

Report of the Director of Nature and Tourism

Subject: Hand Arm Vibration Syndrome (HAVS) – Update Report

Background

This report provides an update on the Authority's work to improve the management of Hand Arm Vibration (HAV) with a specific focus on the work of the Countryside Management Team.

On the 9th November 2022, the Audit and Corporate Services Committee were provided with a brief update explaining that steps were being taken to implement the Authority's new Hand Arm Vibration Policy.

However, following a visit by the Health and Safety Executive (HSE) in December 2022 the Authority subsequently received an Improvement Notice which resulted in a number of actions being accelerated in advance of the 2023 cutting season.

A further update report was provided to the Audit and Corporate Services Committee on the 1st March 2023 along with a recent verbal update by the Chief Executive at the National Park Authority (NPA) meeting on the 21st June.

The positive news, reported at the NPA, is that the HSE has confirmed that the Park Authority has fully complied with the Improvement Notice and that our management approach means that the Authority is meeting its duties under the Control of Vibration at Work Regulations 2005.

HSE Improvement Notice

The HSE Improvement Notice placed a condition on the Authority to either:

1. Ensure that the risk from vibration to our employees is eliminated at source.
2. Where it is not reasonably practicable to eliminate the risk at source, and an exposure action value (EAV¹) is likely to be reached or exceeded, then exposure shall be reduced to as low a level as is reasonably practicable by establishing and implementing a programme of organisational and technical measures.

The Authority has responded robustly by attempting to achieve both of the above outcomes but, due to the nature of our work, by predominantly implementing a detailed suite of actions (please see Annex A) to reduce hand-arm vibration to as low as is reasonably practicable.

¹ The exposure action value (EAV) is a daily amount of vibration exposure above which employers are required to take action to control exposure. The greater the exposure level, the greater the risk and the more action employers will need to take to reduce the risk.

The HSE also provided advice to the Park Authority to “*conduct a review of your policy and arrangement for managing health and safety across your organisation and undertake a longer-term programme of improvement*” with progress to be “*considered at any future intervention HSE might make.*” This work is being led by the Authority’s Health and Safety Project Officer.

HAVS Plan of Action

The most up-to-date copy of the HAVS Action Plan is attached to this report (see Annex A) but Members are reminded that this is a ‘live’ and dynamic document (i.e. it is updated regularly) with the very latest version available on request.

A monitoring group, chaired by the Chief Executive, has been set up to track progress on a weekly basis. The group consists of the following staff:

- Chief Executive
- Director of Nature and Tourism
- HR Manager (until end April 2023)
- Head of Nature Recovery
- Head of Engagement and Inclusion
- Countryside Team Manager (South)
- Countryside Team Manager (North)
- Countryside Team Manager (West)
- Health and Safety Project Manager (from April 2023)

Where necessary, other Authority Officers are asked to report back to the monitoring group. The group meets each Friday and will continue to do so until the Action Plan has been fully implemented.

A more in-depth review of progress to date will be undertaken at the end of the 2023 cutting season to consider the effectiveness of the current approach following what is likely to be a very busy summer in the National Park.

Significant Progress

A comprehensive overview of the Authority’s approach to HAVS is captured in the original update report to the Audit and Corporate Services Committee presented to Members back in March 2023. Rather than repeat the content of the March report, the section below highlights some of the most significant actions undertaken over the last few months to accelerate progress.

Updated HAVS Policy and Risk Assessment – the NPA agreed the Authority’s HAVS policy at its meeting on the 27th July 2022. However, following the HSE Improvement Notice, a more up-to-date version was subsequently agreed at the Authority’s Management Team meeting on the 4th April 2023 (See Annex B). The associated HAVS Risk Assessment (RA) was also updated on the 25th February 2023 and continues to be adapted as the team(s) work through the HAVS Action Plan (see Annex A).

Baseline HAV Assessment (staff) – all staff that use vibrating equipment have, until recently, undertaken a self-assessment to ascertain the impact of vibrating equipment

on their health. Following a review of the Authority’s approach it was agreed that a more robust and independent assessment was needed and, as a result, all associated staff have received a Tier 4 assessment. This involves assessment by a HAVS qualified Doctor and with a formal diagnosis made. It consists of a detailed history, assessment of symptoms and signs of HAVS. Tests include sensation, assessing the vascular system in the hands and look at grip strength. Furthermore, the doctor advises on further surveillance and recommends limits to exposure.

