether the HSE were too remote from local areas.

“At least with local enforcement a one to one relationship can be set up - not sure if the HSE will be an unseen and distant entity or not?” *Health and Safety Panel member*

For some panel members working with the local authority has led to a more consistent approach and has allowed them to develop a working relationship with local enforcement officers, thereby making it easier for them to predict responses to changes in processes.

Geographical enforcement discrepancies are a long-lasting, historical issue for members, with each authority often having its own interpretation of rules. It has created a very *ad hoc* approach to enforcement with something that would be fine in one area being a problem somewhere else. Sometimes differences between local authorities can be significant and in some cases even within the same authority between different individuals. Whilst there is no doubt that the ‘Primary Authority’ scheme run by the Better Regulation Delivery Office (formerly the Local Better Regulation Office) is helping multi-site businesses with a more common approach, some panel members felt the HSE as a central enforcement authority could provide greater consistency still, given it already provides support for businesses either directly - from their website - or indirectly, through its central role in underpinning the Forum of Private Business’s own Health and Safety Guide.

“The HSE have a better understanding of health and safety and businesses. The local enforcement (officers) seem only interested that you have the paperwork in place.” *Health and Safety Panel member*

Those that did feel that the HSE was in a better position to guide enforcement mentioned that they did overall have a better understanding of health and safety than local enforcement agencies. Some contrasted the experience and knowledge of HSE employees with the highly variable level of qualifications and experience available locally.

“I don’t know because there is not enough staff at the HSE to cover all that will be required however, I don’t think the local authorities are really qualified to make judgements either. It will stop any form of victimisation and release the local authority of the costs etc.” *Health and Safety Panel member*

One of the major concerns was whether the HSE had the capacity to provide the level of support to ensure consistency at a local level. Panel members highlighted the reduced budget available to the HSE as a reason why they may not be able to realistically resource such responsibilities.

Assessment of risk was also a contentious issue with some businesses feeling that local authorities tended to know their patch and be far more attuned to local issues than the HSE. There was also a concern about having a different interpretation of enforcement as many panel members are established businesses who have an understanding of what the local authority wants to see. The concern for many businesses would be the adoption of an aggressive approach that is more for major breaches of safety or simply that it was another layer of bureaucracy that made common sense solutions far harder.

Other impacts of the Löfstedt recommendations

“Very little direct impact as we are a low risk business, but indirectly some effect as we are less likely to have onerous conditions applied unnecessarily to us”. *Health and Safety Panel member*

42% of businesses that expressed an opinion indicated that the review would not really have much impact on their business. Around 30% businesses did not know due to the complexity of the regulations or how they would be enacted. For most businesses continuing with current processes was seen as the easiest approach until there is clear evidence of reduced administration.

“They might enable me to grow by removing some of the expensive and unnecessary provisions I cannot afford to comply with if we expand.” *Health and Safety Panel member*

