



EAST CAMBRIDGESHIRE DISTRICT COUNCIL

A Site Operators Guide to Health and Safety

Introduction

The Health and Safety at Work Etc. Act 1974 places a duty on all persons having control of a caravan site to look after the health, safety and welfare of their employees and the health and safety of residents and others on the site. This means that they must ensure, as far as is reasonably practicable, that no one is put at risk from activities carried on at the site.

The conditions attached to the Caravan Site Licence contain several matters which are directed towards the safety of residents such as fire precautions, lighting etc. The purpose of this guidance is to help site operators deal with areas of health and safety not covered by site licence conditions.

How do I start dealing with Health and Safety?

The law requires you to **manage** health and safety, much as you would control other areas of your business, such as finance. After all you don't wait to go bankrupt before controlling costs. Why then wait for an accident before dealing with hazards on the site?

This proactive approach to health and safety involves putting into place a policy for carrying out the duties imposed by the Health and Safety at Work Act 1974 then ensuring that this policy is followed and remains up to date.

What is a Safety Policy?

A Safety Policy has three main elements:-

1. The General Policy Statement

This is a statement of the employer's commitment to honour the duties imposed by the Health and Safety at Work Etc. Act 1974. It usually follows the wording containing in the Act and should be signed by the most senior person in the company.

2. The Organisation

This section of the policy makes clear who is responsible for the various tasks necessary for carrying out the policy. It should make clear to all levels of management what they have to do to make the policy work.

3. The Arrangements

This part of the policy deals with way things are done. It should cover the full range of work activities and should include where appropriate:-

- the procedures for dealing with common hazards
- the identification of, and precautionary procedures for, dealing with any special hazards relating to the site e.g. asbestos cement buildings

- safe systems and methods of work, accident reporting and investigations
- the provision and use of protective clothing and equipment
- procedures for introducing new machinery, substances or processes
- arrangements for obtaining and communicating to employees, information on health and safety issues, including articles and substances for use at work
- arrangements for health and safety inspections, audits or other systems for checking the effectiveness of the other arrangements for health and safety.

A major tool to assist you in deciding what areas are to be covered in the safety policy and what would constitute a safe system of work is **Risk Assessment**.

What is a Risk Assessment?

A risk assessment is nothing more than a careful examination of what on the site could cause harm to yourself, your employees, and others such as visitors and residents. You can then weigh up whether sufficient precautions have been taken to prevent harm and identify any additional measures which may be necessary.

A risk assessment can be carried out in a systematic way following a few simple steps. All the guidance which you will read on this subject talks about **hazards** and **risks**. For clarification these are defined as follows:-

- **A hazard** means anything that can cause harm (e.g. chemicals, electricity, lifting and carrying).
- **A risk** is the chance, however great or small, that someone will be harmed by the hazard.

Step 1 Looking For Hazards

- (1) Walk around the site and look afresh at what could reasonably be expected to cause harm. Ignore the trivial and concentrate only on significant hazards which could, if not controlled, cause injury to someone or to groups of people, such as:-
 - LPG use and storage
 - play equipment
 - grass cutting equipment
 - petrol storage
 - pesticides storage and use
 - the electrical installation and equipment
 - rivers and ponds
- (2) Ask your employees to contribute to the identification of hazards. They could be more familiar with the way things are actually done than you are.
- (3) Manufacturer's instructions and safety data sheets may also serve to identify hazards.
- (4) Examine accident records and sickness records to see if these point to a trend which could indicate a hazard.

Example

The storage of bottled gas cylinders on site has been identified as a hazard because of the flammable and explosive property of the gas. The cylinders could:-

- leak due to a faulty valve or cylinder
- be involved in a fire and explode
- be interfered with maliciously or otherwise resulting in the release of gas.

Step 2 Decide Who May be Harmed And How

Consider all persons who may come on site including yourself, employees, outside contractors, residents and their guests. Decide for each hazard the likely consequences if the hazard was to lead to an accident. This includes the severity of the injuries and the numbers of people affected.