Baseline Vibration Assessment (equipment) – a comprehensive assessment of vibrating equipment used across the Authority was undertaken This involved an independent company undertaking an assessment of equipment to ascertain the vibration magnitude of each tool. This information is then used to calculate and aggregate accurate HAVs exposure limits. Each tool is now clearly labelled with a points per hour vibration score to ensure that staff don’t exceed their daily exposure limit.

Investment in new equipment – the independent vibration assessment of the equipment used by staff has resulted in some equipment being decommissioned (due to vibration levels) as well as the Authority embarking in a significant programme of investment in new and more up-to-date tools and machinery (i.e. with lower vibration scores). Of note is the substantial investment in new brush cutters (£8K) as well as high-tech remote-controlled mowers (£176K) which can also be used for conservation cutting.

Extensive training programme – a comprehensive series of training events have taken place with staff across the Countryside Management team over the last 6 months to ensure that all Wardens are fully up to date with best practice in terms of minimising and managing exposure to HAVS.

Monitoring and compliance – daily and weekly logs of vibration are recorded for all staff using vibrating equipment and the Authority will soon be implementing a series of ‘spot checks’ to ensure compliance with the new approach to HAVS management. Any ‘near misses’ (such as staff exceeding vibration limits) will be investigated and, if necessary, potential disciplinary action may be taken to ensure everyone’s long-term safety with regards to HAVS.

Rights of Way Management

One of the concerns reported at the Audit and Corporate Services Committee in March 2023 was the potential impact on productivity and quality standards, particularly in terms of vegetation management along public paths, due to the adoption of a significantly lower HAVS vibration target for staff.

The Authority has adopted a hierarchy of cutting which aims to balance the safety of users, the popularity of key routes and the need to keep the public rights of way (PROW) network as ‘open and accessible’ as possible whilst limiting staff exposure to HAVS.

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| Cutting hierarchy: <ol style="list-style-type: none">1. Coast Path2. Links to the Coast Path |
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| <ol style="list-style-type: none">3. Honey pots / Community Paths, Visitor Centres, Car Parks and Access Paths to Beaches.4. Inland Areas |
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Changing to a new way of working just ahead of the main cutting season has proved challenging but, to date, the Authority has only received a limited number of complaints with regards to the level of vegetation growth along the PROW network. This year's growing season got off to a relatively rapid start due to the unseasonably mild weather but, ultimately, the full impact of the Authority's revised approach will only be fully understood towards the end of the main summer season.

For the time being, the Authority's Access Team, Reception Team and Visitor Centre staff, who tend to deal with the majority of complaints, have been advised accordingly should members of the public raise urgent concerns.

The Authority's duty of care also extends to contractors, and the HAVS Risk Assessment has, therefore, been updated to reflect the need to receive assurances from third party contractors that they have the necessary measures in place to reduce the risk of HAV for their own staff in-line with PCNPA's approach.

Conclusion

The health, safety and well-being of PCNPA staff, volunteers and contractors remains the Authority's highest priority. However, the recent HSE Improvement Notice was a timely reminder that the Authority's policies, procedures and working practices need regular review and adjustment in order to meet contemporary needs.

It is testament to a wide range of staff across the Authority, but especially the Countryside Management Team, that the HSE confirmed on the 31st March that the evidence submitted by PCNPA satisfied the requirements of the Improvement Notice and that the case was duly closed. The HSE also thanked the Authority for "*dealing with this matter promptly and in such a thorough manner.*"

While this is certainly good news, the Senior Leadership Team recognise that this is based on the HAVS Action Plan (Annex A) and it is, therefore, paramount that we keep focussed on this and ensure that the Authority delivers all aspects of the plan in order to ensure long-term standards of safety.