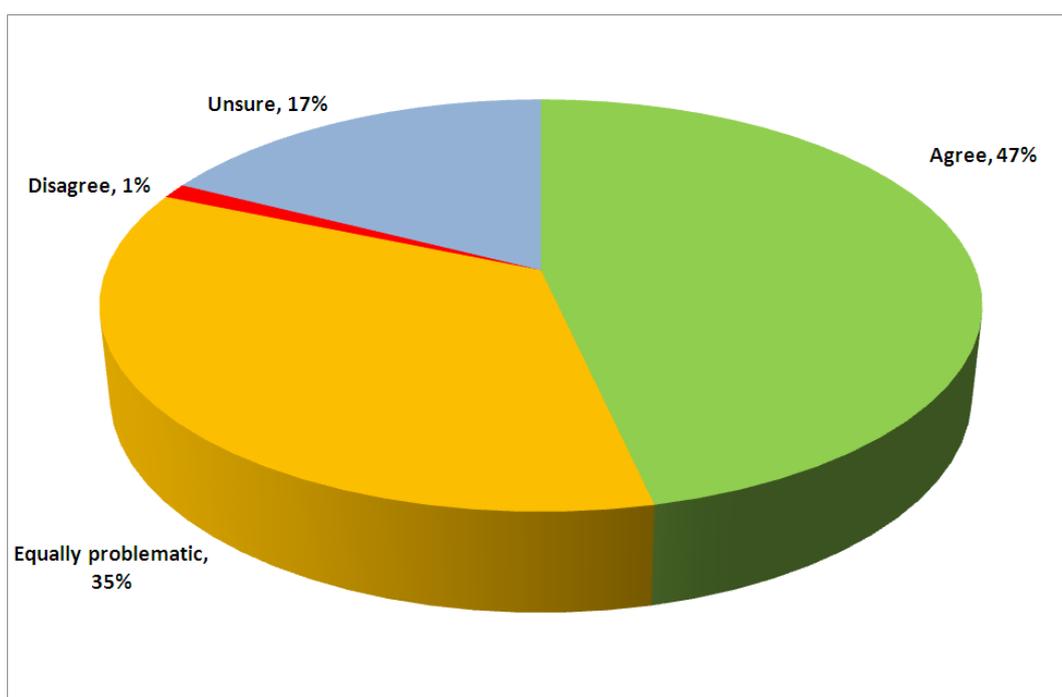
There was some positive feedback from businesses that felt that it would help them to grow by reducing the time and resources spent on ensuring compliance. Whilst less time could potentially be spent ‘covering their backs’, businesses will still need reassurance they have done enough. The other major advantage indicated was the opportunity to save money which in turn would help the business if it was looking to expand. A couple of panel members also felt that it could lead to a more practical approach to health and safety, allowing them to tailor the laws to their own environment.

Is the problem the law or its application

In his review, Professor Löfstedt stated that the misunderstanding and inappropriate application of regulatory requirements are a bigger issue than the regulatory framework itself.

Overall 47% agreed, 35% felt that they were equally problematic and 1% disagreed. In total, 47% were uncertain.

Figure 5: Agreement with Professor Professor Löfstedt that the misunderstanding and inappropriate application of regulatory requirements are a bigger issue than the regulatory framework itself



The businesses that disagreed felt simply that the regulatory framework was continuously being expanded and was concerned that new regulations may indicate that the ways the company currently deals with health and safety laws may contravene the required standards, which are based on the needs of larger companies with greater resources.

“I do agree but feel the framework needs changing too. What does it mean if you say the framework of the law is good? It is just the way it is implemented that doesn't work. Perhaps if the frame was well constructed then misinterpretation or misrepresentation would not be so likely to occur.” *Health and Safety Panel member*

In the current economic climate many smaller firms are opting for a DIY approach to health and safety but are finding that the laws are too difficult to understand, often with duplication and confusion for businesses which fall between two sectors (e.g. manufacturing and construction). Such businesses indicate that whilst they would like to rely on common sense the framework does not allow for this.

Many businesses and individuals may misunderstand their obligations, but this is largely due to the onerous nature of the regulatory framework, and poor or negative reporting of 'health and safety gone mad' in national and trade press.

“The need for a safer working environment is better than perfect paperwork.” *Health and Safety Panel member*

A majority of companies who expressed an opinion indicated that they broadly agreed with the assessment, pointing out that regulations are 'jargonised', badly presented and ultimately deal with administrative issues rather than health or safety issues.

Promoting the benefits of health and safety

“I don't think it makes a difference other than people who are on top of their H&S possibly tend to be more organised so may come across as a bit more professional.” *Health and Safety Panel member*

Figure 6: Where does a good health and safety policy give a business a competitive advantage?

	Advantages	No Impact	Disadvantage	Score
Locally (i.e. its impact on local reputation)	48%	31%	21%	0.28
Nationally	33%	58%	8%	0.25
Internationally	24%	59%	18%	0.06

Businesses felt that the advantages of health and safety were greatest locally, notably amongst caterers, garages and manufacturers. Those who competed directly against the self-employed or businesses with fewer than five employees (especially construction companies) were most likely to see the disadvantages. Costs and time were not a big issue for businesses that operated nationally, although the advantages were diluted slightly. There were greater disadvantages for those competing globally, particularly amongst those whose industry was price sensitive.

