PERTH AND KINROSS COUNCIL

Environment Committee – 20 January 2016

Community Safety Committee – 3 February 2016

WATER SAFETY POLICY

Report by Director (Environment)

This Policy identifies effective, efficient and sustainable water safety management arrangements which can be applied consistently across Council land.

1. BACKGROUND / MAIN ISSUES

1.1 Around 260 people drown accidentally within inland waters in the UK each year. This equates to around 30 fatalities in Scotland of which about 30% occur through participation in water sports. In Perth & Kinross, between January 2010 and April 2014, emergency responders attended 68 water safety incidents of which 8 were fatal. There is no comprehensive information on historical fatality numbers recording if they occurred specifically from Council land. Drownings result from accidental falls and slips, deliberate entry to water where people have underestimated the danger and suicide. Although the available information indicates that the risk of accidentally drowning within inland waters is relatively low, it would clearly be preferable to see no fatalities.

1.2 The Council has a duty of care to everyone on its land under the Occupiers Liability (Scotland) Act 1960. This states that a risk assessment procedure should be used to ensure that reasonable steps are taken to reduce the level of risk, and advises that liability is reduced by ensuring that the danger is brought to the attention of visitors.

1.3 The Royal Society for the Prevention of Accidents (RoSPA) provides information on UK accidental drownings and advises that councils should have water safety policies to reduce drownings. Although the Council does not have a formal water safety policy, a number of measures have been put in place to minimise the risk of drowning on Council land.

1.4 Public education is nationally recognised as the most effective way to reduce drowning and Education and Children's Services (ECS) plays a key role in delivering water safety awareness through outdoor and school based activities. Water safety advice is also provided on the Council's website and to anglers using Council beats.

1.5 The Environment Service, through Community Greenspace (CG), is responsible for water safety management and risk assessment of Council owned green spaces, including town parks and countryside areas. These sites form by far the majority of Council managed land where water safety issues arise. Water safety guidance used within CG to date was produced following advice from RoSPA which was commissioned to assess key Council sites in 1993 and 2006. The guidance and assessments have been followed and appropriate measures have accordingly been put in place on respective sites.

1.6 In addition to the measures identified through the risk assessments, public rescue equipment (PRE) was provided by the Perth and Kinross Water Safety Partnership (PKWSP) in response to public concern arising from water safety incidents around the Perth Bridges, Tay Street and near Woody Island. The Partnership is currently implementing its 'Improvement Plan for Water Safety' and is placing a new style of water safety signage (WSS) and PRE at key locations on Council and private land. To help ensure that this and future work by the PKWSP is consistently applied and sustainably maintained, they have been involved in the development of this policy.

1.7 This Policy also formalises the Council's existing approach and guidance to water safety management including the Risk Assessment Procedure (RAP) for water safety.

1.8 The RAP considers public use and physical site characteristics to identify ways to reduce the level of risk from water hazards at each site. Risk can be reduced by:

- Edge protection through the use of both man-made barriers or wide margins of long vegetation to discourage access
- Water safety signage (WSS) usually positioned at key access points
- Provision of PRE at the water's edge

2. PROPOSALS

2.1 It is proposed that the Water Safety Policy (Appendix 1) should be implemented to fulfil the Council's duty to reasonably reduce the risk in relation to water hazards and encourage an effective, consistent and sustainable approach to applying appropriate safety measures. The policy does not significantly change the measures which already exist. In most cases, operational responsibility lies with Community Greenspace. Where this is not the case, the responsible section or service is specified.

2.2 The main changes proposed to current practice arising from the implementation of the policy include:

- The RAP recorded site re-assessments will be reduced from 2 to 4 years unless there is a water safety incident or change to the conditions of the site, in which case the particular site will be reassessed.
- WSS will be reviewed to ensure it is located to achieve maximum visibility, usually at main access points and will be placed at locations as indicated by the RAP being:
  - At slipways
  - Where deep and/or fast water is adjacent to a public facility
  - Where there are known and recurring incidents of entry to water

  This approach will reduce the number of superfluous WSS in some locations which will help to reduce costs, improve visual amenity and increase the effectiveness of WSS.
- PRE will only be provided where:
  - There are known and recurring instances of entry to water
  - They are highly visible and can be effectively used
  - They can be regularly inspected and maintained
- PRE will be not be provided where:
  - High falls are likely to be fatal or the casualty is seriously injured, and rescuers are likely to put themselves in danger
  - Fast flowing water will carry the casualty rapidly out of range of PRE
- PRE which is subject to persistent wilful vandalism will be removed and relocated or replaced with WSS.
- Over provision of PRE on a site will be reduced.
- On greenspace sites, the inspection frequency of PRE will be reduced from daily to weekly between April and October and monthly between November and March to be consistent with RoSPA guidance. This reflects seasonal use of the water's edge.

2.3 The proposed implementation of this policy will consolidate current practice and ensure any ineffective measures that have been previously provided are withdrawn. The policy will be implemented with immediate effect if approved and kept under review.

3. CONCLUSION AND RECOMMENDATION

3.1 Although there have been very few accidental incidents involving water accessed from Council land, the Council has a responsibility to ensure its sites continue to be safe for public use. Primarily, individuals have a responsibility to look after their own safety and for those in their care by avoiding obvious hazards and not taking unnecessary risks. Where hazards are less obvious or there is a known risk, the Council must ensure these are assessed and appropriate proportionate measures put in place.