Background Documents

Report 08/23 Health & Safety Group – Hand Arm Vibration (HAV) (Audit and Corporate Services Review Committee 01/03/23)

Author: James Parkin – Director of Nature and Tourism
Consultees: Michelle Webber – Head of Nature Recovery

| HAND ARM VIBRATION ACTION PLAN - Last Updated 22 June 2023 | | | | | |
|---|-----------------|---|--------------------------------------|------------------|--|
| AIM: To develop a plan of action to reduce the risk of Hand Arm Vibration to as a low as reasonably practicable. | | | | | |
| Main Activity | Priority | Sub Activity | Owner | Timeframe | Notes |
| Audit | 1 | Audit of existing working practices | | | |
| | 1.1 | Current state - Estimate exposure / frequency / time taken carrying out tasks involving HAV equipment. | Countryside Managers | Completed | Completed |
| | 1.2 | Future state - Map out respective areas identifying 1) types and %age of vegetation 2) method of control and machinery used 3) assessment of working practices and machinery and changes that can be made to reduce HAVs to lowest possible level (EAV). Where not possible justification to be provided. | Countryside Managers | Completed | Phase 1 completed. Further work to be done at review stage (Phase 2), to determine if even further efficiency and lower exposure gains can be achieved. |
| | 1.2a | Ground truthing via apps to use relevant resources and potential HAVS exposure | Head of Nature Recovery | Completed | Phase 2 in progress. Meetings required to discuss further actions. Refer to 2.6. |
| | 1.3 | Spec and costs for any new equipment. Supplier visit to assess viability. Green climber and tendering process is finishing 14/04/2023 | Head of Nature Recovery | Completed | Initial supplier visits carried out February 2023 and further feasibility studies to be carried out on increasing the usage for RCs (remote). 3 x Green Climbers ordered, awaiting delivery. |
| | 1.3a | Future procurement for equipment to include decommissioning and to evaluate the market for improved HAVS exposure and mitigation | Head of Nature Recovery | Ongoing | Delayed while Finance team complete end of year results. Expected to start in July 23. |
| | 1.4 | Feasibility report provided to HAVS Monitoring Group setting out recommendations to eliminate risk at source or where not practicable, reduce to as low as level as practicable. Report to provide options / feasibility study and | Head of Nature Recovery/HSPM/Finance | Completed | First draft completed |
| | 1.5 | Set out budget requirements for project and for implementation | Head of Nature Recovery | Completed | Budget approved for an increase in seasonal staff from 6 to 10 in 2023, however only 4 seasonal staff were appointed. RV equipment addressed in other actin (grant funded) |
| | 1.6 | Agreement on policy position for minimum exposure levels when operating HAV equipment. | Chief Executive | Completed | Completed. Policy decision taken - minimum exposure levels set at 150. Policy to be updated (see 1.7 below) |
| | 1.7 | Update existing HAVS policy with revised limits for exposure levels | HSPM | Completed | Completed |
| HAVS Risk Assessment | 2 | RA completed to meet all requirements set out by HSE guide on HAVS Risk Assessments and Regulations | | | |
| | 2.1 | Update vibrating tools/machine list. | HSPM | Completed | Risk Assessment drafted and main tools included. Full list of all equipment completed and the equipment list has been removed from the assessment to avoid double handling of data. |
| | 2.2 | Agree Vibration Magnitude data is to be used for all machines / considering <u>HSE recommended initial value</u> or data which is 'reasonably representative of work undertaken'. | Countryside Managers | Completed | Main tools incorporated into Risk Assessment. Full list to be completed and revised Risk Assessment to be issued. Completed 12/04/2023. Results from Havi received 20/04/23. |

