



# Highlands & Islands Enterprise Health & Safety Consultancy Support

## Cairngorm Independent Safety Review

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## Executive summary

This report presents the review and observations raised on the Health and Safety (H&S) arrangements put in place for Cairngorm Mountain by the new operators "Natural Retreats".

The observations were made on documentation provided via Highlands and Islands Enterprise (HIE), discussions with staff during a site visit and from review of additional documentation obtained during the site visit.

Common themes observed were:

- Overall all the elements for an effective Safety Management System (SMS) are in place, and the majority of staff at site are experienced with good knowledge of the risks present;
- At the procedure level there is a good level of information available and it is clearly presented. However the SMS documentation suffers from two issues; one is the traceability from the high level documents down to the relevant procedure, and the other is that the documentation is spread across a number of systems and locations. The principal locations that have H&S documentation are the legacy Team Site system and the new SharePoint system, although there are other locations especially with regards maintenance records.

The above observations point towards the following principal areas for improvement:

- Capturing more explicitly the good onsite knowledge and experience, for example with regards the site boundaries both physically and operationally;
- Consolidating the SMS related information into fewer locations so that it can be more easily accessed by staff;
- Clarifying the linkage between the different levels of the SMS, so for example a new member of staff in a role could easily work through the Safety Management Manual, identify their safety responsibilities and then work down to the specific procedures that support discharging those responsibilities.

A number of observations made on the initial documentation were answered on site, or were answered within the detail of the underlying procedures. However it is noted that the overall presentation of the information, and therefore its usability, could be improved.

## Abbreviations

Abbreviation	Definition
ALARP	As Low As Reasonably Practicable
ARC	Abbott Risk Consulting Ltd
BCP	Business Continuity Plan
BS	British Standard
CMM	Capability Maturity Model
CMMI	Capability Maturity Model Integration
COSHH	Control of Substances Hazardous to Health
DSE	Display Screen Equipment
EMP	Emergency Management Plan
EMS	Environmental Management System
EOP	Emergency Operating Procedure
FIS	Federation Internationale de Ski
HAZID	HAZard Identification
HIE	Highlands & Islands Enterprise
HSE	Health & Safety Executive
H&S	Health & safety
ISA	Independent Safety Assessor
KPIs	Key Performance Indicators
OH&S	Occupational Health and Safety
PPE	Personnel Protective Equipment
SMM	Safety Management Manual
SMP	Safety Management Plan
SMS	Safety Management System
SSI	Site of Scientific Interest

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## 1.0 Introduction

This report documents results of the review by the Independent Safety Assessor (ISA) on behalf of HIE, of the H&S arrangements at Cairngorm Mountain.

The review was not an audit of the implemented H&S system, and does not provide certification of that system. It was intended to provide HIE, as owners of the facility, with assurance that Natural Retreats, as the new operators of the facility, are properly discharging their responsibilities. It was also intended to identify any potential areas of improvement that can be made.

## 2.0 Scope

The scope of the ISA task was to review the current set of Cairngorm Mountain H&S documentation and also the implementation at site. These were reviewed against 'best practice', and observations provided. The following documents were supplied for review:

- Relevant sections of the Operating Arrangement (Ref. [1]).
- Natural Retreats H&S Management Manual (Ref. [2]).
- Natural Retreats Environmental Management Manual (Ref. [3]).
- Natural Retreats Cairngorm H&S Management Plan (Ref. [4]).
- Natural Retreats Cairngorm Business Continuity Plan (Ref. [5]).
- Report on Maintenance and Safety of Funicular Railway, Ski Tows and Decommissioning Chairlifts at Cairngorm Mountain (Ref. [6]).
- Condition Survey of the Property and Infrastructure at Cairngorm Mountain (Ref. [7]).

Further to the site visit to the Cairngorm mountain site the following documentation was also reviewed:

- The underlying set of SMS procedures as presented in the References section Page 25 and 26 of the Safety Management Manual (Ref. [2]) were reviewed in outline, with the procedure for Emergency Planning and Response (Ref. [8]), and the following associated Emergency Operating Procedures (EOPs), reviewed in detail:
  - EOP1 – Hill Evacuation (Ref. [9]).
  - EOP2 – Medical Emergency (Ref. [10]).