Example : If cylinders were to ignite or explode the consequences could be fatal both for numerous people on the site or to members of the emergency services. This, therefore, constitutes a major hazard in the context of your particular business.

Step 3 Evaluate The Risk And Decide Whether Existing Precautions Are Adequate Or More Needs To Be Done

As stated earlier, the 'risk' is the likelihood of the 'hazard' causing harm. For every hazard look very carefully at what is being done at present to reduce the risk i.e. to stop the hazard causing harm.

Example

Hazard:- Leaking Cylinders

- Bottled gas obtained from a reputable supplier. Enquiries have been made to check that all returned cylinders are checked before being refilled in accordance with the relevant codes of practice.
- Cylinders on site are visually checked both on delivery and if they dropped or otherwise damaged. Staff have been instructed what to look for.

Hazard:- Involved in Fire

- Cylinders are stored outside away from buildings.
- A Fire hose is adjacent to the storage area and can be used to keep cylinders cool whilst awaiting the fire brigade.
- No flammable materials are stored near the cylinders.
- The cylinders are on a hard standing and weeds are kept down.

Hazard:- Interfered with

- Staff told to keep an eye on them.

The next part of the step 3 procedure is to decide if all reasonable precautions have been taken. To this end the following matters should be considered:-

1. Have all legal requirements been satisfied? For example, have the requirements set out in specific legislation or relevant codes of practice been achieved? Are, for example gas cylinders separated from buildings and ignition sources by the distances specified in the Health and Safety Executive Guidance Note on the storage of LPG.
2. Are all generally accepted 'industry standards' being followed? i.e. advice issued by manufactures, suppliers, caravan owners associations, etc.
3. Finally, using your own judgement, taking advice from competent people if necessary, has everything been done that it is reasonably practicable to do to reduce the risks?

Now you should be in a position to decide on what further measures, if any, need to be taken.

Example Action List

- Provide a 1.8 metre chain link fence around the bottled gas storage area to prevent tampering and to improve security as suggested in the Health and Safety Executive's Guidance Notes on the storage of LPG.
- Notices warning of the presence of LPG and prohibiting smoking to be fitted to the new fence.
- Hold a short training session for employees based on information supplied by the gas supplier to ensure that they are aware of the hazards, and the precautions being taken.

Step 4 Recording your Findings

Employers with more than 5 employees have to record the 'significant findings' of their risk assessment. This means writing down the significant hazards identified and recording the conclusions reached following the assessment. It is not necessary to record every part of the assessment but you must be able to demonstrate the following:-

- a proper check was made
- those who may be affected were identified
- all obvious hazards are dealt with
- the precautions are reasonable and any remaining risk is low.

There are no specific forms for recording this but an example of one way which this may be done is attached as an appendix to this guide.

Step 5 Monitor and Review the Assessments

All that now remains is to ensure that what you say you are going to do, actually happens!

Risk assessments should never be seen as a paper exercise, they are intended to be the principal tool in managing Health and Safety at the site.

Finally, it would be quite remarkable if you managed to think of every hazard first time around. Also circumstances are constantly changing. New machinery may be introduced, staff may change and thanks to the European Union, a steady stream of new Legislation is being introduced. It is necessary, therefore, to review the assessments at regular intervals and when circumstances change.

Are there any specific risks I must control?

As well as the general requirement to carry out risk assessments, there are some regulations that deal with specific risks which you may well have on the site. These specific regulations deal with the following areas:-

Hazardous Substances

The Control Of Substances Hazardous To Health Regulations require risk assessments to be carried out on all substances used on the site (i.e. pesticides, solvents, cleaning materials etc.) which could cause harm. The procedure for carrying out the assessment is the same as described previously.