| <u>Main Activity</u> | <u>Priority</u> | <u>Sub Activity</u> | <u>Owner</u> | <u>Timeframe</u> | <u>Notes</u> |
|--|-----------------|--|---|------------------|--|
| | 2.2a | Full review of equipment to agree disposal of equipment with high exposure measures and narrow equipment range. | Countryside Managers | 24-Dec-23 | Work has commenced and some items have been selected for disposal and replacement. Full inventory and disposal policy to be completed. Any equipment with excessive vibration has been withdrawn from use. |
| | 2.3 | Maximum trigger time to be set for each item of equipment and for day where multiple equipment is used. | Head of Nature Recovery/CSMs/HR Manager | Completed | Full equipment list with trigger times in place, however multiple equipment use will require day to day management based on points |
| | 2.4 | Include measures for employees below EAV, whose health is at particular risk | HR Manager | Completed | Completed. Written into separate confidential risk assessment to be owned by Countryside Managers. |
| | 2.5 | Identify employee groups at risk. | HR Manager/CSMs | Completed | Completed to include Wardens, Rangers, Buildings staff etc. Included in confidential Risk Assessment due to sensitive medical data |
| | 2.6 | Review "typical" work activities on ARC GIS to identify where exposure exists at or above Exposure Action Value | Countryside Managers | 31-Oct-23 | Main activity completed. Further work to be done to divide and map coastpath onto GIS with estimated exposure limits for each section. |
| | 2.7 | Develop and document control measures where Exposure Action Value is met or exceed | HR Manager/CSMs | Completed | Completed |
| | 2.8 | Develop and document control measures for employees with existing health problems. | HR Manager/CSMs | Completed | Completed. All Tier 4 assessments completed except for 1 long term absentee. |
| | 2.9 | Document PPE control measures already in place and new ones to control risk. | HR Manager | Completed | Risk Assessment completed |
| | 2.1 | Introduce control measure to ensure no member of staff is exposed above Exposure Limit Value and trigger times are complied with. | HR Manager | Completed | Policy drafted and process in place to evidence compliance. |
| | 2.11 | Develop procedure for ensuring RA is updated each time new kit is purchased, which has a significant change in the work activities for employees | Performance & Compliance Officer/HR Manager | Completed | 3 month reviews as part of Health & Safety Group Meeting and as part of wider KPIs. Standing Agenda Item set. |
| | 2.12 | New Havs Working Practices introduced. | Managers | Completed | Completed |
| <u>Control Measures</u> | 3 | | | | |
| | 3.1 | Spot check review. First one to be mid-year to assess the new ways of working. | Countryside Managers / Leadership Team | Ongoing | Meeting on 14-06-23 with agreed schedule for 2 spot checks per year per person to check HAVS data and setup of watches. HSPM to develop MS Forms for recording spot checks |
| | 3.2 | Monitor and review of effectiveness of implemented control measures to reduce exposure | Managers | Jul-23 | Procedures in place for monitoring of daily use, with watches and Vibration Logs for all relevant staff. At the end of July, HSPM will audit Vibration Logs versus data gathered and produce report. |
| | 3.3 | Carry out annual monitoring using HAVi technology to test measures within Risk Assessment. | Managers | Completed | HAVi devices are in place and monitoring HAVS. Review of data at end of season. |
| <u>Training & Instruction</u> | 4 | <u>Ensure suitable training, information and instruction is in place for all staff to understand the risk and how to work safely.</u> | | | |
| | 4.1 | HAVs policy verbally briefed out to all relevant staff. Staff asked to sign as read and understood. | Countryside Managers | Completed | Staff briefed, but not signed off. HR to set up Cezanne to record |