3.2 This policy identifies an efficient, effective, consistent and sustainable means of ensuring the Council meets its duties for water safety on the land it manages. The policy ensures that water safety management and risk assessment procedures are in line with current legislation and national guidance. It is therefore recommended that the Council adopt this policy for Water Safety.

3.3 It is recommended that the Environment Committee:

(i) approve the Water Safety Policy (Appendix 1).

3.4 It is recommended that the Community Safety Committee:

(ii) note the Water Safety Policy (Appendix 1).

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ANNEX

1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

Strategic Implications	**Yes / None**
Community Plan / Single Outcome Agreement	**Yes**
Corporate Plan	**Yes**
Resource Implications	
Financial	**Yes**
Workforce	**Yes**
Asset Management (land, property, IST)	**Yes**
Assessments	
Equality Impact Assessment	**Yes**
Strategic Environmental Assessment	**None**
Sustainability (community, economic, environmental)	**None**
Legal and Governance	**None**
Risk	**None**
Consultation	
Internal	**Yes**
External	**Yes**
Communication	
Communications Plan	**None**

1. Strategic Implications

Community Plan / Single Outcome Agreement

1.1 The policy relates to the delivery of the Perth and Kinross Community Plan/Single Outcome Agreement by helping to create a safe and sustainable place for the general public. They contribute to the following Local Outcomes: Our area will have a positive image locally, nationally and internationally; Our communities will be vibrant and active; Our communities will have access to the key services they need; Our area will have a sustainable natural and built environment.

Corporate Plan

1.2 The Council's Corporate Plan 2013 – 2018 lays out five outcome focussed strategic objectives which provide clear strategic direction, inform decisions at a corporate and service level and shape resources allocation. They are as follows:

(i) Giving every child the best start in life
(ii) Developing educated, responsible and informed citizens
(iii) Promoting a prosperous, inclusive and sustainable economy
(iv) Supporting people to lead independent, healthy and active lives; and
(v) Creating a safe and sustainable place for future generations

1.3 This Policy relates to (ii), (iv) and (v) above.

2. Resource Implications

Financial

2.1 There will be no additional resource implications arising from this report. A more consistent approach to provision of measures, inspection and maintenance will assist in making more efficient use of available resources.

Workforce

2.2 There will be no additional workforce implications arising from this report.

Asset Management (land, property, IT)

2.3 The Policy will ensure the efficient management of land and assets to provide an appropriate level of protection for site users.

3. Assessments

Equality Impact Assessment

3.1 Under the Equality Act 2010, the Council is required to eliminate discrimination, advance equality of opportunity, and foster good relations between equality groups. Carrying out Equality Impact Assessments for plans and policies allows the Council to demonstrate that it is meeting these duties.

3.2 The policy presented in this report was considered under the Corporate Equalities Impact Assessment process (EqIA) with the following outcome:

(i) Assessed as **relevant** and the following positive outcomes expected following implementation: all water safety signs placed will be visually accessible in line with the sign standards.

Strategic Environmental Assessment

3.3 The Environmental Assessment (Scotland) Act 2005 places a duty on the Council to identify and assess the environmental consequences of its proposals. Pre-screening has identified that the policy will have no or minimal environmental effects, it is therefore exempt and the SEA Gateway has been notified. The reason(s) for concluding that the policy will have no or minimal environmental effects is that any effect on the environment is from minor and localised alterations to the management of water edge vegetation to increase water safety and, where appropriate, to encourage biodiversity.

Sustainability

3.4 Under the provisions of the Local Government in Scotland Act 2003 the Council has to discharge its duties in a way which contributes to the achievement of sustainable development. In terms of the Climate Change Act, the Council has a general duty to demonstrate its commitment to sustainability and the community, environmental and economic impacts of its actions.

3.5 This policy has no effect on the above.

Legal and Governance

3.6 The Head of Legal Services has been consulted on the policy presented within this report.

Risk

3.7 This policy identifies an efficient, effective, consistent and sustainable means of ensuring the Council meets its duties for water safety on the land it manages. The policy ensures that water safety management and risk assessment procedures are in line with current legislation and national guidance.

4. Consultation

Internal

4.1 The Head of Legal Services, The Health, Safety and Wellbeing Manager, and colleagues in Operations have been consulted on the policy presented within this report.

External

4.2 The Perth and Kinross Water Safety Partnership has been consulted on this report.

5. Communication

5.1 The communications in relation to the policy presented in this report will be principally through the council website.

2. BACKGROUND PAPERS

2.1 There are no background papers relevant to this report.

3. APPENDICES

3.1 Appendix 1a: Water Safety Policy

3.2 Appendix 1b: Summary of Legislation and Guidance for Water Safety Policy

3.3 Appendix 2: Guidance for the Risk Assessment Procedure (RAP) for Water Safety.

Water Safety Policy 2016

Water Safety Policy

Contents

1 Introduction

1.1 Information provided by RoSPA states that there are around 260 accidental drownings within inland waters in the UK every year and suggests that approximately 30 fatalities are within Scotland. Around 30% of these fatalities are attributed to participation in water sports. Although this indicates that the risk of accidentally drowning within inland waters is relatively low, it would clearly be preferable to see no fatalities.

