

BURDENS ON BUSINESS

There is no easy panacea for removing the burden of regulations from business. It is the weight of requirements as a whole rather than individual cases; very few regulations taken in isolation are wholly unreasonable. There are five areas to assault:

- Bold measures to cut a swathe through an area of legislation: Annex 1 lists some of the more important proposals. We endorse them all with the exception of merging PAYE and NIC. They will all be difficult and Treasury may be reluctant for those with revenue implications even to be discussed. Changes to Health and Safety although sensible are politically dangerous. We have underlined those we recommend you particularly pursue at the meeting.

- A slog through all the detailed recommendations which cumulatively will have a major impact upon the overall burden. Annex 2 is the Policy Unit list currently of 374 proposals but we would hope to keep adding to this. This includes all the recommendations from the Scrutiny Report, the CBI and the Institute of Directors as well as our own and other peoples ideas. Naturally we do not agree with them all, and those misguided or too dangerous we have crossed. The good ones we have underlined. (I have sent the list to Lord Young and David Trippier).

These first two measures attack the problem of existing regulations, the next three should stop it recurring.

- ?!
- Inculcate compliance cost awareness throughout the Government machine and enforcement agencies. Give two people within the Enterprise Unit the responsibility for cost-benefit impact analyses on all new regulations. Perhaps establish a Parliamentary Committee to scrutinise all new regulations (including EC).
 - Change the emphasis from specific detailed regulations to general statutory duties backed up by simple codes of practice. Always place the burden of proof or justification on the regulator, rather than on the employer to prove his innocence.
 - Constrain the rising volume of legislation by annual limits or 'sunset' provisions or best by consolidation. Make the legislation understandable. Laws that cannot be obeyed because they are lost in the morass of other legislation or that only a specialist can decipher, serve no purpose. (Parliamentary draughtsmen claim obscurantist wording is necessary to achieve legal certainty but experience shows this is one thing they are not achieving).

This is the real agenda for Lord Young's committee. All Ministers must support the project in principle, but few departments are likely to welcome changes actually on their patch (which is why since 1979 little has been achieved in getting Government off the backs of business, especially business start-ups).

If Lord Young is to succeed he will need you to give special impetus to the project in all of these areas, in setting up his committee, and in publishing the Scrutiny Report.

Peter Warry
PETER WARRY

THE BOLDER OPTIONS

Raise VAT exemption threshold somehow

Give right to be treated for both tax and employment law as self-employed

Harmonise pay definitions for PAYE and NIC

Merge the PAYE and NIC systems altogether (not recommended)

Raise the PIID threshold

Employers to contract out of SSP refund and offset by reduced NIC contributions

Raise exemption threshold on reinstatement following maternity leave to 20 people

Local authorities to cease superimposing special employment obligations

End the duty of the Health & Safety Executive to maintain or improve all standards

Exempt small shareholder managed companies from statutory audit

Simplify accounting and administrative requirements for limited companies

Deregulation of shop hours

Simplify or repeal pricing and some weights/measures legislation

Just one licence for all food shop products

Chains of multiple off-licences to require single licence for all

Critical general review of licensing requirements

Large sections of the Consumer Credit Act to be repealed

Automatic planning permission unless council object within one month

Strict time limits for decision on both inspectors' reports and ministerial appeals

Authorities to provide sites for 'bad neighbour' industries

More simplified planning zones including relaxation of building regulations

Review of building regulations particularly of cost/benefit of compliance

Experiment with help line/one stop shop services

Produce computerised 'expert systems' to lead businessmen through regulations

Get European Community agreement for action on burdens

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CODE: S = Scrutiny, C = CBI, D = IOD, P = Other, ? = Option

THE GENERAL APPROACH TO REGULATION

1. (A) STATUTORY DUTIES AND CODES

- S Replace detailed regulation by general statutory duties eg for safe working
- S Compliance costs to be taken into account in formulating all regulations
- S Codes of practice should be flexible
- S Codes to distinguish between the best practice and minimum necessary standards
- S Codes to have short summaries of key points for small businesses
- P Codes and guides to be limited in length - say 500 words
- S Greater use of self certification rather than direct policing