- 1. Identify the substances.** This can be done initially by reading the labels of all substances that people are exposed to. Remember, exposure can be by breathing it in, splashing it into eyes, absorbing it through the skin or swallowing it. All labels will have health and safety information on them including, if appropriate, one of the hazard warning symbols. Don't forget to include any substances that may be produced as a result of your work processes, such as exhaust fumes and asbestos dust.
- 2. Decide what harm the substance can do and the risk of that happening.** Again the health and safety information on the label is useful but you can also ask your supplier to provide a safety data sheet for the product. This must be made available on request and will contain all the information you need to carry out a risk assessment. When deciding on the degree of risk, consider the way you use it. For instance, if you use bleach to wash floors, it is unlikely to splash in someone's eyes. However, it would be a different story if high shelving was being cleaned.
- 3. Reduce the risk.** First, ask if this particular hazardous substance needs to be used at all. Second, is there a less hazardous product which will do the job equally well? If not, then consider if it can be used in a safer way, for instance in a diluted form. Finally, if these measures do not reduce the risk sufficiently, consider what protective clothing to wear. It is important that all your employees are aware of the hazards you have identified and have been instructed on the precautions you decide upon.
- 4. Record and Review.** Record the findings of your assessment as before and review it on a regular basis, particularly if you introduce new substance or change working practices.

Noise

The Noise At Work Regulations are designed to protect people from hearing damage as a result of exposure to loud noise over a period of time.

There are three action levels of ascending noise readings which need progressively higher levels of precautions. These noise levels are averaged over the working day. Exposure to a reasonably high level of noise for only a short time may not, therefore, give an averaged value up to the action levels. As a rough guide, if you can talk to each other a metre apart without shouting the noise is most unlikely to reach action levels.

If you think you have a noise problem, first try and reduce the noise at source. This may be just a case of a bit of maintenance to a machine or providing an acoustic cover. If this is not possible, ear defenders may be needed.

Electricity

The Electricity At Work Regulations deals in detail with the way work on electrical installations is carried out and is beyond the scope of this guide. However, the regulations also require employers to ensure that any electrical installation is maintained in a safe condition. The term electrical installation includes not only the wiring up to the plugs but also anything that is connected to them. Your site licence already requires you to have the electrics up to the connection point checked every year by a competent person. To fully comply with these regulations you should also have any portable equipment tested at least once a year. Electrical equipment should be visually checked by the user every time it is used. Users should be trained in what to look for. Sites which rent holiday homes should also ensure that all electrical appliances within the vans are checked regularly.

Work Equipment

This term covers everything from the tractor to a hammer. **The Provision And Use of Work Equipment Regulations**, in a nutshell, require all work equipment to be used for the purpose it was designed for. All equipment should be maintained in a safe condition. Where appropriate guards should be in place and working.

All users of equipment must be given suitable instruction and training to use the equipment safely. All work equipment must also be chosen with care. If it is new it should be stamped with the EU mark. This ensures that it meets the standards set down within Europe for that particular type of equipment. Existing equipment should be maintained, examined and tested in a way that is appropriate i.e. a hammer only needs a visual check to see that the shaft is not damaged and the head secure. A grass cutter, on the other hand, would need far more attention. Any examinations should be carried out by a competent person and experience to do what is required to them.

It is strongly recommended that records of such examinations and tests (including those referred to in the previous section) be kept in order to prove that they are taking place. In the case of visual checks this may be simply a check list which is dated and signed. For more complex equipment records, such as service receipts, should be available.

Manual Handling

The Manual Handling Operations Regulations require risk assessments to be carried out of all lifting and carrying tasks where there is a risk of personal injury.

On your site this would include such tasks as locating caravans, changing gas cylinders etc. The process for assessments is much the same as described above. However, when assessing the risk for manual handling the following should be considered:-

The Task - How is the load to be lifted? Does the lift involve twisting, stooping or over reaching? Is the lift away from the body or at high or low levels. Is it repetitive?

The Load - Is it heavy, bulky, unwieldy, difficult to grasp, unstable, hot, cold or with sharp edges?

The Environment - Is it very hot, cold, humid, very windy, or is the lighting poor?

The Individual's Capability - Does the task require unusual strength, or require any special knowledge or training?

When considering reducing risk, firstly try and make the lift unnecessary. For instance by having gas cylinders delivered directly into the compound. If this is not practical, consider mechanical aids such as tractor lifts or simple wheel barrows.

