City of London Corporation

Departmental Health and Safety & Fire Safety Plan

Open Spaces

V1.2 - 2015

Rel Date	Rev	Author	Notes
25 June 2014	1.0	P Hegarty	Initial document
May 2015	1.1	P Hegarty	Draft revisions
June 2015	1.2	P Hegarty	Revisions following consultation

Open Spaces Department Health and Safety Plan

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Open Spaces Department Health and Safety Plan

Open Spaces Department
HEALTH AND SAFETY
POLICY STATEMENT

Safety isn't separate from our business. It's central to everything we do. Each and every one of us must put safety at the heart of what we do in delivering our excellent services. If we do this together we can all keep the Open Spaces working safely, for our visitors and our workforce.

Putting safety at the centre of everything does not mean placing obstacles in the way of progress; it's more about the behaviour displayed by our staff in discharging their responsibilities.

Being open and honest
We all have a duty to report and share information. It's not just accidents and emergencies that need to be recorded, but also those close calls or near misses. Getting that feedback means we will learn and hopefully prevent any accidents and let us get better at what we do.

Let's understand what went wrong, why it went wrong, and how we can make improvements.

Working with others
Although I maintain ultimate responsibility, I have delegated duties to the Superintendents to ensure that they have their own Divisional H&S procedures and policies bespoke and risk profiled to their services, which detail their commitment and arrangements as necessary, identify specific targets and provide a measure of monitoring to gauge their performance.

Safety isn't just a personal responsibility, our managers, our health and safety coordinators, the trade unions and external partners such as contractors, suppliers and volunteers, all have a critical role in delivering safety.

Embracing safety
It can be easy for people to see safety as getting in the way and slowing us down. The truth is that working safely improves productivity, efficiency and can often deliver substantial savings. This alone should align our business objectives to ensure safety is used to drive and deliver savings and preventing waste.

Communicating clearly
As a unique and complex organisation we need to make sure that people understand what they need to do to stay safe, and so, our processes, safe systems of work and basic rules are much more likely to be remembered and adhered to if they are presented in a clear and uncomplicated way.

Trust your instincts
If something doesn't feel safe, the chances are it's not. So, don't do it, stop the job and speak up. If you see others doing something that feels risky, stop them and report it. Short cuts are often when accidents happen. So don't take them.

I don't believe in a blame culture within the Open Spaces Department. I do believe, however, in a just culture and that only by working as a team, with people taking responsibility, pride and acting professionally in their roles, to ensure they work safely, will we be able to foster a positive safety culture across the Open Spaces Department

Signed:

Sue Ireland
Director of Open Spaces

Departmental Statement of Intent

As the Director of the Open Spaces Department I recognise and accept my responsibility for ensuring the health and safety of everyone who may be affected by the work environment and activities of the Department. This includes the safety of employees, volunteers, contractors, local residents and visitors to our Open Spaces.

I am committed to the provision and maintenance of safe and healthy working conditions, equipment and systems of work, and to the provision of such information, training and supervision as needed for this purpose.

Effective management of health and safety at work is reliant on all the people involved. Whilst good communication and representation are essential, it is the responsibility of all staff to participate in the creation of a safety culture in the Department.

The allocation of duties and responsibilities for safety matters and the particular arrangements which we make to implement the policy and plan are set out in this plan.

The plan will be kept up to date, particularly in light of any significant changes. To ensure this, the plan and the way in which it is operated will be reviewed as necessary, and at least on an annual basis.

Sue Ireland
Director of Open Spaces

INTRODUCTION

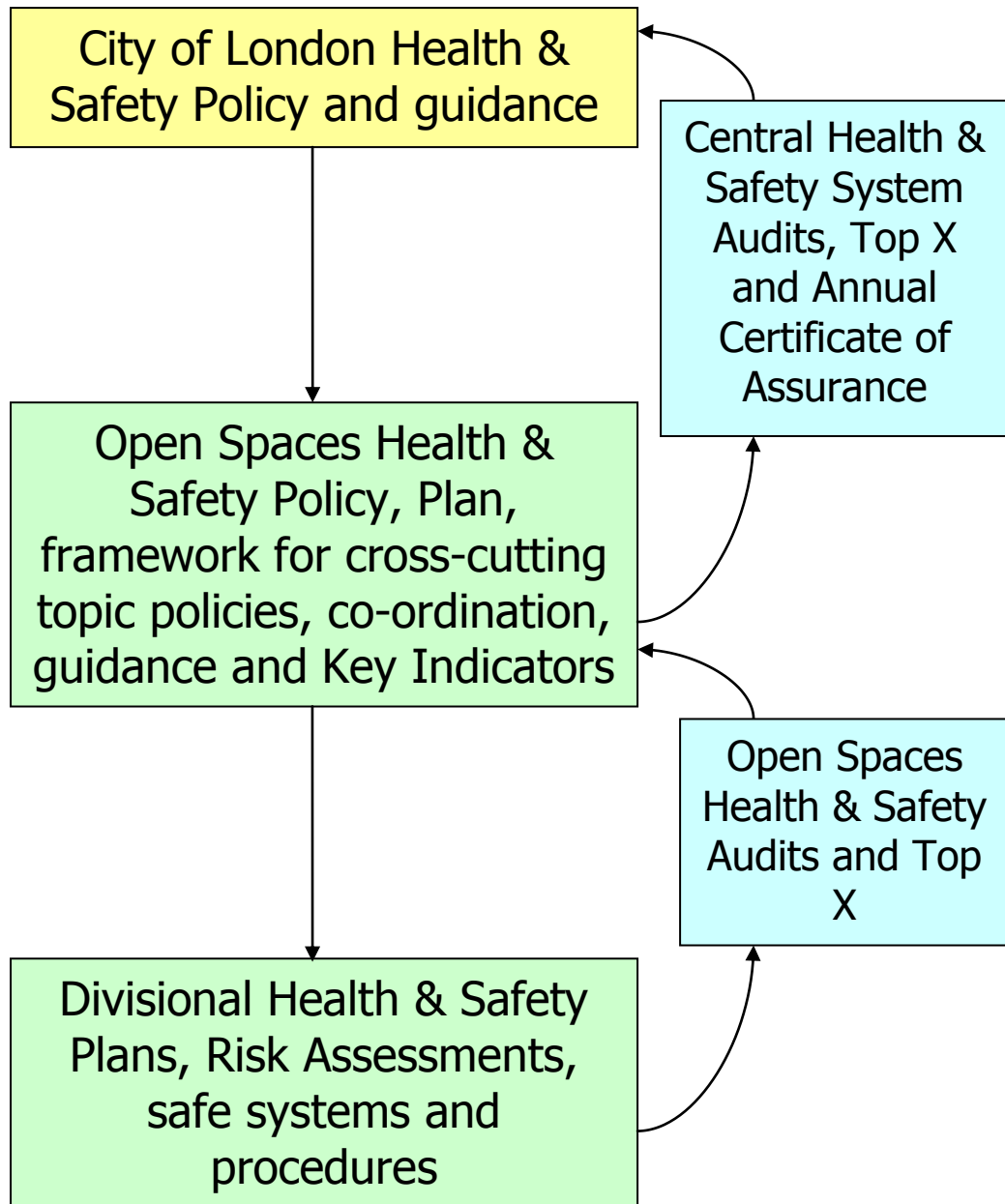This document sets out the framework for managing health and safety within the department.

Our departmental system comprises the following:

- our health and safety policy statement
- our health and safety and fire safety plan
- a health and safety committee which meets quarterly as the focal point of a community made up of staff with defined health and safety responsibilities
- defined health and safety responsibilities for all staff
- effective communications between managers, employees, volunteers, contractors and all stakeholders, including access to guidance documents
- effective planning processes to include risk management, appropriate health and safety training, accident prevention and investigation and inspection regimes
- provision for internal and external proactive health and safety audits and inspections to ensure continuous improvement.

Our policy, plan and other documents are not intended to duplicate procedures or guidance but provides a link between the City Corporation's corporate requirements and the Open Spaces Department and demonstrate our commitment to managing health and safety within the Department. We endorse the City of London Corporation H&S Policy and the departmental policy should be read in conjunction with both the corporate Health and Safety policy and divisional arrangements.

Cross cutting corporate health & safety policies, procedures, codes of practice and guidance notes are adopted by the Department. However where there are specific Open Spaces risks and circumstances, this Plan and associated documents outline the arrangements that are in place to address these issues.