1. (B) COMMUNICATION WITH BUSINESS

- S Crisp summaries of the main requirements of each body of law
- S Short covering note when detailed material sent
- C New laws to be accompanied by simple guidance notes
- S Clearly signposted enquiry points
- S Spread best practice on cost effective compliance
- S Produce simple starter packs on regulatory requirements
- P Rationalise all leaflets into a 'Croners Guide' compendium
- S Produce computerised 'expert systems' to lead businessmen through regulations
- S Experiment with help line/one stop shop services
- S Pilot project to test out some of these ideas
- C All forms to ask for information in the way business produces it
- P Official jargon to be avoided in written and verbal communication

1. (C) LONGER TERM STRATEGY

- C Clarity of legislation even at expense of supposed legal certainty
- S,C Set annual limit to volume of new regulation
- S Set quantified target for compliance costs
- C Sunset provision for all new regulations

- S All new proposals to have a cost benefit analysis
- S,C Central taskforce of 2/3 people to do impact analysis on new regulations
- C Impact analysis on incremental value of changes to legislation
- P Impact analysis and rationalisation of existing legislation
- S Regular over-views of the overall burden of regulations
- S,C Parliament to scrutinise compliance costs of new regulations (including EC)
- C Interdepartment coordination on all new regulation
- C Minimise overlap between separate departments' regulations
- S Parliament to scrutinise existing regulatory requirements
- C Advance consultation of business sectors to be affected
- S Strengthen the business voice in regulation consultation
- S,C Bring regulators into direct contact with small businesses
- P Exempt small firms from regulations which have disproportionate compliance costs
- P Introduce a US style Regulatory Flexibility Act for small firms
- S Critical general review of licensing requirements
- S Review requirements deriving from local authority private Acts

1. (D) EUROPEAN COMMUNITY

- S Increase Community awareness of regulatory burdens
- S Get Community agreement for action on burdens
- S Aim regulations at wealth creation rather than social initiatives
- S,C Single Commissioner should be responsible for compliance costs control
- C EC to review its objective of harmonisation of national laws
- S Interdepartmental action to secure these EC initiatives

1. (E) ENFORCEMENT

- S Enforcement officers to show greater flexibility
- S,C Enforcement action to be more consistent across agencies
- S Less overlap between enforcing agencies

- S Enforcement activity to be made simpler
- S Burden of proof to be on the regulator
- S Guidelines of enforcement practice to be developed
- S Enforcement officers to be trained in the needs of small businesses
- S Rationalise the selection of businesses visited for enforcement
- S Enforcement officers to be aware of compliance cost of their actions
- S Enforcement officers to offer constructive advice where possible
- S Policy of positive assistance not negative policing
- C Enforcers must avoid 'guilty until proved innocent' approach
- S Review comparative inter-agency enforcement practice
- S Concentrate enforcement where cost of non-compliance is high
- S Give statutory direction to local authorities on enforcement practice
- S Make it easier to appeal against enforcement decisions
- S Statutory defences for criminal regulation breaches to be reviewed
- S Review the various safety requirements across departments

2. TAX AND NATIONAL INSURANCE2. (A) PAYE

- P,D Give right to be treated in all respects as self-employed
- S Make binding one departments decision on self-employment on others
- C Less suspicious approach by Revenue to part-time and self-employed workers
- C? Move to US style self-assessment of tax
- C Payslip to be used in lieu of P60 and perhaps P14
- C Raise the PlID threshold
- P Make all PlID expenses non-tax allowable to employer
- C Omit allowable expenses from PlID reporting
- C? Consolidate Schedule E payments in kind into the PAYE system
- P Simplify tax assessment basis for partners and sole traders

2. (B) PAYE AND NIC

- S Improve starter pack by contents list and description of total system
- S Harmonise pay definitions for PAYE and NIC
- S Make PAYE and Class 1 NIC non-cumulative (but more study)
- S X Merge the PAYE and NIC systems altogether (but more study)
- P X Introduce the negative income tax system
- P X Abandon link between NIC contributions and benefit entitlement
- S End separate visits by PAYE and NI inspectors
- S X Consider quarterly payment by employers of PAYE and NIC

2. (C) NATIONAL INSURANCE

- S Reduce number of mariners' NIC rates
- S End reduced employees rate for married women
- P Abolish class 4 NIC rate
- S Changes to small earnings exception on class 2 NIC
- S X Harmonise employer's and employee's NIC rates

