



**Executive Summary:
Regulating Work
Health and Safety in
Wales**

Using and Sharing Information

August 2025

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Introduction

This Executive Summary outlines the key findings of a preliminary study that explores the nature of work health and safety information, and how the various organisations involved in regulatory oversight of workers' rights and their employers' responsibilities approach using and sharing this information in their efforts to secure compliance from duty holders in Wales. It:

- Reviews publicly available sources of data on the labour market contexts and work health and safety outcomes and regulation in Wales.
- Explores the extent to which this information represents a useful evidence base for improving levels of compliance and enforcement of work health and safety standards in the contexts of the labour market in Wales.
- Discusses the usefulness of sources of this data with special reference to experiences and perceived needs of trade unions represented on the TUC Cymru Health and Safety Regulation Committee and in the work of the members of Welsh Government's Workplace Rights and Responsibilities Forum (WRRF).
- Identifies strengths, weaknesses and gaps in current knowledge of these matters.
- Explores ways in which policy developments might facilitate greater sharing of information and more strategic joint actions by members of the WRRF to aid improved support for securing compliance with work health and safety standards in Wales.

Background

The importance of good information on work health and safety to support effective strategies to secure compliance with regulatory standards has long been acknowledged. Effects on work health and safety arise not only from proximal unsafe practices and unhealthy work exposures themselves, but also from the structural and organisational contexts and conditions that create such practices and exposures. It follows from this, that support for securing compliance with regulatory standards may require information concerning these contexts as well as the proximal risks to which they give rise. It is further widely acknowledged that currently such contexts are subject to significant and rapid changes that have significant implications for both the nature of the relevant information and its role in support of regulation.

A further consequence of current patterns in the organisation of work and employment is the substantial prevalence of work-related ill-health in the working population of the UK. Here again, the importance of good information is paramount, since the causes of such prevalence are neither straightforward nor easy to regulate. In particular, until now, regulatory practices have made relatively little impact on reducing the scale of mental health outcomes that form a substantial part of current work-related ill health outcomes. Yet, it is well-known that much of their incidence is related to organisational issues affecting the quality and control of work and employment. Further questions therefore arise concerning the relevance of regulatory standards to current work health and safety challenges and the appropriateness of the enforcement strategies of agencies charged with securing compliance and protecting workers from harm in contexts of rapid and complex labour market change. Good data on these regulatory practices and their outcomes are important in determining effective strategies in relation to these challenges, especially at a time when resourcing support for securing compliance has declined.

Acknowledgement of an 'enforcement gap' in the face of some of these challenges has led to efforts to create and co-ordinate labour inspection agencies tasked with securing compliance from some of the elements of this more diverse labour market regulatory scenario, although the agencies directly responsible for work health and safety, the HSE and LA Environmental Health Departments, have remained outside these structures.

Meanwhile, current regulatory compliance theories as well as the policies of state agencies have increasingly advocated more strategic forms of enforcement activity and a variety of additional means of securing greater 'engagement' from duty holders and their workers with matters of work health and safety. A further feature of such thinking and operational policies is the need for better intelligence and more 'joined up' activity to take account of the complexity of current labour market scenarios and the possible benefits of more coordinated approaches to securing compliance.

It was with the aim of exploring these developments in Wales that the present project was undertaken. Arrangements for securing compliance with work health and safety standards in Wales present an interesting situation. On the one hand, a relatively small and geographically proximal economy would seem to support the possibility of co-operation and sharing information between key regulatory actors. On the other hand, its regulatory profile is complicated by the semi-autonomous nature of Welsh governance, where although the UK state retains responsibility for the main regulatory framework governing work health and safety and the regulatory agencies charged with securing compliance, the Welsh Government has devolved authority for health and has also adopted several pieces of legislation that have implications for work related health and safety too.

