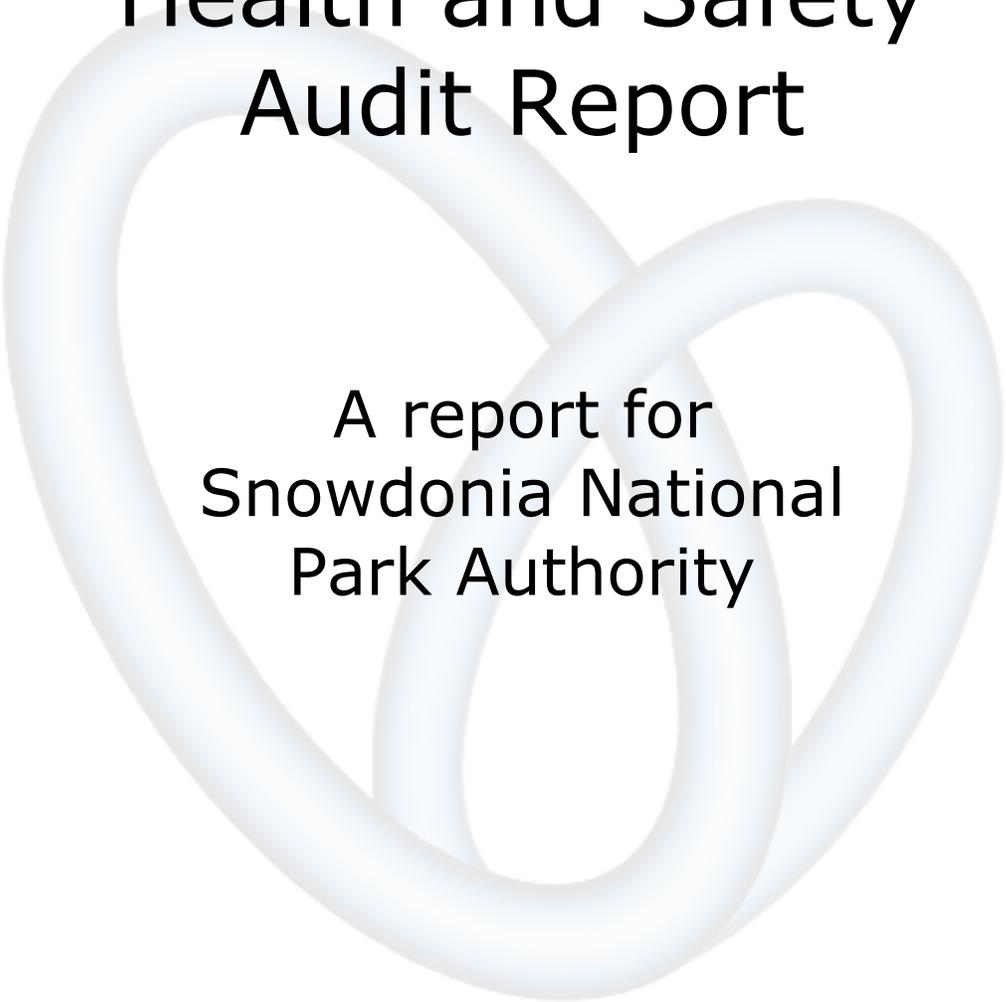


# Health and Safety Audit Report



A report for  
Snowdonia National  
Park Authority



## **INTRODUCTION**

This audit is aimed at providing a 'where are we now' snapshot of health and safety within the Snowdonia National Park Authority (SNPA), identifying areas of weakness and allowing planning over forthcoming months and years to address the issues raised. The audit is concerned primarily with systems and controls – i.e. rather than focusing on a single problem or non-compliance, what is more important is *why* that non-compliance has arisen.

The audit is restricted to activities that fall within the Health and Safety at Work etc. Act 1974 (HASAWA '74), which is the umbrella statutory instrument applying to people at work. In practice, this means that a tenant in a residential property does not fall under the scope of this control, nor does the landlord's responsibilities, however a workman carrying out repairs on the property would fall within the scope. Health and safety is also a separate discipline from food safety, child protection or environmental controls.

Aside from the regulatory control, good management of health and safety is fundamental to a successful business, a fact which is recognised by many business leaders. Alan Reade, former CEO of Merial and Aventis Crop Science, summed this up with the comment that "any business with poor management of health and safety is one which is poorly managed". The economic case for good management of health and safety has now been well established – in a MORI survey of company directors, responses highlighted a conviction that poor health and safety standards had an impact throughout their organisation, including reductions in productivity, poor employee morale, loss of skills and experience, increasing insurance premiums, creating a poor reputation and even having a detrimental impact on the quality of the work undertaken.

For the audit, the principle was used that if individual(s) were not aware of the existence of a policy or procedure which should affect them and could not lay their hands on it then it has to be taken that the policy or procedure is not 'in place'.

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The audit by default focuses on the areas where work is needed therefore the balance of 'criticism' to 'compliments' should not be taken as a comment on current performance.

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## **Total Findings**

<b>Total 1:</b>	<b>12</b>	<b>Total 2:</b>	<b>30</b>	<b>Total 3:</b>	<b>23</b>
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## Scope

The objective was to assess the arrangements for health and safety in relation to the requirements and obligations introduced by health and safety regulations, Approved Codes of Practice (ACoPs) and what may be considered as good practice.

The audit was undertaken by:

- Discussion of health and safety issues
- Tour / Review of the sites and follow-up questions for items seen during this
- Post-visit documentation review.

## Report Content

The report is presented in sectional format.

### Executive Summary

This initial chapter highlights the most important findings arising from the report. It is intended as a brief summary of headline areas, highlighting the critical issues where changes are recommended.

Following this, each subsequent chapter in the report contains two sections.

### Heading

General comments relating to the subject area, often giving an overview of its importance, regulatory structure or other information which is relevant to the findings.

### X.1 Details

This section lists individual issues found.

To the right of each page is a column headed "Follow Up". One issue with an audit is the client knowing where to start therefore a basic ratings system has been used to rank the findings and is used to signify findings where action should be taken to address the issues detailed.

- All items marked as 1 are potentially serious legal breaches or issues of high importance to management of H&S. No 'best practice' issues are rated as '1'.
- Category '2' is an identified legal breach of mid or lower level or an aspect of best practice which could be important to the company safety management.
- Any findings which are of low importance, including many items which may be 'best practice' but not law, are marked with a '3'. Minor legal breaches are marked as a '3'.
- If no rating is given the item is a general comment only.

Although a ratings system is used to rank items this is primarily an audit of the company's health and safety management systems and is not a risk assessment. The ratings system is a guide to importance only and the client must develop an implementation plan to suit its own priorities. The audit is not intended to replace risk assessments as a hazard identification tool.

**While remedial action must be taken for any particular instances highlighted in the report, it is important that the same action is taken in all similar workplaces where repeat occurrences may take place.**



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## **EXECUTIVE SUMMARY**

The key issues considered of highest importance are given below. All are linked and implementation of one will then facilitate the next.

### **A. Risk Assessment**

Risk assessment is the foundation of almost all current health and safety legislation. The Park has made several attempts to address this but still has some areas where a concerted effort is needed to bring the systems into line with regulatory compliance.

