

REPORT OF OPERATIONS MANAGER

SUBJECT: ADOPTING VISITOR SAFETY PRINCIPLES AT PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

Background

During recent years Pembrokeshire Coast National Park Authority (PCNPA) staff have started to adopt Visitor Safety (VS) principles when assessing risk on the authority owned estate. These principles had been developed by the Visitor Safety Group (VSG), a nationwide body, over the last decade. The Personnel Manager recognised that formally adopting these principles would be a further benefit, so commissioned a Visitor Safety Strategy in 2017, as a way of ensuring the principles were adopted and applied consistently across the Authority.

Following advice given by the VSG, it was clear that there was no requirement for a separate Visitor Safety policy. PCNPA has instead embedded the main principles of Visitor Safety into all relevant current policy. Both the Authority's principal Health and Safety Policy (2015) and its Assessing Health and Safety Risk Guidelines were updated to reflect VS principles in 2018. Updating current policy was seen as the most effective way of ensuring the principles would be seen and applied.

In practice, the key principles of Visitor Safety should, where relevant, be embedded within Site Risk Assessments. This has meant a change in format for Site Risk Assessments, to a new Visitor Safety Risk Assessment (VSRA). The VSRA format contains more information linked to the basic principles, including plans, photographs and more detail relating to how decisions were made. VSRA also include more background information relating to the site and its visitors, something overlooked in standard Risk Assessments.

The intention is to create VSRA for the main sites owned by PCNPA. In addition the Strategy also refers to reviewing the general Risk Assessments for the Foreshore (which is leased by PCNPA), the Rights of Way network and the Coast Path, much of which crosses privately owned land.

PCNPA are active members of VSG and take part in regular workshops with similar organisations across the UK and Ireland. Other members include the National Trust, NRW, RSPB, other National Parks, the Landmark Trust, and Centre Parks. All share the common responsibility for managing visitors to a huge variety of sites – from stately homes to the Giants Causeway. Our involvement with the VSG has improved our knowledge and expertise when managing Visitor Safety.

VSG guidelines and the basic principles of Visitor Safety are detailed in two publications.

- Managing Visitor Safety In The Countryside – Principles and Practice 2011

- Managing Visitor safety in the Historic Built Environment – Principles and Practice 2015.

Both publications, case studies and more detail can be found at <http://vscg.org/>

VS Principles are supported by the Health and Safety Executive (HSE) and are backed up by a wealth of case law.

Visitor Safety in Practice

The VSG guidelines provide a pragmatic approach to safety, an approach which is of particular interest to Site Managers within the National Park Authority. Risk Assessments had in the past been designed from an occupational perspective. Whilst adequate, there was a feeling amongst Site Managers that the format, which included a scoring mechanism, was subjective and not directed enough towards specific aspects of risk that were pertinent to visitors rather than staff.

Sometimes safety and its mitigation can clash with the core purposes of the Park. Balancing safety with the impact any mitigation may have on the landscape, or the impact mitigation may have on user enjoyment, is of primary importance and can prove challenging at times. The adoption of these principles, as well as the learning gained from membership of VSG is a great aid to decision making in this respect.

Site Managers, although working within a robust Health and Safety framework, can at times feel exposed when attempting to determine the level of risk at a site and how best to mitigate it. Hazards on some sites can be complex and it can be unclear which way they should be controlled. The temptation is a belt and braces approach, which aside from sometimes creating unnecessary and costly work, can lead to disproportionate control measures being adopted. Applying basic VS principles can help guide decision making in this respect.

The adoption and understanding of these core principles, and having the confidence to apply them, will ensure we see a positive improvement in the way we manage our sites for visitor safety.

General Principles

The general principles outlined below are a basic summary of the principles that are detailed within the VSG literature, and were briefed to managers in January 2018.

The Risk Assessment process is designed to expose risk in order that it can then be controlled. Most risk can be eliminated without adversely impacting the benefits of the visit or the activity. Those risks that cannot be eliminated should be controlled in a sensible and proportionate way.