“We are a low risk business; it costs money that could be better used elsewhere.” *Health and Safety Panel member*

Cost and time were the big disadvantages regardless of where the company did business. Slightly different reporting requirements were also an issue e.g. CHAS, Safe Contractor, Constructiononline, although these are diluted if the company operated nationally.

“Big advantages are locally.” *Health and Safety Panel member*

The advantages of a good health and safety policy was the perception that the company was better organised than its rivals, strengthening a good local reputation and allowing them to compete more effectively for tenders. Good health and safety was also seen as useful in terms of reducing staff absences so that work could be completed in a timely and effective manner. These advantages were more

identifiable at a local level than at a national one, where the lack of disadvantages were more important than any noticeable advantages - i.e. poor health and safety can lose businesses work.

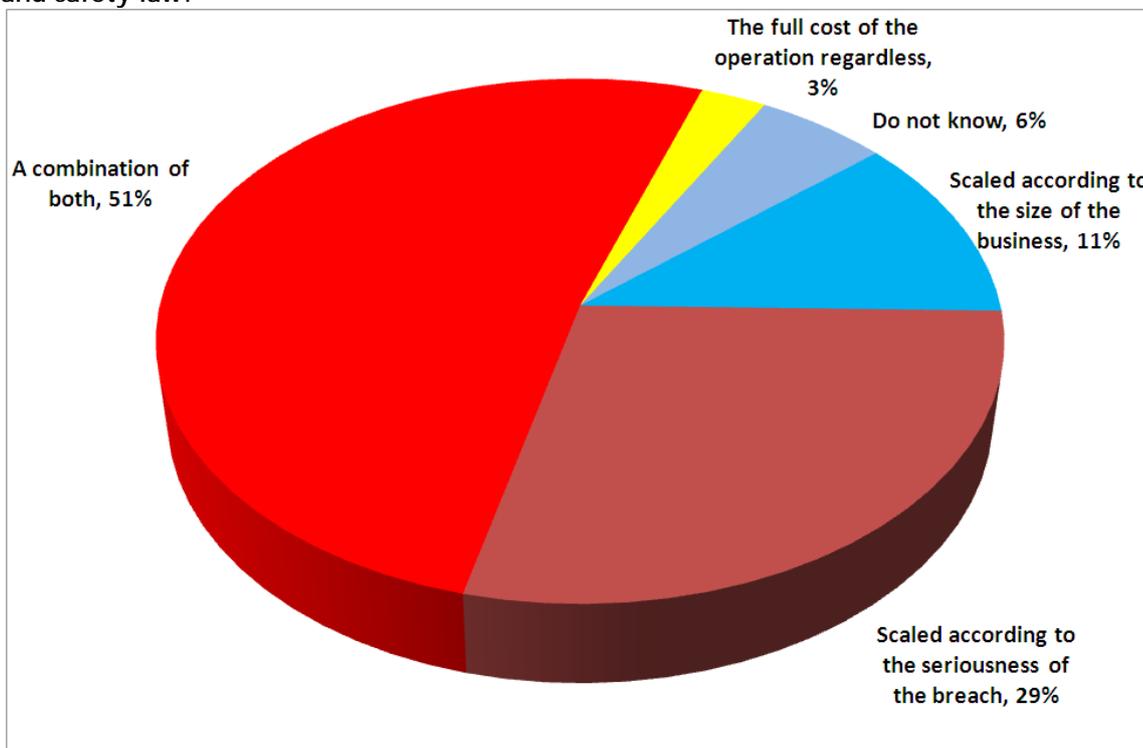
Some of these advantages held true at an international level although exporters did feel that the advantages were lower when competing for contracts in countries where there was no culture of health and safety or where their competitors were not bound to a similar regulatory level. A comparison with the rest of Europe shows that our workplace safety record is superior to many of our continental rivals.