### 3.0 Methodology

The methodology used for this review is as described in the Task Description ARC-088-015-R05 (Ref. [11]). The major steps in the agreed methodology were as follows:

- Identify the relevant documentation to conduct the review against (this includes identification of relevant standards and guidelines).
- Review the following information:
  - Operating Agreement.
  - Safety Management System.
  - Environmental Management System.
  - Safety Management Plan.
  - Continuity Management Plan.
  - Any supporting inspection reports etc.
- Review the implementation at site of the identified and stated H&S arrangements.
- Produce a consolidated report that documents the outcome of the review and any arising observations.

## 4.0 Review

Observations stated in this report are written as the documents were reviewed and as such there are some points that were answered during review of other documents or during the site visit, e.g. 'may be covered in SMP'. A full conclusion of all observations is provided in the consolidated observations section. This methodology was followed to provide an audit trail of the review process.

## 4.1 Identify Relevant Guidance & Standards

The current National and International Occupational Health and Safety (OH&S) guidance was subject to review to establish the industry best practice with respect to OH&S at Ski Resorts. The following are considered to present the principal guidelines and standards applicable to the Cairngorm Mountain facilities:

- 'Workplace (Health, Safety and Welfare) Regulations 1992, Approved Code of Practice and guidance' - L24, HSE, 2nd Edition, 2013 (Ref. [12]).
- 'Managing for Health and Safety' - HSG65, HSE, 3rd Edition, 2013 (Ref. [13]).
- The International Ski Federation (FIS) also provides guidance that is also of relevance:
  - Rules for Safety in Winter Sports Centres (Ref. [14]).

As well as the items above consideration was given to European Directive 2000/9/EC relating to cableway installations designed to carry persons (Ref. [15]). Whilst this doesn't currently apply to any of the cableway installations (taken here to mean ski, tows, funicular and chairlifts) currently installed at Cairngorm Mountain as they are all legacy systems installed prior to 2004, if new systems are installed or current system are sufficiently modified it will become applicable.

In addition to the above, the following British Standard (BS) (as well as supporting guidelines for implementation) provides guidance for the development and maintenance of SMSs. Although it should be noted that BS OHSAS 18001 only has advisory status and is therefore compliance with this standard is a voluntary undertaking:

- 'Occupational Health and Safety Management Systems – Requirements', BS OHSAS 18001:2007 (Ref. [16]).
- 'Occupational Health and Safety Management Systems – Guidelines for implementation of OHSAS18001:2007', BS OHSAS 18002:2008 (Ref. [17]).

## 4.2 Review of Operation Agreement Sections

The following sections of the Operating Agreement between HIE and Natural Retreats were provided for review:

- Section 9.6 – Statutory Compliance and Safety.
- Section 9.7 – Operating Conditions.
- Section 9.8 – Signs and Advertisement.
- Section 9.9 – Displays and Brands.
- Section 9.10 – Environment.
- Section 9.11 – To observe title conditions.
- Section 9.12 – Indemnity.

### 4.2.1 Observations

1. Section 9.6.1 – The identified list of applicable laws identified after section 9.6.1.4 should be listed in either the Safety Management System (SMS), Environmental Management System (EMS), Environmental Management Plan (EMP), Safety Management Plan (SMP) or Business Continuity Plan (BCP) as the applicable set of the laws that must be complied with.
2. Section 9.6.2 – The requirement to complete all works required under any Laws, should be identified in either the BCP or the SMP for the site to ensure that any necessary activities are carried out and communicated to HIE.
3. Section 9.6.5 – This section regarding fire laws should be explicitly identified in either the SMP or BCP for the site.
4. Section 9.6.6 – The requirement to obtain the necessary Consents should be captured as a potential Business Risk.
5. Section 9.6.7 – The items relating to the OH&S Policy and associated documentation in this section should be confirmed during the site visit. (NB this observation was made prior to the site visit. The listed items were confirmed as available to the ISA during the visit).
6. Section 9.6.8 – This section regarding uplift infrastructure maintenance should be explicitly discharged by either the SMP or the BCP, and should identify an appropriate inspection / maintenance regime. (NB these items were confirmed during the site visit, and documentation was provided).
7. Section 9.6.9 – This is a specific risk (dropped articles) that should be captured in the site Risk Register.