Policy Framework

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┌─────────────────────────────┐
│   City of London Health &   │ ◄────────────┐
│  Safety Policy and guidance │              │
└─────────────────────────────┘    ┌──────────────────────┐
              │                     │  Central Health &    │
              │                     │  Safety System       │
              ▼                     │  Audits, Top X       │
┌─────────────────────────────┐    │  and Annual          │
│  Open Spaces Health &       │    │  Certificate of      │
│  Safety Policy, Plan,       │    │  Assurance           │
│  framework for cross-cutting│    └──────────────────────┘
│  topic policies, co-ordination,│ ◄───┐         ▲
│  guidance and Key Indicators│ ────────┘         │
└─────────────────────────────┘              ┌──────────────────┐
              │                              │  Open Spaces     │
              │                              │  Health & Safety │
              ▼                              │  Audits and Top  │
┌─────────────────────────────┐             │       X          │
│  Divisional Health & Safety │             └──────────────────┘
│  Plans, Risk Assessments,   │                      ▲
│  safe systems and           │ ─────────────────────┘
│  procedures                 │
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The work of the Open Spaces Department

The Open Spaces Department provides a wide and diverse range of services, reporting to a number of committees. The department consists of five operational divisions spread across London and bordering counties, each of which contributes to a departmental Business Plan and regular progress report updates for their reporting Committee. These divisions are:

- Burnham Beeches & City Commons;
- City of London Cemetery & Crematorium;
- Epping Forest;
- Hampstead Heath, Highgate Wood & Queen's Park;
- Parks & Gardens.

The Open Spaces Department vision links to the corporate aims and objectives set out in the Corporate Plan and The City Together Strategy. However, each Open Space managed by the City is a special place, with well-established management plans and dedicated staff. Given their operations, habitats and locations around London, the management of each site varies. They have in common, the management and maintenance of publically accessible land, amounting to almost 4,500 hectares and the City of London Cemetery & Crematorium provides burial and cremation services. We seek to balance the responsibilities of conserving and enhancing the special environments for a wide variety of uses, with policies to encourage access and increase the opportunities for enjoyment, education and recreation.

DEPARTMENTAL ROLES AND RESPONSIBILITIES

Chief Officer – Director of Open Spaces

The Director, Sue Ireland, is ultimately responsible for ensuring the implementation of this departmental health and safety Plan. She will secure adequate resources for the Superintendents, the Departmental Business Manager, and other managers to fulfil their duties and responsibilities under the corporate and departmental health and safety policies and procedures.

She chairs the Open Spaces H&S Improvement Group and as well as representing the Department, has a responsibility for H&S corporately through the Corporate Health & Safety Committee.

The Superintendents and the Departmental Business Manager (see the Departmental Structure chart below)

are responsible for ensuring the implementation of the departmental H&S Plan and the development of further policies and procedures appropriate to their operations and risks. They must ensure safe systems of work and safe practices are in place within their areas through their management control.

As appointed safety officers, they are responsible for ensuring that this Plan is being complied with. They must ensure the necessary resources are provided so that

managers and other staff can fulfil their duties and responsibilities. They must also ensure adequate monitoring is carried out and recorded, to assure processes are implemented, are working and are being effective.

They will attend the quarterly meetings of the Departmental Health & Safety Improvement Group or send nominated deputies.

Together with the Director they form the Senior Management Team (SMT) for the Open Spaces Department. Health & Safety is a standing item on the agenda of the SMT which meets twice monthly and holds a telephone-conference in the intervening period. The departmental Safety Co-ordinator will be invited to attend as and when required.

Managers (see the Departmental Structure chart below)
Managers are responsible for the daily implementation of this plan and the development of any safe systems of work as required. As such they are responsible for ensuring that work activities are assessed, planned and organised, so as to reduce risks to the lowest reasonably practicable level.

Managers are responsible for ensuring that auditing, inspections and the review of risk assessments for their respective teams takes place as required including the maintenance of their safety risk registers (not to be confused with business risk registers) which ultimately inform the departmental Top X.

Managers will encourage and support reporting of all accidents/incidents and near misses and bring to the attention of the senior management any health and safety concerns within their teams or the division.

Employees
All employees have a duty to take reasonable care for their own health and safety, and for that of others, and to co-operate with their manager or supervisor on health and safety matters. They must also follow the procedures laid down for safety and ensure they only carry out tasks for which they have been trained.

In addition to these general responsibilities many employees in the Open Spaces have specific H&S roles as well as expertise and skills which are crucial for the safe operation of the Department. Appropriate training commensurate with these responsibilities and the risk profile of the department will be given. Whilst the application of these roles and skills is co-ordinated and managed through managers, supervisors and team leaders, it is the responsibility of all staff to carry out their tasks in a safe manner and contribute to the creation of a safety culture in the Department.

All departmental staff are supported by safety co-ordinators:

Departmental Safety Co-ordinator – Technical Manager
The Technical Manager is the Departmental Safety Co-ordinator. His role is the co-ordination of the H&S work of the Open Spaces, including the work of the Open Spaces H&S Improvement Group. He represents the Department on matters of

health and safety; as such he will ensure the regular monitoring of departmental safety performance and will support the consideration of safety issues at SMT meetings.

Other roles include monitoring and auditing health and safety, encouraging accident/incident reporting and providing regular feedback on performance and issues to the Senior Management Team and the Corporate Safety team through the Departmental Safety Managers Forum (DSMF quarterly). Further responsibilities include:
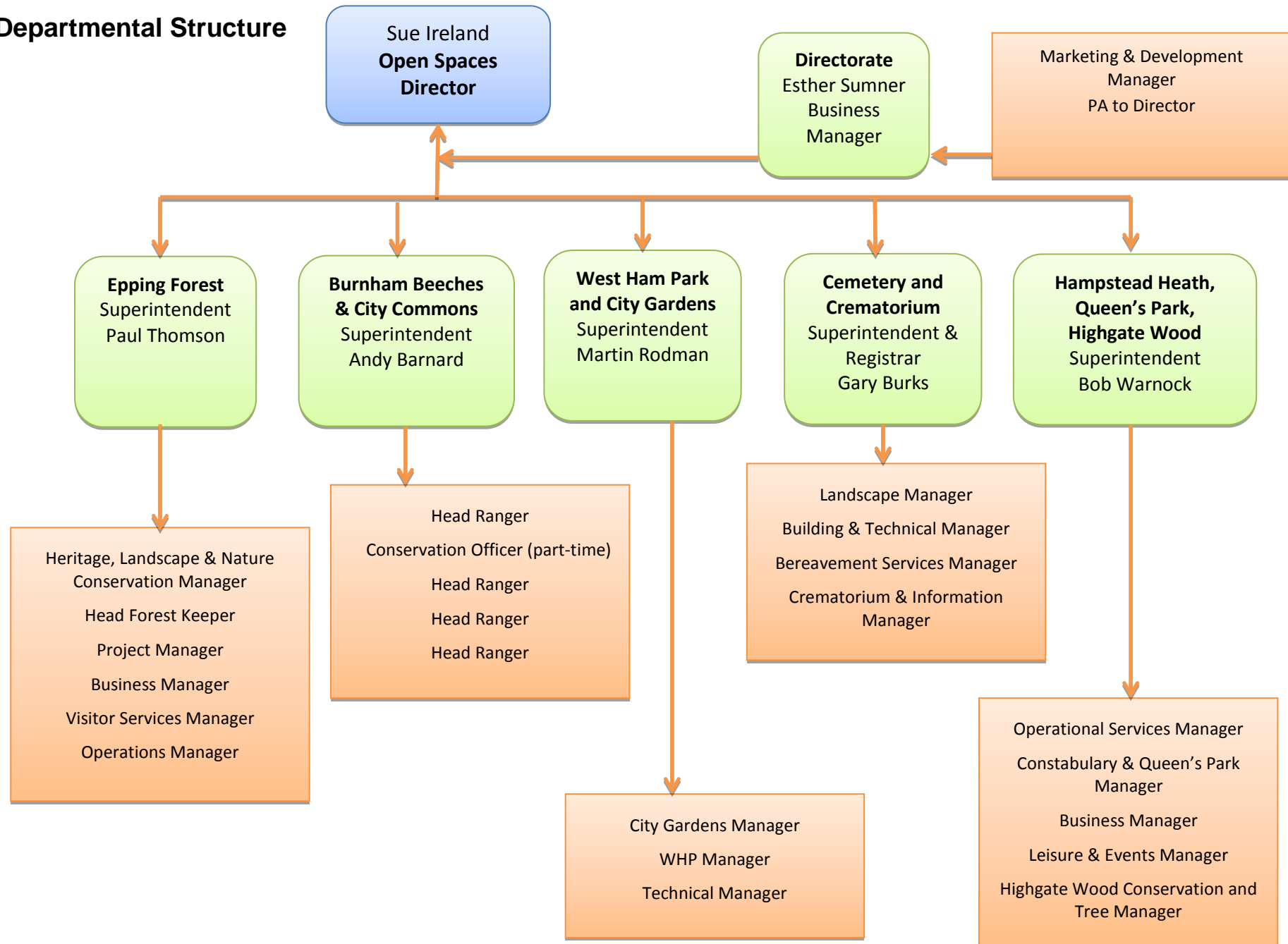
- Liaising with Managers to ensure risk assessments, including fire risk assessments and display screen equipment assessments, and accident investigations are completed/reviewed as required;
- Oversee the work of the H&S Sub Group;
- Review and report accident trends to the Open Spaces Health & Safety Improvement Group and liaise with Santia Incident Line;
- Ensure audits (self-assessments) of divisional health and safety performance are carried out as necessary;
- Provide an annual certificate of assurance on H&S to the Town Clerk's Department;
- Co-ordinate departmental Top X reports twice a year;
- Co-ordinate the development of departmental wide safety policies and procedures;
- Co-ordinate and update the departmental Occupational Safety and Health Plan and guidance documents;
- Feed back issues throughout the Department;
- Liaise with the Corporate Safety Team to ensure best practice;
- Adhere to the principles of Sensible Risk Management.