1.2 All landowners have a duty of care under the Occupiers Liability Scotland Act 1960 to take reasonable steps to safeguard those on their land; and therefore Perth and Kinross Council should have a robust water safety policy and risk assessment procedure.

1.3 This Policy will ensure that the Council has effective, efficient and sustainable water safety management which will be applied consistently across Council land. It will also formalise the Council's position and assist dialogue with partners and response to the public.

1.4 Responsibility for water safety within parks and green open spaces lies with Community Greenspace and is risk assessment based.

1.5 Public rescue equipment (PRE) has been placed along Tay Street and around the bridges in Perth and near Woody Island through the Perth & Kinross Water Safety Partnership (PKWSP). This was in response to drownings in that area and associated public concern. The Partnership is currently progressing its 'Improvement Plan for Water Safety' which involves further placement of water safety signs (WSS) and PRE at locations identified by PKWSP on both Council and private land.

1.6 Drownings within Perth and Kinross have followed deliberate attempts to self-harm and deliberate entry to the water where the risk has been underestimated. Other fatalities have arisen from accidental falls, slips and trips from land into adjacent water. There is no comprehensive information or historical fatality numbers on Council land.

1.7 This Policy aims to reduce accidental and deliberate entry to water and use a risk assessment procedure to ensure the appropriate water safety response within the context of the character of the site. It aims to complement the work of PKWSP whose remit extends beyond land managed by the Council and links more closely to reducing attempted suicide.

2 Context

2.1 Council Responsibilities in Relation to Water Safety

2.1.2 Perth and Kinross is a largely inland area with many large lochs and rivers including the River Tay, which has the largest volume of water in the UK and becomes tidal at Perth.

2.1.3 Land owned by the Council often has water within or adjacent to it. It is managed for public use and enjoyment which has social, health and economic benefits to residents, visitors and businesses. Management also aims to enhance biodiversity. In some cases the design of land adjacent to rivers also accommodates flood prevention measures. The North Inch in Perth is adjacent to the River Tay and has a popular riverside path, running and cycle route, with viewing platforms and flood bund. The Birks of Aberfeldy is an example of a countryside site where a path and viewpoints facilitate viewing of a series of spectacular waterfalls, and is a popular visitor attraction. Perth Lade Path and the riverside path linking Perth to Almondbank are shared use paths used for active travel contributing to public health and sustainability.

2.1.4 There are no designated bathing waters within Perth and Kinross and the Council does not provide public facilities for water sports.

2.1.5 The Council issues fishing permits for the River Tay in Perth. It also owns several slipways in Perth with authorised use by specific water sports clubs, as well as training by the emergency services. The main slipway on Tay Street is available for public use. The Council and jet skiers using the River Tay from the slipway have agreed a voluntary Code of Conduct to reduce disturbance to local communities. This Code of Conduct does not affect the Water Safety Policy.

2.1.6 Perth harbour is owned by the Council and is managed by a Harbour Master as a commercial area and is not accessible to the general public.

2.1.7 Although the Environment Service (TES) is largely responsible for the public realm other council services have roles with regard to water safety as outlined below.

2.1.8 Education and Children's Services (ECS) have an important role in water safety education within the classroom and through the work of the Outdoor Education Team. They provide teacher training for water safety and opportunities for schools, clubs and the public to develop water sports skills including rescue techniques. The annual 'SafeTaySiders' event for primary

seven classes promotes water safety to children at a key stage in their lives. Risk assessments are required for all out of school activities.

There are no water bodies within the school estate.

2.1.9 Housing and Community Care (HCC) have responsibility for liaison with PKWSP and the Council's work on mental health planning and suicide prevention. PKWSP brings together emergency responders (the Scottish Fire and Rescue Service and Police Scotland), the Council and charities such as Safe Tay and the Samaritans to implement an 'Improvement Plan for Water Safety'. The Partnership has placed WSS and PRE at key risk locations selected by the PKWSP. This includes locations known to be used for attempted suicides, most notably around the Perth Bridge area. HCC advise that some people entering water do so as a 'cry for help' and hope to be rescued. Samaritans signage which aims to offer support in moments of despair has also been placed. PKWSP is resourced and is responsible for the placement and ongoing maintenance of their WSS. PRE placed on Council land is installed and maintained by the Council. Community Wardens engage with the community to reduce vandalism to PRE where there is a problem.

2.1.10 Health, Safety and Wellbeing provide training for officers with responsibility for risk assessing sites. A General Risk Assessment (one day) course and an IOSH Managing Safely (one day for six weeks with final assessment) course are available. Relevant guidance documents are available on Eric including Slips, Trips and Falls.

2.1.11 Within TES responsibilities for water safety are summarised below.

2.1.12 Roads and Structures (R&S) have responsibility for roads infrastructure including pavements and surfaced paths, bridges, and slipways. R&S do not carry out specific water safety risk assessment in relation to pavements and paths outwith the design and construction stage, nor do they have responsibility for inspection or maintenance of existing water safety provision within the road corridor. Their approval is required in relation to placement of WSS and PRE within the road corridor.