Risk assessment only works easily if done in a formal, structured manner. Where risk assessments were in place it appeared very much to be a case of assessments having been done for tasks as they have been thought of, rather than arising from a structured approach. This was evident in many cases where, when asked if a certain risk assessment was present, the result was a lot of flicking through files to try and find the actual assessment rather than going to a single reference point to see if it had been done. The importance of this extends beyond an easy indexing system and goes to the heart of the control of the risk assessment process – how can the Park know where it currently stands on risk assessment if there is no identified goal? The Park cannot know how many assessments have been completed against how many are needed and thus cannot determine how much resource is needed in terms of time and personnel, to adequately manage the issues.

The temptation when undertaking risk assessment is to dive in and start to work through them immediately, but first and foremost, one of the most important actions is to identify which assessments are needed. The Park should take a step back and start at this level with each area identifying exactly what risk assessments are needed, (not forgetting issues such as chemicals, or jobs which are only done intermittently) and then see which are already in place and when these assessments were done. This will then give a clear objective of what new assessments are needed and which are in need of review.

As a secondary note, the issue of risk assessment does vary by area within the Park. For example, the Access and Forestry teams had an excellent and proactive approach, while for the Wardens it appeared to be an issue which has gone largely unaddressed. The Forestry and Access teams have developed a very simple approach of combining a basic generic assessment for a specific risk (e.g. using chainsaws) and then adding to this a very simple site-specific assessment to tie the generic assessment into the job being done. However, even here, the assessments are being done on the basis of 'as they are thought of' with some misunderstanding about their complexity – for example, for repairing fencing, or planting, a single generic assessment will be perfectly acceptable for the whole Park and does not need to be repeated for each individual task.

## B. Policies / Procedures

Policies (which may also be referred to as procedures, SOPs, H&S arrangements, etc.) are a vital part of any health and safety management system as they set out how the organisation will control the risks present within its undertaking and set out the minimum standards which will be accepted. They also provide a clear means of guidance for everyone on what is expected, ensuring a consistent approach which is important in an organisation such as the Park where there are geographically isolated employees.

The Park has some policies in place, notably within the Health and Safety Policy itself, but there is need for an overhaul of this system. In addition, policies/procedures cannot be said to be 'in place' unless everyone to whom they may apply is aware of them and in most cases during the audit, people questioned were not aware of procedures.

The Park has a reliance currently on the Arrangements section of the Health and Safety Policy but this is not covering all areas sufficiently. There are some stand-alone procedures such as those governing accident reporting and lone working. A key action is to develop a clear set of guidance documents which act as the central reference source for all health and safety issues. It is a fairly simple task to write them in such a way that they can equally apply to places such as Plas while at the same time being relevant for other workers such as Access or Wardens.

## C. Objectives and Monitoring

The HSE set out the recommended route for managing health and safety in book HS(G)65. In practice, this means having a feedback loop where the organisation can assess whether its objectives are being met, which in itself means clear objectives need to be set.

A two-fold recommended action therefore is to firstly to set annual objectives for health and safety (arising from the Health and Safety Group, and this can be to 'complete / review all risk assessments in the area, etc.') for key personnel. The agreement of senior management is needed here as this will only work if they are formal targets within an annual appraisal, thus carry equal weight to other work tasks.

It is important that these are practical objectives that personnel can meet, hence it is recommended that 'attend x training course' is not the only style of objective assigned here as this can be very passive on behalf of the individual who will simply go on a course which has been arranged for them. These objectives should tie in with the overall Park objectives of getting all risk assessments done, and from there implementing an ongoing improvement strategy.

Following on from this, the Park then needs a formal measurement basis for these objectives – are they being met and how well. This is crucial for the Park as it needs to know if its goals are being met. This means setting up some form of routine inspection, assessment or reporting structure so the Health and Safety Group can assess each quarter how the various lines are progressing and where efforts need to be focused.

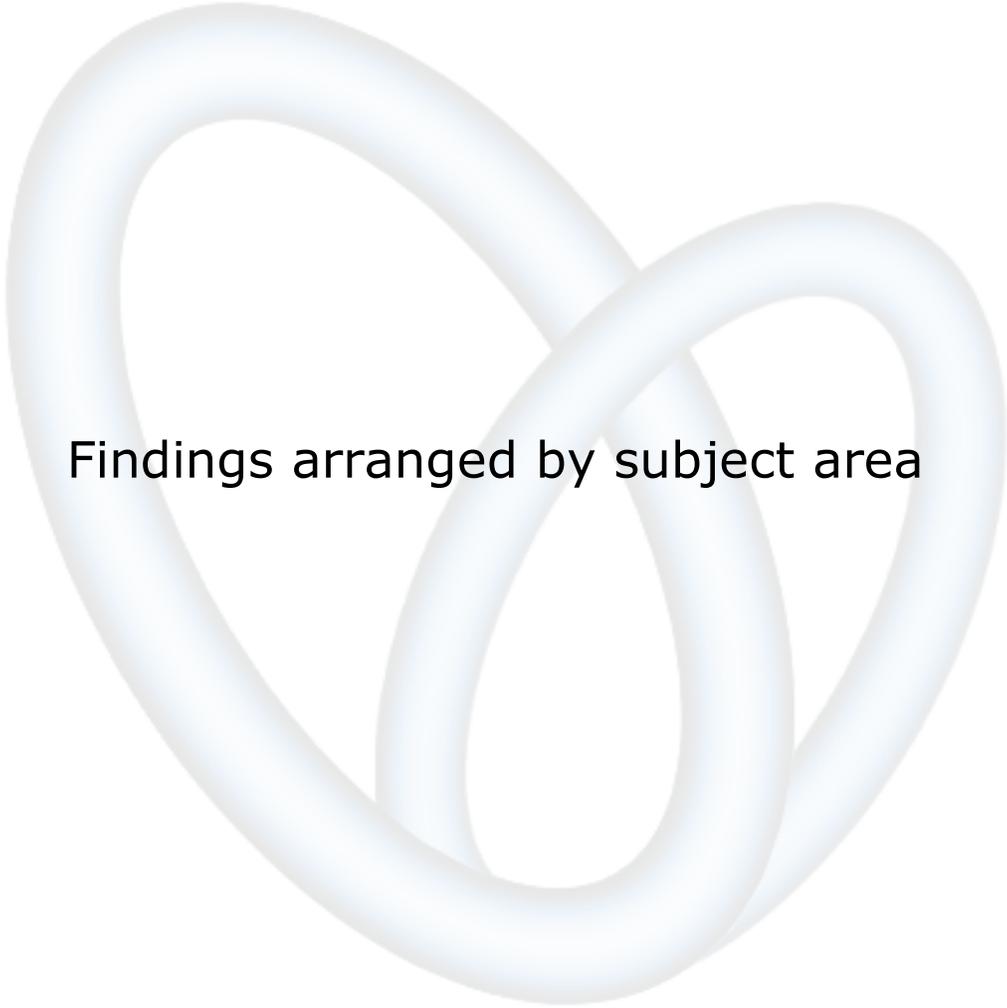




#### **D. Specific issues**

Some specific issues which should be dealt with as a priority:

1. Health and Safety Group  
Formalise the group to meet quarterly. Use it to set goals and objectives and to review performance. Group must meet regularly as this is the driving force for H&S within the Park. Consider rearrangement of the group to include more personnel from the 'practical' jobs such as Access, Forestry or Wardens – people who would have to work with the policies being determined and who can advise on their actual application. There were some very useful people met during the audit within the Access and Forestry departments who could help with this.
2. Communications  
Following from item 1, improve communications on health and safety within the Park. This is particularly important where employees work in small groups and are isolated from the main hub. Consider a quarterly newsletter as a means of this (printed rather than on an intranet – it is important to put the information in front of people rather than have them go and seek it out).
3. CoSHH  
Some tightening is needed for chemical safety including a review of all MSDS to ensure all relevant data sheets are held, a review of the risk assessments to ensure they are present, and users of disposable masks must be fit tested and trained in their use.
4. Portable Electrics (PAT)  
The PAT system has fallen away within the Park and is need of review and re-starting.
5. Noise  
There are a number of people who are potentially exposed to high noise levels at work and noise assessments are required for this.



