

HSE RIDDOR CONSULTATION 2026

Request for information



INTRODUCTION TO HSE PROPOSAL

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) legally requires employers to keep records of, and report, work-related fatalities, specified injuries, occupational diseases and dangerous occurrences. RIDDOR came into force on 1 October 2013, replacing the 1995 regulations, and has changed very little since its enactment. HSE's RIDDOR consultation launched on 7 April 2026 and marks a significant opportunity for businesses to have their say on the proposed changes - an opportunity that may not arise again for a considerable period.

SHARE YOUR VIEWS ON HSE PROPOSALS

The purpose of our form is to collect and aggregate practical insights from our clients on how the Health and Safety Executive's (HSE) proposals to the RIDDOR process would affect their own experiences and sectors. It is designed to allow clients to openly share their views and examples in their own words, rather than limiting responses to the tick-box exercise within HSE's consultation.

We would kindly invite you to complete our form by 15 June 2026 for us to review, aggregate and complete one submission to the HSE's consultation. We will not name or refer to your company when sending our submission although may refer to your experiences and sector. The consultation formally closes on 30 June 2026.

We have summarised key points from the proposal below.

At the end of this document is a link to our interactive form. Your answers will only be sent to Gordons' Regulatory team for their review.

For any further information about our form or HSE's consultation, please contact Gordons Regulatory Solicitor [Rachel Little](mailto:rachel.little@gordonsllp.com) on rachel.little@gordonsllp.com

The consultation is in two parts, the first addresses the legislative side of the RIDDOR process, and the second on the non-legislative side, including administration of reporting. HSE has stated that *"the proposals are designed both to strengthen protections for workers and to cut unnecessary administrative burden on businesses"*.

KEY PROPOSALS

1. Clarifying Definitions

HSE wants to clarify the definitions of key terms within RIDDOR with the aim of simplifying their meaning for duty holders. This would include providing examples in the guidance where definitions are not clear.

The aim of clarifying key definitions is to prevent duty holders from submitting RIDDOR reports as a precaution even though they do not meet the criteria. According to HSE, overreporting has led to administrative burden and inconsistent data, in turn making it more difficult for HSE to assess risk data. Conversely, uncertainty around the definitions has led to underreporting and significant events being missed in their entirety - ultimately resulting in enforcement action against the duty holder.

We (Gordons' Regulatory team) welcome the clarification of definitions, as greater certainty should help reduce unnecessary administrative burden on businesses and duty holders while supporting more consistent, accurate reporting.

2. Expanding Reportable Occupational Diseases

The largest of the changes that HSE is proposing is to expand the list of occupational diseases from 6 to 19.

The change was to reflect low reporting numbers, but there remained some concern that serious occupational health issues were no longer visible because of the amendment.

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In addition to re-introducing nine previously removed diseases, the following four new diseases will also be added:

- Noise-induced hearing loss,
- Bronchiolitis obliterans,
- Occupational allergic rhinitis, and,
- Occupational contact urticaria.

This represents a substantial expansion of reporting obligations and signals a renewed regulatory focus on occupational health surveillance. For some employers, particularly those without support in RIDDOR reporting, the increased number of occupational diseases may be challenging and could increase the time and resource required to remain compliant with obligations.

3. Broadening the Scope of 'Diagnosis'

Under the current RIDDOR reporting scheme, any reportable occupational disease must be diagnosed in writing by a doctor registered with the General Medical Council. The consultation proposes expanding the scope of 'diagnosis' to include other registered health practitioners.

The aim of this proposal is two-fold. Expanding 'diagnosis' to include other health professionals such as registered nurses, pharmacists, and physiotherapists would take the weight off GPs where a condition can be reasonably diagnosed by another health professional and would prevent employees from having to seek further diagnosis where diagnosed by someone other than a GP or doctor. However, in turn it lowers the threshold for reporting, perhaps triggering duties under RIDDOR more frequently.

4. New and Amended Dangerous Occurrences

HSE is also looking to amend the current list of dangerous occurrences to reflect industry changes since RIDDOR came into force in its current iteration in 2013. There is concern that the current list leaves room for potentially dangerous occurrences or significant incidents to be missed, leaving health and safety breaches unreported and therefore hidden.

However, some of the proposed new dangerous occurrences (for example, those relating to dropped objects) appear to be drafted broadly, even with the qualifying provision that they are reportable where they "could cause the death of a person". In practice, this may place significant pressure on duty holders to submit formal reports in a far wider range of scenarios than previously, particularly in high-activity sectors such as construction, and will undoubtedly bring additional regulatory attention with it.

It is our view that any concern on the reporting criteria and definitions should be notified during the consultation process to help inform HSE's approach and reduce ambiguity when the final proposal is published.

5. Simplifying RIDDOR Reporting

The final, and only non-legislative proposal, is the review and revision of the RIDDOR reporting form. HSE's plan to simplify the form to address both over and under reporting. The form was adjusted in 2023 to add pop-up messages and improve guidance within the form itself, however the proposed changes within the consultation suggest a more thorough adjustment.

The proposed changes appear intended to influence reporting behaviour by increasing usability of the form, simplifying, and clarifying requirements. In turn, this will most likely lead to changes in enforcement risk associated with the submission, or lack, of RIDDOR.

Overall, the proposals would make more incidents reportable, expand the range of occupational diseases that must be reported, and, by widening the range of professionals able to provide a qualifying diagnosis, are likely to increase reporting obligations.

[Complete the form here](#)