2.1.13 Community Greenspace (CG) has responsibility for water safety within greenspace areas. The risk assessment procedure carried out by CG to date has been based on advice from RoSPA in 1993 and 2006. CG also administer fishing permits for council beats which include water safety advice for anglers.

2.1.14 Operations have responsibility for recorded inspection and replacing missing or damaged PRE. Spare PRE is kept in stock and carried so that replacements can be made during inspections.

2.2 Legislation and guidance

2.2.1 Appendix 1B shows the relevant legislation and guidance and the main issues arising in relation to the Council's Water Safety Policy.

2.2.2 As an owner of land, the Council has a duty of care under the Occupiers Liability (Scotland) Act 1960. This specifies that a risk assessment procedure (RAP) should be used to ensure that reasonable steps are taken to reduce the level of risk, and advises that liability is reduced when the danger is brought to the attention of visitors. This is borne out by law cases such as Tomlinson v Congleton Borough Council (2003) in which the claimant sustained a broken neck after diving into shallow water having ignored signs stating 'Dangerous water no swimming'. Although the court initially imposed liability on the Council on the basis that their RAP was inadequate, this was later overturned. The final ruling asserted that there was no duty to take steps to prevent the claimant from diving as the danger being obvious. This ruling was taken with due regard to the wider social benefits of landowners facilitating access to water, without fear of litigation. This implies that the RAP controls should be placed largely where hazards are not obvious.

2.2.3 The Council has a duty to uphold the right of responsible access to most land and water given by the Land Reform (Scotland) Act 2003. This Act and accompanying guidance places the responsibility for personal safety largely on the individual.

2.2.4 The Nature Conservation (Scotland) Act 2004 places a duty on the Council to further the conservation of biodiversity which implies that water environments should be managed for wildlife as well as for public benefit.

2.2.5 The Civic Government (Scotland) Act 1967 allows the Council to provide signage and rescue equipment at locations it considers appropriate. National signage standards ensure that signs are easily understood by most people.

2.2.6 National guidance from the Royal Society for the Prevention of Accidents (RoSPA) provides useful advice for local authorities in relation to managing water safety and explaining the level of risk based on numbers of water related incidents recorded.

2.2.7 The Council's Community Safety Strategy 2007-2012, developed by the Community Safety Partnership, includes long term water safety outcomes to reduce the number of accidental drownings by 30%.

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2.3 Recorded Water Rescue Incidences and Implications on Policy

2.3.1 UK accidental inland drowning

The numbers and types of accidental fatalities by drowning within inland waters is provided by RoSPA for the 2009 to 2011 period.
The main findings show:

- About 260 people drown accidentally in inland waters each year in the UK, of these approximately 30 occur within Scotland.
- About 30% of drownings arise from participation in water sports.
- Males drown twice as often as females; the male 15-30 year age group has the highest number of fatalities.
- Rivers are more hazardous than contained water features such as lochs.
- Falls into water while engaging in land based activities such as walking, running and cycling, results in the most fatalities of all activity groups (it is the largest activity group).

RoSPA stresses the need to increase public awareness of the potential dangers of land based activities adjacent to water in order to reduce accidents, and to reduce the numbers of people deliberately entering water without an awareness and consideration of depth, strong currents or cold temperatures.

2.3.2 Implications for the Policy

The Council should continue to educate the public in relation to the dangers of water, including appropriate placing of WSS, and should take reasonable steps to reduce the risk at the water's edge where slips and trips may occur and dangers may not be obvious. This can be achieved, for example, by establishing wide margins of long grass and other vegetation which dissuade people from accessing the water's edge; or where waterside access is desirable, to provide secure edges and barriers if appropriate.

2.3.3 Water rescue incidents in Perth & Kinross

The Scottish Fire and Rescue Service (SFRS) is trained and equipped as emergency responders for water rescue incidents. The SFRS has provided information on water incidents they attended within Perth and Kinross between January 2010 and April 2014. In this period 68 water rescues were attended, 38 of these were in moving water, there were 8 fatalities and 18 non-fatal casualties. No information is available regarding the circumstances of these incidents and how many people entered the water deliberately. SFRS has also provided information on two specific rescues which involved the use of PRE around the Perth Bridges. In two incidents in November 2013

and June 2015, police officers used throwlines to reach and hold casualties against the current until the SFRS completed the water rescues.

2.3.4 Implications for the Policy

Phoning the emergency services should be the priority for anyone witnessing an incident. This message should be prominent on all WSS and PRE. In addition PRE should be provided where there are known and recurring incidents of accidental or deliberate entry to water and conditions allow for their effective use (see also 2.24 below).

2.3.5 Fatalities on land owned or managed by the Council

There is no record of the number of water related fatalities associated with Council land, however, the incidents described below give an indication of how fatalities can occur.

2.3.6 Two fatalities resulted from accidental falls into water in 2002/3. A slip from stepping stones at Rumbling Bridge Gorge and a fall from height at Bruar Falls led to fatalities. Both sites are extremely popular, highly scenic gorge areas with precipitous sides in private ownership. The Council held management agreements for the paths (no longer in place at Bruar Falls) and following these fatal accidents path improvements, warning signage and improved site monitoring were implemented.

2.3.7 In 2013 a young man was swept away and drowned while attempting to wade across the River Tay from Woody Island in Perth to gain access to the Rewind event in Scone. Following this fatality the PKWSP placed WSS and PRE (throw lines) within this area.