8. Section 9.6.10 – This should be explicitly discharged in either the SMP or the BCP as it relates to accident investigation and / or accident prevention. (NB this clause was confirmed as met on the site visit by the safety investigation procedures).
9. Section 9.6.11 – This will be discharged by the site visit. (NB this observation was made prior to the site visit. The site visit in part answers this section as it was fully cooperated with. Further demonstration of satisfaction of this clause would be obtained during the response to an incident/accident at site. In addition, a safety investigation procedure is place, which gives confidence that it will be met when required).
10. Section 9.10 – This should be discharged by the EMS or EMP. Environmental impacts are of specific concern on Cairngorm Mountain as they present a specific reputational business risk due to the presence of Sites of Scientific Interest (SSI).
11. Section 9.12 – This indemnity requirement should be captured in the Natural Retreats BCP as it represents a specific business risk.

### 4.3 Natural Retreats Safety Management Manual

The version reviewed of the Safety Management Manual (SMM) was Version 1, dated September 2014 (Ref. [2]).

#### 4.3.1 Observations

The following observations are made against the Natural Retreats SMM:

12. General:

- a. Throughout the document there are a number of grammatical and language errors that don't help with the understanding of the document. The document should be subject to a Quality Assurance review to identify and remove these;
- b. During the site visit it became apparent that a number of the observations below are answered by the detail in procedures. Relevant procedures should be more explicitly referenced against the sections of the SMM that they support, or alternatively some of the information in the procedures could be brought up a level and presented in the SMM.

13. Pg. 3, Approval – There should be a signed copy of this Approvals page (NB During the site visit it was confirmed that a signed version is kept at head office).

14. Pg. 5, Definitions:

- a. A key safety management concept and phrase 'As Low As Reasonably Practicable' (ALARP) is used in the document, however it is not explained as a concept.

15. Pg. 6, Section 1:

- a. There are several mentions of the various management roles, but it is not clear what the management structure at site is (i.e. the specific arrangements rather than generic roles). A diagram would be helpful in aiding understanding.
- b. The phrase 'approved documents' is used but it is not clear what this refers to. This could perhaps be included in the 'Definitions' section.

16. Pg. 6, Section 2:

- a. The listed H&S standards and guidelines do seem to cover the major items for consideration. There are other potential items to include such as the Personal Protective Equipment (PPE) and Display Screen Equipment (DSE) guidance.

- b. The cableways directive is not mentioned, which is understandable given that the cableways systems in place were installed prior to 2004, however it might be worth capturing elsewhere (such as in the BCP) as it could become relevant if any of the implicated systems are replaced / modified or new systems are installed. More generally it would be appropriate to regularly review and update relevant regulations and standards to ensure that arrangements remain up to date. This would appropriately be captured in the SMP>

17. Pg. 7, Scope of SMS:

- a. It would be usual in this section to define what the geographical limits of the Cairngorm Mountain resort is. This would help to clarify the limits of responsibility that Natural Retreats have. This definition of the boundary may be covered in the SMP.

18. Pg. 7, Safety Policy:

- a. Safety Policy should include the Safety Objective of 'zero accidents' or similar.

19. Pg. 8, Section 5.2 Natural Retreats Key Performance Indicators (KPIs):

- a. These seem reasonable, but could include more emphasis on monitoring/reduction of identified lead indicators/implementation of preventive measures, although it is noted that this information may be measured under Occurrence Report rates.
- b. These KPIs do not contain quantitative measures. KPIs that cannot be measured against do not provide a useful indication of the degree of compliance.