Safety is a shared responsibility between the owner of a site and the visitor. Responsible risk-taking should be regarded as normal. Members of the public should not be discouraged from undertaking activities solely on the grounds of risk, although visitors should always be aware of the risks they are taking. Visitors have a responsibility to take reasonable care for their own well-being. The VSRA process is aimed at uncovering risk, assessing the extent to which risk should be controlled and

assessing the level of expectation the authority can reasonably expect to have of visitors in terms of shared responsibility.

1. Fundamentals

In the first instance we must take account of the Authorities wider objectives, aimed at protecting conservation, heritage, recreation, cultural and the landscape. The use of safety precautions may conflict with these objectives in some instances. A balance must be achieved between risk and the impact of safety measures.

- When assessing Visitor Safety, account should be taken of Pembrokeshire Coast National Park purpose and guiding principles. Access and a sense of freedom and adventure in the Park should be protected. We manage rugged and sometimes isolated terrain, a big attraction for many. Safety measures should be balanced with this in mind. A proliferation of signage and fencing on the Coast Path National Trail could for instance detract from the unique character of the Park.
- Account should be taken of the objectives of the Well-being of Future Generations (Wales) Act (2015).
- Where possible, avoid restrictions on access. Avoid giving visitors long lists of do's and don'ts.

2. Awareness

The aim of conducting a Risk Assessment in the first instance is to identify and assess the impact of hazards. There is no positive benefit in doing this unless visitors to the National Park and its properties, path network, foreshore and events are made aware of the risks identified during this process.

Our aim is for visitors to be aware of risks and decide whether or not to accept them. There should be no nasty surprises.

It is reasonable to expect visitors to recognise hazards in the natural environment, themselves. Any visitor should be aware of certain hazards and require no instruction. However some hazards are not obvious to a visitor – if the Authority is aware of these hazards it is reasonable that visitors are made aware of them.

A visitor could be reasonably expected to understand the hazards associated with most activities such as a guided walk. It may be unreasonable to expect them to understand specific hazards related to the site chosen for that guided walk.

We can manage and reduce many risks by informing and educating rather than erecting signs and physical barriers. When considering the management of risk, the following methods can be considered for example -

- School visits
- Engagement with community councils and landowners.
- Information on websites
- Social media

- Communication at holiday accommodation.
- Signage and interpretation at main access points.

There are many ways of informing visitors about risk and in many cases the erection of physical structures is costly and unnecessary. Where risk cannot be controlled sufficiently by alternative methods, warning signs and physical barriers should be considered.

3. Partnership

- Understand how different groups view and accept risk and how the acceptance of risk varies. The same activity can be viewed by different users in a different way in terms of risk. Codes of practice already in existence may help in this assessment.
- Understand during the course of the assessment how some methods for mitigating risk to one user group, may impact on another. For example, erecting a barrier around a harbour may reduce the risk of a pedestrian fall, but increase the risk of crush injuries to boat users.
- Work with visitor groups to promote understanding, consider the physical segregation of different users and promote awareness.

4. Responsibility

It is important to strike a balance between visitor self-reliance and management intervention.

- It is reasonable to expect parents, guardians and leaders to supervise people in their care. There may be no need to erect signs and barriers but there may be a need to inform about any risk that may be unexpected or hidden.
- It is reasonable to expect visitors to exercise responsibility themselves. Wearing suitable clothing during a visit for example.
- It is reasonable to expect visitors not to put others at risk.

These principles are supported by case law. This is outlined in the two VSG publications or on the website, if further clarity is required.

The interaction between people with different levels of skills and experience and hugely variable environments is complex. The general premise is that as the environment becomes less developed, it is reasonable to expect that a visitors self-reliance, knowledge and understanding of the surroundings will increase – less management action is required and fewer physical safety measures may be needed.

The Risk Control Matrix in Appendix 1 gives a summary and overview of how that complexity can broadly be broken down.