Divisional Safety Co-ordination
At a divisional level Safety Assistants or nominated managers, carry out co-ordination of local health and safety including:
- Co-ordinate and monitor risk assessments, accidents, control measures and health investigations;
- Provide regular updates to Senior Managers on H&S performance;
- Liaise with the Corporate Safety Team to ensure best practice;
- Adhere to the principles of Sensible Risk Management.
- Analyse local H&S processes and recognise limitations of these processes;
- Identify resource and H&S training needs for continuous improvement;
- Ensure proactive monitoring is carried out as identified by the Risk Assessments and that it is adequately recorded, e.g. for noise and vibration exposure, Display Screen Equipment, etc.;
- Maintain H&S training records through monitoring;
- Coordinate and report results of any workplace inspections;
- Liaise with Managers to ensure risk assessments / fire risk assessments and accident investigations are completed/reviewed as required;
- Co-ordinate divisional Top X reports;
- Ensure health surveillance is completed as required for noise, vibration, etc.

Departmental Structure

Sue Ireland
Open Spaces
Director

Directorate
Esther Sumner
Business
Manager

Marketing & Development
Manager
PA to Director

Epping Forest
Superintendent
Paul Thomson

**Burnham Beeches
& City Commons**
Superintendent
Andy Barnard

**West Ham Park
and City Gardens**
Superintendent
Martin Rodman

**Cemetery and
Crematorium**
Superintendent &
Registrar
Gary Burks

**Hampstead Heath,
Queen's Park,
Highgate Wood**
Superintendent
Bob Warnock

Heritage, Landscape & Nature
Conservation Manager

Head Forest Keeper

Project Manager

Business Manager

Visitor Services Manager

Operations Manager

Head Ranger

Conservation Officer (part-time)

Head Ranger

Head Ranger

Head Ranger

Landscape Manager

Building & Technical Manager

Bereavement Services Manager

Crematorium & Information
Manager

City Gardens Manager

WHP Manager

Technical Manager

Operational Services Manager

Constabulary & Queen's Park
Manager

Business Manager

Leisure & Events Manager

Highgate Wood Conservation and
Tree Manager

Other Support
As part of the City of London, the implementation of our Policy relies on support from teams in the Town Clerk's Department and the City Surveyor's Department in particular. The Occupational Health Manager and the corporate Health and Safety Manager for People are within the HR Division of the Town Clerk's Department. The corporate Health & Safety Manager for Property is within the City Surveyor's Department and the City Surveyor is also responsible for building and infrastructure maintenance.

Health and Safety Manager (People)
The H&S Manager (People) in the HR Section of the Town Clerk's Department, is the **Competent Person** as defined by the Health & Safety Executive. They and their team provide:

- advice and guidance on current and new health & safety legislation;
- advice and guidance in response to specific local issues and concerns;
- production and updating of City of London Health & Safety Policy and Codes of Practice;
- system inspections and audits;
- provision of internal health and safety training;
- attendance and support at the Open Spaces Health & Safety Improvement Group (plus local meetings when required);
- accident policy, training, codes of practice and investigation of major incidents;
- analysis and feedback on cross City of London trends (accidents, verbal/physical abuse etc);
- support for occupational hygiene issues such as specialist risk assessments;
- maintain the Display Screen Equipment assessment tool, Assessrite.

Occupational Health Manager
The Occupational Health Service provides:

- pre-employment assessments including base line health surveillance.
- health surveillance programmes following risk assessment (including drivers, noise, vibration (HAVS), work related vaccinations, life guards,);
- advice and referral in relation to musculoskeletal problems
- management referrals of staff where specialist advice is required.

Health & Safety Manager (Property), City Surveyor's Department
They and their team provide:

- Control of contractors guidance;
- a Competent Person with regard to Legionella;
- a Competent Person with regard to Asbestos;
- premises related system inspections and audits;
- advice and guidance on new and existing legislation in relation to buildings, infrastructure and equipment, including working at height and working on water equipment;

- where consulted, ensuring the consideration of health and safety in the provision of contracted work, infrastructure inspections and long term site plans;
- a Competent Person for advice regarding Fire Safety and the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR), etc.

The City Surveyor is responsible for managing asbestos (not part of the MITIE contract), providing advice and keeping records, including provision of asbestos surveys and management plans;

Property Facilities Manager (PFM)
Acts as a point of contact in the City Surveyor's Department for Open Spaces issues arising under the corporate building and infrastructure maintenance contract. The contract is held by **MITIE** who are responsible for:

- portable appliance testing (PAT) (frequency based on advice/risk assessment);
- electrical circuit fixed wiring testing (every five years);
- gas appliance testing/servicing (annually);
- emergency light testing (every six months);
- security alarm testing/servicing (annually);
- fire alarm testing (every six months);
- fire extinguisher and equipment testing (annually);
- pressure vessel testing (annually);
- lifting equipment testing (every six months for equipment used to lift people and 12 months for other lifting equipment);
- water systems hygiene including temperature (typically monthly but frequency based on risk assessment)and legionella testing (if a specific issue is identified);
- Local Exhaust Ventilation (LEV) system testing (every 14 months);
- Lighting conductors checks (every 11 months).

See also **Specific working arrangements for the corporate building and infrastructure maintenance contract** below.

Insurance and Risk Management Team in the Chamberlain's Department
Oversee the contract for the independent inspection of lifting plant and accessories for City as required under LOLER. They can arrange for the current schedule to be updated with additions and deletions on request and can authorise access to the schedule of plant and examinations. For information, contact:
CHBInsuranceTeam@cityoflondon.gov.uk (CHB – Insurance Team)

The contract is currently with Allianz and besides lifting plant and accessories, covers items such as Local Exhaust Ventilation(LEV) and pressure systems. The contract can be seen at:
http://www.allianzengineering.co.uk/home/inspection/inspection-services.html.

CONSULTATION AND COMMUNICATION ARRANGEMENTS

Open Spaces Health & Safety Improvement Group
See Appendix 1 for the current membership of the Open Spaces H&S Improvement Group.

The Health and Safety Improvement Group meets quarterly and has an advisory and co-ordinating role with the power to make recommendations within the Department. It is chaired by the Director of Open Spaces, assisted by the Technical Manager and is attended by the Superintendents, officers with specific H&S responsibilities, employee representatives and corporate H&S, Occupational Health and Insurance managers.

The Department recognises Safety Representatives of the City of London Branch of the GMB and Unite unions. The Director co-operates fully in safety matters with such employee representatives and will provide them with sufficient facilities to enable them to act effectively in this function and with opportunities for training.