20. Pg. 9, Section 6 Safety Accountabilities and Key Personnel:

- a. Good emphasis of 'Just Culture' and 'Safety Culture' concepts in the accountabilities and responsibilities.
- b. Useful to have the organisation chart, although this does not necessarily give the level of detail required at site (i.e. specific roles). It would also be good to make clear what the relationships are with external parties (such as HIE). This is tied to the need to define the boundary of responsibility for Natural Retreats.

21. Pg., 10, Section 6.3 Natural Retreats Safety Health and Environment (SHE) Advisor:

- a. The section states that the SHE Advisor is accountable to the 'Senior Manager'. The role of 'Senior Manager' isn't described, but it is assumed that this is the General Manager. This should be clarified.
22. Pg. 12, Section 7 Positive Safety Culture:
- a. Good to see 'Safety Culture' and 'Just Culture' explicitly spelled out. These high level concepts could even be incorporated into the Safety Policy.
  - b. 'Just Culture' - Departmental manuals are mentioned, however it is not clear where these are or which ones apply to Cairngorm Mountain Resort.
23. Pg. 13, Section 7.1 Safety Reporting:
- a. The section is clear about the need for Safety Reporting, however it doesn't clearly indicate how Safety Reporting is achieved at Cairngorm Mountain Resort. It is noted that this may be provided within the SMP. (NB it was confirmed during the site visit that there is a safety reporting procedure).
24. Pg. 13, Safety Investigation:
- a. Similarly to the Safety Reporting section it is not clear how Safety Investigation is actually carried out or who has the responsibility for undertaking them. (NB it was confirmed during the site visit that there is a safety investigation procedure that defines this).
25. Pg. 13, Section 7.3:
- a. The safety reporting methodology is provided here. This could perhaps be made clearer in the document structure.
26. Pg. 14, Section 8 Hazard Identification and Risk Management:
- a. Given the number of potential sources of information for HAZard IDentification (HAZID), a diagram might be useful.
  - b. There is no explicit reference as to how HAZID is carried out at Cairngorm Mountain Resort. (NB it was confirmed during the site visit that there is a risk assessment procedure).
27. Pg. 18, Section 9 Safety Performance Monitoring and Measurement:
- a. There is no real indication of what the KPIs that have been set are and what the monitored levels/rates will be.

- b. It is not clear how the KPIs are monitored or when they are reviewed (either on a schedule or when they breach certain conditions).

28. Pg. 19 Section 10 Safety Investigations:

- a. It is not clear from this section how the safety investigation will be undertaken and who has ultimate responsibility for undertaking it. If the organisations have relevant procedures / forms that could be used for this they should be referenced. (NB the site visit confirmed the safety investigation procedure).
- b. The section discusses 'root cause', singular. The causes of accidents/incidents can very seldom be attributed to a single event, this should really be 'root causes'.

29. Section 11 Safety Training:

- a. It is not clear from this section what safety training and on what schedule/under what circumstance safety training would be undertaken. This may be provided in more detail in the SMP. (NB it was confirmed that there is a training and competency procedure).
- b. It is not clear what is covered in the induction training and when this needs to be refreshed / updated.

30. Section 12 Safety Tours / Auditing:

- a. Good to see these activities identified, not a huge amount of detail provided on more specific timing. This may be covered in the SMP.

31. Section 13 Safety Communication:

- a. Good to see this covered, although more detail should be provided. This may be covered in the SMP. (NB site visit confirmed that there are safety communication procedures in place).

32. Section 14 Management of Change:

- a. Is the requirement for the Department Managers to advise the SHE Advisor of any potential changes of their identified responsibilities recorded anywhere?