4.1 Zoning

On larger more diverse sites, it may be necessary to zone areas to improve risk management. Zones can be determined based on footfall, the nature of the terrain and how each part of a site is used. Trees overhanging a popular childrens play

area may be zoned as a high risk compared to those in the middle of a remote woodland. Zoning could be considered for the Foreshore, Coast Path and Inland Rights of Way network, breaking down a large area or network into more manageable sections.

Route grading as a way of informing visitors of variable risk is also another example of zoning and could have positive benefits for controlling risk.

5. Risk Control

- Use a Visitor Safety Risk Assessment to create a risk assessment for each site.
- Ensure risk assessment measures are consistent across sites and within sites, inconsistency causes confusion and is not helpful for visitor decision making.
- Balance risk controls with wider benefits.
- Know your visitor – monitor behaviour, observe flow of people, understand type and experience of visitor, maintain an accident and incident log.
- Do not expose visitors to risk through your own activity (e.g vegetation cutting on the Coast Path).

PCNPA Risk Assessment Regime

The Visitor Safety Strategy outlines how the adoption of VS principles will be achieved by different teams. In some cases such as for activities carried out solely by employees and volunteers, the current risk assessment may suffice.

For activities offered to visitors, current risk assessments may be enhanced by the inclusion of some of the key elements of Visitor Safety outlined in this document.

Site Managers undertake a Risk Assessment annually. VSRA will now be completed for all sites, focussing first on those sites with most visitors.

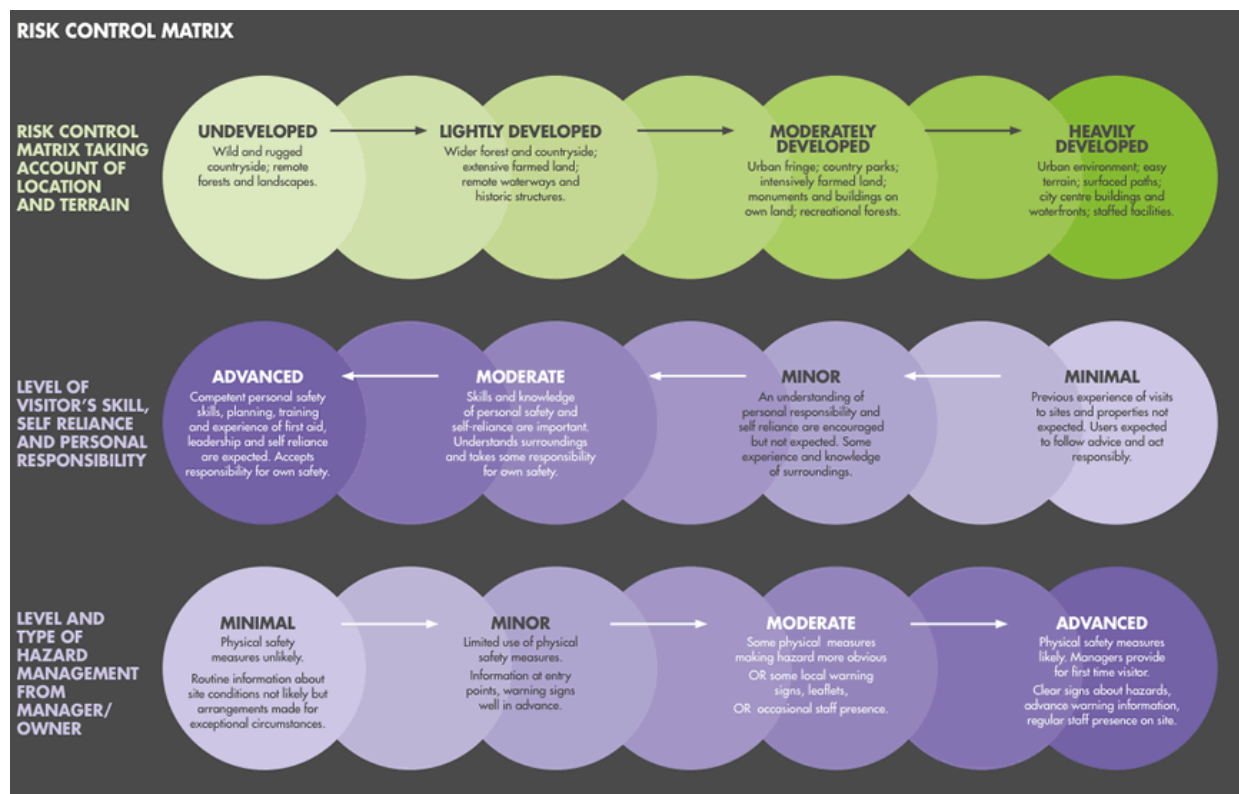
The Authority will continue to be a key member of the VSG and will attend regular workshop and training events, to ensure the VS Strategy remains at the core of all assessment of risk on the Authorities estate. Membership of VSG will also ensure we continue to progress and develop as the sector advances.