Findings arranged by subject area



## 1. ORGANISATION FOR HEALTH AND SAFETY

This section reviews the overall management of health and safety within the business, looking at organisational controls and resources.

### 1.1 Overall Responsibility for Health and Safety

The Management of Health and Safety at Work Regulations 1999 and their associated ACoP require the person with overall responsibility for health and safety within the organisation to be identified. This should also be stated in the Health and Safety Policy required by the Health and Safety at Work Act etc. 1974.

Overall responsibility for health and safety rests with the Chief Executive and this is commendably clearly stated within the Park's Health and Safety Policy.

### 1.2 Safety Policy

A Health and Safety Policy is a requirement of the Health and Safety at Work Act 1974, which requires employers with five or more employees to have a written policy. There are three mandatory sections for this:

- a. The general statement of intent
- b. The responsibilities for various levels of people within the organisation, from the top down.
- c. The arrangements which are in place to ensure the statement of intent is met.

The Park has a Health and Safety Policy in place which is dated September 2003. The Arrangements section of the Policy contains systems or references for reporting an accident (a good complete procedure), fire precautions (limited information), first aid, provision of information, a basic training statement, PPE and Transport. This is not complete not covers all areas of the Park's activities which require specific arrangements<sup>1</sup>. For example:

- Risk Assessment is missing – who will complete the assessments, to which standard, under who's responsibility, who is responsible for corrective actions, in which timescale, etc.
- Consultation – there is a basic statement about information and Safety Reps. but not specific detail about how the Park will consult with people, what time Reps will have for their duties, etc.

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<sup>1</sup> For an example, see HSE document IND(G)259 which includes a sample policy and its arrangements.



- How equipment is to be maintained safely, what routine inspections are to be carried out and who is responsible for corrective actions where needed.
- How chemicals will be handled and stored, what type of chemicals are present on the Park's premises, who manages them, etc.
- How the Park will monitor health and safety – see the HSE's book HSG65, which outlines the basic principles for managing health and safety. A key part of this is setting out what is to be done, putting arrangements in place to do it, and then crucially, having a system in place to ensure that it has been done and is achieving the required goals.
- Other issues which should be covered include Lone Working, management of electrical risks, how asbestos is managed, how CDM is managed, DSE issues, manual handling controls, etc.

The Policy itself may reference other procedure or policy documents – a very common route is for sections A and B to be within the Policy, with Section C then cross-referencing other documents within the organisation. With this approach, the entire H&S Policy does not need to be re-issued each time an individual procedure is modified.

1

### 1.3 Health and Safety Assistance

The requirement to appoint one or more 'competent persons' is a component of the Management of Health and Safety at Work Regulations 1999. (Such 'competent persons' can be internal or external and if internal can be someone who just has a general basic knowledge and uses external assistance where required). This issue has the potential to impact all other areas of the health and safety programme.

- a) The Park does not have a dedicated health and safety officer, which is a common post in similar sized organisations. However, under the current structure, the Head of Personnel is responsible for the majority of health and safety management, focused primarily on the 'soft' issues, such as accident management, H&S procedures, risk assessments, training, etc. The Head of Property also has a slightly lesser role, being responsible for the 'hard' issues (facilities maintenance, construction, etc.). Due to the two specific personnel in place, and those others working with the Head of Personnel on health and safety issues, this is working well and no changes are recommended as the introduction of a full-time health and safety person would be of little direct benefit, other than freeing up time from the present HR personnel. Should these staff change in the future this issue should be reviewed as



health and safety management has the potential to quickly deteriorate.

- b) The Park has some people who have a very commendable approach to Health and Safety within the organisation. During the audit, those who particularly stood out as taking health and safety seriously were:

- Forestry
- Footpaths/Access (Hywel and Pete)

The Park would benefit from encouraging these people (and/or others) to develop their involvement in H&S, and with appropriate guidance they could provide a useful resource for managing the issue internally.

#### 1.4 Health and Safety Responsibilities – Job Descriptions

Inclusion of health and safety requirements in job descriptions is a good means of communicating and highlighting the key health and safety responsibilities which are part of any position, from part-time worker to director level.

Sample job descriptions were viewed including:

1. *Director of Land Management*

No health and safety responsibilities are detailed in the job description.

1

2. *Warden and Access Service Manager*

Includes a basic statement that the post-holder will ensure that "statutory health and safety requirements are observed by staff". This omits any internal procedures which the Park may have to a requirement to promote health and safety generally within their sphere of influence.

3

3. *Access Officer*

No health and safety responsibilities are given.

2

4. *Access Projects Officer*

Includes a basic statement that the post-holder will ensure that "statutory health and safety requirements are observed by staff".

3

It is important to ensure that clear health and safety responsibilities are included in Job Descriptions. This is backed up with some general statements for Heads of Service, Section Managers and Supervisors in the Health and Safety Policy.



### 1.5 Health and Safety Objectives

Objectives are a useful management tool for maintaining basic health and safety standards and also driving continual improvement processes. The setting of formal annual health and safety objectives helps retain the focus of managers on key issues, including health and safety, and provides an independent metric for measuring performance.

There were no known health and safety annual objectives in place at the Park.

2

### 1.6 Management Meetings – Inclusion of Health and Safety

Health and safety issues are included in the management meetings.

### 1.7 Employee Safety Reps / Communications

There is an explicit requirement to consult employees on health and safety issues, in both unionised and non-unionised businesses. This consultation can be directly with employees or via representatives but it must be a two-way process rather than simply informing them what is happening. How this is achieved depends on the situation. In unionised sites the union can appoint safety reps, while in non-unionised sites a safety rep. system can be used, or consultation can be direct with all employees or could be via the management chain.

a) It was reported that health and safety communications for the Wardens have been poor recently but this is expected to improve in the near future as new management systems are being introduced, including regular meetings.

3

b) Feedback of health and safety issues to several groups of people throughout the Park was patchy. Most of the 'front end' people such as Wardens, forestry workers, etc. reported receiving little in the way of formal communication on health and safety issues.

One way of improving this can be the development of a quarterly in-house health and safety newsletter which can inform people on changes that are coming up, solicit their views on key issues, inform them of accident trends, etc.

3

### 1.8 Health and Safety Meetings / Committees

There is a health and safety group within the Park although meetings have been sporadic in the past. Such a group has the potential to be a very effective driving force for health and safety within any organisation as it brings a suitably varied group of people together to review health and safety specifically.



a) The Group last met on 17<sup>th</sup> September 08. Previously to this it had met on 2<sup>nd</sup> March 06 for a review of an evacuation chair, with the last actual meeting being December 05. The Group is now planning to meet more frequently – quarterly would be recommended as a good balance of frequency and ongoing control and improvement. The Group is next planning to meet on 3rd Dec 08.