Partly to address this complicated situation, the Welsh government set up the Workplace Rights and Responsibilities Forum, which is comprised of members representing regulatory actors, labour market actors, and other interested stakeholders, to support effective communications between them. Exploring the practice and potential of the Forum in relation to information sharing and its uses is the principal focus of the research. The work was commissioned by TUC Cymru and throughout the Report and this Executive Summary of its findings, the main objective has been to inform that organisation and especially the membership of its Health and Safety Regulation Committee, which was set up to help to channel effective communication of the work health and safety interests of trade unionists in Wales to the WRRF.

Study Methods

This is a small and very preliminary study. Its aim has been to provide *indicative findings*¹ that are intended to be useful in informing the strategic position of TUC Cymru in its dealing with the WRRF and for future policy development in this respect.

The research was undertaken between April 2024 and May 2025. Its methodology involved an initial review of published sources on the organisation of work and employment in Wales, the nature of work health and safety outcomes and the role of efforts to monitor and secure compliance with regulatory standards and improve these outcomes in Wales. Although the report was focused on Wales, its review of published sources embraced UK sources and sometimes international ones too. This wider material helped fill gaps in the data specific to Wales. It allowed comparisons to be made with the UK more widely. And it further allowed the understandings developed in the study to be informed by the wider critical literature on the challenges confronting work health and safety and labour regulation in advanced economies.

Following the review of published sources, the study sought information from key informants from organisations represented on the WRRF. This information concerned their experience of gathering, using and sharing information and undertaking collaborative regulatory actions. The majority of these informants represented regulatory bodies, although other members of the WRRF were also interviewed. As already noted, this was a study commissioned by TUC Cymru to help inform its recently established Health and Safety and Regulation Committee. Therefore, the study commenced by gathering information from interviews and discussions with trade union members of this committee and relevant TUC Cymru officers, concerning their experience and needs in relation to regulatory agencies' efforts to secure compliance with work health and safety standards in Wales. This information helped the researchers focus the meetings that followed with the representatives of organisations among the membership of the WRRF.

¹ *Indicative findings* are findings that may require further substantiation from more in-depth research but which nevertheless provide a clear indication of the likely nature of the situations they identify. These approaches are commonly used in research to inform policy development

Findings from Published Sources of Information

The labour market and economy in Wales

Chapter 2 of the Report reviews publicly available data on the labour market in Wales. It largely describes what might be anticipated with the decline of a heavily industrialised economy, such as that which developed in South Wales and in parts of North Wales until the mid-twentieth century. This decline was accompanied by substantial levels of unemployment, and associated features of social and economic deprivation. Economic recovery through transformation into a largely service based economy occurred in the following period until the present time. This has led to the present labour market in Wales being characterised by a substantial proportion of public sector employment; a greater than average concentration of employment in micro and small firms; and pockets of growth among IT based firms and other 'new industries' as well as growth in low skilled forms of work and in non-standard forms of employment. In parallel, the labour market and the structure of employment in rural Wales has remained fairly typical of an agriculture-based economy, with changes occurring as a consequence of growth in leisure and tourism, increased work mobility, an aging population and so on, also leading to some growth of work in public and private services.

The data describe an economy in which there is a continuing presence of pockets of comparative poverty in a number of locations of economic and social disadvantage mainly in formerly industrial areas. The employment rate in Wales is lower than that of the UK overall and there is a higher rate of economic inactivity. There is a further suggestion in the data, that in several respects, changes in the structure and organisation of work and employment in Wales have led to a marginally greater presence of a number of situations that may be associated with risks of poor work health and safety outcomes, such as for example, a slightly larger proportion of micro and small enterprises than for the UK; a higher proportion of workers still employed in high-hazard industries like agriculture, manufacturing and construction; fewer workers in permanent jobs and more low paid work than in the UK overall, and more seasonal workers too. Supplementing this data, with that on health, in turn points to a greater presence of long-term sickness compared to the UK as a whole.