Recommendation

Members are asked to note the work undertaken in relation to Visitor Safety

Appendix 1

Risk Control Matrix





Pembrokeshire Coast National Park

Visitor Safety Strategy

Introduction

The Pembrokeshire Coast receives over 4 million visitors annually and many of these visits will be to Authority owned or managed facilities. These facilities include the 76 NPA owned sites, most of which are accessible by the public, the Crown Estate Foreshore, the Pembrokeshire Coast Path National Trail and an extensive network of inland public rights of way. To guide the management of these facilities the NPA has drafted some years ago a series of Safety Statements which include those for the Coast Path, Public Rights of Way and NPA Properties. However since these statements have been drafted the management of visitor safety has developed rapidly through the work of the Visitor Safety in the Countryside Group (VSCG) of which the NPA is an active member. This strategy recommends that the NPA Health and Safety Policy and the safety statements mentioned above are updated to include the principles of Visitor Safety.

NPA Visitor Facilities

The visitor facilities outlined below are accessible by the public in different ways, with a huge variation in visitor numbers to each site.

- Three year round staffed sites – Oriel y Parc (St Davids), Carew Castle and Castell Henllys.
- Two seasonally staffed sites – Solva and Newport Car Parks
- Two sites with entrance fees (Carew Castle, Castell Henllys)
- 72 other sites, most of which are accessible to the public but not staffed, including car parks, woodlands and historical sites such as Angle Tower. Some of these sites are very well visited, including Porthgain Harbour for example. Some sites are rarely visited and remote.
- The NPA leases the majority of the Crown Estate Foreshore (the area between Mean High Water Mark and Mean Low Water Mark) within the National Park.
- The NPA manages and maintains the 186 mile Pembrokeshire Coast Path National Trail through a management agreement with and funding from Natural Resources Wales. The NPA manages and maintains 480 miles of inland public rights of way, through an Agency Agreement with Pembrokeshire County Council. The NPA promotes use of these paths, particularly through the extensive list of web walks accessible through its website.

Traditionally the authority has managed safety through the implementation of guidance outlined in various policy documents, including the Health and Safety Policy Arrangements (2015), and various supporting documents 'Assessing Health and Safety Risk' (2016), Tree Safety Policy (2016) and 'Safety Guidelines for Managers of Authority Properties (2016)'. The process involves undertaking separate Site Risk Assessments for each NPA owned site including the Crown Estate Foreshore. This is normally carried out annually by the nominated site manager or delegated to another suitably trained employee.

As mentioned above the Coast Path and Public Rights of Way have their own separate safety statements and regimes for checking and inspection. The coast path is inspected annually by the National Trail Officer as part of the management agreement and a work programme including any safety works this highlights is carried out by the area warden teams. The inland rights of way are checked on a three year cycle with footbridges checked on a two year cycle. Again any safety works these highlight are carried out by the area warden teams.

Visitor Safety – Background.

The Visitor Safety in the Countryside Group (VSCG) has rapidly become the recognised UK wide expert group in all aspects of Visitor Safety (VS). The group provides a forum for organisations dealing with visitors, organises practical workshops and has written guidance on Visitor Safety both in the countryside and in the historic built environment. The group regularly advises on Visitor Safety and has provided expert witness services in court cases involving injury to visitors on owned or managed sites. As members, PCNPA staff have participated in a number of workshops and as well as hosting a Coastal Safety workshop for the Group in September 2014.