- S Enquiries on past years' NIC be answered from P60 rather than by employers
- S Combined visits also for Class 2 and 4 NIC
- P Introduce a low flat rate employers' NIC in business's first year

2. (D) STATUTORY SICK PAY

- P Employers to contract out of SSP refund and offset by reduced NIC contribution
- S Employers forego SSP refunds in return for reduced recording
- P Exclude small firms from SSP
- S Changes to definitions of qualifying days for SSP
- S Simpler SSP recording system in line with above
- S The 'linking letter' to be sent direct to the employer

2. (E) PENSIONS

- C Employees to be able to contribute to own pension fund separate from employment
- C Abolition of some of the Inland Revenue Limits for pensions
- C Simplify regulations relating to "franking"
- C End over-riding legislation to allow schemes to be complete on their own
- C Do not introduce Public Deposit Registry of pension schemes

2. (F) COMPANY TAX CHANGES

- D Abolish all or some stamp duty
- P Abolish token stamp duty payments
- D Abolish Development Land Tax
- D 7 year cut off for capital gains tax
- D Exempt business assets from capital transfer tax
- D £5,000 of profits tax free for small business start ups
- C End petroleum licence holders responsibility for tax of defaulting subcontractors
- C X Allow parent companies to take on tax assets of liquidatable subsidiaries

2. (G) TAX ADMINISTRATION

- D X Government to pay business for collecting VAT, PAYE, etc

- C Existing tax law to be codified and consolidated
- C More published guidelines on Revenue interpretation of the law
- C Inland Revenue to be less zealous in blocking little loopholes
- C Ensure timely publication, eg of Finance Bill
- C Better communication within Inland Revenue so requests not repeated
- C? ~~X~~ Merge Inland Revenue and Customs and Excise

3. CUSTOMS AND EXCISE3. (A) VALUE ADDED TAX

- S?,D Raise VAT exemption threshold
- P Raise VAT exemption threshold and reimburse EC if necessary
- P Set high initial VAT threshold for business startups which then gradually reduces
- P Compulsory VAT registration for all, but exempt status below £50,000
- D Abolition of VAT between registered traders
- D Assess VAT on figures in annual counts
- D Less suspicious approach to apportionments between business and private use
- S Monthly payment plan for small business
- S ? Flat rate scheme for retailers
- S Retailers should be allowed to change schemes with some retrospection
- S Increase turnover limit flexibility on retailers schemes
- S Encourage deregistration of traders below threshold
- S Bad debt relief should be extended
- C Less refinement of detail in operating VAT

3. (B) ADMINISTRATION OF VAT

- S Emphasis on compliance costs throughout Department
- S Officials should provide advice on best retailer's schemes
- S Central register and dissemination of approved computer systems
- S Proprietary computerised accounting systems that work should be endorsed
- S Various improvements in literature and forms
- S Appoint liaison officer to help trade advisory bodies

3. (C) VAT ON IMPORTS AND EXPORTS

- S System to avoid importers having to give a VAT guarantee
- S Importers VAT certificates to be issued more promptly
- S Use sales invoice for retail export relief

- C Implement VAT relief on returned imported goods
- C Extend same reliefs on imports for VAT as for duty
- C More consultation on VAT and import/export changes

3. (D) IMPORT/EXPORT DOCUMENTATION

- S EC to develop single administrative document for low value consignments
- S No charge for the above SAD
- C Simplified export documentation
- S Abbreviated entry form for all consignments under £200
- C Alignment and simplification of all export/import forms in EC
- C Greater use of normal business records rather than special forms
- C Reduction or simplification of IBAP procedures
- S EC statistics ceiling raised from £200 to £500
- C Only spot checks for reliable companies

4. COMPANY AND TRADING LAW4. (A) COMPANY LAW

- C Replace Memorandums of Association by short form statement
- C New "micro" company to simply confer some benefits of incorporated status
- C Reinstate register of trading titles
- C Help protect shareholder minorities by Ombudsman to review contested cases
- C Remove requirement for trading certificates under 1980 Act