33. Section 15 Emergency Plan:

- a. Emergency contact information is not filled out. A suggested list of potential additional emergency contacts would be:

- i. Landowner – Highlands and Islands Enterprise (HIE), [REDACTED]

- [REDACTED]

- ii. FCS Glenmore – [REDACTED] :  
[REDACTED].
- iii. Rothiemurchus Estate: 01479810647.
- iv. Rothiemurchus Lodge (Army): 01479861288.
- v. Cairngorm Reindeer Company Ltd.: 01479861228.
- vi. National Trust for Scotland, Mar Lodge Estate - [REDACTED]  
[REDACTED]
- vii. RSPB Abernethy - [REDACTED].
- viii. SEPA Elgin: 01343547663.
- ix. SNH Aviemore: 01479810477.

- b. Site specific emergencies should be identified in the SMP or BCP. (NB site visit confirmed that there are specific emergency procedures in place).

34. Pg. 25 References:

- a. There are a large number of referenced documents here that are evidently process/procedures and forms used to support the SMS. It would be helpful if they were more extensively referenced throughout the document so that their application is more clearly presented.

#### 4.4 Natural Retreats Health and Safety Management Plan

It was not clear what version of the Safety Management Plan was provided as there was no version number / date. The following high level observations were made:

35. The SMP is using the most up to date HSE approach of Plan-Do-Check-Act Theory.
36. Given that no date is given for when the SMP was developed, it is impossible to identify whether identified activities have been implemented within their intended target dates.
37. There is no reference to the identified forms/procedures in the SMS that could be used to implement some of these actions.
38. It is not clear when the SMP will be updated.

#### 4.5 Business Continuity Plan (BCP)

The BCP provided for review is noted as being Version 1 September 2014. The following observations were made:

39. The Business Continuity Flow Diagram doesn't seem complete and is more like an organisational structure.
40. The items presented in the risk register section do not present risks in a very clear format, i.e. they do not break out the risk, impact, likelihood and resulting identified controls. The items seem reasonable, but the information could be more clearly presented. The BCP Matrix would appear to be more like a risk register.
41. The BCP does not provide much detail or guidance to the specific emergency plans and specific activities that support it.

#### 4.6 Site Visit

The site visit was undertaken on Tuesday 9<sup>th</sup> December 2014. Due to the weather on the day the site visit was restricted to the base station area as the funicular and Ptarmigan restaurant were closed.

Informal OH&S interviews were held with the following key members of staff:

- [REDACTED] – Health and Safety Manager.
- [REDACTED] – Technical Operations Manager.

Other staff kindly provided their time and comments as and when asked.

From these discussions the following observations were made:

42. The SMS has been the responsibility of a number of individuals, as the individual who initially produce it left in September 2014.
43. The vast majority of the operational staff, and their associated experience and knowledge, has been retained in the change of site operator. This means that the established maintenance schedules and practices for the main mechanical and electrical systems on site have been retained.
44. The definition of the physical and operational boundary was discussed. Whilst the boundaries appear to be well understood and practiced by the staff on site, it is not clearly defined in the SMS or other documentation. The relationship between Natural Retreats and HIE is well documented in the legal agreement, however this does not cover the operational boundary between, for example, Natural Retreats and the emergency services in the event of an accident near the ski slopes. In addition it should be considered whether clearer indication to the public is required.
45. Similarly, the definition of the internal physical and responsibility boundaries between different groups (identified as Quest Services, Food & Beverage, Kitchens, Sales and Operations) were well understood by staff but not clearly defined in documentation. This creates the potential for both overlap in activities, and for specific activities to be missed or inconsistently applied between different groups.
46. The SMS folder was reviewed, this provided the underlying SMS procedures. These contain far more detail and information about the specific H&S activities undertaken. These procedures, although listed in the SMM, are not clearly linked to the specific areas of the SMS that they support. This traceability would make the SMM a more useful document as it would guide responsible personnel to the procedures they should use, rather than them having to establish this from a review of the full list of procedures.
47. The current completed risk assessments were reviewed. It was noted that only the mitigated risk was presented rather than the unmitigated risk, implemented safety controls and resulting mitigated risk. Providing the fuller information helps to establish how important the safety controls are, and where effort should be prioritised to maintain risks to ALARP. In addition there is not one overall risk register that provides an indication of the aggregate risk for the site.
48. There is a well-established, and practiced, set of emergency procedures on site. Again their existence could be better traced from the SMM to aid usability.
49. The SMS related documentation is currently split across two different systems. Team Site, which is the legacy system and contains most of the maintenance material, and Natural Retreats' SharePoint implementation. Whilst staff have access to both systems, this does make it awkward to access all the required information. In addition there are other locations for documentation, some of which is only hardcopy.