A visit by Mark Daniels, a qualified safety practitioner to Carew Castle in 2016, led to the reviewing of how we manage Visitor Safety in the park. It was observed that whilst our Health and Safety regime was robust, there was a tendency for our systems and processes as well as our documentation to lean towards occupational health and safety. Site based risk assessments have traditionally taken Visitor Safety into account but it was felt that the inclusion of the well attested basic principles of Visitor Safety, formulated by the VSCG could further enhance our safety systems.

Aim

The aim of this proposed strategy is to ensure that Visitor Safety (VS) principles are embedded into how we assess and manage risk within the Park, particularly focussing on a site based approach. These principles include –

- Balancing risk and benefit – ensuring we balance safety with conservation and access needs.

- Focusing on the concept of shared responsibility between the landowner and the visitor.
- A consideration of the different types of visitors we receive and how different visitor groups impact on risk levels.
- Using a standardised Visitor Safety Risk Assessment.
- Use of effective monitoring and recording systems.
- Collecting information on incidents to help understand hazards and make improvements.
- The use of effective communication through various media of risk and hazard to our visitors.

The following sections outline how this should be achieved.

1.0 Define Roles & Responsibilities

Key to successfully implementing Visitor Safety principles within the authority is a consideration of the roles involved and ensuring Visitor Safety is considered at all times.

Identify those staff members and teams that should adopt VS principles and ensure buy-in for the adoption of Visitor Safety principles across the authority. It is recommended that a single Visitor Safety champion is recognised in the authority and that person should co-ordinate policy writing and development, report to the senior team and members and liaise with external partners, the VSCG and the Health and Safety Group within PCNPA. The nominated person should also ensure that VS principles are adopted within all of the relevant teams across the authority.

2.0 Training Requirements.

A review of training requirements for staff is recommended. Currently key members of staff are trained in aspects of health and safety and this varies depending on requirements for the role. This training is currently tailored to occupational Health & Safety. It would be useful to determine whether Visitor Safety is different enough to warrant further training and/ or qualifications or whether current skills levels will suffice. Development of a centralised system for storing information specific to Health and Safety training and qualifications, including Visitor Safety should be considered.

3.0 Update Current H&S Policy and Guidelines

The introduction of a new stand-alone Visitor Safety Policy is not recommended by VSCG, instead Visitor Safety principles should be embedded within the current policy and guideline structure. This will allow Visitor Safety principles to become part of the routine when assessing safety.

- 3.1** Publish an updated version of the current 'Health and Safety Policy Arrangements' Document, to include Visitor Safety principles. This will form

the basis for implementation of this strategy. The original H&S Statement written and signed by the CEO and Chair should be reviewed and renewed following publication of this new version. The updated version of the policy should also be presented to members for their consideration.

3.2 Write updated versions of 'Assessing Health and Safety Risk' and 'Safety Guidelines for Managers of Authority Properties (2016)', adopting a new framework to ensure that VS principles are embedded into the way we carry out Risk Assessments.

3.3 Summarise the key principles in a single document 'An Overview of the Principles of Visitor Safety'. This document will form the guidance for all teams that interact with visitors and have responsibility for visitors safety.

4.0 Managing Risk to Visitors

4.1 In order to ensure VS principles are considered at all PCNPA owned sites, it is recommended that the Visitor Safety Risk Assessment format replaces the current matrix based risk assessment format for all of our owned and managed sites. Given the complexity of VSRA documentation – which includes photographs, text and maps, due consideration should be made to the design of the form to ensure it is user friendly and standardised.

4.2 Site Managers appointed for each site are currently responsible for conducting risk assessments. This principle forms the basis for effective Visitor Safety Management and should be maintained.