Other data on the presence of non-standard forms of employment, as with that for the UK more widely, suggest such employment may present a challenge for the agencies charged with securing compliance with health and safety standards. There is also evidence that some non-standard forms of employment in Wales occur in less visible types of work, undertaken to complement main incomes, with more workers in Wales being underemployed or underpaid. The presence of trade unions has declined in Wales over recent decades, in common with the general trend in the UK and many other advanced economies, although they nevertheless have a proportionally greater remaining presence in Wales than in the UK overall. Contextualising this information with that from the wider literature, lends support to a conclusion that the presence of these factors in the Welsh economy is likely to contribute to the existence of poor work health and safety practices and outcomes and give rise to challenging scenarios for securing compliance with regulatory rights to fair standards of work health and safety.

Work health and safety practices and outcomes in Wales

These suggestions are borne out by the review presented in Chapter 3 of the report. It first explores the data that show the effects of these factors on work health and safety practices and outcomes and, as outlined by the sub-section below, it further demonstrates the challenges this labour market profile present for securing compliance. Notwithstanding some small differences, patterns of the data on these matters in Wales reflect what might be anticipated from the wider UK evidence and that from other advanced economies. As already noted, while data suggests a decline in injuries, including fatal injuries arising from work, it further shows little change in the substantial prevalence of work-related ill-health. The small differences in work health and safety outcomes in Wales, compared to the UK as a whole largely reflect the industrial legacy and on-going presence of some hazardous work in the areas in which the majority of the population live and work; as well as features of the agriculture and service-based economy found in the more sparsely populated rural areas. They further include the wider effects on health outcomes that may be associated with areas of economic and social deprivation that still feature in the social and economic profile of Wales. The conventional explanations for the slightly greater incidence of fatal injuries

experienced at work in Wales, for example, are that they are largely compositional effects that reflect the continuing presence of proportionally more hazardous work, while the presence of a slightly greater proportion of micro and small firms in the economy may lead to the known effects that the limited resources such firms have on work health and safety practice and outcomes.

In rural Wales, the acknowledged serious safety and health risks of agriculture, along with its high levels of casual, temporary and low-skilled and poor paid jobs, high levels of migrant labour and informality along with a predominance of micro and small enterprises, all contribute to its work health and safety outcomes — as do the prevalence of low-skilled, precarious and poorly paid work in the private and public sector.

The profile of work health and safety in such an economy would be expected to include, in the formerly industrialised areas, a continuing presence of the health and safety effects of conventionally hazardous work, as well as incidences of ill-health that are consequences of the long latency of the effects of past exposures. Additionally, it would be anticipated to reflect outcomes prevalent in an economy in which there is relatively high proportion of workers in low-skill, poorly paid work in health and social care, retail, and transport; as well as in in health, education and other service-based work with a large public interface, in both public and private sectors. And where micro and small firms predominate, along with a growing amount of work taking place in non-standard forms of employment. In such scenarios, which are common elsewhere in the UK as well as in other advanced economies, current data indicate high levels of work-related health outcomes such as musculoskeletal diseases (MSDs), work-related stress, depression and anxiety, as well as injuries and fatalities arising from preventable incidents and a high prevalence of longer-term health issues arising from these forms of work.

In relation to the most significant forms of work-related ill-health, the HSE's analysis of Labour Force Survey data highlight the most important causes of MSDs (and associated prevalence rates) to be manual handling, awkward/tiring positions and keyboard work or repetitive action. An analysis conducted on reported cases of stress, depression or anxiety indicates the main causes of such conditions (and associated prevalence rates) to be workload, lack of support, violence and threats or bullying, changes at work, role uncertainty and lack of control.

These findings confirm wider evidence indicating that conflict at work, high job demands, an imbalance between effort and reward and a lack of autonomy and control (particularly in the context of high job demands) elicit long-term health consequences, including coronary heart disease, morbidity and mortality, and mental illness.