50. The current H&S inductions are carried out by the Human Resources (HR) personnel using the available H&S induction material. It is typical, especially on smaller sites, for this activity to be undertaken by the H&S responsible individual.
51. Safety audits are undertaken and are required to be kept for five (5) years. It was not clear if this was reflected in the records/document management procedure.
52. The maintenance records, processes and practices for the major items of electrical and mechanical equipment on site have continued from the previous operator. Whilst there are number of well understood maintenance schedules for individual items of equipment, there is no single Master schedule.

## 5.0 Consolidated Observations

The following present the consolidated common themes of the observations made against the documents reviewed and the site visit:

53. There is much more detail and useful information provided at the procedure level, however the traceability down from the SMM level through to the specific relevant procedure is not clear. The SMM should act as a high level guide so that personnel can quickly work down to the relevant procedure for the responsibilities they have. The majority of observations on the SMS documentation made prior to the site visit were answered when the procedures were reviewed at site.
54. In general there is a degree of development still to be undertaken to substantiate some of the areas of the SMS. It is a natural part of an SMS development that it needs to be iterated and matured.
55. The scope/boundary, both physically and operationally, is not clearly defined in the SMM, although it appears to be well understood by staff at site. The site is complex with a number of different parties having multiple or overlapping roles, for example Cairngorm Mountain staff who also act as mountain rescue volunteers. The on-site knowledge of the staff could be better recorded and presented, as well as the various necessary interfaces between staff and external parties in the different scenarios. The capture of good operational experience in documentation is also a business resilience measure as it partially mitigates the loss of operational experience if staff leave or fall ill.
56. The SMS is spread across a lot of documents and systems. This should be consolidated into a single accessible location and links provided up and down the documentation tree to aid navigation and usability. This general theme of consolidation and clarification of knowledge and information is something that should be followed generally for the SMS.
57. The SMS utilises some good principals including 'Just Culture'. However there could be greater emphasis on identifying, implementing and qualitative and quantitative monitoring of preventative measures. In part this is because preventative measures, such as preventative maintenance, is already being implemented at site and greater credit should be taken for this good practice.

## 6.0 Conclusions

Overall the Cairngorm Mountain SMS contains all of the necessary elements of an SMS, however this is not perhaps presented as clearly as it could, and traceability is missing that would make it a more usable document/system. This is in part because it is spread across a number of different documents and IT systems. The consolidation of these different elements into a single properly linked location represents the easiest to achieve improvement.



Given the high level of staff retention, there is a good degree of confidence that established good safety practice will continued. But this needs to be appropriately captured so that new staff can be properly trained and that knowledge is not lost as staff leave or retire.