1

b) The minutes of the meetings should be sent to all locations such as Warden Centres, remote offices, TICs, etc. so everyone is aware of what is happening regarding H&S in the Park. At the moment, the group is not meeting this goal, in some cases with people commenting that they 'did not know there was a group' or they 'did not know who was on it from their area'.

There is a good potential side benefit from circulating the minutes in this way in that often remote workers who are physically separate from the main office in an organisation are unaware of what is going on and the assumption is usually that 'nobody cares' about health and safety. By distributing the minutes people can see that progress is being made and that improvements implemented, even if it does not affect them directly. They will also know who is covering health and safety for their area.

3

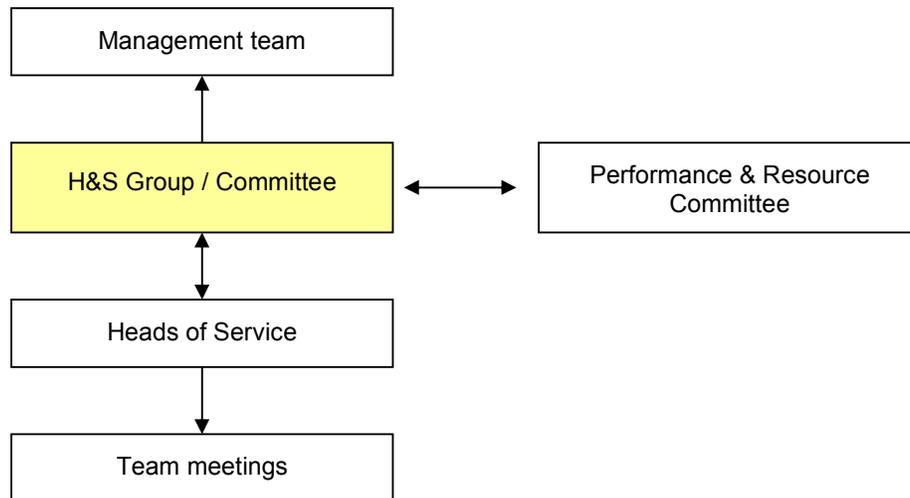
c) The composition of the group is primarily admin / management focused, with some union representatives. For example, on a quick review of the membership nobody could be identified from Forestry as being a regular member.

Consideration should be given to including people who would have to physically implement or comply with new policies (rather than manage those who would need to comply with them). This would reduce the chance of something small being overlooked which when a policy is being rolled-out then becomes a major stumbling block. This is one potential improvement route only, but the group would benefit from increased input from practical workers, either via membership of the group or by some other improved communication means where they can feedback on policies before they are formally issued.

3

Separately from the Group, the wardens from the south and north of the park meet every two weeks, along with their line manager. Health and safety is a standard part of the minutes.

The H&S Group is believed to fit into the Park's structure in the following way, (links only rather than management chain):



### 1.9 Routine Health and Safety Inspections

There are a number of health and safety issues which require routine management, including:

- Fire safety provision such as extinguishers, exits and emergency lights.
- Ladders.
- The workplace itself – flooring, lighting, etc. (particularly important where the Public may be present).

Inspections are in place at Plas but nothing was being done at the various Warden, Estate and Access centres and the TIC.

1

Routine inspections are being done, and records maintained, at the Penrhyndeudraeth joinery workshop. The records were viewed during the audit and Robin is to be commended on the quality and consistency of his records.

### 1.10 Health and Safety Manuals / Procedures

*(Linked to the Health and Safety Policy)*

Procedures (or Policies) are a key tool in health and safety management as they allow the minimum standards which are to be followed to be clearly defined and communicated. One aspect which is often forgotten however is that they can also be used to place upper



limits on the work that employees should undertake. See the CoSHH or Maintenance sections of this report for examples of this.

For the purposes of health and safety and this audit, the Park's 'policy' documents are health and safety procedures as they specify controls and responsibilities.

The Park has some basic health and safety procedures within the arrangements section of the health and safety policy but these are very much 'top level' and do not give specific detail on the areas covered.

There are a limited number of health and safety procedures available on the intranet, e.g. document HS1 – Guidelines for Completing and Incident Investigation Form, also Lone Working Policy.

Examples (not exhaustive) of where procedures are needed to be produced or updated are given in the Safety Policy section previously, and in addition:

- a) Temps may be used in the Warden / Estate areas. When starting they have a session with the Warden first and are provided with PPE. Ensure this is documented in a procedure somewhere. 2
- b) An electrical safety procedure is required which should cover fixed wiring testing (which is done), PAT testing (weak) and the Park's policy for hand tools, e.g. 110v. 2
- c) For remote workers, if the weather closes in they use their own judgement when to stop work. A formal policy should make it clear to them that they have the authority to do that. (Many accidents are caused by people slightly over-stretching themselves with the best of intentions to get a job done). A policy was reported as being in place – review to ensure it is current and meets this requirement. 3

Other procedures examined during the audit included:

- i) The Footpath team at Cwm y Glo have some very good Heli-lift procedures in place.
- ii) Procedure documenting what work experience people can do when working with the Footpath team.

Following risk assessments, and as advised in this audit, review the H&S Policy and develop a comprehensive set of H&S procedures/policies and ensure these are communicated, and available, to all sites. 1



## 2. HEALTH AND SAFETY TRAINING

Training is a critical part of any health and safety management programme and is needed at all levels. Employees need to know and understand the risks which they are facing, as well as the safety precautions to be followed. Managers need to know what is expected of them, what are the main health and safety issues they face and how they can deal with them. As a cost, both in terms of finance and time, training needs to be planned to minimise impacts on production, allow for holidays, busy periods, etc.

This section examines the management of training generally, while specific requirements are dealt with in their appropriate subject areas – e.g. under CoSHH, Noise, etc.

### 2.1 Health and Safety Training Planning

The primary driver for identifying training needs was reported as being the staff appraisals which take place annually, with a six monthly review. Training issues are identified here and the HR Department maintain a training matrix to manage and implement the programme. Copies of the Training Matrices were viewed and were of an excellent standard.

One improvement to consider is to have a set training outline per job description (for key functions such as Wardens, TIC Managers, etc.). For best use, this can be enlarged to a 'training and competence' register incorporating any other non-H&S key skills or awareness levels which are needed for the job. When a new individual is appointed to these posts this will provide a quick and simple way to ensure they are given the required information and training and that the Park can assure itself of their competence. This will help provide a pro-active backup to the staff appraisals where other training needs may be missed. Such systems can be readily constructed in MS Access or OpenOffice Base. (No rating as comment only).

### 2.2 New Employee Induction

New employee induction training was variable through the areas examined:

- a) Llyn Tegid has voluntary wardens who are present seasonally. Before starting they are given training in the powerboat use and in first aid.
- b) The footpath team working from Cwm y Glo have a policy that new team members are inducted by the more experienced personnel.
- c) At Pen-y-Pass the response was that seasonal workers or volunteers are 'selected on the basis of experience rather than giving them training'.



At the moment, each area is doing their own thing to a greater or lesser extent and in most cases the missing component was a means of ensuring consistency of quality across the various areas and proof that it is taking place. For example, there is nothing wrong with the Pen-y-Pass approach to voluntary wardens, but the Park at least needs to know what the key skills are and have some form of assessment and sign-off to prove the system is working.

