

## Report of the Director of Nature and Tourism

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

#### **Introduction**

This report provides a brief 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.

This report follows on from the more comprehensive update report provided by the Director of Nature and Tourism at the Audit and Corporate Services Review Committee meeting held on the 12<sup>th</sup> July 2023.

#### **Background**

The Park Authority received a HSE Improvement Notice in December 2022 (which has since been withdrawn as PCNPA has fully complied with the notice) which placed a condition on the Authority to either: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 (EAV<sup>1</sup>) 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.

As highlighted via the last update report, the Authority has responded 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 to reduce hand-arm vibration to as low as is reasonably practicable.

#### **Plan of Action**

The most up-to-date copy of the HAVS Plan of Action is attached to this report (see Annex A) which remains the key document in the Authority's management of HAVS related matters.

A monitoring group, chaired by the Chief Executive, was established in December 2022 and, up until recently, was meeting on a weekly basis. However, the high level monitoring group now only meets as required with most activity mainstreamed within the Authority's wider corporate approach to managing H&S (i.e. via the internal Health

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<sup>1</sup> 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.

and Safety Group) and the current version of meetings are used as a management tool.

A more in-depth engagement process was undertaken with staff, especially Wardens, at the end of the cutting season to ensure that the Authority's revised approach to HAVS is working 'on the ground'. The feedback from staff was very positive with any associated issues captured via the HAVS Plan of Action.

The key focus now is on capturing data through the winter period, when the nature of practical work changes (i.e. less grass cutting), in order to ensure that we have a year-round picture of our management of HAVS. This will provide more detailed data to help inform key business decisions (such as investment in equipment, training, systems, staffing, etc) longer-term.

### **Significant Progress**

More comprehensive reports were presented to the Audit and Corporate Services Committee in March and July 2023. Consequently, the section below only highlights some of the most significant actions undertaken over the last few months to maintain progress.

Baseline Vibration Assessment (equipment) – a comprehensive assessment of vibrating equipment used during the summer months was undertaken across the Authority in advance of the cutting season. This involved an independent company undertaking an assessment of equipment to ascertain the vibration magnitude of each tool. This information was then used to calculate and provide accurate HAVs exposure limits. Each tool now has a vibration rating and staff have been provided with a comprehensive list highlighting exposure points per hour for the tools ensuring they don't exceed their daily exposure limit.

We now need to expand this work across a wider variety of tools to ensure that we have the most up-to-date and accurate vibration data available (i.e. for tools used predominantly for winter work). Specific staff have also been trained to undertake the testing of equipment and have been and will continue to test the equipment.

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 – funded via Local Places for Nature) which are also 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 has implemented a series of 'spot checks' to ensure compliance with the new approach to HAVS management, and no issues were identified. 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.

Contractors

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.

**Rights of Way Management**

One of the issues discussed 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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| <p>Cutting hierarchy:</p> <ol style="list-style-type: none"> <li>1. Coast Path</li> <li>2. Links to the Coast Path</li> <li>3. Honey pots / Community Paths, Visitor Centres, Car Parks and Access Paths to Beaches.</li> <li>4. Inland Areas</li> </ol> |
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Changing to a new way of working ahead of the main cutting season proved challenging but we are pleased to report that there was no significant change in the level of complaints received over the summer (i.e. complaints remained extremely low in-line with previous years).

**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 31<sup>st</sup> March 2023 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.”*

Background Documents

Report 18/23 Director of Nature & Tourism – HAVS Update Report (Audit and Corporate Services Review Committee 12/07/23)

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*

<b>HAND ARM VIBRATION ACTION PLAN - Last Updated 23 October 2023</b>					
<b>AIM:</b> To develop a plan of action to reduce the risk of Hand Arm Vibration to as a low as reasonably practicable.					
<b>Main Activity</b>	<b>Priority</b>	<b>Sub Activity</b>	<b>Owner</b>	<b>Timeframe</b>	<b>Notes</b>
<b>Audit</b>	<b>1</b>	<b>Audit of existing working practices</b>			
	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 and work 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/Countryside Managers	Ongoing	Work is ongoing to identify and evaluate current equipment, and commence planning future procurement. A working group is being set up to look at this.
	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 cost / benefit analysis.	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 action (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
<b>HAVS Risk Assessment</b>	<b>2</b>	<b>RA completed to meet all requirements set out by HSE guide on HAVS Risk Assessments and Regulations</b>			
	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.
	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. Standardise procurements using HAVS to narrow equipment range.
	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	23-Dec-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 is 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 purchases, 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
<b>Control Measures</b>	<b>3</b>				
	3.1	Spot check review. First one to be mid-year to assess the new ways of working.	Countryside Managers / Leadership Team	Ongoing	Meeting took place 14-06-23 with agreed schedule for 2 spot checks per year per person to check HAVS data and setup of watches. HoNR and/or HSPM visited each warden team (depot and site visits) in September. Winter spot checks to place.

	3.2	Monitor and review of effectiveness of implemented control measures to reduce exposure	Managers	Ongoing	Procedures in place for monitoring of daily use, with watches and Vibration Logs for all relevant staff. At the end of July, HSPM audited Vibration Logs versus data gathered and produce report. A further audit is due to take place in December 2023. Adaption of MS Forms for monitoring ongoing.
	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.
<b>Training &amp; Instruction</b>	<b>4</b>	<b><u>Ensure suitable training, information and instruction is in place for all staff to understand the risk and how to work safely.</u></b>			
	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
	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	Completed	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	Completed	HAVi conducted training on 19th July 2023
<b>Health Surveillance</b>	<b>5</b>	<b><u>Continue and improve processes for Health Surveillance</u></b>			
	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
<b>Consultation</b>	<b>6</b>				
	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 and will continue to do so throughout the year.
	6.2a	End of season meeting to be arranged for all relevant staff	Management Team and Countryside Managers	Completed	End of season update regarding HAVS and data. Meeting took place 29/09/23.
	6.3	Consult with Union	HR Manager	Completed	Completed.
	6.4	Inform Committee Members	Chief Executive	Completed	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 consultation 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. Email sent updating all staff in Feb 2023
<b>HSE Response</b>	<b>7</b>	<b>HSE Response</b>			
	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

<b>Key:</b>
Completed
Partially completed / further work to be done
Flag

<b>Notes:</b>
<i>HSE notice was published early on 11 February 2023. Improvement Notice now public.</i>

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