| <u>Main Activity</u> | <u>Priority</u> | <u>Sub Activity</u> | <u>Owner</u> | <u>Timeframe</u> | <u>Notes</u> |
|-----------------------------------|-----------------|---|----------------------|------------------|---|
| | 4.2 | Findings and measures as a result of Risk Assessment to be briefed out to relevant staff | Countryside Managers | Completed | Completed |
| | 4.3 | Understanding HAVS Line Manager / Supervisor training course to be developed | HSPM | Completed | HST HAVS awareness course purchased and will be rolled out w/c 02-05. No specific training for Managers/Supervisors has been found. |
| | 4.4 | Existing leaflets and posters to be reviewed. | HSPM | Completed | Posters sent to Graphics for revision to avoid copyright issues. Posters laminated and sent out. |
| | 4.5 | Understanding HAVS - Employee training course to be developed | HSPM | Completed | HST HAVS awareness course purchased and will be rolled out w/c 02-05, as 4.3 |
| | 4.6 | Training course built into induction for new staff | HSPM | Completed | While the current and seasonal staff have been covered for Summer 2023, a further decision for new staff is required. All new staff will undergo training. |
| | 4.7 | Develop Safe Working Practices training for each machine in use | Countryside Managers | 30-Sep-23 | Detailed practices to be developed but for the interim it was agreed that User Log/Risk Assessment for each machine is sufficient to cover this issue. |
| | 4.8 | Safecards' to be updated to incorporate findings from HAVS Risk Assessment | Countryside Managers | Completed | This action requires qualification as the Safecard system is likely to be reviewed as a longer term project. Safecards are a generic safety message and aren't specific enough. See 4.7 |
| | 4.9 | HAVs Refresher Training to be built into automatic reminders on Cezanne HR and e-learning module rolled out. | HR | Completed | System configured to enable refresher reminders. A new Toolbox talk has been produced to act as refresher training and needs agreeing by all parties. Agreed to refresh annually. |
| | 4.10 | HAVi to provide training so that equipment testing will be completed in-house. | HSPM/CSM | 01-Jul-23 | Steve has confirmed date for HAVi to conduct training - 19th July 2023 |
| <u>Health Surveillance</u> | <u>5</u> | <u>Continue and improve processes for Health Surveillance</u> | | | |
| | 5.1 | Continue with annual Health Surveillance plan | HR | Completed | Completed. The next round of health assessments will be completed in Mar 2024. |
| | 5.2 | Organise with Caer Health for all existing staff to undergo Level 3 / 4 assessment to obtain baseline for existing staff with prolonged exposure. | HR | Completed | Organised for 1/2/3 March. All staff confirmed. |
| | 5.3 | Ensure all employees with underlying HAVs issues have Risk Assessment in place. | Line Managers | Completed | All reports received, except one long term absentee who will be assessed upon their return to work |
| | 5.4 | Audiometry testing (not HAVs but tied in with other surveillance) | HR | Completed | Completed. Organised for 14/15 February |
| <u>Consultation</u> | <u>6</u> | | | | |

| Main Activity | Priority | Sub Activity | Owner | Timeframe | Notes |
|---------------------|----------|---|---|-----------|--|
| | 6.1 | Consult and Inform staff / Involve staff further when implementation plan has been agreed. Script being developed and Questions and Answers to ensure consistent message. | Director (Nature Recovery & Tourism)/CSMs | Completed | First meeting conducted by Countryside Managers. All Warden meeting completed on 16 February 23. Another meeting took place 11th May 2023 with Q&A. All non-attendees have since been briefed. Rangers took place 25th May 2023. |
| | 6.2 | Meeting with staff to review progress against new measures. | Management Team and Countryside Managers / HR | Ongoing | Two meetings for Wardens and one for Rangers have taken place with regular updates during Team meetings. Senior management will 'drop-in' on future Team meetings. |
| | 6.2a | End of season meeting to be arranged for all relevant staff | Management Team and Countryside Managers | Sep-23 | End of season update regarding HAVS and data. Meeting arranged for 29/09/23. |
| | 6.3 | Consult with Union | HR Manager | 03-Feb-23 | Completed. |
| | 6.4 | Inform Committee Members | Chief Executive | 09-Feb-23 | Completed. Report also to be sent to Audit and Corporate Services Committee. A revised action plan will be made available for Committee members for July 12th meeting. |
| | 6.5 | Consult with RoW and Conservation team | Head of Nature Recovery | Completed | Informal consultaton completed, ongoing updates via Nature Recovery managers meetings. |
| | 6.6 | Libby Taylor, Rebecca Evans and Andrew Muskett to be consulted to ensure that other staff and volunteers are included in Risk Assessment. | HR | Completed | Completed |
| | 6.7 | Develop Internal and External Comms Plan | Head of Comms/Chief Executive | Completed | Tegryn to discuss External Comms Plan with Marie Parkin. External PR message completed. Update in staff newsletter on HAVS post HSE compliance. Internal newsletter sent 18/05/2023 |
| HSE Response | 7 | HSE Response | | | |
| | 7.1 | Draft HSE response for PCNPA/Chief Executive's formal response | HR Manager | Completed | 28-Feb |
| | 7.2 | Deadline for response | HR Manager/Chief Executive | Completed | 17-Mar-23 |

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| Key: |
| Completed |
| Partially completed / further work to be done |
| Flag |

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| Notes: |
| HSE notice was published early on 11 February 2023. Improvement Notice now public. |

HSPM = Health and Safety Project Manager
CSMs = Countryside Managers

Actions from meetings:

Full list of tools
Method Statements / Safe Cards
Brief Wardens not in attendance at meeting