



Combe Mill Society Health and Safety Policy Statement

Issue History

Version N ^o	Date of Adoption	Details of Change Made
1-6	December 2012	Earlier editions of the Policy Statement. The last was issued on the recorded date. No longer relevant.
7	5 February 2020	Policy fully revised
8	13 November 2023	Policy revised and updated

Combe Mill Society Health & Safety Policy Statement

1. Statement of Intent

The Combe Mill Society of Blenheim Palace Sawmill, Combe, Witney, Oxfordshire OX29.8ET is a small company limited by guarantee and registered as a charity. It has no employees and as a consequence has no legal requirement to produce a written Health and Safety Policy Statement. Its Board has however resolved to produce a statement in accordance with the Guidance published by the Health and Safety Executive. This document is the Health and Safety Policy Statement of the Combe Mill Society.

Our health and safety policy is to maintain safe and healthy conditions within the curtilage of the Mill and its associated grounds and, in particular:

- 1 to provide adequate control of the health and safety risks to members, volunteers contractors and visitors arising from our activities, in the context of a Grade 2* historic building
- 2 to consult our members and contractors on matters affecting their health and safety
- 3 to consider any relevant advice received from competent persons
- 4 to provide and maintain in a safe condition all modern machines and equipment provided by the Society and to ensure that it is operated in accordance with the manufacturer's instructions
- 5 to ensure that risks associated with heritage machinery that cannot meet modern standards are assessed and reduced to a level that is as low as reasonably practicable and that the machines are operated solely by Proficient Persons deemed by the Head of Technical Area as having the necessary skills and understanding to operate and maintain the machines in a safe manner in accordance with the requirements of the appropriate risk assessment(s) and any associated method statement.
- 6 to ensure the safe handling and use of all substances
- 7 to provide appropriate information, instruction and supervision for members, volunteers, visitors and contractors
- 8 to ensure that all members, volunteers, and contractors are competent to do their tasks, are appropriately qualified and adequately trained
- 9 to prevent accidents and cases of activity-related ill health
- 10 to revise this policy as necessary and. at regular intervals not exceeding 2 years, to review and if required update this statement.

Details as to how this policy is applied in practice are set out as an annex to this Statement of Intent. The Statement of Intent complete with its annex is available, on the Combe Mill website or on application to the Charity Secretary or the Director Responsible for Safety

Issue history	Version 8
Approved by the Board	13 November 2023
Last review date	Not applicable new version.
Next Review due	Not later than 1 November 2025

Abbreviations Used

In this policy statement the following terms and abbreviations are used and have the following meanings assigned to them:

ALARP	As Low As Reasonably Practicable
DRS	Director Responsible for Safety or a competent and approved person acting on his/her behalf.
HSE	The Health and Safety Executive
HSTA	The Head of a Standard Task Area or an approved person acting on his/her behalf.
HTA	The Head of Technical Area or an approved person acting on his/her behalf.
PPE	Personal Protective Equipment
STA	A Standard Task Area that is an Area of work not being a formal Technical Area.
Technical Area	An area of work involving <i>inter alia</i> significant Safety Related Tasks
The Mill	The premises and grounds leased by the Combe Mill Society
The Society	The Combe Mill Society

Contents

Issue History	1
1. Statement of Intent.....	2
Abbreviations Used	3
2. Responsibilities for health and safety	4
2.1. Overall and final responsibility for health and safety.....	4
2.2. Day to day responsibility for ensuring this policy is applied.....	4
2.2.1. Subdivision of operations	4
2.2.2. Safety Related Responsibilities in the Technical Areas	4
2.2.3. Safety Related Responsibilities for Standard Tasks	5
2.3. Ensuring health and safety standards are maintained/improved on site	6
3. Arrangements for health and safety	7
3.1. Control of Risks at the Mill	7
3.1.1. Classification of Risks	7
3.1.2. Control of Health and Safety Risks in the Technical Areas	7
3.1.3. Standard Tasks.....	9
3.2. Risk Assessments and Method Statements	9
3.3. Training.....	10
3.4. Consultation with members and contractors.....	10
3.5. Members' responsibilities.....	10

2. Responsibilities for health and safety

2.1. Overall and final responsibility for health and safety.

- 1 This Policy sets out the measures that are designed to control the health and safety risks faced by the Combe Mill Society's members and volunteers when working at the Mill's premises and more widely on the Society's business elsewhere.
- 2 The body with overall and final responsibility for health and safety is the Society's Board of Directors.
- 3 The Board appoints one of its members to be the Director Responsible for Safety (DRS).
 - ◇ The DRS is responsible for ensuring, on behalf of the Board, that this health and safety policy is applied in practice throughout the Mill.
 - ◇ The policy requires that the DRS shall be a member of the Board.