2.3.8 Fatalities have also resulted from attempts to self-harm, most frequently associated with jumping from the Perth bridges.

2.3.9 RoSPA water safety guidance stresses the need for drowning prevention to dissuade people from entering the water and advises that rescue from water is a poor option and that PRE may delay calling the emergency services.

2.3.10 ECS Outdoor Education advise that public rescues are unlikely to be effective as considerable training is required to operate rescue aids effectively; in moving water the casualty is likely to be swept out of range downstream. The panicking casualty is unlikely to be able to catch a throwline and the witness should not put themselves at risk. The most effective course of action is to alert the emergency services while watching and shouting reassurance and encouragement.

2.3.11 Implications for the Policy

WSS should be placed at sites where there is deep and/or fast flowing water to deter unwise entry into the water by warning of the hidden dangers of strong currents, deep or cold water.

Provision of PRE will be kept to a minimum and be provided only in situations where a rescue may be effectively achieved. For this reason PRE will not be used where:

- high falls may result in the casualty being unconscious or the rescuer placing themselves in danger (eg gorge situations).
- fast flowing water is likely to carry the casualty rapidly out of range of PRE.
- regular (weekly) inspection of PRE is not sustainable in remote locations.

2.4 The Council's Existing Water Safety Guidance and Procedures

2.4.1 RoSPA were commissioned by PKC to carry out water safety site assessments in 1993 and 2006. Their subsequent reports provided both general guidance based and site specific recommendations.

2.4.2 RoSPA stressed the importance of public education as the best way to improve water safety and did not recommend PRE as a key risk control in isolation. Their approach to risk assessment included a banding guide to help identify the degree of risk based on site characteristics and suggest suitable controls.

2.4.3 The RoSPA report and general guidance formed the basis of the subsequent PKC Water Safety Guidance document. It recognises the importance of public education to deter entry into the water in the first place and includes a site risk assessment based on a banding guide. Control measures to reduce the level of risk include:

- edge protection
- warning signs
- public rescue equipment (PRE)

2.4.4 Edge protection

The following design principles are followed as appropriate:

2..4.5. Water safety is increased by routing paths and other well used areas away from the water's edge, or by the potential provision of secure edges and/or barriers where public facilities are adjacent to a water's edge.

2.4.6 The management of vegetation at and near the water's edge can enhance water safety and can either facilitate or dissuade access to the water's edge.

2.4.7 Where direct access to the water's edge is considered integral to public amenity, vegetation is maintained to ensure the edge and water is obvious. This is most appropriate where there are shallow gradients and still, shallow water, and where there is a relatively small area at the water's edge, usually at ponds.

2.4.8 Where access to the water's edge is not considered essential and/or an extensive natural water's edge exists, vegetation is managed to create a wide margin of long growth (grass/wildflowers/shrubs) along the water's edge, which discourages access whilst still retaining views of the water.

2.4.9 Aquatic and marginal planting at the edge of ponds can discourage access and encourage wildlife.

2.5.8 The design and management of public spaces also maximises the public use and enjoyment of the outdoors, enhances biodiversity and accommodates flood prevention where relevant; as well as incorporating the above water safety measures as appropriate.

2.5.9 Water safety signage (WSS)

In 2006 the Council, working within the Community Safety Partnership, introduced signage incorporating the 'Be Water Wise' message and placed it at appropriate locations. No WSS was placed within applicable countryside sites where any safety signage has been of a general nature. In 2013 the PKWSP developed new signage for use at old and new sites with prominent advice to dial 999 including a space to enter the grid reference of the location.

Temporary warning signs may be placed when required in relation to algal blooms and ice within ponds on Council land.

2.5.10 Public rescue equipment (PRE)

Throw lines are located near to the water's edge as they as designed to be thrown at distance; and lifebelts are only provided near the Queen's Bridge, Perth, as they are better used from height, (they can only be dropped or thrown a short distance).

2.4.11 In a few circumstances the Council's response differed from the RoSPA recommendations, these are outlined below:

- barriers to prevent accidental drops from height into water, such as Norrie Miller Park, do not include 'no climbing' pictograms on railings which were recommended by RoSPA. The Council considered that these signs were not required as the barriers prevent accidental falls and the risks of climbing were obvious.

- substantial barriers prevent accidental drops from height into water, including Tay Street and the bridges in Perth. RoSPA recommended no PRE in these situations on the basis that it is difficult to operate in these circumstances. The provision of PRE in these locations is in response to known incidents of people deliberately jumping into the water (tombstoning or attempting suicide) and the potential benefit of the PRE in these circumstances.

- PRE is provided without accompanying water safety signage. RoSPA recommended use of safety points incorporating both PRE and WSS. The Council has positioned WSS where most site users will see it, usually at main access points. PRE is located at the water's edge where it is readily available for emergency rescue.

- Equipped play parks near to rivers, including in Dunkeld Riverside Park. RoSPA recommended fencing off the play area from the river. The Council considers a fence is not essential on the basis that the river is highly visible and obvious; there are no steep drops to the water's edge; and the play area is located more than 6 metres from the river edge . The Council has placed WSS at access points to the park and has established a wide long grass margin at the riverbank to discourage access to the water's edge. Also the play area is designed to focus activity away from the water, provide equipment for the younger children at the furthest point from the river, and locate seating to accommodate parental supervision. There have been no recorded incidents regarding water safety at the sites.