What do I do if an accidents happens?

Up to now this guidance has been about preventing accidents but unfortunately sometimes things can go wrong. If one of your employees or anyone else has an accident on your site, then details should be recorded. If the accident involves an employee and they have suffered a major injury such as a broken arm or it causes them to take more than 3 days off work, then you should notify the Environmental Health Service Unit at the Council. Likewise, if the accident involves an employee and they have suffered a major injury such as a broken arm or it causes them to take more then 3 days off work, then you should notify the environmental Health Service Unit at the Council. Likewise, if the accident involves a member of the public, including residents on the site and they are taken to hospital then this must also be reported. Details of what is considered a major injury and the information which should be given to the Council are contained in the **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations**. A booklet explaining these Regulations in more detail and a copy of the form which may be used to report accidents can be obtained from the Environmental Services Commercial Team.

Where can I get more help?

As well as enforcing the law, East Cambridgeshire District Council's Environmental Services are always available to assist site owners in complying with their legal obligations. It is not possible in this short leaflet to deal with every issue in a comprehensive manner. Further information is available on most of the matters mentioned in this guide and the Council's Domestic or Commercial Team will be pleased to assist you in setting up a system to manage health and safety at your site.

APPENDIX

RISK ASSESSMENT RECORD 1
(Identify Tasks and Hazards)

SITE	Happy Mobile Home Site	SECTION	Maintenance
ASSESSOR	Mr Right	DATE OF ASSESSMENT	10/09/01

TASK NO	DESCRIPTION	PROCEDURES	HAZARDS
1	Storage of bottled gas cylinders on site.	Cylinders are delivered on site, unloaded and stored in designated areas in the maintenance yard.	1. Leak due to a faulty valve or cylinder. 2. Cylinders may be involved in a fire or explosion. 3. Cylinders may be interfered with maliciously or otherwise resulting in the release of gas.
2			
3			

RISK ASSESSMENT RECORD 2
(Identify Controls & Risk Rating)

SERVICE UNIT	Happy Valley	SECTION	Maintenance
ASSESSOR	A. Smith	DATE OF ASSESSMENT	07/02/99

HAZARD/ RISK	PEOPLE AFFECTED	SEVERITY OF INJURIES	EXISTING CONTROLS	RISK RATING
Bottled gas leak due to faulty valve or cylinder.	All staff, residents and emergency service personnel.	If gas was to ignite or explode possible multiple fatalities.	<ol style="list-style-type: none"> 1. Bottled gas obtained from a reputable supplier. Enquiries made to check that all returned cylinders are checked before being refilled in accordance with the relevant codes of practice. 2. Cylinders on site are visually checked on delivery and if they are dropped or damaged. Staff have been instructed on what to look for. 	Low
Bottled gas cylinders involved in a fire	All staff, residents and emergency service personnel	If gas was to ignite or explode possible multiple fatalities	<ol style="list-style-type: none"> 1. Cylinders are stored outside and away from buildings 2. A fire hose is adjacent to the storage area and can be used to keep cylinders cool whilst awaiting the fire brigade 3. No flammable materials are stored near the cylinders. 4. The cylinders are on a hard standing and the weeds are kept down. 	Medium
Bottled gas cylinders may be interfered with resulting in a release of gas.	All staff, residents and emergency service personnel	If gas was to ignite or explode possible multiple fatalities.	<ol style="list-style-type: none"> 1. Staff told to keep an eye on them. 	High

RISK ASSESSMENT RECORD 3

ACTIONS AND RECOMMENDATIONS

SITE	Happy Valley	SECTION	Maintenance
ASSESSOR	A. Smith	DATE OF ASSESSMENT	01/12/98

ACTION	RESPONSIBLE PERSON
Build a 1.8 metre chain link fence around the bottled gas store.	A. Smith
Provide new bottled gas store fence with warning notices and no smoking signs.	A. Smith
Hold short training course on handling bottled gas.	B. Jones