The Improvement Group is the focal point for the management of H&S in the Open Spaces Department and responsible for:
- monitoring the Top X risks,
- reviewing accidents and near miss reports in order to target improvement efforts and pass on learning points,
- reporting on H&S training initiatives,
- receiving information on corporate and legislative changes in H&S and
- the monitoring and review of this plan

Minutes of the meetings are sent to all attendees for sharing at local level and made available via the intranet. An Action Sheet is maintained to monitor progress on issues discussed.

The Improvement Group is supported by regular safety meetings at site level through Divisional Health & Safety Working Groups and a Sub-group.

H&S Sub-group
The H&S Sub-group is composed of officers with H&S responsibilities from each Division who meet to develop departmental guidance and procedures such as generic risk assessments and safe systems of work. It is overseen and supported by the Technical Manager and chaired by the Epping Forest Technical Officer. It looks into specialist topics and reports back to the Improvement Group. It also organises the annual H&S Audit of the Department with the assistance of additional Managers to carry out the audit validation visits.

Divisional Health & Safety Working Groups
Each division has local H&S working groups appropriate to the size and risk profile of the division. They meet regularly usually quarterly, and are representative of the staffing structure of the division. They are empowered to address H&S issues at a local level and communicate their minutes to all staff in the division. They cascade

issues which arise at the corporate and departmental level and are an opportunity for staff to raise H&S issues directly or through representatives.

Corporate Health & Safety Committee (CHS)
The CHS is chaired by the Town Clerk and meets quarterly. Its function is to advise and make recommendations to the City Corporation's Chief Officer Group on matters relating to the overall management of health, safety and welfare throughout the organisation. The Committee may delegate appropriate business to managers and/or departmental safety committees/groups and can require reports of any outcomes. The CHS will also receive reports on the meetings of the departmental safety committees / groups or other meetings where safety issues have been discussed to ensure corporate oversight and sharing of issues raised within one service area or externally where these may have implications for other City Corporation service areas.

The Director represents the Open Spaces Department on the Corporate Health & Safety Committee where she raises issues and reports to the CHS on relevant matters. Information from the CHS is proactively shared with the Safety Co-ordinator and SMT and forms part of an update on corporate matters to the H&S Improvement Group.

Departmental Health & Safety Managers Forum (DSMF)
The DSMF is a corporate group of safety staff and who meet quarterly to communicate on all safety matters. It provides a forum for sharing good practice and support for the departmental Safety Co-ordinators. Being linked to the corporate health and safety systems, it helps promote more effective control, facilitates consultation and aids co-ordination of implementation or amendment of any procedures or formal policies, to ensure successful embedding and improved H&S compliance.

The Technical Manager is the nominated representative to attend the Departmental Health & Safety Managers Forum and is responsible for reporting back on relevant matters to the Open Spaces H&S Improvement Group.

General Communication
Notice boards must be provided in communal areas for staff to access the latest minutes of H&S meetings, local procedures, guidance and statutory information. A H&S Law Poster must be displayed in all divisions. Notice boards should have dedicated H&S areas, be kept uncluttered and up to date and have nominated individuals to take responsibility for them.

Fire and evacuation notices must be displayed on all sites in line with the local Fire Risk Assessment. The names of First Aiders and the location of First Aid kits and equipment should be clearly displayed. Emergency Action Plans should also be available for staff to familiarise themselves with local arrangements.

Relevant H&S documentation must be readily available to allow staff to undertake their work safely.

In addition Tool Box Talks and safety awareness events should be undertaken to supplement formal safety training.

GUIDANCE AND PROCEDURES

Corporate guidance
Policies, procedures and guidance are available from the City of London H&S Management System on the intranet along with useful contact details.

Open Spaces departmental guidance
A H&S toolkit is available on the Open Spaces H&S intranet pages.

Additional procedures and guidance are available in each Division, tailored to local operational requirements.

An Open Spaces Occupational Safety & Health Manual was developed in 2010 to provide a framework for the management of the key safety topics in the Department and is available in our intranet H&S site. This document is provided to assist managers to carry out their H&S duties under the Safety at Work, etc. Act 1974 and regulations under the Act, as an integral part of all work related activities. It provides Key Principles of H&S and outlines management responsibility regarding the following topics:

- Manual handling
- Use of work equipment
- Use of chemicals
- Violence at work including bullying and harassment
- Confined spaces
- Lone working
- Working at height
- Thermal comfort
- Noise
- First aid
- Fire
- Managing contractors
- Managing volunteers
- Managing the public
- Managing events
- Managing trees
- Managing grazing
- Managing water
- Safe vehicle movements
- Asbestos
- Legionella

Open Spaces Department Health and Safety Plan

It is intended to rationalise the sources of guidance available in the department and the OS Occupational Safety and Health Manual will gradually be superseded by updated guidance provided through the City of London H&S Management System and guidance on specific topics in this document.

Control of Contractors

Contractors undertaking work on premises under the control of the City of London must have the competence to perform the contract without risks to the health and safety of any person who may be affected by the works.

Contractors must be provided with all relevant information about the premises (e.g. location, condition, and extent of any known or presumed asbestos or areas which may be too inaccessible to survey) which may affect the health and safety of any person. Where necessary a further more complex survey may be required prior to the works commencing**.**

All contractors must be signed in when accessing a site and shall not commence work until permitted to do so. Permit to Work systems will be introduced and enforced where appropriate.

Specific working arrangements for the corporate building and infrastructure maintenance contract

In providing staff or subcontractors to carry out works in Open Spaces, Mitie are responsible for checking Risk Assessments and Method Statements for their staff and subcontractors and when satisfied issue a Permit to Work. At this point notification of the visit is sent to the site and the next stage is a Permit to Access. This process is sample audited by the Surveyors' Technical Advisory Group (TAG) team and the Property Facilities Manager / Assistant Property Facilities Manager (PFM/APFM).

The OS site manager is responsible for the Permit to Access which covers local access arrangements and will ensure those contractors and their employees:
- adhere to site rules;
- are aware of emergency procedures;
- are aware of health and safety risks and measures in place to deal with those risks;
- communicate arrangements and control OS staff activities and public safety on site during works.

Reporting and Investigation of all Accidents & Near Misses

All accidents and near misses must be reported in line with the Corporate Accident Reporting Procedure. All incidents, which include accidents, abuse, dangerous occurrences, instances of occupational diseases and 'near miss' incidents to be reported on the Santia Incident Line – 02920 855 605.

The Santia service provides reports and statistics on incidents which occur in the Department and assists in compliance with statutory reporting under RIDDOR 2013.

The line manager of the injured party must review and investigate all reported accidents as necessary and determine the course of action to be taken to ensure there is no further risk to staff or members of the public and discuss them in team meetings. This may require revision of risk assessments or amendments to procedures and processes.

All line managers will be responsible for ensuring the necessary paperwork is attached to any accident report notification as necessary. This is critical for the investigation process and may be crucial if required to uphold a valid personal injury claim or mitigate or defend against one.

All accident reports will be discussed, monitored and actioned at the departmental Health and Safety Group quarterly.

Risk Management

Risk management is the responsibility of all line managers who control a given task or activity. It implies an understanding of which risks may arise from work activities. Risks must be identified pro-actively before an accident or ill health occurs. We should prioritise our actions in responding to risks.

In the majority of cases, an initial risk assessment is all that is required. Particularly if the risk is low and little more can be done to control the risk or it can be demonstrated that the risk is at a tolerable level. If the controls are obvious, then they are recorded on the assessment. The manager must define, by exception, which risks require assessing at a detailed level.

Lower risks are more easily dealt with by local discussion and agreement between local managers and staff, or through health and safety inspections. Higher risks may need to be referred to the relevant management team for consideration.

Whilst risk assessment exists as a tool to aid the identification of appropriate risk controls for a given individual risk, risk management uses risk assessment information to direct limited resources to known high-risk tasks and to the most significant risks faced at any given time. At the same time, the City of London does not wish line managers to become obsessed with Health & Safety risk control, it must make sense within the context of operational duties, available resources and the effort involved. It is therefore imperative that line managers concentrate simply on the most significant risks at the time. What is required is a balanced judgement of H&S risk so as to ensure the implementation of sensible and practical controls within the resources available.

Top X and risk profiling are integrated in the departmental business plan and are recorded using the corporate Covalent system (see Top X below).

Risk Assessment

Risk Assessment is a legal requirement and as such the process is controlled corporately but implemented locally.

Open Spaces Department Health and Safety Plan

All managers are responsible for ensuring that risk assessments for their respective teams and service areas are in place, are reviewed, updated as necessary or at least once a year.