2.4.12 In practice the Council has also recognised that the character and use of the countryside sites differs from town parks which can influence the application of water safety measures. When in the countryside it is reasonable to anticipate (and enjoy) a more informal approach to design, infrastructure and management. Also the very nature of the sites, such as informal paths in steep glens /gorges, have inherent and obvious risks and due care is required.

2.4.13 <u>Cost of provision and maintenance of WSS and PRE</u>

WSS and PRE are relatively affordable to purchase and install. The estimated cost of installation of a sign or PRE is £150 per item. Signage is low maintenance and is inspected infrequently as part of wider site inspections. However, the requirement to ensure PRE remains in working order requires regular inspections and substantial officer time and, where PRE is frequently vandalised or stolen, costs are significant. Records show that between 2010 and 2015 209 throw lines and 55 throw line housings were purchased at a total cost of £6,146.41. This is for 24 locations where PRE is provided: 8 locations on Tay Street, 5 within the North Inch, 2 within Norrie Millar and Bellwood Parks, 4 within Muirton near Woody Island (placed by PKWSP) and 5 within Kirkgate Park in Kinross.

Grounds Maintenance (GM) staff inspect and replace any damaged PRE on weekdays and both inspections and repairs are recorded. Street sweepers check the PRE within Perth at weekends. PRE at Muirton (placed by PKWSP) has been subject to repeated vandalism requiring frequent replacement by the Council. Community Wardens also inspect this PRE on behalf of PKWSP.

3 Development of Council Water Safety Policy

3.1 RoSPA's recently published 'Water Safety Policy in Scotland – A Guide' highlights the need for local authorities to have water safety policies. The guidance sets out key policy considerations and aims to promote consistency across local authorities.

3.2 This guide omits risk assessment based on a banding guide due to RoSPA's concern that too great a reliance was being placed on it, resulting in less consideration of individual site characteristics

3.3 The development of PKC's Water Safety Policy has reviewed the Council's previous Water Safety Guidance , RAP and practise utilising officer knowledge and experience; with due consideration to relevant legislation (summarised in Appendix 1B) particularly the RoSPA guidance above and recognition of the ongoing work with the PKWSP.

4 Council Policy for Water Safety

4.1 In developing this policy it has been established that the Council's current approach to water safety is generally sound. As such this policy and the revised RAP contained within Appendix 2 will make little significant difference to existing management and provision. The new policy does, however, formalise the Council's approach to water safety offering consistency across the Council and will assist working with PKWSP.

4.2 The Council's approach to water safety is on the basis that people are responsible for their actions and safety where hazards are obvious. The Council will take measures to protect the public where indicated by the RAP, where hazards are not obvious and/or where there is an increased chance of entry to deep and/or fast water from an adjacent public facility, such as a constructed path or viewing area. This may include the provision of barriers, WSS and PRE as appropriate. The Council will ensure that all sites with water have recorded risk assessments every 4 years.

4.3 This policy recognises that the character and use of the countryside sites differs from that of open spaces in towns which can influence the application of water safety measures. This principle has been the practice to date and is incorporated into the guidance notes of the revised RAP, Appendix 2; and particularly applies to informal countryside paths next to rivers and gorges, where, in many cases, it would be neither practical nor desirable to have barriers next to the path. However, in some locations where the risk may not be obvious, such as a concealed fall from a woodland path into a gorge, it may be appropriate to have a discreet fence; or the incorporation of a barrier at constructed viewing point which is situated immediately adjacent to a deep or fast river (which would also act as a leaning rail to enjoy the view).

4.4 The measures to be taken arising from this Policy are summarised below. Where these result in a change to current practice, the change is identified and the rationale for it is explained. In most cases operational responsibility lies with Community Greenspace, where this is not the case the responsible section or service is specified.

4.5. Public education

The Council will:

- continue to provide water safety education within appropriate learning environments to encourage people to behave responsibly and appropriately, primarily through the activities of ECS.

- continue to ensure that its website provides water safety advice, offers links to further information and is used to highlight particular high risk events and times.

- continue to provide anglers using Council fishing beats with water safety guidance when applying for a permit.

4.6 Site inspections

The Council will:

- continue to ensure officers responsible for undertaking RAP of greenspace sites follow the approved RAP guidance and have completed the Council's General Risk Assessment training.

- now carry out a RAP every 4 years for all sites where no significant change of conditions, or water safety incidents have occurred.

- now carry out a RAP for any site where a significant change of condition has occurred, within 1 month of the recorded change.

- now carry out a RAP for any site where a water safety incident has been reported, within 5 working days of the report being received.

The frequency of RAP site reinspections is reduced to 4 years which is considered sufficient unless there is a significant site change or incident. These would be captured by 6 monthly general site inspections or by public reporting, either of which would trigger a new RAP.

4.7 Design and management of public open spaces

The Council will:

- continue to ensure design of public places, and in particular play areas, which are near to water bodies take water safety considerations into

account. Where play areas or paths are located near deep and/or fast flowing water, a minimum separation margin of 6m for play areas and 2m for paths, from the water's edge will be ensured. These distances are based on current practice and experience.