The Park does have a 'Staff Induction Programme' document which is supposed to be completed on the day new staff start and then returned to the Personnel Department but from the discussions around the Park the implementation of this would appear to be patchy.

2

### 2.3 Health and Safety Training and Information – Key Elements

Health and safety training can take many forms. Managers and supervisors may receive more theoretical instruction on the key legal requirements and how they can help meet them, while employees may receive more practical training for specific issues.

#### Other Issues

- a) Manual Handling. Training given.
- b) Use of Respiratory Protective Equipment, including dust masks (requirement for employees to fit-test before use and training to include at least a qualitative fit test).
- c) Chainsaws are a key tool in many areas of the Park and the policy as reported was very strict – no certificate of competence, no chainsaw work. Only trained competent people are allowed to be exposed to this risk.
- d) Chemical use training is ongoing as needed.
- e) Fire safety training has been given.
- f) DSE users have been trained.

2

### 2.4 Health and Safety Training for Managers

Managers have a need for health and safety training which is specific to them, covering both the general responsibilities which automatically go with being a manager, and the specific requirements of the Park.

Upper levels of management have attended the 4-day IOSH Managing Safely courses.

This is an area which is in need of review for lower-level managers and supervisors. For example:

- a) General safety awareness for mid-level managers covering the responsibilities which go with this and Park requirements.

2



**Follow  
Up**

- b) Training for new managers. (New manager in place at Betws TIC but no training given to date).

3

For both of these, a course such as the IOSH Managing Safely is perhaps overkill but a tailored course of one day or so would be useful in introducing the concepts, legislative approach and basic principles.

**3. ACCIDENT MANAGEMENT**

- 3.1 The new-style accident books are in use.

- 3.2 The Park has a well defined procedure for accident reporting which is covered in Section 4 of the Health and Safety Policy and also in the document 'Guidelines for completing an Incident Investigation Form'. The current document focuses on 'incapacity' and absence but the area of someone who is injured but requires no treatment and no time off work but who does need to avoid a certain part of their job for a few days is not addressed. RIDDOR requires accidents where someone undertakes modified duties for over three days to be reported to the HSE. Review and update this policy.

2

- 3.3 The Park does not appear to maintain and distribute statistics on the type of accidents which are recorded (the Policy states that these are reviewed by the H&S Group but no other employees spoken to were aware of any H&S statistics or how the Park is performing). This can be a very valuable tool, particularly where employees are separated into groups who may not meet each other regularly. A system for distributing accident stats can be very effective for giving a sense of realism to health and safety, for allowing others to learn from issues which arose in another area of the Park, and also for tracking of long term trends which in themselves may be minor but when viewed over time can become significant.

3

- 3.4 The Park has a comprehensive Absence Management policy in place.

**4. AGGRESSION**

When dealing with the public, the risk of an aggressive response has to be taken into account.

- 4.1 Wardens may occasionally be called where people are camping, partying, etc. in an area where this is not permitted. The response from the Wardens when discussing this was primarily one of good, common sense that they use their own judgement on when to get involved, when to walk away or when to call from assistance such as the police. Recommend that the Park has a policy document detailing this to ensure everyone is particularly



- clear about the limits of what they should do before leaving and/or calling assistance.
- 4.2 Nobody spoken to during the audit reported that they themselves had been subject to physical assault by a member of the public although everyone recognised it as a risk.

3

## 5. ASBESTOS

The following is an extract from the HSE's website - Employers must:

- a) make, and keep up-to-date, a record of the location and condition of the asbestos containing materials – or materials which are presumed to contain asbestos;
- b) assess the risk of anyone being exposed to fibers from the materials identified;
- c) prepare a plan that sets out in detail how the risks from these materials will be managed; (this is one part which the Estate needs to do).
- d) take the necessary steps to put the plan into action;
- e) periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date; and
- f) provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.

- 5.1 The Park has had an asbestos survey done by asbestos professionals and has records for all locations. Data sheets have been drawn up giving summary information on the results and were present in the locations visited. There is also an ongoing ad-hoc process of asbestos removal where renovation works are being undertaken. The Park has good controls on this and it is being well managed.

## 6. CHEMICALS AND COSHH

Chemical safety in the UK is mainly governed by the Control of Substances Hazardous to Health Regulations 2002, with links to the Management Regulations. The main requirement is that a chemical safety risk assessment (usually referred to as a CoSHH assessment) is conducted for hazardous chemicals in the workplace.

This is very closely linked to Risk Assessment (see later) with CoSHH and Risk Assessments often being merged into one system.

Chemicals are not widely used around the Park, being limited to occasional herbicide or pesticide use by specific people, some cleaning chemicals and fuel for equipment.





Follow  
Up

- assessment. Individuals must not specify their own as they may inadvertently obtain gloves, RPE, etc. which provides insufficient protection. For example, some gloves will provide excellent resistance to a particular chemical, while others which appear to be as good may offer only a limited protection time before breakthrough occurs. In addition, once the RPE fit testing (see above) has been carried out individuals must only use styles of RPE which it has been proven is suitable for them. 1
- 6.7 Training is needed for users of RPE and other PPE. 2
- 6.8 The petrol at Cwm y Glo was stored in a secure store and a spill kit was available nearby.
- 6.9 CoSHH requires inspection of Local Exhaust Ventilation (LEV) every 14 months. This is being done.
- 6.10 *Penrhyndeudraeth* Workshop: There are a number of products here which fall into CoSHH and for which Material Safety Data Sheets (MSDS) are needed:
- Cuprinol Filler - MSDS not present
  - Cuprinol wood treatment – MSDS not present
  - Evostick glue – MSDS not present
- Review chemicals present on the site and ensure MSDS are present for all hazardous chemicals. (Rated low due to small volumes and relatively low-risk nature of the products). 3
- 6.11 Robin is exposed to formaldehyde via his work with MDF and is aware of the risk. Generally, protection is via local exhaust ventilation with a mask being used when sanding the edges. (See fit testing comment above).
- 6.12 *Penrhyndeudraeth Wardens / Estates*. In general, MSDSs were present but CoSHH assessments absent. E.g. 2

Chemical	MSDS	Assessment
Gordoprim	x	05.10.1992
Tordon 4	✓	x
Stirrup	✓	x
Cropoil	✓	x

- 6.13 Where MSDS are held they are generally kept in the office or base from which the employees work. As a general rule, for remote workers such as these the MSDS should be kept with the employee using it, e.g. in the vehicle. In the event of an accident, this will



enable the MSDS to be taken to the G.P. or hospital with the employee which can greatly speed up treatment time.

2

## 7. CONFINED SPACES

Confined spaces can be a source of increased risk via a potentially reduced oxygen supply or presence or build-up of hazardous fumes or gasses.

7.1 This was not identified as a risk at any of the locations visited.

## 8. CONTRACTORS AND CDM

The use of contractors within a company is often a maze of control requirements and interlinking responsibilities and Contractors must be selected on the basis of their competence for the job. For more major projects, the elements of the Construction (Design and Management) Regulations come into force.

8.1 A question was specifically asked by the Footpath team of 'do footpaths count as construction and therefore does CDM apply'. The answer for this is given in the appendix to this report but after discussing this with the HSE's Construction Inspector for the area, it's a qualified 'maybe'.