The divisions will appoint competent Risk Assessors who will facilitate this process to the managers responsible. This does not mean they simply delegate this task but are part of it and are led through the process by the Risk Assessor. This is done to assure quality and negate the need for duplication of training and improving departmental efficiency and consistency between assessments and controls.

In order to manage their risk assessment process all divisions will maintain a register of their risk assessments and supporting documents. This is to identify gaps and facilitate sharing of documentation as well as keeping track of review dates.

Written safe systems of work/instructions will be developed from risk assessment for all significant tasks and activities.

The Open Spaces H&S Sub-group has produced generic risk assessments and safe systems of work covering the main hazardous operations of the Department. These can be accessed on a shared area – Risk Assessments and Safe Systems of Work.

The process for Risk Assessment can be accessed through this link – Risk Assessment Process and a Template for Risk Assessment can be found from this link also.

Top X

Top X is the Corporate Health & Safety Risk Profiling and assessment tool. The aim of Top X is for significant risks to be identified and pushed up from divisions to the Open Spaces Department level where risks can be acknowledged and action plans put in place to minimise their impact on the Department – their impact can be manifested through injury, loss or damage to equipment or in some tasks, death.

Top X reports **must** be included as part of the Open Spaces business planning process and is required by the City's business planning framework. The departmental Top X risks are captured through the Covalent system.

Top X Guidance and Templates

This process is linked to risk assessment as many risks will be identified within this register so it is often useful to consider these processes in tandem. As the process is driven from the bottom up, all teams must prepare their Top X Registers and submit their Top X to the next layer of management as necessary.

This process will be coordinated by the Health & Safety Coordinator who will submit the departmental Top X Registers twice yearly to the Corporate Health & Safety Team. The Open Spaces Top X is discussed at the H&S Improvement Group in December and April before it is submitted to the Town Clerk's Department. This is monitored centrally as a KPI.

Open Spaces Department Health and Safety Plan

Training

Safety training is an important way of achieving competence and helps to convert information into safe working practices. The departmental risk assessments should help to determine the level of training needed for each type of work as part of the preventive and protective measures. The training should include basic skills training, specific "on-the-job" training and training in health and safety or emergency procedures. A training needs analysis (TNA) must be carried out for each post, posts can be grouped under a general TNA, however, line managers must identify any particular need that an individual member of staff may have as a result of their duties or personal circumstances.

Training needs may be significant on recruitment but new employees must receive basic induction training on health and safety, including the arrangements for first aid, fire and evacuation. Particular attention must be given to the needs of young employees and those who are disabled or have special needs. Line managers must ensure that any new employee is given a full induction including completing the H&S e-learning package.

The responsibility for ensuring that safety training needs are assessed lies with the head of service in consultation with the line managers of individuals. Those for whom safety training is deemed necessary are required to attend such training.

Identification of safety training needs of new staff must be carried out by the line manager, normally during the first weeks of the staff's appointment, and delivery of that training will normally form part of the staff member's competency assessment. A refresher procedure should operate for existing staff. Line Managers may call upon the services of the Corporate Safety Team in determining safety training needs.

All new staff will be given instructions on the local emergency procedures during their first week this will be done by their line manager.

Local Induction

All new staff will complete the new corporate safety induction. This information will be captured by Learning & Development.

All managers must also provide an orientation induction and this must cover local H&S information, most this information is contained in this plan. A local induction must be recorded locally and be given to the employee within the first day of starting their employment. A guide to what must be included in local H&S induction can be found at Appendix 2.

Fire Safety

See Fire Safety Guidance.
Each division must appoint a Responsible Person under the Regulatory Reform (Fire Safety) Order 2005 and must ensure adequate Fire Risk Assessments are carried out for their premises.

Information shall be available in the form of a Fire Log Book for significant sized buildings and all buildings where staff or the public are present on a regular basis. This Log Book can refer to documentation held elsewhere but reasonably available in the event of an incident. A list of the minimum information which needs to be available via the log book is included as Appendix 5.

Further advice is available via the Fire Safety Advisor and see also the role of the Property Facilities Manager.

Habitat Fire Control
See Appendix 6 for our detailed Habitat Fire Control Policy.

Managing Tree Safety
See Appendix 4 for our detailed Tree Safety Policy.

MONITORING, REVIEW & CONTINUAL IMPROVEMENT

Local arrangements shall be monitored closely by each Superintendent and will be subject to a self-assessment by each division each year as part of the Open Spaces H&S Audit System.

Open Spaces H&S Audit System
Annual H&S audits are carried out across the Open Spaces Department to monitor existing arrangements under twelve H&S indicators which are described in Appendix 3. The aims of the process are to assure the effectiveness of our H&S management system and support managers in carrying out their H&S roles.

Members of staff from other Open Spaces divisions validate these self-assessments in alternate years, to share best practice and to review management practices, procedures and the safety culture on the ground.

Following the self-assessment each division prepares an annual H&S improvement plan to carry out identified actions. These tasks are integrated in work programmes and Superintendents are responsible for developing and delivering the action plans.

An annual report on the Open Spaces audit is submitted to the Open Spaces & City Gardens Committee and the Health & Safety Manager (People), Town Clerk's Department as a certificate of assurance for the management of Health & Safety in the Open Spaces Department.

In addition visits and specialist audits by the corporate Health and Safety managers will take place. Independent external audits will be commissioned as deemed necessary. Outcomes of H&S audits will be reported back to the Improvement Group or divisional H&S Working Groups as appropriate to share key learning.

Open Spaces Department Health and Safety Plan

For further information on the Open Spaces H&S Audit click on the link.

Appendix 1

Current Membership of the Open Spaces H&S Improvement Group

Director of Open Spaces
Technical Manager
PA to Director (notes)
Departmental Business Manager
Superintendent Parks & Gardens
City Gardens Manager
City Gardens Support Services Officer
Manager West Ham Park
Support Officer West Ham Park
Superintendent Hampstead Heath, Highgate Wood & Queen's Park
Operational Services Manager Hampstead Heath
Senior Technical Officer Hampstead Heath
Superintendent Cemetery and Crematorium
Technical Officer Cemetery and Crematorium
Superintendent, Burnham Beeches & City Commons
Support Service Manager, Burnham Beeches & City Commons
Head Ranger, Burnham Beeches & City Commons (as nominated)
Superintendent Epping Forest
Business Manager Epping Forest
Technical Officer Epping Forest
Unite representative
GMB representative
H&S Manager (for people) Town Clerk's Department
H&S Manager (Property) City Surveyor's Department
Occupational Health Manager, Town Clerk's Department
Occupational Health Advisor Town Clerk's Department
Risk Assessment & Insurance Officer, Chamberlain's Department

Open Spaces Department Health and Safety Plan

Appendix 2

Health & Safety Induction Guide
(What every new member of staff should receive or know on their first day)

Item	Receive	Be Told
Safety Policy (Corporate and Departmental)	✓ (e-link will suffice)	
Fire Evacuation Plan *Does member of staff require PEEP (Personal Evacuation & Emergency Plan)	✓	
Fire evacuation route(s), Assembly Point(s) and when systems are checked		✓
How to Access The H&S online guide		✓
First Aid Provision: Who's your First-aider / First Aid Kit location		✓
Accident reporting procedures. All incidents, which include accidents, abuse, dangerous occurrences, instances of occupational diseases and 'near miss' incidents to be reported on the Incident Line – 0207 3321920		✓
Display Screen Assessment (if a user) - undertaken by manager/DSE Assessor **HR to send out** (link to WorkRite software from DSE Assessor)	✓	
General Risk Assessment for their post Any other specific risk assessments relevant to the post -COSSH, Work Equipment etc	✓	
Any Post-Specific Guidance, e.g. Lone Workers' Security etc.	✓	
Hazard Reporting Procedures		✓
Safety Representative(s) or approved trade unions– names and locations		✓
Location of any Welfare Facilities		✓
Location of Occupational Health	✓	
Training Needs Assessment	✓	

Open Spaces Department Health and Safety Plan

Appendix 3

The Open Spaces H&S Audit Indicators

Indicator 1: Organisation, Implementation and Communication. Each Division must have a local Health & Safety Plan and statement, and ensure that is regularly updated, clearly communicated and understood by all staff.

Indicator 2: Risk Management. Each Division should have Risk Assessments and Safe Systems of Work in place that cover all activities, operations and premises and adhere to current legislation and City Codes of Practice.