- continue to ensure water safety is a key consideration in relation to design of ponds and other water features. Ponds will have gentle gradients, or where there is a vertical edge, such as at the South Inch Pond, the edge will be less than 0.5m above the water. Water will be shallow (0.65m or less) at edges and water plants will be established to dissuade entry to the water and encourage biodiversity as appropriate.

- continue to consider installing new barriers in relation to water safety, only in circumstances indicated by the RAP, where there is a sheer or steep drop (60 degrees or more) into fast flowing and/or deep water from an adjacent (within 1 m) public facility such as viewing area. Designs will be appropriate to the risk and site character, robust and low maintenance.

- where access to the water's edge is considered integral to the amenity of the site, continue to manage water edge vegetation to ensure the edge is obvious, for example at ponds. This can be achieved by pruning or removal of obscuring trees or shrubs and/or the maintenance of a wide mown grass border.

- where access to the water's edge is not considered integral to the amenity of the site continue to manage water edge vegetation to discourage access, for example to separate a path from a natural riverbank. This can be achieved by the maintenance of a wide uncut margin of natural vegetation between the public facility and the water's edge.

4.8 <u>Water safety signage (WSS)</u>

The Council will:

- continue to place WSS in locations indicated by the RAP, these being:
  - at slipways (facilities for managed access to water)
  - where deep and/or fast flowing water is adjacent to a public facility
  - where there are known and recurring incidents of entry to water

- continue to place and maintain WSS only at main site entrances or key points where there is a water safety risk. Signs will therefore be visible to most users whilst minimising the number required, reducing clutter and maintaining amenity. Waterside WSS may be required in some circumstances.

- now place WSS at relevant countryside sites with water safety and general safety warnings being included in the site welcome/information signs at the main access points

- now consider removing WSS at locations where the hazard is obvious and the risk is low, for example at ponds.

- continue to consider placing temporary signs when required at pond locations to warn people of the risk of toxic water and ice.

WSS will be placed at all greenspace sites as indicated by the RAP, including some countryside sites where no WSS may currently exist. In most cases WSS will be located at site entrances only. Guidance for where to place signs within sites will improve consistency of use of WSS on all sites and ensure most site users are made aware of the need to be careful around water.

4.9 Public rescue equipment (PRE)

The Council will:

- continue to place PRE at locations as informed by the RAP where:
  - there are known and recurring instances of accidental or deliberate entry to water
  - they are highly visible
  - they can be used effectively
  - they can be regularly inspected and maintained

  PRE will not be used where:

  - high falls are likely to be either fatal or cause very serious injury and the PRE would not be effective for rescue and could also put rescuers at risk
  - fast currents would carry the casualty too quickly out of range of the PRE

- continue to ensure all PRE is clearly marked with instructions on use and that WSS is provided nearby.

- now remove PRE which is repeatedly vandalised and consider relocation or replacement with WSS.

- now consider removal or relocation of existing PRE within sites with multiple PRE to ensure the most effective and sustainable placement of PRE.

- now inspect all Council PRE on greenspace sites once a week between April and October and monthly between November and March, record any defects and replace with functional PRE. This responsibility lies with Operations.

- continue to inspect PRE on Tay Street daily throughout the year, record any defects and replace with functional PRE. This responsibility lies with Operations.

The change in PRE inspection frequency adheres to RoSPA guidance which advises that PRE should be checked weekly at well used locations in the summer and less often during the rest of the year. Consideration of location and an alternative safety method where PRE requires regular replacement also adheres to RoSPA guidance.

5 Conclusion

5.1 The Council's existing water safety management has been found to be sound and few changes will result from this policy. The Water Safety Policy will, however, formalise the Council's approach to water safety management. It will ensure that effective, efficient and sustainable water safety management is applied consistently across Council land assisting in future dialogue with partners such as PKWSP. This will increase clarity regarding responsibilities and avoid duplication of effort in relation to placement and maintenance of water safety provision on Council land.

5.2 In providing a policy the Council will meet RoSPA current guidance and continue to fulfil the Council's legal duty to take reasonable steps to safeguard people on its land.

5.3 It aims to reduce accidental falls and deliberate entry to water.

5.4 Sites are risk assessed and control measures recommended with due recognition to their context and character. The RAP has been fully revised to provide clear guidance for onsite risk assessment. Appropriate water safety measures will be provided where hazards are not obvious and/or there is an increased risk of entry to water from an adjacent public facility, such as a constructed path or viewing platform.

5.5 Water safety measures range from site layout/ design components, vegetated and constructed barriers, and WSS to PRE.

5.6 WSS are generally located at site entrances. PRE are only provided where there are known and recurring instances of deliberate entry to water and where it can be used effectively and inspected and maintained.

Appendices:

Appendix 1B- Summary of relevant Legislation and Guidance and Implications for the Council Water Safety Policy.

Appendix 2- Guidance for the Risk Assessment Procedure (RAP) for Water Safety.