The business view on 'Fee for Intervention' policy

"Hopefully [it will give out] a positive message that the bigger you are the less you can get away with."
Health and Safety Panel member

Fee for Intervention (formerly cost recovery proposals) will enable the HSE to recoup the costs associated with identifying and rectifying material breaches of health and safety law. As the Government has already stipulated that the principle of cost recovery is not up for debate, panel members were asked whether recovery costs should be scaled according to the size of business, according to the seriousness of the breach or a flat fee paid.

Figure 8: How should the HSE calculate recovery costs from companies in material breach of health and safety law?



"Most 'small' businesses do not deliberately breach health and safety. It is because it is so complex and difficult to follow and too heavy-handed for small business that perhaps breaches occur. If they do, then the business concerned should just have that breach pointed out and explained to them WITHOUT CHARGE. Those obviously breaching should be the ones to be charged. Small business cannot afford to employ someone to oversee health and safety - BIG business can!" *Health and Safety Panel member*

Few businesses felt that this would have an impact on their business, pointing out that avoiding material breaches was an important part of their daily working practices.

However, for when breaches are identified, just over half the panel members wanted to see both business size and seriousness of breach taken into account in cost recovery procedures, which isn't intended at present to be the case. A further 11% wanted the recovery of costs scaled according to the business size, which was seen as a good indicator of the ability to pay and a further 29% felt that the seriousness of the breach should be the only concern. So, overall, 62% of panel members want the size of business taken into

account and 80% want the seriousness of the breach to impact on the level of cost recovery. Just 3% of businesses argued that businesses should pay the full cost of the operation, seeing such a fee as a deterrent for poor practices.

"None, breaches seem to mostly be caused by ignorance or deliberate corner cutting, so nothing would change there." *Health and Safety Panel member*

There were general concerns about whether the Health & Safety Executive should be put in a cost recovery position *and* be responsible for ensuring consistency of local inspections. Some businesses felt that this could indirectly lead to a redefining of the 'material breach' concept whilst others felt that third parties (i.e. HSE approved contractors) should be involved. One or two respondents felt that third parties would be too expensive - an issue highlighted in a previous panel report.

Creation of a risk intelligent society

"Start by taking 'contents may be hot' from paper cups of McDonald's coffee and allow a little Darwinian theory to deal with people who make poor decisions." *Health and Safety Panel member*

"I don't believe it will - I firmly think current health and safety legislation wants to remove the 'intelligence of society' and make the 'risk' the responsibility of the employers only." *Health and Safety Panel member*

Businesses tended to agree that allowing employees and customers to take more responsibility for their actions was a key initial step to creating a risk intelligent society.

Some argued that currently there is no need for education to help individuals make informed decisions in weighing up risks if the employer is left with sole responsibility for the consequences. One panel member felt this should start at school level (e.g. manual handling training), so that young people were ready for the world of work and the employer could assume some level of common sense. For some businesses there were concerns that a risk intelligent society would be unlikely until the incentives for helping a company to improve were equal to those for suing the business.

"Bring back common sense. It is absurd when an individual can knowingly break H&S legislation and then sue his employer for his own breach." *Health and Safety Panel member*

As one business highlighted, if the blame culture has already led to employees being incentivised to sue first and report issues later then there is little initial hope for the rest of society. One felt that a recent radio advert to shop your employer did nothing to help businesses that were struggling and trying to cut costs in a safe and responsible way.

Others felt that reform was needed to the way politicians and civil servants approached health and safety. There was a feeling that while health and safety remained a 'tick box exercise' with an emphasis on paperwork rather than actual practice this was unlikely to happen. Owners also felt that there was little responsibility from civil servants and elected representatives, who did not seem to have any idea about or interest in the consequences of the legislation they enacted.

One or two businesses did feel that the process was going in the right direction, pointing out that good risk assessments, consistent enforcement by individuals who want to improve workplace safety by working with the barriers that the business has and scaling down the responsibility on the employer to foresee all things was a step in the right direction.