Indicator 3: Training. All staff shall receive a thorough health & safety induction followed by regular recorded and evaluated training determined by legislation, risk assessments and duties.

Indicator 4: Volunteers, Contractors and Suppliers. Each Division should have local arrangements to ensure that all third parties are working in accordance with health & safety legislation.

Indicator 5: Accident and Near Miss Reporting. Each Division must have procedures to ensure the reporting, investigation and analysis of accidents, incidents and near misses in accordance with City and Departmental Codes of Practice.

Indicator 6: Central Support. Each Division should have arrangements in place with the City Surveyors Department, the Occupational Health Section and the central Health and Safety Section to ensure central support according to the schedules defined in the Open Spaces Health & Safety Policy.

Indicator 7: Checklists, Inspections and Maintenance Records. Each Division should ensure that all statutory tests and inspections are undertaken in accordance with current legislation and that infrastructure is regularly inspected according to an accurate asset inventory.

Indicator 8: Policies. Based on Departmental guidance, each Division should define site specific policies (as applicable) on Water Safety, Tree Safety, Play Equipment, Vehicle Safety, Events and Lone Working.

Indicator 9: First Aid. Each Division should have appropriate first aid arrangements relating to training and provision according to current legislation and local risk assessments.

Indicator 10: Emergency Action Plans. Each Division should have plans and procedures to deal with emergencies and disasters.

Indicator 11: Fire Safety. Each Division should have appropriate fire safety equipment, training and procedures based on local fire risk assessments.

Indicator 12: Monitoring and Review. Each Division should review their local Health & Safety Plan on an annual basis, advising the Open Spaces Health & Safety Committee of any key issues arising from this process.

Appendix 4

Open Spaces Tree Safety Policy

City of London Open Spaces Department Policy: MANAGING TREE SAFETY

1. Policy Introduction and Context:

1.1 Each Division, for its geographic area of responsibility where it would be deemed as 'the occupier' as defined by the Occupiers' Liabilities Acts, must have a risk limitation strategy for trees based upon the 5 key principles identified by the National Tree Safety Group in *Common Sense Management of Trees* (NTSG 2011) endorsed by the Health and Safety Executive (HSE). Within each Division, a named person has responsibility for ensuring this is in place. In accordance with the Open Spaces Health & Safety Plan, the Responsible Person is the Superintendent, or appropriate delegated officer.
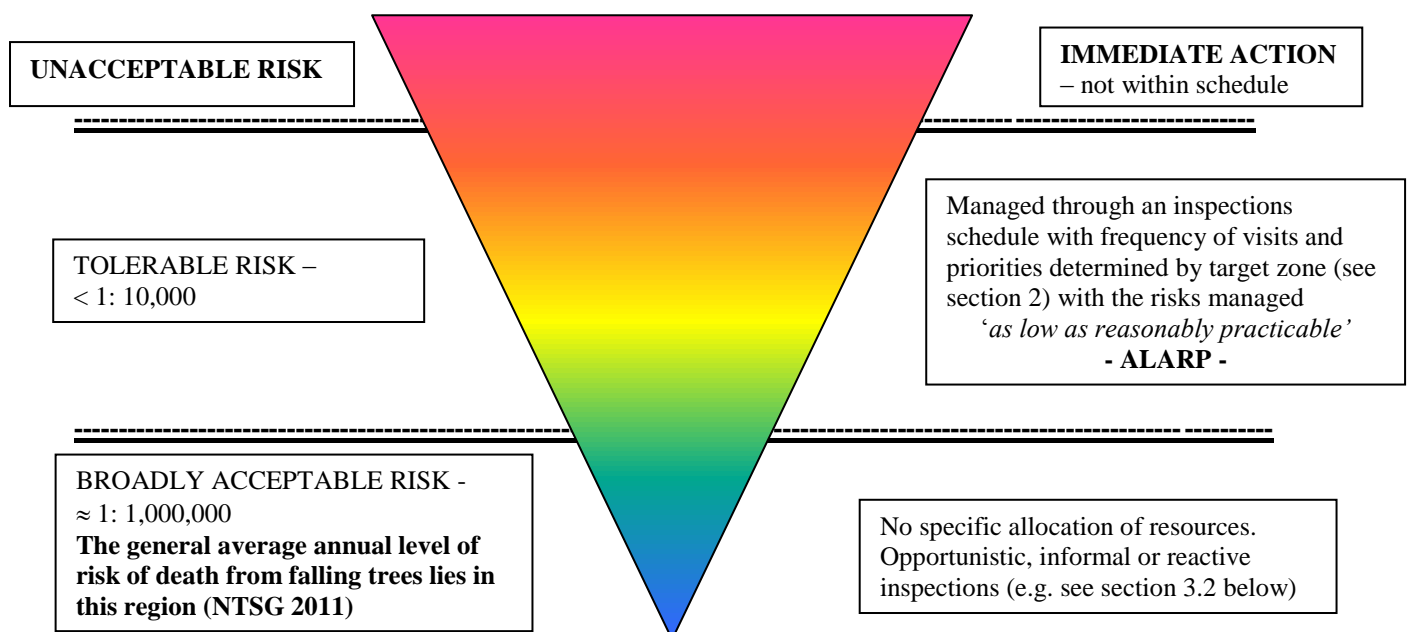
The 5 key principles

- trees provide a wide variety of benefits to society (including supporting significant biodiversity)

- trees are living organisms that naturally lose branches or fall

- the overall risk to human safety is extremely low

- tree owners have a legal duty of care

- tree safety management should be balanced & proportionate to risk/benefit.

1.2 As part of each Divisional Strategy there must be a:

- clear zoning system
- verifiable tree hazard inspection regime
- balanced, proportionate risk assessment
- clear risk management process.

1.3 The Tolerability of Risk Framework set out in Figure 1 below demonstrates the three levels of risk – Unacceptable, Tolerable and Broadly Acceptable – and will be the basis for each Divisional strategy. Therefore, in deciding upon actions, the evaluation of what is reasonable and proportionate intervention must be based upon a balance between the benefits and potential for harm. According to the HSE, the risk of being killed by a falling branch or tree is extremely low (Figure 1).

Figure 1: Tolerability of Risk Framework

UNACCEPTABLE RISK

IMMEDIATE ACTION – not within schedule

TOLERABLE RISK – < 1: 10,000

Managed through an inspections schedule with frequency of visits and priorities determined by target zone (see section 2) with the risks managed *'as low as reasonably practicable'* **- ALARP -**

BROADLY ACCEPTABLE RISK - ≈ 1: 1,000,000 **The general average annual level of risk of death from falling trees lies in this region (NTSG 2011)**

No specific allocation of resources. Opportunistic, informal or reactive inspections (e.g. see section 3.2 below)

Open Spaces Department Health and Safety Plan

1.4 In general, NTSG 2011 states that "*the courts appear to indicate that the standard of inspection is proportional to the size of and resources available (in terms of expertise) to the landowner".* In determining the resources the level of risk, which is very low (Figure 1), is also key and, as landowner, a "*reasonable and prudent*" approach is required in this context.

1.5 The risk management process and tree hazard inspections should not lead to a loss of character or species diversity within Open Spaces. It should ensure that a balance is maintained between nature and landscape conservation, public access, recreation and enjoyment, and risks to safety posed by trees.

1.6 Except where there is an imminent danger to life, before work is undertaken on any tree an assessment of its use by bats (and other protected species) as well as of the general requirements of any statutory wildlife protection of the site (e.g. SSSI/SAC) must be undertaken and advice sought from relevant authorities to prevent damage to those species or habitats. For bats a Bat Risk Assessment form should be completed to provide written evidence of procedure and to record the rationale for subsequent actions.

1.7 In order to undertake a tree risk assessment the two separate factors of *Hazard* and *Risk* must be addressed:

- **Hazard:** Trees are subject to decline, physical damage and infection. As trees deteriorate they are increasingly likely to shed limbs or fall in strong winds and the potential to cause harm increases. Remedial action is only necessary when there is clearly a significant risk to life or property. This might mean either removing part of the tree that is creating the hazard or reducing the level of public access in the vicinity or both.