Information on securing compliance

Chapter 3 also reviews the limited published evidence of support for securing compliance with regulatory and other standards of good practice in these scenarios in Wales. It shows a similar profile to that evident in the UK more widely. On the one hand, reported enforcement actions undertaken by state and local authority agencies (the HSE and the LA Environmental Health Departments) with direct responsibilities for monitoring and securing compliance with regulatory standards in work health and safety are relatively few, and trends suggest that they are decreasing in numbers. On the other hand, the accounts in which these statistics appear, as well as those of the various other agencies charged with labour market enforcement duties (such as the ESA Inspectorate; the GLAA; HMRC minimum wage enforcement; the EHR Commission and others represented on the WRRF) along with the critical literature more widely, suggest an awareness of a similar array of challenges to securing compliance with labour standards (including those on work health and safety). They include those resulting from an increased presence of non-standard forms of work and employment, technological change and change in business management practices, as well as those arising from change in the composition of the labour force and the extent of its capacity to represent its interests in work health and safety.

Not surprisingly, given the comparatively small numbers involved, and the nature of work and employment in Wales, there are limits to the specific details publicly available concerning WHS outcomes and the extent and effectiveness of support for compliance in Wales. This necessitates reliance on wider data sources. In some cases, this may be justified, while in others it raises questions concerning the need for more specific information. In line with the conclusions of the Fair Work Commissioners in their 2019 Report on Fair Work in Wales, the present

study concludes that current information on some features of the profile of work and employment, their consequences for WHS and for securing compliance with regulatory standards, remains incomplete, fragmented and anecdotal. It is therefore of relatively limited use in identifying where risks of non-compliance may be greatest, or of usefully informing the orientation of strategies of support for achieving improved regulatory compliance. This said, it is further concluded that filling these gaps with additional detailed routine information, along with special research reports and their more detailed analysis would require additional resources. It is not at all clear where such additional resource would come from, or whether a strong enough case could be made to lead to its provision. This suggests that a more pragmatic and less costly solution to filling gaps in the data, at least as far as it is relevant to securing compliance, might be found by regulatory agencies sharing the intelligence that each of them separately gathers concerning the risk profiles of the elements of the labour market over which they conduct surveillance.

The Experience and Perceptions of Key Informants

Findings from the field work undertaken in the research are presented in detail in Chapter 4 of the report. An analysis of the key themes emerging from this data and a discussion of their implications for the practice and potential of the WRRF are then presented in Chapter 5.

The testimonies of key informants vividly illustrate both the breadth and depth of regulators' familiarity with securing compliance in the context of the labour market profiles and health and safety outcomes in Wales. They further show how work health and safety and the role of securing compliance with regulatory standards are regarded by other stakeholders and information providers who are also among the membership of the WRRF.

The strongest leitmotif running through these testimonies concerns the scale of the challenge that the diverse and rapidly changing labour market presents for the agencies charged with securing compliance from duty holders. The size of the task confronting them, the uncertainties created by the current pace of change, the limits of the resources available and the ubiquity of safety and health issues across the range of work scenarios under regulatory scrutiny are all evident in the responses of those interviewed, regardless of the specific provisions each is charged with enforcing. As are the innovations they have made in finding effective ways to best support securing compliance in these difficult scenarios.

Equally evident in the testimonies in Chapter 4 is a perception among many key informants of a difference between what might be described as 'traditional occupational safety issues' and those work health and safety issues arising from the structure, organisation and control of work and employment. In the former case, enforcement actions were seen as relatively straightforward. In the latter case however, while informants all acknowledged that these factors too had important effects on safety and particularly on health, securing compliance was often regarded as 'too difficult' or 'too uncertain' and the relevance of regulatory standards to the prevention of health outcomes arising from such factors was frequently questioned.

In all cases however, the role of information and especially, sharing this information was seen as supportive of efforts to secure compliance. Informants uniformly identified how ways of gathering, using and sharing relevant labour market information might play a positive part in improving WHS surveillance and its outcomes in Wales. Key informants among non-regulatory actors interviewed, such

as those from Public Health Wales, also spoke of how they shared information on work and health with regulators. The thematic analysis in Chapter 5 discusses how informants obtained this information from other agencies, or shared information they held themselves, in order to better support their regulatory strategies and actions; and the extent to which overlapping concerns with broadly defined work health and safety issues could support joint regulatory actions to secure compliance in Wales. It also draws attention to the constraints and barriers informants saw as limiting these possibilities, pointing to a number of institutional, procedural and personal barriers that serve to prevent or constrain regulatory agencies from sharing certain information and from undertaking more joined up regulatory activities in practice. However, none of these constraints appear to be entirely insurmountable, once a focus for co-operation has been identified.