8.2 When contractors are used, the decision as to whether a risk assessment and/or method statement is needed is made on the basis of the scale of the work being considered. This is a reasonable approach. Ensure the Park has a procedure covering the use of contractors which states who has the final ability to make this decision.

8.3 Most construction, repair or alteration work is arranged and co-ordinated via the property department. The policy is that if there is a possibility that CDM will apply then consultants / architects are used to manage this.

3

## 9. ELECTRICITY

Electrical safety covers the use of portable appliances (PAT) and the fixed supply. Routine electrical inspections are required for both.

9.1 PAT testing was poor, and was missing or many years out of date in most areas examined. In some areas of the Park plans are underway to address this (e.g. Plas) while in others the approach still needs to be decided. As a note, undertaking this in-house with the appropriate training is a very good<sup>3</sup>, and cost-effective, way to manage this. Ensure that as the systems are developed that they

<sup>3</sup> E.g. City and Guilds 2377



are risk based and are not simply based on an 'everything every year' routine – e.g. portable electrical hand tools may need to be done more frequently such as quarterly, while stationary IT equipment may be OK with a visual inspection every two years and never need a formal electrical test.<sup>4</sup>

1

9.2 At Cwm y Glo, the mains board has an inspection label stating it was inspected and tested in 2004 and says the next one was due in 2008. The standard for this is actually every five years therefore this is still in date, with the next inspection and test being 2009<sup>5</sup>.

9.3 Fixed wiring records were viewed at Plas and were current.<sup>6</sup>

9.4 Generally, most portable electrical tools examined were either battery operated or 110v.

## 10. FIRE

Fire safety has changed a lot in the last few years, moving from a prescriptive basis to one based on risk assessment and strong fire prevention.

10.1 Fire extinguishers are in place and are examined annually by a competent person.

- Cwm y Glo – annual only, no monthly inspections<sup>7</sup>
- Llyn Tegid – annual only, no monthly inspections
- Betws TIC – annual only, no monthly inspections
- Penrhyndeudraeth Workshop – annual only, no monthly
- Plas – monthly extinguisher inspections are carried out and documented.

Where not being done currently, ensure extinguishers are inspected monthly.

2

10.2 Fire risk assessments are in place.

<sup>4</sup> Guidance on testing frequencies is given in the appendix to this report.

<sup>5</sup> See appendix – extract from Wiring Regs (although not official 'regulations' they are referenced by the Electricity Regs as an 'appropriate standard' and therefore obtain their legitimacy from this.

<sup>6</sup> For clarity, a copy of the fixed wiring inspection and test requirement are attached to this report.

<sup>7</sup> BS 5306 Part 3. "It is recommended that regular visual inspections of all extinguishers be carried out by the user or user's representatives. The frequency of inspections by the user should not be less than monthly"



	<b>Follow Up</b>
10.3 Emergency lights, where present, should be activated and tested monthly. <sup>8</sup> Emergency lights at the Penrhyndeudraeth Workshop are not tested monthly, (rated low due to low-risk nature and low-occupancy of this site).	3
10.4 Although there is a lot of petrol-powered equipment around the Park, the storage of fuels in the locations visited was good.	
10.5 The Fire Alarms at Plas and HQ are sounded weekly but implementation of this in other areas where alarms are fitted would appear to be sporadic.	2

## **11. FIRST AID**

First aid safety is based on the principle of risk assessment, which takes into account the risk of injury arising from a particular task, whether an individual is working alone or in a remote site, etc.

- |  |   |
|--|---|
| 11.1 The Park has good systems in place for first aid. All Wardens, forestry, footpath workers, other remote workers, etc. are first aid trained and first aid facilities are provided. Refresher training is given as required. |   |
| 11.2 No overall first aid risk assessment for the Park as a whole was seen during the audit. Ensure one is in place covering the various groups. Rated low as the precautions are excellent otherwise.                           | 3 |

## **12. HEIGHTS AND LIFTING**

Work at heights involves particular risk. Heights can mean any height above ground level, with the most common tool used being ladders.

- |   |   |
|---|---|
| 12.1 SNPA employees do not work up trees. If this is required contractors are used.   |   |
| 12.2 SNPA employees may occasionally abseil – only trained personnel would do this. Ensure it is documented in the training & competence records and procedures.  | 3 |
| 12.3 Ladders are used around the Park. The Park must have a register of all ladders, documented routine inspections must be in place (e.g. monthly) and there must be a written purchasing policy stating the minimum standards needed for buying further ladders. <sup>9</sup> | 2 |

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<sup>8</sup> BS 5266: Must simulate a mains failure of not more than ¼ of the lamp's battery life each month.

<sup>9</sup> Although this may seem slightly over the top, following a HSE Inspector's visit to a client they were specifically required in writing by the inspector to do this for all ladders.



- 12.4 Lifting equipment is examined regularly. Documentation reviewed at the Footpath team for the equipment based here.
- 12.5 There is a small tower scaffold at the Penrhyndeudraeth joinery workshop but no procedure was available which states the steps needed for safe use.
- 12.6 Ladders are used by the teams based at the Penrhyndeudraeth Warden / Estate base. The ladders viewed there were certified to EN131.<sup>10</sup>

2

### 13. LONE WORKING

Lone working can pose a risk to employees in two ways. Firstly, the work itself may be of a particular level of risk and by working alone the risks to the individual are increased should an accident happen. In the second category, the work itself may be of lower risk but a known health condition may place a particular employee at increased risk when spending long periods alone.

It is worth highlighting that lone working is one of the most often misunderstood aspects of health and safety and lone working itself is not prohibited unless a specific risk assessment identifies a need for it<sup>11</sup>.

- 13.1 There are several controls for this currently in place:
- There is a 'Buddy system' technically in place where a nominated person is told where a person who is working alone will be located and when they are expected to return. During the audit people questioned were honest and reported that the system is rarely followed in practice.
  - Some specific jobs are prohibited from being done by Lone Workers. E.g. chainsaw use by the Forestry team. This appeared to be closely followed although it was thought there was no written procedure specifically governing this.
  - Wardens have radios and mobile phones which can be used in an emergency, although coverage with both can be poor in places.
  - Footpath team have a policy of a minimum of three people working together. Where holidays or other absence reduce the number of the people the teams are merged to adhere

<sup>10</sup> Ladders used at work should be Class 1 / EN131 rated and must not be of domestic standard. See free HSE leaflet IND(G)402 'Safe use of Ladders' for guidance on ladders. Copy included with this report.

<sup>11</sup> See IND(G)73 from the HSE – 'Working Alone in Safety' for further detail. A copy of this has been provided with this report.



to this minimum level. This is a great policy in light of the location and nature of the work being undertaken.

The Park has a Lone Working Policy (copy obtained and reviewed), the principle requirement of which is that risk assessments will be undertaken which will determine what precautions are required. This is an acceptable approach, providing adequate risk assessments are subsequently done.

Recommend a review of the risk assessments Park-wide to ensure all potential lone workers are identified and that a reinvigorated system is re-introduced where a need is identified for it. The Policy itself should be more explicit to detail specific minimum standards across the Park – this can still make an allowance for the various groups such as minimum of two people for chainsaw work, minimum of three for footpaths, etc.