"Better, consistent briefing and responsibilities." *Health and Safety Panel member*

Others simply felt that consistent communication was the solution, this often meant engaging with the workforce and general public as well as business owners. Providing a simple checklist of what they were required to do and where responsibilities should lie would help but businesses also felt that refraining from jargon was beneficial, including dropping the specific phrase 'risk intelligence'.

"Haven't a clue what that means! Why can't people talk in terms that EVERYONE understands rather than inventing new gobbledigook terminology?? No wonder people get confused!!" *Health and Safety Panel member*

Support wanted by businesses

“No good for the FPB, but all businesses should have your guide FREE.” *Health and Safety Panel member*

The Forum offers members a comprehensive Health and Safety Guide as well as a helpline for members to access, so our panel members do have access to support that is not typically available to other businesses. Despite the feedback from the Guide being overwhelmingly positive (89% found the guide useful or very useful) there are still problems due to the complexity of the regulatory framework.

“Your H&S guide is helpful, but even wading through its largely irrelevant (to us) pages is an imposition which is unnecessarily time consuming.” *Health and Safety Panel member*

Businesses liked the idea of access to a helpline and wanted access for all to sensible advice with the option of a site visit if necessary. There was also concern about the loss of the HSE information line which ultimately anchors the provision of advice from consultants and other support lines.

“Free guidance documents from (the) HSE. Don't charge for advice which can prevent accident/injuries.” *Health and Safety Panel member*

In general it was felt that businesses should have access to concise and industry-specific information through a website and access to a free site visit to allow them to focus resources on the priorities for the business, their customers and employees.

“A transparent system where help can be asked for without the risk of being prosecuted.” *Health and Safety Panel member*

Businesses felt that they would like to be able to work with inspectors in a mature way with more aligned goals; some owners fear providing too much information in case they then have to pay for new equipment or invest more time in risk assessments for parts of the workplace where there is very little apparent risk.

“I believe the Government should provide more guidance without resorting to regulation - educating the workforce should come from the top!” *Health and Safety Panel member*

Most importantly, support should not just be provided to the employer but also be able to be accessed by the employee to highlight their responsibility in ensuring their own health and safety and that of their colleagues. Smaller firms also provide considerable senior management time in training employees in the way the business provides a safe, high quality service and this has become harder to do as margins have become tighter. Business owners also wanted to see better sharing of best practice in their industry, in particularly seeing how smaller firms with limited resources had improved practices within their organisation.

The burden of health and safety

“Overall as a low-risk business I think we have a good balance of consideration of risks and common sense.” *Health and Safety Panel member*

Each year the Forum asks its members about whether or not certain issues are a barrier to development. Broadly there has been no change over the last few years with 45% of businesses still feeling that health and safety is an issue for their business.

Figure 9: Number of Forum members finding health and safety law a barrier to business development

	2009	2010	2011	2012	Change in 2012
Health and safety law	37%	45%	45%	45%	0%

Source Forum Reference 199

Broadly the figures are fairly similar when the relatively small sample size is taken into account. The slight jump in the ‘burden’ of health and safety on a businesses could be down to a number of reasons. Some of the reasons why the burden may be considered greater whilst the barrier to developing the business has not may be down to the decreasing affordability of being compliant as the margins on products and services remain limited.

Figure 10: Burden of health and safety regulation on businesses

	Panel 1	Panel 2	Panel 3
	September 2010*	April 2011*	April 2012*
Burden of health and safety(out of 10)	4.09	4.00	4.30

*Date of Fieldwork

Conclusions

The tone and suggestions from the Löfstedt review are generally welcomed as a return to common sense. However there are concerns about the practicality of the suggestions in view of the cuts to the Health & Safety Executive.

Businesses remain cautious as to whether it will have any practical impact on their business until the recommendations are enacted and tested legally. There were also concerns that the recommendations may be superseded by the EU review in 2013.

Forum of Private Business
Ruskin Chambers
Drury Lane
Knutsford
Cheshire
WA16 6HA

Telephone: 01565 634467
Email: info@fpb.org
Web: www.fpb.org