The themes identified in the informants' testimonies further addressed the ways in which regulatory actors sought to overcome these challenges. All of the key informants representing regulatory agencies gave examples of ways in which they had managed to overcome constraints and share intelligence with other agencies or, in some cases, undertake joint actions. These activities were often predicated upon the identification of mutual interest in undertaking enforcement actions in relation to particular abuses. In some cases, labour market enforcement agencies had identified transgressions on safety and health that they were able to draw to the attention of the HSE. In other cases, they had simply sought information held by other enforcement agencies. Memoranda of Understandings between agencies helped to clarify what kind of information could be shared and what was confidential. Several key informants drew attention to joint actions between enforcement agencies, targeting abuses in particular sectors or locations (although there were few examples of these located in Wales). Others talked about liaison between themselves and the HSE on platforms set up for such purposes. But there were few examples of systematic, proactive and prolonged institutional liaison beyond that developed between the HSE and Environmental Health Departments, which are required by statute to consult in their shared delivery of support for securing compliance and where their institutional roles and relations have been largely defined by this.

Sharing and using intelligence — the practice and potential of the WRRF

The practice and potential of the WRRF as a platform to facilitate and support greater cooperation between regulatory agencies and between them and other labour market stakeholders is a focus of the analysis in Chapter 5. It indicates that virtually all of the informants felt that the WRRF was useful for sharing information. However, beyond this general approval, the range of expectations expressed by informants about its functions lacked a common sense of strategy, or overall purpose. Furthermore, it notes that a significant finding of the study is that the examples of information sharing and use, as well as the co-operation and joint actions described by informants, were all ones that had occurred without any obvious involvement of the WRRF. None of the informants provided examples of ways in which the WRRF had supported any special efforts to share information in relation to their activities or in the undertaking of joint regulatory actions. Of course, some sharing of information within the WRRF would have no doubt occurred when members reported on their activities during meetings and may have also occurred informally during discussions between members during meetings, but a more strategic role for the Forum as a means of using and directing shared information for particular regulatory purposes seems to have not been tested.

Nevertheless, the present study confirms that the existence of the Forum presents an opportunity to explore the possibility of developing more strategically focused enforcement activity within Wales. To an extent, the conclusions of the present research, echo those of the Fair Work Commissioners in their 2019 Report, which applied to working conditions in the Welsh labour market more widely. They do so in two important respects. Firstly, from a work health and safety perspective, they agree with the Commissioners that *‘Wales exemplifies the problems of the wider labour market but is also worse on some indicators’*². Secondly, they point to a lack of specific data on many of the work health and safety consequences of the restructuring, organising and control of work and employment that has taken place in Wales in recent decades, in the same way as the Commissioners

² Fair Work Wales: Report of the Fair Work Commission 2019 page 16.

identified gaps in knowledge of working conditions in relation to fair work. Arising from these observations, the Commissioners recommended well-resourced, more comprehensive, proactive state inspection and enforcement, and that the Welsh Government develop a strategy to improve the effectiveness of existing rights enforcement in Wales, which they recommended, includes measures to increase the detection of non-compliance and its consequences. The findings of the current research support these recommendations and also point to need for such well-resourced, more comprehensive, pro-active state inspection and enforcement in relation to work health and safety. But more pragmatically, they indicate that the platform created by the WRRF affords opportunities to develop ways of improving the existing rights enforcement in Wales through cooperation between regulatory actors and between them and other stakeholder membership of the Forum, in ways not dissimilar to those canvassed in recent regulatory literature on ways of securing better compliance in current labour market contexts. As noted in various places in this report, current literature on regulatory inspection identifies a range of innovative practices in which more 'strategic enforcement' is achieved by labour inspectorates in the face of the challenges evident in current patterns of work and employment. Sharing information between regulators and between them and other interested parties, and undertaking more orchestrated actions to achieve desired regulatory outcomes are common to many of these initiatives.