2.2. Day to day responsibility for ensuring this policy is applied

2.2.1. Subdivision of operations

- 1 In order to facilitate responsibility for health and safety the Board divides all work carried out in the Mill into two broad categories based on the perceived level of Risk. They are:
 - a Those activities whose inherent risks need to be controlled by a rigorous application of a formal Risk Assessment procedure. These activities are known as **Major Tasks** and ranges of related tasks are brought together as "**Technical Areas**".
 - b Those activities with lower inherent (and therefore broadly acceptable) risks. These activities are known as "**Standard Tasks**".
- 2 For further details of the arrangements see Section 3.1 on the Control of Risks at the Mill.

2.2.2. Safety Related Responsibilities in the Technical Areas

Head of a Technical Area

- 1 The Board appoints a suitably qualified and experienced person to be the Head of each Technical Area.
 - a The HTA is responsible for ensuring that all work within the scope of his/her technical responsibility is carried out in an effective and safe manner
 - b The HTA may also appoint suitably qualified and experienced members to be Proficient or Competent Persons to assist him/ her to run the Technical Area.
 - ◇ The responsibility for arranging for persons to be trained and to gain the necessary experience to become Competent or Proficient Persons in the TA concerned lies with the HTA.
 - ◇ The Board may require that, for some heritage machinery, the DRS endorse the HTA's appointment of a Proficient Person.
 - c In exceptional cases the HTA may allow volunteers to work as if they were a Competent Persons
 - ◇ In all such circumstances the volunteers work must be supervised.

Combe Mill Society Health & Safety Policy Statement

- 2 In the event that there is no HTA, his/her responsibilities are carried out by two suitably experienced directors acting in consort.
- 3 For historic reasons the HTAs of some Technical Areas are known by colloquialisms. For example the Head of the Blacksmithing Area is known as the Chief Blacksmith and the Head of the Tea Room as the Tea Room Manager. The terms are synonymous.

Project Manager

- 1 Large single projects are handled outside the normal HTA based health and safety arrangements.
- 2 Instead of an HTA the Board appoints a project manager who is responsible for carrying out, insofar as they apply to the project, all the relevant HTA duties described immediately above and elsewhere in this policy statement.
 - ◇ In this document wherever the term HTA is used the term Project Manager may be substituted unless the context of the statement prevents such substitution.

Proficient Persons

- 1 Proficient Persons are individuals who are deemed sufficiently qualified and experienced to allow them to take charge of work within the Technical Area in the absence of the HTA

Competent Persons

- 1 Competent Persons are individuals who are deemed sufficiently qualified and experienced to allow them to carry out work within the Technical Area in the absence of direct supervision insofar as is permitted by the relevant Method Statement
 - ◇ In particular they are deemed capable, in an emergency, of safely closing down any machinery involved.
- 2 Competent Persons can only carry out this work if a Proficient Person is available on site and free to go to the work site in an emergency.
- 3 The Board may designate heritage machines that Competent Persons must not operate other than under one to one supervision as part of a training programme designed to create essential new Proficient Persons.

2.2.3. Safety Related Responsibilities for Standard Tasks

- 1 Whilst the Society aims to place all of its major high risk tasks within the Technical Area Safety Structure there remain a variety of routine tasks that do not fit this model. These operations are brought together as Standard Task Areas (STA).
- 2 STAs come in two basic forms:
 - a Specialised safety related tasks (e.g. routine testing of portable electrical appliances [PAT Testing], ladders and fire alarms).
 - ◇ The Board appoints persons to carry out these tasks. They have the status of a Head of a Standard Task Area (HSTA) and, where appropriate, are empowered to recruit others to assist them with the work.
 - b The second form of STA is a series of *ad hoc* Groups that form when members get together to undertake a particular type of Standard Task. The Board wishes to encourage this type of participation and has accordingly adopted a structure that delegates the maximum responsibility for the execution of this type

Combe Mill Society Health & Safety Policy Statement

- of work that is consistent with the need to ensure that the Board exercises its responsibility for the safe operation of Combe Mill.
- ◇ Membership of these Groups are more fluid than those of the Technical Areas;
 - ◇ Each Group is required to appoint its own Head.
- 3 Where necessary, the Board stimulates the formation of these Standard Task Areas by persuading a member to take on the role of HSTA and then requiring the HSTA designate to take on the responsibility for forming the STA.
 - 4 Subject to the approval of the HSTA any suitably qualified and experienced member or volunteer may join the group.
 - ◇ The HSTA must maintain a list of the names of those members who have been authorised as capable of carrying out the work.
 - 5 Prior to entering the persons on the approved list, the HSTA must
 - a either satisfy him/ herself that the person is competent to undertake the relevant work or
 - b Arrange for the member to be trained and to gain the necessary experience.
 - 6 The HSTA, for the time being, is responsible for ensuring that all work within the scope of his/her responsibility is carried out in an effective and safe manner.
 - ◇ In particular he/ she must ensure that the work is carried out in accordance with the requirements of a relevant Risk Assessment or, where appropriate, good industrial custom and practice.
 - 7 The HSTA may allow volunteers, with appropriate training and experience, to work in the Group as if they were trained and experienced members or to join the group in order to receive training or gain experience.
 - ◇ In all such circumstances the HSTA must determine what if any supervision the volunteer needs.
 - 8 No volunteer may:
 - a Work alone at the Mill or
 - b Participate in the appointment of an HSTA.
 - 9 In the absence of the HSTA, members on the list of persons approved to work in the Area must elect one of their number to act as the HSTA.