4. (B) COMPANY ACCOUNTS AND ADMINISTRATION

- S Reduce prescribed content of accounts for small firms
- C Relief from full filing requirements for subsidiaries
- P Relief from filing subsidiaries accounts if parent guarantees all creditors
- C Dormant companies to make only single line Annual Return
- S,C Exempt small shareholder managed companies from statutory audit
- D Changes in company circumstances only to be reported in Annual Return
- S Combine accounts and annual return into a single requirement
- S Send out annual return form six weeks before it is due
- S X Reduce annual filing fee
- C X Non-disclosure of small loans to directors

4. (C) TRADING REQUIREMENTS

- S,C Repeal Bargain Offers order and replace in reduced form
- C Repeal The Food (Prohibition of Repricing) Order 1978
- C Single authority for enforcing trading standards in overlap areas
- S,C Strengthen statutory defences for honest traders against misdescription
- C De minimis or little injury defences to be introduced
- C Quality of other similar goods for sale as defence in Food Act
- C Trade Descriptions Act not to be used if action under another Act possible
- S General statutory duty that goods are safe but not detailed laws

- S Compliance costs/benefit to be explicitly used in setting safety standards
- S Review regulations on night dresses, carry cots, prams, oil lamps etc
- C Repeal without replacement the code of practice on fumigation
- S,C Deregulation of shop hours
- S ~~X~~ Deregulate late night hours for cafes and take-aways
- S? Apply easier existing rules for take-aways to cafes as well
- C Just one licence for all food shop products
- C Chains of multiple off-licences to require single licence for all
- C Liquor licences to be renewable every five years
- C Abolish game licence
- S Scrap Metal Dealers Act to be repealed in part

4. (D) WEIGHTS AND MEASURES

- C Complete metrication in food retailing
- S Simplify prescribed quantities requirements for pre-packed food
- S Continue to oppose EC proposals on "Unit Pricing"
- C Apply average weight system to catchweights as well
- C More self certification/approvals in weights and measures area
- C 3 months advance notice before any change in technical criteria on weights
- C Legislation and certification should take account of latest technology
- C Quicker and cheaper approval of new measuring techniques
- C Only parts critical to weighing accuracy to be certified
- C Modules rather than whole measuring systems to be approved

4. (E) CONSUMER CREDIT

- S Reduce or end Acts coverage of commercial borrowing
- S Reduce or end licensing of credit businesses
- S Simplify lenders statutory obligations
- S Simplify advertisements regulations

- S Abandon quotations regulations
- S Simplify documentation for credit agreements

4. (F) DATA PROTECTION

- C Home Secretary to have power to exclude some data from scope of Act
- C Widen exemption given to word processing activities
- C Exclude internal office administration from Data Protection Act
- C Limit subjects access to single point in organisation
- D Data protection registrar to report impact on business

4. (G) STATISTICAL RETURNS

- C Statistics to be in form that businesses normally use themselves
- S,C Improve layout and presentation of forms
- S Try to exclude very small firms altogether
- S Minimise sample sizes and spread burden evenly
- S New forms to be tested by initial pilot exercise
- S Post hoc monitoring with user firms to be instituted
- P Further cut down on volume of statistics collected
- S Curtail EC statistical requirements

5. EMPLOYMENT LAW

5. (A) UNFAIR DISMISSAL AND INDUSTRIAL TRIBUNALS

- S,D,C Employment protection rights only to be established after 2 years (Agreed)
- D Qualifying period for small firms to be extended from 2 to 5 years
- D,C Small firms to be those employing less than fifty (200 CBI)
- D Right to determine own employment contract
- C Review industrial tribunals to make more speedy and less legalistic
- S Promote conciliation directly between the parties rather than between lawyers
- S,C Refundable deposit for pursuing case through industrial tribunal
- C Power to dismiss meritless case at pre-hearing assessment
- P Refundable deposit for pursuing cases after unfavourable pre-hearing assessment
- P More frequent awards of costs against meritless plaintiffs
- C Train tribunal members especially about their powers
- S Tribunals only to give written reasons in significant cases or for new principle
- S Introduce requirement for leave to appeal to Employment Appeals Tribunal
- S Introduce charges for appeals
- D No unfair dismissal on medical grounds for small firms
- D Make dismissal for non union membership always unfair