The Conclusions of the report argue that the WRRF represents a platform that could act as the means of facilitating the innovation described above, and that both the structure and geographical proximity of the Welsh economy offer a suitable milieu for more coordinated strategic approaches towards enforcement in relation to work health and safety standards. However, they also point out that there are a number of constraints. Not least of these are the jurisdictional challenges, with the mix of Welsh Government and UK state responsibilities for work health and safety regulation that are identified in this report. This is especially challenging for the provision of strategic leadership that would likely be required to take forward more co-ordinated and focused approaches to sharing information and regulatory actions. Another constraint is the current absence of an identified focus around which strategic co-operation might occur. As pointed out in this Report, the WRRF grew out of a previous forum that was established to co-ordinate regulatory activities in relation to the implications of the Covid 19 pandemic for exposures at work. It was largely perceived as successful because it was able to focus attention

on a particular issue. But as Chapter 3 shows — there is no shortage of possible issues on which information couldn't be more widely shared, or on which jointly developed and shared enforcement strategies could focus in the current labour market in Wales. A third constraint seems to be concern over possible resource implications of more joined up regulatory action. It is widely acknowledged that labour market regulatory agencies have few resources and there has been little political will during recent decades to increase them. Indeed, as the data on work health and safety enforcement in Chapter 3 clearly indicates, the trend for the resourcing of the major regulatory inspectorates — the HSE and the LA Environmental Health Departments — has been in the opposite direction over this period. But concerns about resources may be misplaced. Clearly strategic co-ordination of sharing information and regulatory action will require resourcing, but this doesn't necessarily mean a requirement for more resources overall. It is possible that it may be achieved through a redistribution of existing resources.

Finally, the report's Conclusions also draw attention to the wider canvas of labour market regulation in the UK at the present time. It identifies a number of elements of current change that may have important implications for the future role of the WRRF. It is beyond the remit of this report to explore them in detail, but it is clear that the current political discourse on the reform of employment rights offers opportunities to engage with what might be best for work health and safety in Wales, in this contemplation of reform. It also provides opportunities to question whether the traditional separations between bodies responsible for securing compliance with occupational health and safety standards and those with wider labour inspection functions continues to be the most appropriate way of protecting workers from the health and safety consequences of the risk profile of current constructions of work and employment. More particularly, it argues, in line with other recent publications, that given that some 50 years have passed since the adoption of the HSW Act instituted a major reform of the UK regulatory system for work health and safety, now would seem a timely moment to undertake a wider review of what works and what doesn't, in health and safety regulation in Wales and the UK more widely. Such a review, would be able to explore the potential of the WRRF, as part of a wider brief to create more relevant, adequately resourced and effective regulatory framework for work health and safety in Wales as well as in the UK more widely.

Conclusions

The key findings of the report outlined in this Executive Summary include:

- In current labour market contexts, a more holistic understanding of the relationship between work and its risk to the health, safety and well-being of workers is needed to replace that traditionally understood as ‘occupational safety and health’, which is shown to exclude the causes of much of the negative health outcomes associated with current work and employment. (Chapter 1)
- Sources of information in Wales describe its labour market as having features similar to those found in the UK more widely but with a number that are somewhat more prominent than in the UK as a whole — which may indicate somewhat greater challenges for work health and safety. (Chapter 2)
- Such a view is borne out by sources of information on work health and safety outcomes, which are broadly what would be expected from UK figures but in some cases slightly worse. (Chapter 3)
- Similarly, evidence of enforcement actions suggests a pattern that is broadly the same as that for the UK more widely, with declining numbers of such actions that are associated with reductions in their resourcing in recent decades. (Chapter 3)
- There are significant gaps in the information available on work health and safety risks, and their outcomes in the current labour market contexts in Wales (Chapters 2 and 3)
- Trade unionists’ main concerns about work health and safety were not those matters addressed by occupational safety management systems but rather those that arose as consequences of current patterns in the structure, organisation and control of work and employment in Wales and which lay beyond conventional occupational safety management arrangements. (Chapter 4)
- The pace of change and the complexity of the current labour market was acknowledged, to be a major challenge for the limited resources at their disposal, by most of the regulatory agency informants. (Chapter 4)
- Work health and safety matters were among the features of abuses encountered by labour market enforcement agencies, not only the HSE and the Environmental Health Departments. (Chapter 4)