2.3. Ensuring health and safety standards are maintained/improved on site

- 1 For the site overall the responsibility lies with the DRS. In particular
 - ◇ he/she is responsible for monitoring on behalf of the Board the safety performance of the various Technical and Standard Task Areas
- 2 For each of the Technical Areas the immediate responsibility lies with the relevant HTA or, in the absence of the HTA, with the Proficient Person acting for the HTA.
- 3 For each of the Standard Task Areas the immediate responsibility lies with the relevant HSTA or in his/her absence a group member appointed to take his/her place. In the event that the group cannot agree on an HSTA, work must stop and the situation reported to the DRS or to another director, who will make any necessary *ad hoc* arrangements.

Combe Mill Society Health & Safety Policy Statement

- 4 Members with safety concerns or suggestions should, in report them to the appropriate HTA, HSTA, or Project Manager.
 - ◇ If no appropriate person can be identified the matter should be referred to the DRS.

3. Arrangements for health and safety

3.1. Control of Risks at the Mill

3.1.1. Classification of Risks

- 1 The Board recognises that all operations pose risks and uses a process of Risk Assessment as the basis of its Risk Control Strategy. Early observation showed that members tended to form groups around fairly self-contained units within the Mill; the beam engine and the blacksmiths' forge are examples. It also turned out that the majority of the major health and safety risks occurred in these areas.
- 2 These Areas were originally called Technical Areas and, for historic reasons, the name has been retained.
- 3 In use the technique proved useful and is the basis on which the major health and safety risks are currently identified, analysed and controlled. The Mill operations presently covered by this system are listed in the following Section.

3.1.2. Control of Health and Safety Risks in the Technical Areas

- 1 The current Technical Areas are:
 - ◇ Blacksmiths' Forge
 - ◇ Heritage Band Saw
 - ◇ Barn Engines and Equipment
 - ◇ Beam Engine
 - ◇ Historic Clocks
 - ◇ Grounds
 - ◇ Steam Raising Boiler
 - ◇ Small Steam Engines
 - ◇ Waterwheel Complex
 - ⇒ Includes Gear Room, Head Race, Waterwheel and its Viewing Area
 - ◇ Wood turning
 - ⇒ Incudes Vintage Lathe driven from the Line-shaft
 - ◇ Lone working
 - ◇ Metal Working Area
 - ◇ Tea Room and immediate surrounds
 - ◇ Pre-steaming Inspection and Oiling of the Powertrain
 - ◇ The Powertrain includes the Beam Engine, Waterwheel and Line Shaft and equipment attached to the shaft.

Combe Mill Society Health & Safety Policy Statement

- ◇ Bench and Model Engines
- 2 All work within the TA must be covered by a valid Risk Assessment and the work as executed must conform to the terms set out in the Assessment and any other supporting documentation.
- 3 Each Technical Area must be supported by at least one overarching Risk Assessment covering the routine work carried out in the Area.
 - ◇ These Assessments are carried out using a procedure recommended by the HSE.
- 4 Before work that is not covered by the main Assessment is carried out an appropriate Assessment must be produced. Further details can be obtained from the DRS.
- 5 Members working in the TAs must undergo a suitable period of training and gain appropriate experience.
- 6 The training and experience is provided by suitably qualified persons under the overall supervision of the relevant HTA.
 - a The trainer is normally a Proficient Person.
 - b In the event that the HTA determines that some other arrangement is more appropriate he/she may be asked to justify the decision.
- 7 When the HTA is satisfied that the trainee is qualified to undertake the appropriate role the HTA will approve his/her appointment as a Proficient or Competent Person and enter the appointee's name on the appropriate list of Competent and Proficient Persons that the HTA is required to keep.
- 8 The HTA will also request that a Certificate of Competency or Proficiency, as appropriate, is issued to the appointee
 - a The lists kept by the HTA are the definitive record of the names of Competent and Proficient Persons approved to work in the particular Technical Area.
 - b The certificates of Competency and Proficiency provide reassurance to the persons concerned that they are on the HTA's list.
- 9 To control risks, the Board may place additional constraints on the operation of some heritage machinery. The heritage band saw is an example. These constraints may include:
 - a Limiting the purpose for which the machine may be operated: typically
 - ◇ Demonstration to visitors of the use to which the machine was once put
 - ◇ As part of a maintenance or operator training regime
 - b Limiting the use of the machine to a limited cadre of more highly skilled and experienced persons.
 - ◇ Special heritage machines are an exception to the Mill's general policy of allowing any interested appropriate person to be trained to develop the widest range of skills practicable. Here it is the Board's policy to use such machines as little as possible consistent with the effective discharge of the Mill's charitable objects.
 - c The HTA's appointment of a Proficient Person to operate a heritage machine with restricted usage must be endorsed by the DRS.
 - ◇ This endorsement is to make overt the Board's responsibility for the appointment.