- **Risk** is an estimate of the likelihood and severity of an adverse event occurring. The NTSG (2011) principles upon which this policy is based recognise that overall the risk to human safety from trees is extremely low (see Figure 1 above). Risk is related to the location of the tree. It reflects the intensity of use of the immediate surroundings of the tree and the proximity of the tree to buildings or other structures. The intensity of use by the public, staff, volunteers and contractors within Open Spaces is not evenly distributed and, therefore, levels of risk may vary across a site. This fact must be recognised in an appropriate, site-specific tree inspection zoning system.

2. Divisional Zoning System

2.1 The zone designation below will determine the priority and regularity of proactive inspections.

2.2 Divisional resources must be directed to the areas in proportion to the potential for harm to people and property. As such, zones must be related to identifiable, potential "targets", both physical targets such as property and targets based on level of usage of an area by people. Both the nature and frequency of use of the "target" by people need to be taken into account. Where no data on levels or patterns of use are directly available for an area, the level of use by people should be a reasonable estimate based on local knowledge of the area and its particular features. A reasonable outcome of the zoning process may be the decision that some areas require no proactive inspections.

2.3 Decisions on zones and the definition of each zone need to be recorded and be accessible for inspection. Zoning systems at each Divisional area of responsibility should be reviewed periodically in order to take account of significant changes to site use, the uses of adjoining land or modifications to site boundaries.

2.4 Zoning will be achieved by each Division by designating each area of land under its responsibility into a minimum of three *Use Levels* requiring some level of proactive inspections based on the concepts of risk and hazard outlined above.

- **High Use targets** - coloured **red** on the tree inspection map.

- **Medium Use targets** - coloured **amber** on the tree inspection map.

- **Low Use targets** - coloured **green** on the tree inspection map.

2.5 Within the Open Spaces the variety of sites and situations, rural and urban, is very large and zoning needs to reflect local knowledge and divisional differences. It should be recognised that within each of the target zones, there may be a need to prioritize further based on availability of resources.

2.6 Areas deemed as of *broadly acceptable risk* (see Figure 1 above) because of low use and low target levels would require zoning so that the demarcation is clear but may not require proactive inspections. These will be demarcated but left **uncoloured** on the zone map.

3. Inspection regimes

3.1 Proactive Inspection Regime and Competence Level for Inspectors

3.1.1 The identified coloured zones above must each have a proactive, formal inspection regime defined and carried out at a frequency based on the level of use of the target. A competent Inspector will assess the tree. For all Open Spaces Department formal inspections, tree inspectors will be trained to LANTRA (Sector Skills Council) Professional Level, have passed the Professional Tree Inspection (PTI) course and possess demonstrable, recent experience of tree risk assessment work.

3.1.2 Defects on the trees will be recorded in order to assess the potential hazard and consider the risk posed by the defect. Given that the risk to human safety from trees is, in general, very low the assessment of defects needs to bear this in mind. However, where i) the risk to a target is considered high (see Figure 1 above); ii) the tree is of importance for nature conservation or has landscape value and iii) the nature of the hazard posed by the defect is uncertain (e.g. level of internal decay), more detailed assessments may be carried out before a decision on the type of action required is taken.

3.1.3 During walk-by inspections within a surveyed zone, trees with no obvious defects that appeared sound and that required no further level of inspection would not need to be recorded. A record of the visit to that zone by the inspector would be all that would be required. However, any trees subject to more detailed individual inspection, whether requiring subsequent action or not, would require a record. Once the work has been completed on these recorded trees, if they are retained rather than felled they do not necessarily require future recording unless a subsequent survey flags them up again as having obvious new defects requiring another inspection. However, in High Use Target zones, should time and resources allow, site managers may wish to continue individual inspection regimes once started. However, this is not a requirement of this policy and will be dependent on the characteristics of the trees involved and the nature of the site and its zones. The purpose of the annual inspection is to pick out obvious problems and prioritize them, not to repeat recording.

3.1.4 All records must be readily accessible to relevant staff and will be kept indefinitely. This will be especially important for those trees located next to Highways and other high use target zones.

3.1.5 Any tree works that are required must be prioritized according to risk, taking account of location (target level) and hazard, and there must be a recommended period for the work to be carried out. The range of this period might be from immediate action up to a recommendation for work within 12 months.

3.2 Reactive Inspections

3.2.1 Sites must have a local emergency plan that details the actions to be taken in the event of severe weather conditions or events, such as storms, flooding, drought and fire. This emergency plan would be additional to, over and above, the regular proactive inspection regime. There also may be the need for other reactive inspections over and above the proactive inspection regime where a new target is created or develops rapidly (e.g. an unplanned public event).

3.2.2 Therefore, in either enacting an emergency plan or responding to a new and changing situation, reactive inspections of trees should be focused on identifying *serious and present dangers* (NTSG 2011). Such inspections may be carried out by any person able to identify such threats and with a good local knowledge of the site. Such persons do not need to be qualified specifically for tree inspections. These reactive inspections do not constitute detailed inspections, as defined by NTSG 2011. However, follow-up detailed inspections of identified trees by PTI-qualified inspectors may be required in order to prioritize remedial action if large amounts of work are involved.

3.2.3 For reactive inspections following weather events, including drive-by checks, the top priority is to identify the areas of worst damage and then to prioritize the inspections in order of zonal priority but this may include areas not normally proactively inspected, if deemed necessary, because of new *serious and present dangers* created by the event or reported by others on the site.

4. Risk assessments and determining priorities

4.1 Risk assessments may be qualitative <u>or</u> quantitative to suit the needs and resources of each Division and each site. For larger, more complex sites with many targets and many trees, quantitative assessments, such as provided by a Target Risk Index (TRI), should be considered as an option to help stratify priorities and determine the order and speed with which remedial action is taken.

4.2 If a quantitative system is chosen it should be based on target sequencing to generate a Target Risk Index (TRI). Resource allocation should take an As-Low-As-Reasonably-Practicable (ALARP) approach as described in the NTSG guidance (2011 and see Figure 1 above).

4.3 A priority matrix should be formulated based on the hazard rating: - Tolerability of Risk (see Figure 1 above) and the Target Risk Index (TRI). This matrix would then enable cost-effective decisions to be made with clear justifications.

What Documentation Should be Kept?

- Up-to-date tree zoning maps, zoning rationale and reviews
- Records of tree inspection visits/timesheets – signed and dated by inspector.
- Individual tree management recommendations and actions, preferably also on a computer GIS database (e.g. *Arbortrack*, *EzyTreev*) for larger sites
- Records of more detailed individual tree investigations if undertaken – (e.g. *Picus* tomography records of internal decay)
- Records and details of reactive inspections following severe weather events and any site closure programme.
- Records of any tree disease survey or other tree health monitoring activities.
- Records of training and copies of certificates for all relevant members of staff.
- Records of contractors and their competency checks.

Policy Summary

As a reasonable and prudent landowner, responsible for the safe management of trees, the City of London will ensure that:

- Each Division will have tree safety management guidelines comprising of tree zone map(s), tree inspection regime, and tree risk assessment & management procedure.
- Each Division has a Responsible Person in accordance with the OS Health & Safety Policy, or appropriate delegated officer, who will ensure adherence to the Policy.
- Deal with immediate threats to public safety as a priority.
- Keep records of the assessment of trees and the remedial actions taken.
- A competent person will undertake inspections of trees to assess the risks they pose. Keep records of tree safety training and monitor these to ensure training and certificates renewed.
- Inspect areas of high use levels as soon as is reasonably practicable and within five days of any storm event, and record the appropriate measures taken to make the site safe.
- Monitor the weather forecasts and print off the relevant information and display appropriately.
- Monitor the near miss records as per the tree safety management system and transfer records to tree safety recording forms/database.
- Undertake appropriate surveys of trees for environmental factors that are hazardous to human health e.g. Oak Processionary Moth. Take appropriate action and record the activity.