- Informants further recognised the widespread presence of psychosocial risks and their health consequences in the forms of work and employment in which they sought compliance, but several indicated the problematic nature of establishing regulatory breaches when contemplating enforcement actions in relation to these matters in comparison to identifying and addressing more straightforward occupational safety issues. (Chapter 4)
- The presence of a labour market ‘enforcement gap’ in Wales such as that identified in the research literature in relation to labour standards and precarious and insecure work, was perceived in different ways and to differing degrees by the informants. They conveyed a strong sense of ‘doing the best they could with the resources available to them’ in a rapidly changing labour market whose size and complexity was not matched by the resources available to support securing compliance with regulatory standards. (Chapter 5)
- Several further sub-themes were common in the testimonies of representatives of regulatory agencies (Chapter 5):
 - › The role of information and especially, sharing this information was seen as supportive of efforts to secure compliance.
 - › Regulators acknowledged the likelihood that when serious breaches of one element of labour standards are discovered, further investigation would reveal breaches in other areas of labour regulation too
 - › Joint regulatory actions were acknowledged to be potentially helpful for addressing overlapping concerns with broadly defined work health and safety issues and supporting compliance from duty-holders in Wales.
 - › There were several institutional, legal, procedural and personal constraints identified as limiting sharing information and undertaking joint actions.
 - › Nevertheless, informants gave examples of how they had overcome constraints and managed to share information and actions, including in identifying mutual interests in undertaking enforcement actions in relation to particular abuses; drawing work health and safety abuses to the attention of the HSE; using Memoranda of Understandings between agencies to clarify what kind of information could be shared and what was confidential. Several also drew attention to joint actions between enforcement agencies,

targeting abuses in particular sectors or locations (although there were few examples of these located in Wales). Others talked about liaison between themselves and the HSE on platforms set up for such purposes.

- › However, few examples of systematic, proactive and prolonged institutional liaison beyond that developed between the HSE and Environmental Health Departments were given by informants.
- All the informants indicated they found the WRRF useful for the exchange of information but there was little sign of its use more strategically. Indeed, the examples of information sharing and joint regulatory activities discussed by informants had all taken place without the involvement of the WRRF. (Chapter 6)
- Nevertheless, some informants saw 'a role for it to play ... to go that bit further than to just share information' (Chapter 5)
- The Report finds that the platform created by the WRRF affords opportunities to develop ways of improving the existing rights enforcement in Wales through cooperation between regulatory actors and between them and other stakeholder membership of the Forum, in ways not dissimilar to those canvassed in recent regulatory literature on ways of securing better compliance in current labour market contexts. (Chapter 6)
- To take advantage of such opportunities, however, several constraints need to be addressed, including questions of leadership in the complicated jurisdictional responsibility framework represented by the devolved authority of the Welsh Government, and the UK wide responsibilities for work health and safety regulation of the UK Government and its agencies. (Chapter 6)
- Finally, the current wider discourse on the reform of employment rights regulation in the UK allows trade unions an opportunity to engage in a dialogue on reforms in which attention could be drawn to ubiquitous presence of work health and safety issues in current labour market contexts, the need for more holistic understandings of their regulation, the unique situation in Wales and the benefits of the WRRF as a platform for joint actions to achieve better outcomes.