Combe Mill Society Health & Safety Policy Statement

3.1.3. Standard Tasks

- 1 Standard tasks normally pose lower risks and importantly the risks are better understood by members. These differences have allowed the Board to adopt a less formal method for judging the ability of members to carry out these tasks.
- 2 The overall objective remains unchanged: to ensure that a person undertaking a task has the appropriate training and experience to safely undertake it. The essential arrangements are:
 - a Each Standard Task Area has a formal head.
 - ◇ This person is referred to as the Head of Standard Task Area (HSTA)
 - b Members wishing to work in an STA must undergo suitable training and gain appropriate experience.
 - ◇ The training is provided by suitably qualified persons under the overall supervision of the relevant HSTA.
 - ◇ Experience is mainly acquired by working on the job.
 - ◇ Once the HSTA is satisfied that a person has the necessary training and experience, he/she declares the person competent and enters his/her name on the list of competent persons.
 - ◇ Willing competent persons are given further training to allow them to substitute for the HSTA in his/her absence.

3.2. Risk Assessments and Method Statements

- 1 Before any significant action is authorised, HTAs or HSTAs ensure that
 - a Appropriate risk assessments either exist or are produced
 - ◇ With certain standard tasks the responsible HSTA may, instead of a formal risk assessment, rely on existing good industrial practice or specialist skills and/or experience possessed by the operator.
 - ⇒ An HSTA who relies on such a waiver may be required to justify the reliance should the situation so demand.
 - b Any significant risks are reviewed and appropriate remedial action identified and taken
 - c A written record of the outcome of the risk assessment is prepared and is retained for the record.
 - d All persons, including contractors who are to participate in the work, are adequately briefed as to the work that they are required to carry out prior to its commencement.
 - ◇ Method Statements are normally used to set out the work that has to be under taken.
 - ◇ The HTA may, if he/she so determines, substitute an oral briefing
 - e All persons, including contractors, have the necessary skills, qualifications and experience to enable them to carry out the required work effectively.
- 2 The DRS is empowered to forbid an operation if he/she believes it to be unsafe.

Combe Mill Society Health & Safety Policy Statement

- ◇ The DRS has no powers to authorise the carrying out of a task if the relevant HTA or SHTA opposes it.

3.3. Training

- 1 In addition to the specific task based training to be provided as set out above, the HTAs and HSTAs ensure that appropriate members and volunteers receive any necessary training in the following topics:
 - a Appropriate response to emergency situations
 - b Lone working (MS12 refers)
 - c Working at heights (MS16refers)
 - d Working with Power and Hand Tools
 - e Identifying and handling hazardous chemicals (MS16 refers)
 - f Manual Handling (MS16 refers)
- 2 Members must demonstrate their competence to undertake a task before being allowed to carry out such work unsupervised at the Mill.
 - ◇ The work of members under training must be supervised by a person approved by the appropriate HTA, SHTA or equivalent.
- 3 Volunteers must be appropriately supervised at all times
 - ◇ It follows from this requirement that volunteers cannot work alone at the Mill (MS12 refers)

3.4. Consultation with members and contractors

- 1 Insofar as is reasonably practicable, all members are kept informed as to the work that is being carried out at the Mill by means of the publication of a monthly Newsletter.
 - ◇ This publication is in addition to the information provided as required by the Mill's formal Articles.
- 2 Specific consultations are normally carried out orally but can be conducted in writing if the persons involved so agree.
 - ◇ Any important conclusions should normally be recorded in writing.
 - ◇ This provides protection to individuals in the event that something goes wrong.

3.5. Members' responsibilities

- 1 All members and volunteers should:
 - a Co-operate with the relevant persons named in section 2.2 on health and safety matters.
 - b Take reasonable care of their own health and safety
 - c Ensure that any activities they are carrying out do not pose risks to others and
 - d Report all health and safety concerns to an appropriate person as detailed in section 2.3.
 - ◇ Including untoward Incidents and Near Misses.