4.3 The number and variety of owned sites (76) will require a phased approach to assessing Visitor Safety. Delivery of VSRA for each site should be prioritised with those with highest footfall and/or highest risk being undertaken first.

4.4 Current site maps are derived from Ordnance Survey products at 1:2500 scale and in some cases do not show the level of detail required for effective planning and zoning. There may be a requirement for commissioning larger scale plans for these sites – plans that could also be used for other purposes including interpretation and for planning maintenance regimes.

5.0 VSRA for the Coast Path, Rights Of Way and the Foreshore.

The coast path and PROW cross mostly private land and thus a number of hazards visitors may come across when following paths such as grazing livestock are beyond the NPAs control. However as the NPA actively encourages visitors to use these routes through self-guided trail leaflets and the programme of web walks which are freely available to download from the authority website, it is recommended that we

consider embedding the principles of Visitor Safety into the management of Public Rights of Way, particularly the Web Walks and the Coast Path. The Foreshore currently has a generic property risk assessment, which covers a huge range of sites and hazards and this could well be improved by adopting the VSCG approach. This task is potentially complex and time consuming and may require more resource than adopting Visitor Safety principles for the 76 PCNPA owned sites.

A review of the current safety policies for PROWs, Web Walks, Coast Path and Foreshore should be carried out initially, with the intention of assessing the feasibility of adopting Visitor Safety principles for those areas. This assessment should look at whether Visitor Safety principles such as zoning and the use of technology such as G.I.S could simplify this task. VSCG are currently reviewing Visitor Safety on national trails, it would benefit PCNPA to be involved with that review.

6.0 Visitor Safety for Events and Activities.

Some of the basic principles of VS can be used to enhance current guidelines and risk assessment of activities and events. VS principles, outlined in the document 'An Overview of the Principles of Visitor Safety' should be considered and embedded in current H&S processes for events and activities hosted at owned sites and externally.

7.0 Monitoring and Recording Regimes

A basic principle of Health and Safety policy is to ensure users have easy access to the relevant documentation. Risk assessments should be easily accessible for use across the Authority. Both risk assessments and monitoring records can be used as evidence in legal cases brought against the Authority – it is imperative therefore that such documentation is secured and archived for future use.

- 7.1** All risk assessments should be easily accessible for users. Storage and access to documentation needs to be considered as well as protocols for ensuring access to the latest version of documents. Consideration also needs to be made to the remote access of documentation.
- 7.2** Sites are routinely inspected and monitored to a defined plan at present. Monitoring work is a key part of the Authority's operational work and can be time consuming and costly. The storage of records in different locations and on paper needs to be reviewed and improved with the aim of creating a single standardised and centralised system. A GIS system is recommended to facilitate the storage, quality control and analysis of monitoring data, allowing better decision making and more focussed inspection regimes.
- 7.3** Under the plan-do-check-act cycle it is crucial that any mitigation or improvement works, highlighted during monitoring or risk assessment work are completed within appropriate timescales. A centralised work

management system to ensure such work is scheduled, budgeted for and completed on time should be adopted.

7.4 Regular maintenance at sites is key to ensuring effective Visitor Safety. Site Maintenance Plans should be created for each site in the first instance, with the aim of ensuring works are carried out to the required quality and standard.

8.0 Communication

No risk assessment system can be effective without onward communication of those risks and hazards to visitors and staff. Whilst easy access to these documents is one improvement, a communications plan also needs to be formulated. This includes determining how we onward communicate information on hazards to our visitors. This will involve -

- A review of our leaflet information.
- A review of PCNPAs web based information
- A review of PCNPA signage and interpretation
- A review of verbal communication and instructions at sites.

9.0 Incident Recording

Due to the complex nature of the national park and the number of visitors it receives annually, despite best efforts, accidents will inevitably occur. In order to understand the cause of these accidents and to take effective preventative measures where possible, it is recommended that the Authority develops a centralised system for collecting and storing both those reports we receive from visitors as well as 3rd party data on incidents that we source after an event. An effective system would include a simple way of accessing and analysing this data. Understanding the cause of incidents is the first step to future improvement.