## 7.0 References

- [1] Cairngorm Mountain Lease Pages 14, 15, 16 & 17
- [2] Natural Retreats Cairngorm Mountain Safety Management System, Safety Management Manual, Version No. 1, September 2014
- [3] Natural Retreats Cairngorm Mountain Environmental Management System, Environmental Management Manual, Version No. 1, September 2014
- [4] Natural Retreats Cairngorm Mountain, Health and Safety Plan (NB No version number of date is given on the document)
- [5] Natural Retreats Cairngorm Mountain, Business Continuity Plan, Version No. 1, September 2014
- [6] ██████████ HIE, Report on Maintenance and Safety of Funicular Railway, Ski Tow & Decommissioned Chairlifts at Cairngorm Mountain Updated 21 November 2014
- [7] ██████████ Consulting Engineers (M&E), Cairngorm Ski Centre, Condition Survey of the Property & Infrastructure at Cairngorm Mountain, Report on Maintenance Procedures for the Ski Tows and Funicular, October 2013, New Job Number: 47067575
- [8] Natural Retreats Cairngorm Mountain, Health & Safety Procedure, Emergency Planning, CML/HSP013, Amendment No. 11, JAN 2011
- [9] Natural Retreats Cairngorm Mountain, Emergency Operating Procedure, Hill Evacuation, CML/HAS/EOP 001, Amendment Date NOV 2014
- [10] Natural Retreats Cairngorm Mountain, Emergency Operating Procedure, Medical Emergency, CML/EOP/002, Amendment Date NOV 2014
- [11] Abbott Risk Consulting Ltd, Task Description – Cairngorm Independent Safety Review, Issue 1 Draft 2, November 2014
- [12] 'Workplace (Health, Safety and Welfare) Regulations 1992, Approved Code of Practice and guidance' - L24, HSE, 2nd Edition, 2013
- [13] HSE, 'HSG65 – Managing for health and safety', 3<sup>rd</sup> Edition, 2013
- [14] FIS, Rules for Safety in Winter Sports Centres, Approved by the FIS Congress 2002
- [15] Directive 2000/9/EC of the European Parliament and of the Council of 20 March 2009 relating to cableway installations designed to carry persons
- [16] Occupational Health and Safety Management Systems – Requirements', BS OHSAS 18001:2007.

[17] Occupational Health and Safety Management Systems – Guidelines for implementation of OHSAS18001:2007, BS OHSAS 18002:2008

# Appendix A Suggested Actions

## 1.0 Suggested Actions Prioritisation Methodology

The following Table 1 lists the suggested actions from the review of the Cairngorm Mountain SMS documentation. The columns contain the following information:

- Observations Number (Obs. No.) – This column references the observation, or observations, number that have prompted the suggested action. Related observations will be consolidated into a single suggested action. NB Not all observations lead to a suggested action.
- Action Number (Action No.) – This is a unique reference number for the suggested action.
- Observation Summary – This give a summary, rather than an exact copy, of the observation or observations that prompted the suggested action.
- Action Summary – This gives description of the suggested course of action to meet the observation, or observations, which prompted the suggested action.
- Priority – This gives a priority ranking for the suggested action so that effort to respond can be appropriately assigned. Priority is based on the following levels:
  - 1 – Suggested action that should be considered and responded to as a matter of urgency.
  - 2 – Suggested action that should be added to the SMP to be considered and responded to this year.

- 3 – Suggested action that should be considered as part of the next review cycle of the SMS for potential inclusion.

## 2.0 Actions Table

Table 1 - Arising Actions

Obs. No.	Action No.	Observation Summary	Action Summary	Priority
1. 3. 16 a. 16 b.	01.	Identified list of applicable laws to be listed in appropriate Safety Management System documentation	Section 2 of the SMS should be updated to make sure it is comprehensive against this clause 9.6.1.4 of the agreement. The presentation of the appropriate regulatory requirements could be more clearly presented so that they are more easily reviewed and confirmed that the most up to date regulations are being worked against.	3
2.	02.	Requirement to carry out and notify HIE of any works required to maintain legal compliance	Add/confirm requirement to notify HIE is part of relevant process/procedures (such as incident/accident investigation) that may result in actions to ensure legal compliance.	2
4.	03.	Requirement for necessary Consents for works should be captured as a Business Risk	Add to business risk register and BCP.	3
7.	04.	Dropped articles should be captured in the site Risk Register	Add/confirm that 'Dropped Articles' is on the one of the site Risk Assessments.	1
10. 11.	05.	Clauses 9.10 should be explicitly be identified in the EMS or EMP. Clause 9.12 should be explicitly identified in the BCP	Add/confirm that Clause 9.10 and Clause 9.12 is explicitly referenced in the EMS or EMP and BCP as appropriate, so that liability is clearly defined. Also ensure that they are on the Business Risk Register.	3