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Appendix 5
Fire Log Books Index

	Item	Responsibility	Comments
1	**Plans of the premises** or a simple line drawing showing: - Hazards within the property - Position of main entrances - protected fire exit routes - Fire alarm panel - Gas/electrical intake rooms & isolation points - Areas where special risks are present - Position of the two nearest fire hydrants	CS OS CS CS CS OS CS	Log Books to be available in larger buildings and buildings with public access. MITIE to provide list of locations where they currently have folders. CS to provide the building plans.
2	**Fire Policy** relating directly to the site	OS	Evacuation procedure
3	**Fire Strategy for the premises**	OS	Local priorities for firefighting and prevention
4	**Arson Reduction Policy**	OS	e.g. keeping bins secured
5	**Fire Risk Assessment** Up to date with all remedial actions recorded	OS	
6	**Perpetual Planner** for tests and inspections	CS/MITIE	Referenced to site MITIE Folder
7	**Notes on, Test procedures and frequencies**	CS/MITIE	Referenced to site MITIE Folder
8	**Fire Alarm Systems** - Instructions - List of trained persons to operate and reset the system - Record of tests	CS/MITIE OS OS OS	Bell tests by OS on site and recorded in Log Book
9	**Maintenance** - Door – Record of location and monthly inspections - Emergency Lighting System - record of tests - Lightning conductor inspections	 CS/MITIE CS/MITIE CS/MITIE	 Also visual checks by OS Duty Manager Referenced to site MITIE Folder
10	**Fixed installations** - Record of tests/inspections: - Fire extinguishers, record of tests and inspections - Fire shutters, smoke control and curtains - Hose reels - record of tests - Miscellaneous equipment - record of tests	 CS/MITIE CS/MITIE CS/MITIE OS	 Referenced to site MITIE Folder Fire shutters at Crematorium Referenced to site MITIE Folder If any
12	**Staff Training**		

	- Record of fire instructions & fire drills, *PEEPs assessments	OS	
	- Record of staff training: induction, yearly, marshal, extinguisher	OS	
13	**Visits by Fire and Rescue Service** Fire safety/local station familiarisation visits 7(2)D	OS	
14	**Specific unusual process** - Events relevant to your department	OS	
15	**Modifications to protection systems**	CS/MITIE	Referenced to site MITIE Folder
16	**Inventory of portable firefighting equipment**	OS	e.g. Knapsack sprayers, bowsers
		CS/MITIE	e.g. Extinguishers
17	**Entertainment licence**	OS	
18	**Hot Work Permit**	CS/MITIE	Referenced to site MITIE Folder In place in Epping Forest and probably needs to be rolled out to other divisions
19	**Address book** e-mail address, useful telephone contacts; The City of London Corporation 24 hour numbers Contractors: - Building, fire alarm engineers, Salvage, fire/security and scaffold companies. Key M & E	CS/MITIE	MITIE contacts to be included
20	**Record of Operational Attendance** of the Fire Service to alarm activations, location and reasons, for activation, date, time and call sign of the incident Commander	OS	

*PEEPs = Personal Emergency Evacuation Plans

Open Spaces Department
Habitat Fire Management Policy

Foreword
This policy has been drawn up as part of the City of London's Climate Change Mitigation strategy.

1.   The need for a Departmental Habitat Fire Management Policy
The impact of habitat fires can be dramatic and harmful with the potential to lose biodiversity, restrict access and enjoyment, destroy infrastructure and diminish scenic beauty.

Habitats can take many years to recover from uncontrolled fires and management work to repair this damage is often extremely time consuming and costly.

Habitat fires are also dangerous to all who work on or use, the sites. They absorb staff time, materials and other resources that might otherwise be used more productively.

Habitat fires release gases and particulates into the atmosphere that exacerbate the impact of climate change.

2.   The Habitat Fire Management Policy

Aim
The Habitat Fire Policy aims to reduce the risk of harm to people, wildlife, landscape and climate, as a result of fire on the City of London's Open Spaces, as far as is reasonably practicable. It will guide the development of local '**Habitat Fire Action Plans**' and ensure a considered and consistent approach to the management of habitat fires across the Open Spaces Department.

Structure
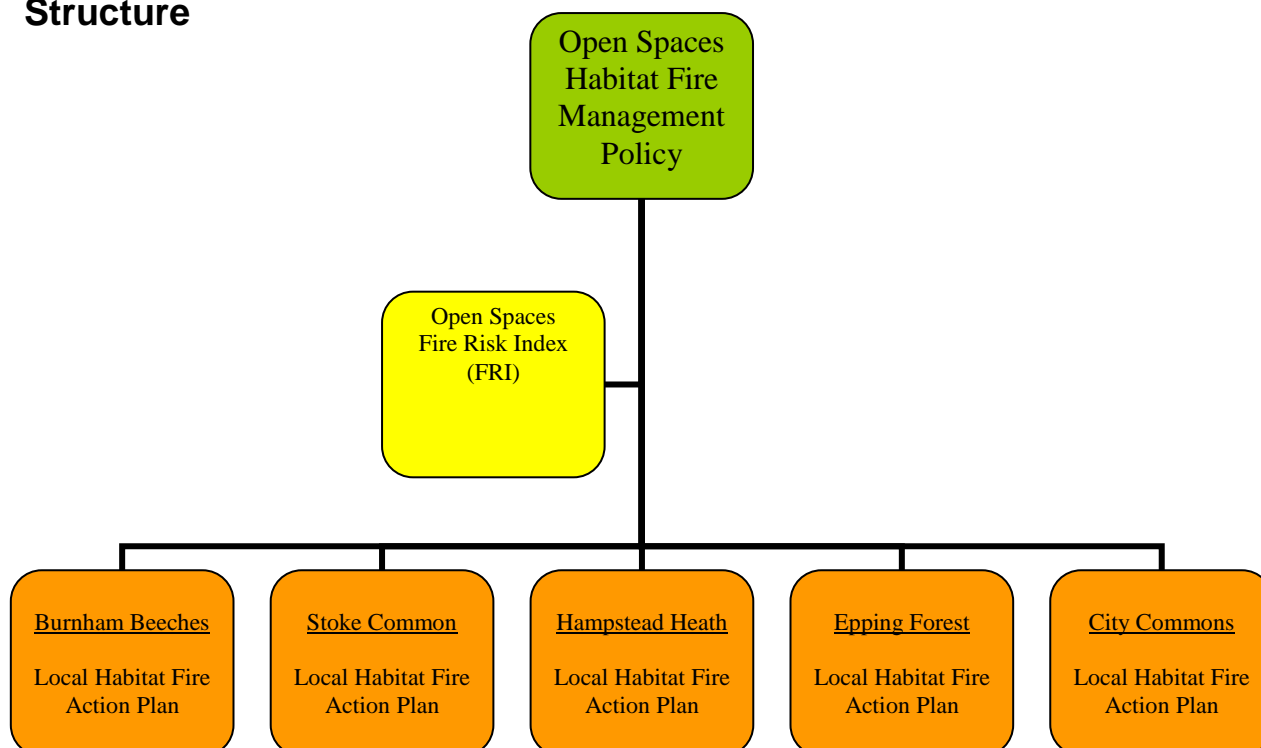
Actions

a) Each division should develop and hold an up to date **Local Habitat Fire Action Plan** that reflects the habitats found locally and contains sufficient information to ensure that habitat fires can be dealt with quickly, safely and effectively.

b) Each Division shall use the Fire Risk Assessment Process (FRAP) to guide habitat fire related decisions.

c) Local Habitat Fire Plans should be reviewed annually.

d) Each Division should purchase and maintain adequate fire fighting equipment that reflects the specific needs of the site. This should include communication equipment.

e) Each site should liaise closely with their Local Fire Services to ensure that fires can be tackled quickly and efficiently.

f) Each site should provide staff with appropriate training to assist in the prevention and control of habitat fires.

g) The Open Spaces Habitat Fire Management Policy will be reviewed annually by the Senior Management team. Amendments will be effectively disseminated across s the department.

3.   The Fire Risk Index (FRI)

The **FRI** is part of the fire limitation process and has been developed by Natural England. It plays a key part in lessening the frequency and impact of habitat fires across the Open Spaces Department and should be used to guide the actions set out in 'local' Habitat's Fire Plans.

The purpose of the FRI is to quantify the risk of fire for habitats commonly found on the Open Spaces. Chief amongst these are the grass and heath areas.

Fire Risk Indices for all Divisions can be found on the following Natural England web site:

http://www.openaccess.naturalengland.org.uk/wps/portal/oasys/maps/MapSearch?mapType=fireRisk

On this website the assessment of fire risk is expressed as an index:
1 = Very low
2 = Low
3 = Moderate
4 = High
5 = Exceptional

Full instructions for using the web site are provided on the site. It is possible to get a risk forecast of up to 5 days for the chosen area.

The above index will be used at each Division to guide the decision making process.

The Fire Risk Indices may vary widely from day to day and Divisions may sometimes wish to take an 'average score' from the five day forecast to aid their decisions.

4. Local Habitat Fire Action Plans

Superintendents will ensure that their Division/Sites have their own Habitat Fire Action Plan.