5. (B) OTHER EMPLOYEE RIGHTS

- D Abolish time off with pay for union duties
- D Abolish time off (without pay) for union activities
- D Abolish guarantee payments
- C Guarantee payments to be excluded if resulting from external strikes
- S ? Persuade EC to drop requirement for pre-notification of redundancies
- D Redundancy payments only after 5 years in small firms
- S ? Increase redundancy payment rebate for small firms
- S ? Increase redundancy payment rebate for small firms on transfer of undertakings
- P Persuade EC to repeal transfer of undertakings regulations

- D No redundancy payment on insolvency for small firms
- D No medical suspension payments for small firms
- S?,C Maternity payments to be made directly by the State
- S? Employers to recover maternity payments by deducting from their NI contributions
- C Further simplify administration for both maternity and redundancy rebates
- S? Raise exemption threshold on reinstatement following maternity leave to 20 people

5. (C) WAGES COUNCILS AND YOUNG PEOPLE

- D Abolish wages councils
- C Reform but do not abolish all wages councils
- C Companies with own collective bargaining to be able to opt out of council
- C Council to be limited to single adult and youth pay rates
- S ? Resolve overlap of wage council minimum and YWS
- S End requirement to notify employment of young people
- S Repeal restrictions on women and young persons' hours
- P Disapply all employment and wage legislation to the under 21s
- S ? Relax entry criteria for Enterprise Allowance Scheme
- S ? Encourage small firms to participate in YTS
- S ? ITBs to be replaced by voluntary arrangements

5. (D) DISCRIMINATION

- C Equal opportunities and Race Relations Commission to limit support to complainant
- C The Commissions to pay employer's costs if their sponsoree loses
- S Issue and monitor a sex discrimination code of practice
- S Monitor race discrimination code of practice

5. (E) MISCELLANEOUS PROVISIONS

- P End ACAS role of promoting collective bargaining and (implicitly) unionism
- S End requirement to display extracts of Factories Act etc
- C Local authorities to cease superimposing special employment obligations

- S ? End or reduce licensing of employment agencies
- S Simplify form for unemployment benefit enquiries
- D Pendulum arbitration in essential services and no immunities for strikes
- S ? Combine monthly pay and employment surveys or do quarterly
- C Consolidate the various employment and union Acts

5. (F) ADVICE

- S X Increased publicity for ACAS services
- S Introduce ACAS handbook for small firms
- P Produce specimen employment contracts for business start-ups
- S Publicise DE telephone enquiry point
- S Trial freephone enquiry point for ACAS and HSE
- S Better DE literature displays at job centres
- S Better publicity of ACAS and HMFI advisory services
- S Job Centres to be source of advice and signposting for all small company needs

6. HEALTH, SAFETY AND INJURIES6. (A) HEALTH AND SAFETY REGULATION

- S,C ? Modify the requirement to maintain or improve health and safety standards
- S ? Be more reluctant on future health and safety legislation
- C HSC to be enabled to recommend repeal of archaic regulations
- C HSC to set good practices not mandatory standards
- C Guidance notes should be voluntary targets of best practice
- C Guidance notes should be in clear language not legalistic
- C Give breathing space before regulating further on hazardous substances
- C HSC to do cost benefit on all new regulations and publish the evidence
- S Legislative proposals to have small firms impact analysis
- P Government to provide 50% grants for safety equipment recommended by inspectors
- S ? One member of Commission to represent small firms
- S ? End the requirement for Commission to consult on health and safety
- S Only firms of more than 20 to have written safety policy
- P X Partial exemption from most requirements for 'garage start-ups'
- S ? X Modify machine guarding requirements
- C Proliferation of notification requirements should be consolidated

6. (B) HEALTH AND SAFETY ENFORCEMENT

- S ? Onus of proof in prosecution to be shifted from employer to regulators
- C HSC to promote self regulation in good firms and just police the bad
- S Establish priority rating system for H&SW inspection visiting
- S Inspectors to be taught better understanding of how firms work
- S Appeal procedures to be more clearly indicated
- S, ? Commission to lay down standards for both factory inspectors and EHO
- C Transfer all enforcement responsibilities from local authorities to HSE
- S Simple pamphlet to summarise health and safety requirements

