

Commonwealth Games 2014
Health and safety intervention strategy from summer 2013 onwards

Issue

1. To set out the objectives and intervention strategy for the continuing preparations and delivery of the Commonwealth Games to be held 23 July – 3 August 2014.

Enforcing authority (EA) demarcation

2. Venues are at various stages of handover to Glasgow 2014 who will complete final preparations to manage and operate them during the Games. Glasgow 2014 will therefore become the main duty holder under the Health and Safety at Work etc Act 1974.

3. There is broad agreement between HSE and Local Authorities (LAs) on enforcing authority demarcation at each of the Games venues and events. Most venues will be enforced by Glasgow City Council (GCC). This is based on the main activity (sport and leisure) concept under the Health and Safety (Enforcing Authority) Regulations 1998, the independent status of Glasgow 2014 Ltd as the operating company and the Council's conclusion that no conflict of interest arises. However, some Games venues are located in premises owned by LAs but operated by Glasgow 2014 where there may be regulatory overlap. Residual matters on the fabric of buildings and maintenance would be for HSE.

4. In the event of an incident it is proposed to adopt the approach for the Olympic Games by conducting joint initial LA/HSE visits. If there is the potential for enforcement action in any premises where there may be regulatory overlap, swift agreement will be reached – consulting Crown Office and Procurator Fiscal Service (COPFS) as necessary – on which regulator will proceed to investigate.

5. The principles on demarcation of enforcing authority for temporary demountable structures (TDS) will be followed but may need to be clarified on a case-by-case basis. Robust communication – based on the existing HSE/LA operational liaison arrangements - will allow for swift and effective decision.

6. The Queen's Baton Relay (torch relay on public road) and other sporting events routed via open roads will be HSE-enforced but substantially for the Police to manage with LA enforcement of associated public events and at start and finishing points on closed roads or in parks operated during the Games by Glasgow 2014.

7. The shooting event in Angus – although on Crown (MoD) property - would be LA-enforced as the sporting activity would be under the control of Glasgow 2014.

8. HSE will have enforcing authority responsibility for TV, film and radio broadcasting of the Games, including broadcasting activity in venues where the LA is the lead regulator.

Other regulators

9. The Office of Rail Regulation (ORR) has the main interest in the rail network's duties for public safety on rail premises. The Scottish Government, Critical Infrastructure Resilience Unit, the Police and the Scottish Fire and Rescue Service will also have an interest.

Intervention strategy

10. LAs and HSE aim to be enabling and proportionate co-regulators of health and safety, promoting the lessons of successful regulation of the Olympic and Paralympics Games, to provide adequate reassurance while avoiding unnecessary disruption to Games preparations and delivery.

11. A key issue is open communication with duty-holders, sharing sufficiently detailed information with regulators, to provide a level of assurance that avoids an unnecessarily interventionist approach.

12. None of the sporting or cultural venues fall within a high risk Standard Industrial classification (SIC). Where HSE is the enforcing authority, it will continue to influence through early central intervention with duty-holders rather than proactive individual site inspection - in keeping with UK Government policy. Where the LA is the enforcing authority, HSE has offered support to LAs in adopting an approach in keeping with the National Local Authority Enforcement Code. Glasgow City Council will refine their approach once the licensing regime in relation to Glasgow 2014-operated premises is clarified. Council officers will in any case be visiting premises for a range of other non-health and safety regulatory and licensing purposes.

Risk profile

13 The key risks are broadly the same as those identified for the Olympics but at fewer sites affecting a much smaller population of the public during Games Time (1m tickets as opposed to 10m). The top risks are:

- Failure of temporary demountable structures components/collapse of structures. (Under the Commonwealth Games Strategic Safety and Security Risk Assessment (CoSSSRA), the ownership of the specific risk of a collapse of a temporary stand rests with the duty-holder, Glasgow 2014. This mirrors the position for the Olympics where the London Organising Committee of the Olympic and Paralympic Games (LOCOG) owned the risk.
- Work-related transport at venues especially during overlay and 'bump in'
- Falls from height in particular during the building and take down of TDS, plus maintenance of completed structures during their use
- Liquid Petroleum Gas (LPG) and gas safety - fire and explosion risk eg at catering outlets
- Crowd safety at sporting venues and transport hubs
- Crowd safety on public highways - 'the last mile' (Police Scotland – if the HSWAct does not apply)

14. The larger venues in Glasgow are existing sporting stadia and crowd management is already well understood. Edinburgh City Council has considerable experience of managing large public events and will offer support to Glasgow. HSE can consider engaging a crowd safety specialist as for the Olympics, if desired.

Responding to incidents and concerns during Games Time

15. To ensure no delay in the reactive response, regardless of EA, the relevant LA and HSE will respond jointly to every incident that meets HSE selection criteria and, where the premises is LA-enforced, if the LA requests it. Most incidents will occur out of hours; a roster will be in place for a small team of HSE inspectors. LAs will make similar

arrangements. HSE duty officers will be briefed to pass on details of all incidents during Games time even they fall outside normal selection criteria. HSE specialist resources and access to Health and Safety Laboratories (HSL) will be available to LAs via the normal mechanism.

16. The Health and Safety Regulators' Steering Group, chaired by HSE, will identify a central point of contact with Glasgow 2014 to enable immediate co-operation in the event of an incident, on-going communication and minimal disruption.

Targeted interventions at specific sites in advance of Games Time

17. Targeted precautionary intervention is planned to manage risk at specific premises (HSE and LA-enforced) that could affect Games venues, events and major transport routes. These visits are justified on the grounds of critical infrastructure resilience as well as public reassurance even where they are out with the UK Government's proactive inspection priorities. Examples are:

- *legionella* risk at cooling towers within a short radius of Games venues. LAs plan to visit sites they enforce in 2014 – reasonably close to Games time. HSE will inspect HSE-enforced cooling towers again nearer Games time; they have recently been inspected following a legionnaire's disease outbreak in Glasgow in 2009. (HSE and LAs – according to the *legionella* inspection programme)
- HSE-enforced 'high hazard' (COMAH) sites adjacent to Games venues (HSE)
- Hazardous sites adjacent to major transport routes eg tyre storage facilities (LA); acetylene cylinders at scrap yards adjacent to rail infrastructure (HSE)
- Gas safety at facilities for athletes (facilities will be separate from but adjacent to accommodation blocks) and at main Games hotels (LA)
- Gas safety at rented accommodation - Glasgow 2014 have been asked to promote responsibilities of landlords renting property to Games visitors
- A sample of venues for associated cultural events may be visited at Glasgow Life-run premises (HSE - primarily for TDS risk)
- Fire risks at Special Premises (HSE)
- Storage of fireworks at opening and closing ceremonies – (HSE)