Obs. No.	Action No.	Observation Summary	Action Summary	Priority
12 a.	06.	There are a number of grammatical and language errors.	Ensure that appropriate QA is undertaken on the SMS documentation as it is updated.	3
12 b. 25 a. 29 a. 32 a. 34 a. 37. 41. 46. 48. 49. 53. 56.	07.	Procedures should be more explicitly referenced in the SMM at the appropriate point.  Internal references within SMM could be clarified.  BCP should clearly reference specific emergency procedures that support it.	Ensure that the correct procedures are referenced at the appropriate point in the SMM, and other SMS documentation, so that users can more quickly navigate to the relevant actions they must take. This could perhaps be done as hyperlinks within the SharePoint platform as the SMS is fully migrated to it. This is also true for internal references within the SMM to different sections of the document.	2
14 a. 15 b.	08.	ALARP is not explained as a concept or acronym in definitions section.  'Approve Documents' not defined.	Include ALARP in the definitions section.  Include 'Approved Documents' in definitions section.	3

Obs. No.	Action No.	Observation Summary	Action Summary	Priority
15 a. 19 b. 20 a. 22 b.	09.	Specific site management roles are not presented. Relationship to external parties, and who (or role) within the Cairngorm Mountain Resort acts as the interface. High level document structure should be presented.	Update generic management structure diagram to provide site specific structure, and interfaces across the boundary. Include high level document structure diagram.	2
17 a. 44. 45. 55.	10.	Geographical and responsibility limits not explicitly identified.	Ensure that the geographical and responsibility boundary of the Cairngorm Mountain Resort, and hence the scope of the SMS, is properly defined/captured as well as the interfaces across that boundary.  Internal responsibility limits and interfaces should be clearly defined for internal structure as well.	2
18 a. 22 a.	11.	Safety Policy should state high level goal. Safety Policy should include 'Safety Culture' and 'Just Culture'	Develop and include appropriate high level safety objectives in the Safety Policy.	3
19 a. 19 b. 27 a. 27 b. 57.	12.	KPIs to emphasise leading indicators/preventative measures. KPIs should also contain quantitative measures where appropriate to facilitate measurement.	Review and update KPIs in the SMS to ensure that help to reinforce prevention and also facilitate monitoring for trends and emerging issues.	2
26 a.	13.	Potential sources for HAZID could be presented as a diagram.	Consider a diagram to better present potential support information for HAZID at site.	3

Obs. No.	Action No.	Observation Summary	Action Summary	Priority
27 b	14.	'Root cause' singular is used rather than 'Root Causes'.	Make sure that HAZID and incident/accident investigation takes a holistic approach that considers all contributing factors. This approach is consistent with 'Just Culture' approach as it ensures that individuals are not blamed for accidents/incidents, unless there is clear evidence of negligence or criminal action.	3
30 a. 51.	15.	Safety Tours / Auditing timing not clearly presented. Safety Audit record retention should be clearly identified in relevant records management procedure.	Add/confirm that planned Safety Tours / Audits are presented in the SMP. Safety documentation review / retention could be presented in the SMP.	3
33 a.	16.	Emergency contact information not filled out.	Update Emergency Contact information for all required contacts.	1
36. 38	17.	Not clear what the revision numbers/cycle is for SMS documentation.	Ensure that all SMS documentation has a clearly identified version number and date, and the planned next review if presented and included on the SMP. This should also include a named author, reviewer and approver as appropriate against the Cairngorm Mountain QA process.	2
40. 47.	18.	Risk register does not give as comprehensive breakdown of the identified and assessed risk as would be useful. Aggregate risk should be presented for the whole site, to ensure that overall risk is being controlled.	Update risk register to that it presented both unmitigated risk, i.e. underlying risk, and mitigated risk after risk controls have been applied. Include aggregate risk, and also ensure that all risk registers are properly collated in single location.	2



Obs. No.	Action No.	Observation Summary	Action Summary	Priority
52. 56.	19.	There is no Single Master schedule for all maintenance activities.	Consider consolidating maintenance schedules /activities into single authoritative source. This could be done as part of the migration to SharePoint.	2