6. (C) INDUSTRIAL INJURY ETC

- S? Contracting out of industrial injuries element of NIC
- S Harmonisation and integration of DHSS and HSE accident reporting requirements
- S Information on prescribed diseases to be pooled by DHSS and HSE
- S? Disabled quota reduced to 2% and threshold raised to firms of 50
- S Disablement benefit employment definition as per National Earnings Survey
- S Benefits to be linked to movements in NES data
- S Other minor changes on disablement benefit and forms
- S Changes to the occupational deafness claim form
- S Smaller business to be represented on the Industrial Injuries Advisory Council
- S Industrial injuries information to be included in PAYE starter pack

7. PLANNING, BUILDING AND FIRE REGULATIONS7. (A) PLANNING

- P Automatic planning permission unless council object within one month
- P Timetable for all stages of the planning permission process
- P Strict time limits for decision on both inspectors' reports and ministerial appeals
- P Reason for planning refusal to be given to facilitate quick resubmission if overcome
- S Speed up planning decisions by more delegation of powers
- C Presumption against planning permission should be reversed
- S Simplified planning zones including relaxation of building regulations
- S Additional planning exemptions for small developments
- P Extend the enterprise zone boundaries and make new towns regulation free
- S,C Greater flexibility on need to meet full highway standards
- S Remove highway authorities powers of direction on applications
- C Planning permission to incorporate any footpath diversions necessary
- P Reduce the number of use classes
- S Limit requirement for change of use applications
- P Greater use of approval conditions as an alternative to rejecting applications
- S Simpler appeals for small developments and change of use
- S More guidance for public on going about planning applications
- P Encourage bilateral meetings between planning applicants/objectors to resolve dispute
- S Reactivate review of statutory nuisances
- P Reduce advertising restrictions particularly in rural areas
- C Do not extend number of listed buildings
- P Scrap structure plans or make them less rigid

7. (B) PLANNING GUIDANCE TO LOCAL AUTHORITIES

- S X Refusal of planning permission due to anticipated nuisance to be discouraged
- S X Enforcement action against nuisance to be resisted if possible
- S Guidance on enforcement against nuisance to be issued

- S Authorities to provide sites for 'bad neighbour' industries
- S Guidance on need for permission to work from home
- S Relevance of market conditions to be clarified
- S More favourable attitude to speculative developments for small firms
- S Improve system for informing authorities of planning appeal decisions
- C Stop local authorities further extending existing regulations

7. (C) LOCAL AUTHORITY HELP TO SMALL BUSINESSES

- S One stop shops to provide active assistance to business
- S Pilot schemes of one stop shops to be actioned
- S Reduce constraint on inner city funding to aid the above
- S Government to persuade authorities of the need not to obstruct business
- S X DoE regional policy directorate to ensure business needs met
- S Staff within authorities to represent business against regulators
- P Business liaison officers to help businessmen through the planning machinery
- S DTI to periodically review impact of regulations on business
- S DoE regulatory directorates to include economic regeneration in MINIS
- S DoE to improve coordination of supply of business premises and land
- S Greater involvement of DTI and liaison between DoE and DTI
- S DoE to review interdepartmental consultation to ensure adequate input

7. (D) BUILDING REGULATIONS

- S Review of building regulations particularly of cost/benefit of compliance
- S Less regulations on fire precautions and energy conservation
- S Less onerous regulations for building conversions
- S Restrict change of use triggering coverage by regulations
- S Exemption limit for small buildings to be raised
- S Improve coordination between Departments and with outside interests
- S Better guidance to authorities on Government policies
- S X Abandon regulations and rely on private insurance

7. (E) FIRE PRECAUTIONS

- S ? Exemptions for low fire risk premises
- S ~~X~~ Move to self certification of fire safety standards
- P Rely solely on insurance
- S ~~X~~ Remove or relax some of the fire precaution standards
- P Fire precautions to be limited to life saving not property saving
- S Business to be consulted on fire precaution standards
- S Training of firemen to include compliance cost awareness and flexibility
- S Home Office to reinforce compliance costs and a flexible approach
- P Require inspectors to indicate approximate compliance cost of recommendations
- S Fire brigades to give more consistent advice on precautions work
- S Availability of appeal against fire inspector to be emphasised
- P Allow appeals to an independent arbiter
- S No charges to be levied for fire inspection work
- S Improve links between fire service and Environment Health Officers