2

- 13.2 There is no health declaration currently requested from people who may work alone<sup>12</sup>. From the documentation provided it appeared that a decision had been taken in the past not to do this for in-post staff. Recommend that this is reviewed to help identify persons who may be at particular risk from isolation such as those with an existing heart condition, poor diabetes, etc. In these cases, identification of the issue can allow the Park to develop additional controls if necessary such as a improved buddy system (e.g. increased frequency of contact between people) or provision of automatic lone worker alarms.

2

- 13.3 There were differing accounts given of the role of Wardens in mountain rescue operations with answers ranging from the 'we are not involved in it as part of the job' to 'yes, we go and help'. It would be beneficial to document and clarify this within the Park – do Wardens get involved in mountain rescue, or is that something personal for the individual Wardens and therefore is not part of their work. (As a guideline, do the Park pay Wardens while they are assisting in mountain rescues). If it is part of their work, risk assessments, PPE issue, training, etc. are needed to cover this.

3

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<sup>12</sup> Page 7 of IND(G)73 has a paragraph detailing this. While there is a no law explicitly stating 'employers must do this', it is an inferred legal requirement to enable compliance with other regulations and HASAWA '74 itself. In-service staff are just as at-risk as new staff therefore the Policy must be applied to all. In addition, if the Park has a known risk where part of the control is to establish the health status of those at risk then this safeguard must be applied to all staff equally.



#### 14. MAINTENANCE AND LOCKOUT

A lockout system is a procedure to ensure that all sources of energy have been isolated and locked out before any maintenance work is undertaken. This may be by:

- switching off the electric supply and locking the switch with a padlock
- isolating kinetic energy, for example energy stored within a raised load such a vehicle when working underneath it and isolating it by preventing it fall
- locking out tensional energy, for example in the case of a drive drain which is blocked, by adding a manual clamp
- isolating hydraulic pressure or compressed air sources

14.1 A basic procedure should be in place which places upper limits on the type of maintenance activities which should be undertaken, e.g. repair of tools and equipment. Many accidents are caused by people acting with the best of intentions who over-stretch themselves and undertake a job for which they are not skilled or qualified, but do it as it is easier than getting someone else in.

3

#### 15. MANUAL HANDLING

This is governed by the Manual Handling Operations Regulations which require a risk assessment to be put in place and then the risk reduced as far as reasonably practicable. Training is also required where residual risk remains.

15.1 The Park has made some significant investments in new equipment for the Footpath team to reduce the handling requirements of what is naturally a physical job.

#### 16. NOISE

The Control of Noise at Work Regulations 2005 require that all potentially hazardous noise exposures are assessed, that reduction strategies are implemented, that hearing protection is used where noise levels cannot be reduced any other way, that employees are trained in the noise hazard and protection measures and that a programme of hearing tests (health surveillance) is implemented for all those at risk. A noise assessment is not simply a measure of the noise levels for various pieces of equipment but needs to be job or task based and include time weighting.

Noise is a serious but usually underrated risk. Even where users only undertake high noise work sporadically, their hearing is still at risk.

16.1 Noise assessments are needed for several groups within the Park but these have not been carried out. Examples of areas where this is needed are below.

1



- a) Mowers
- b) Chainsaws
- c) Hedge cutters
- d) Strimmers
- e) Penrhyndeudraeth workshop

A noise assessment is not simply a measure of the noise levels for each job or piece of equipment, but takes into account the work being done, the duration of the equipment's use, the frequency of the task, etc. therefore multiple measurements may be needed for jobs where chainsaws are in use, rather than one measurement for a chainsaw.

- 16.2 New equipment has been purchased in the Penrhyndeudraeth Workshop. As part of the Park's purchasing policy, a written objective should be to obtain equipment which has low-noise level (among other safety objectives). This should be included in the required Policy/Procedure governing noise issues.

3

## 17. PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE relates to items which are worn for the protection of the individual but this definition *excludes* RPE and hearing protection, which are dealt with by the CoSHH and Noise Regs. respectively.

- 17.1 One striking feature present throughout the audit was the response when anyone was questioned about PPE provision within the Park. All responses, with no exceptions, were that it is 'excellent', 'if we need it we are given it with no problems', etc. The Park is to be congratulated on it as this kind of response is unusual when conducting an audit as people tend to use it as a chance to vent a little and usually assume that the PPE they have is the cheapest option available.

- 17.2 The basis of provision of PPE is risk assessment, which leaves the Park in the slightly incongruous position that risk assessments are in need of improvement, but the provision of PPE, which would normally be based on the assessment's findings, is great. Once the risk assessments have been reviewed (see next section) ensure that the PPE issued is in-keeping with this.

3

- 17.3 Where individuals are using PPE, training must be given in its correct use. For specific issues such as chainsaw use, PA1 spraying, etc. this training will have been given as part of the training course. The Park needs to ensure that other users are given training in the use of PPE and its limitations. (For simplicity, recommend this is merged with a course covering use of hearing protection and use of RPE).

2



- 17.4 The Park needs to keep records of PPE issue. This is primarily for insurance risk management and being able to prove that the systems are in place and working as the practical aspects of this are good. There are basic records available via the purchasing documentation but there is no record of who has been issued with what PPE and when. In an Employer's Liability claim or prosecution the Park would be called on to prove what PPE was issued, when and whether it was still in-date (where an expiry is applicable such as hard hats).

3

## 18. RISK ASSESSMENT

Risk Assessment forms the basis of most current Health and Safety legislation, from general workplace issues such as flooring and lighting, through the equipment used to items such as first aid or noise and fire. General risk assessments are needed under the Management of Health and Safety Regulations 1999.

Due to the varied nature of the work undertaken in the Park it is unlikely that a 'one size fits all' approach can be used, and indeed slightly differing approaches are in use, either between areas/departments or even within the same area to address different risks. This is a good approach and keep the focus on the main intent – reducing risk – rather than trying to make the risk management strategy fit a fixed approach.

Risk assessments physically view during the audit included (not an exhaustive list):

- Forestry operation
- Heli-lifting (Access)
- Power barrow use (Access)
- ATVs (Access)
- Dumper truck use (Access)
- Wood Chipper
- School group visits at Plas
- Vehicle / Pedestrian areas at Plas
- DSE assessments

- 18.1 The overall depth of risk assessment varies between the areas examined. In some cases it is excellent, (e.g. Forestry, Footpaths, Plas) while in others it is still lacking. As a summary of the risk assessment status within the Park:

- Wardens – poor, usually not in place. 1
- Estates – poor. 1
- Access – good, detailed and comprehensive. The risk assessments and procedures were excellent.



	<b>Follow Up</b>
<ul style="list-style-type: none"><li>• Forestry – good, with excellent awareness and common-sense approach.</li><li>• Plas – good, key ones in place. Continue with the development programme.</li><li>• TICs – weak. No assessments were present at Betws and the manager was unaware of them.</li><li>• Penrhyndeudraeth workshop – assessments done in June 2006. No review since – some new equipment in place now. Assessments need to be reviewed.</li><li>• Property – no formal policy or formal assessments but surveys, etc. partly cover this. Cleaners for public WCs, etc. are encouraged to report issues as they arise. No reason why this cannot be used as the means of managing RAs for these types of area but it must be formalised both with a Policy and RAs themselves – without that the Park cannot reasonably manage the issues. Other areas have a more formal inspection such as the boardwalks, so again, document this in the RA policy to include it as an assessment – there is no need to duplicate what is already being done. Rated as medium-high as although the facilities are fairly simple there is a large variation in the members of the public who may be present, (e.g. elderly, physically impaired, etc).</li></ul>	2  3  2
18.2 There is a small but residual misunderstanding of risk assessment in some areas of the Park (usually Wardens and Estates) when it comes to non-routine work such as clearing water intakes, moving fallen trees, etc. <sup>13</sup> . In some cases this is accidental, while for others, on the basis of the conversations, this is more a case of exaggerating the requirements of risk assessment to the point where it can justifiably, (in their opinion) be ignored. The non-routine jobs are a weak link in the Park's risk assessment process. As a further example, a site was visited where Estate Workers were working on clearing a fence. No risk assessment was in place.	1
18.3 Llyn Tegid Wardens: While there is an awareness of risk there were no assessments present on the site and the Warden was not aware of any being in place. Review the assessments and ensure they include (examples of required assessments only): <ul style="list-style-type: none"><li>a) Use of the powerboat</li><li>b) Removing dead animals from the water</li><li>c) Manual handling activities</li><li>d) Drain cleaning and other non-routine maintenance activities.</li></ul>	1

<sup>13</sup> To clarify, risk assessment applies to all work, whether routine or non-routine.



- e) Use of mowers, strimmers, chainsaws, etc.

Many of these would benefit from a combined approach. E.g. for most a standard assessment can be used and a site-specific one only used for major works which will eliminate some duplication and (what can appear to end users as) paper-chasing.

- 18.4 Risk assessments were not physically present at the Warden centres visited at Llyn Tegid or at Pen-y-Pass. Risk assessments should be present on all sites as a precautionary measure. This need not be in a hard format and can be via the computer system which can make managing them much simpler. 2
- 18.5 A forestry operation was visited during the audit and risk assessments were in place. The approach taken is a combination of a standard document covering the work generally, and then a site-specific check-list which is completed for each job. In this case it had raised questions about a gas pipeline which had been addressed before work commenced. This is a good system and the commitment to H&S was demonstrable here. To clarify, for jobs such as this a generic assessment for fencing, planting, etc. are perfectly acceptable as it is likely that the risks will be the same in all locations. The site specific add-on is only needed where the job is such that the location may introduce additional risks.
- 18.6 As with the forestry operation, the assessments viewed at the Footpath team were commendable, being a good balance of simplicity and detail. (Too simple and they are useless, too detailed and they won't get done by the people undertaking the work).
- 18.7 There are a number of vibrating tools used within the Park, including chainsaws used by Foresters or Wardens, strimmers, etc. The risk assessments should cover the potential for harm arising from this<sup>14</sup>. (As a rough guide, chainsaws are in use for longer periods by the Forestry team therefore are a higher priority, but other equipment is only used rarely and therefore need not be a priority. The assessment first and foremost needs to decide if vibration is a potential risk meaning the Park need not commence immediately with vibration monitoring or measurement.) 2

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<sup>14</sup> As a note: The manufacturer should be able to give some basic vibration information and the risk assessment should then take this and review it in combination with the frequency and duration of use. This will give a good indication of whether vibration is a risk or not and whether specific vibration assessments are needed.



18.8 A chipper is occasionally used by the Penrhyndeudraeth Wardens/Estates. It was thought that a risk assessment was held for this but on closer inspection it consisted of some guidance documents from the HSE on its use but Chris could not find an actual assessment. This is important as this takes into account location and means of use as well as the basics of the chipper covered by the other documents.

2

18.9 Plas has a good risk assessment system in place.

18.10 Generally, where risk assessments were in place, people were flicking through large files trying to find the pertinent one to the discussion which is symptomatic of a more ad-hoc approach to the assessments. Recommend that some time is spent by each group reviewing exactly which assessments they have, exactly which are needed and have an index or all assessments present and when they were done. Rather than a merely paper exercise, this will make ongoing management of the assessments much easier.

3

18.11 The Park has set up a very comprehensive system for management of DSE assessments and Gwenno has some very good controls for this.

## 19. SECURITY

The Park has a business continuity / disaster management plan in place which is held at the office.

## 20. STRESS

Stress is an issue which must be dealt with in all workplace. Some key aspects to this are:

- There is no such thing as a stress-free workplace and the law does not expect the employer to make a workplace stress-free.
- The law also does not require an employer to foresee all possible cases of stress before they happen, but does expect a degree of proactive approach.<sup>15</sup>

20.1 From discussions with employees, it appeared that the Park's policy on this was focused on providing counselling services. Stress management also requires employees to have a policy in place where employees can raise issues and then address them via steps such as work modifications, providing training, review of targets and deadlines, etc.

2

<sup>15</sup> See appendix for HSE guidance on how employers should address this.



## 21. VEHICLES

The employer has responsibility and liability for *all* vehicles which may be used on behalf of its business, including personal and private cars or motorbikes as well as company-owned cars, trucks, vans, etc.

- 21.1 There are currently no operational control systems reported as being in place for the use of private or company vehicles for business purposes. Recommend as a minimum:

2

### Private Vehicles<sup>16</sup>

- Checks on MOT certificates
- Sight of insurance cover *including business use*
- Confirmation that the driving licence of the individual is valid

### Company Vehicles

- Records of MOT and servicing
- Insurance cover
- Confirmation that the driving licences of the individuals using it are valid
- Routine inspections of tyres, brakes, lights, etc. – e.g. a monthly inspection which is documented.

## 22. WORKING TIME

The Working Time Regs sit as a halfway-house area between HR and H&S.

- 22.1 The Park has good systems for monitoring the working hours for HQ and for Plas but it was not apparent that systems are in place for Estate Workers, Wardens, etc.

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<sup>16</sup> As confirmation, the employer does have responsibility for private vehicles which are used on behalf of the employee's work. See Post Office case law where the Post Office were prosecuted and found liable for an accident which involved a postman's private vehicle which was found to be unroadworthy.



### **23. WORK EQUIPMENT**

For the purposes of the audit, examination of this was via risk assessments (which are required under the Work Equipment Regs) and examination of some equipment present on site, particularly at the Penrhyndeudraeth workshop. Equipment was generally in good condition and well maintained.

### **24. WORKPLACE**

The Workplace Regs cover everything from lighting and flooring, through to temperature, washing and toilet facilities.

- 24.1 Washing and hygiene requirements are difficult to meet in some areas of the Park's activities due to the remote nature of the work. However, external workers are provided with alcohol wipes and water for use when out and about and where longer term workplaces are to be used, temporary facilities are sometimes used such as the huts used by the footpath teams. The Park is making a good attempt to provide suitable facilities given the work some of its people are undertaking.
- 24.2 TICs are a risk due to the number and variety of people who may be present. At Betws-y-Coed, the flooring was clear, free from trip hazards and the lighting was good. Displays were stable (important where small children may pull at them).
- 24.3 There are issues reported with the kitchens in Plas. A new ventilation system is being installed in December which will help improve both the temperature levels and the ventilation.
- 24.4 At Plas, the cleaners have a job description (copy provided and viewed) which includes a requirement for ongoing review of flooring, lighting, etc. and to report any issues found.

### **24. YOUNG PEOPLE**

There are specific regulations which place controls on the employment of people under the age of 18, mostly focused around prohibiting certain types of work, requiring specific risk assessments, etc.

- 25.1 The risk assessments at Plas deal specifically with groups of school children and good systems are in place.
- 25.2 Work experience placements have taken place in the past at the Penrhyndeudraeth workshop but these have now ceased.