Appendix 1B

Summary of Relevant Legislation and Guidance and Implications for the Water Safety Policy

Legislation	Key Implications
Health & Safety at Work etc. Act (1974)	Council has responsibility for the management of sites with water bodies so measures must be taken to minimise the risk to the health and safety of employees and members of the public.
Management of Health & Safety at Work Regulations (1999)	Requires that H&S is managed to control risks effectively to prevent harm to employees and visitors. Imposes a requirement for the Council to assess and manage risks associated with water hazards on council land. Duty to record, notify and investigate accidents to the enforcing authority (e.g. HSE or Environmental Health).
The Occupiers Liability Scotland Act (1960)	Imposes a duty of care upon the occupier (the Council) to any visitor to premises/ land (including trespassers). Reasonable steps must be taken to ensure the safety of visitors. This is particularly onerous where children are concerned. Risk assessment procedure provides the means of carrying out this duty. Through the risk assessment the occupier may be relieved of liability, if the danger is clearly brought to the attention of visitors.
Common Law Duty of Care	Applies to both public and staff. Site owners (PKC) have to assess risks and put reasonable safeguards in place where risk is deemed necessary. '*Duty is to take reasonable care to avoid acts or omissions which you can reasonably foresee would be likely to cause injury to neighbour'.*
Civic Government (Scotland) Act 1967	Permits the Council to provide public rescue equipment at locations they consider suitable.
Public Health Scotland Act (2008)	Gives Council the power to regulate water users and to take any appropriate action to protect human health for example by provision of signs or rescue equipment on private land.
National Water Safety Signs 1987 Water Safety Signage Standard - BS5499 -11: 2002	This sets standards for the shape and colour of warning signs. RoSPA recommends all new signage conforms and existing signage is reviewed and any illegible or unclear signs are replaced immediately.
Land Reform (Scotland) Act (2003)	Provides statutory right of access to most land and water. Applies to non-motorised users only and to most water where responsible access can be taken. Restricts the circumstances where preventing access (for example swimming) is reasonable. Council power to warn public of danger by signage. Places responsibility for safety largely on individual.
The Nature Conservation (Scotland) Act 2004	Places a duty on the Councils to further the conservation of biodiversity. This Implies we should manage water habitats for wildlife as well as for people. Although there is no duty on councils to kill invasive weeds, there is an expectation that we will do what we can to control them.

Guidance	Key Implications
National Water Safety Signs. (RoSPA) Sept 2011. BS ISO 20712-1-2008 & BSO 3864-1-2011	Gives specifications, symbols, shape and colours for water safety signs. Useful easy visual reference guide to national standards. Use makes signs easy for most people to understand.
Assessing Inland Accidental Drowning Risk (RoSPA) (undated)	Analysis of drowning risk possible using Water Incident Database (WAID) managed by National Water Safety Forum (NWSF) provides complete database for UK. Assessment looks at 2009-2011 and shows of 260 accidental drowning's per year highest incidents are in men and those taking part in water sports. Shows higher rates for young (15-30yrs) Scottish men and recommends actions are taken to reduce drowning in this group.
Scottish Local Authority Approaches to Managing Water Safety (RoSPA) (undated)	Results of a survey of 32 local authorities in Scotland regarding their approaches to managing water safety. Lists key findings and draws recommendations based on the benefits of joint working including the need to develop policies and identify key high risk groups to communicate key risks effectively. This has led to the launch in Aug 14 of the Scotland Water Safety Reference Group to which PKC contributes. It operates through meetings and website www.watersafetyscotland.org.uk
Water Safety Policy in Scotland – A Guide (RoSPA) (undated)	Framework for LAs to use when making own policy to help provide strategic and consistent national approach which takes account of geographical areas and issues. Produced through consultation with Scotland Water Safety Reference Group.
Water & Leisure Report for PKC 1993 & 2006 (RoSPA)	PKC commissioned these report from RoSPA to review water safety arrangements. Report proposed a water safety strategy & specific recommendations regarding risk assessed sites.

PKC Policy	Key Implications
Community Plan for Perth & Kinross 2006-2020 Community Planning Partnership	The Community Plan is a collaborative document between the Council and its key partners and sets out a vision and aims towards achieving desired outcomes as follows: *"Our vision is of a confident and ambitious Perth and Kinross, to which everyone can contribute and in which all can share. We will create and sustain vibrant, safe, healthy and inclusive communities in which people are respected, nurtured and supported and where learning and enterprise are promoted." It also states "Perth and Kinross is synonymous with quality of life - renowned for its scenery, accessibility, history, quality local services, facilities, products and strength of community. A key challenge will be to ensure that all our citizens benefit from the quality of life the area has to offer."* In relation to water safety the Council would aim to ensure maximum benefit from water bodies while encouraging everyone to respect the water and risk assessing land in Council ownership.
Community Safety Strategy for Perth & Kinross 2007-2012 Water Safety	Developed by the Community Safety Partnership. Lists 3 key long term outcomes with corresponding actions, indicators, target groups and targets. Final targets for 2012 in all cases is a 30% reduction in number of accidental drownings. Specific target groups include young males using alcohol and those using Council fishing permits.
PKC Corporate Plan 2013-2018	Plan builds on five outcome focussed strategic objectives to provide clear strategic direction, inform decisions at a corporate and service level and shape resources allocation. They are as follows: 1. Giving every child the best start in life 2. Developing educated, responsible and informed citizens 3. Promoting a prosperous, inclusive and sustainable economy 4. Supporting people to lead independent, healthy and active lives 5. Creating a safe and sustainable place for future generations Providing information and equipment to help ensure people of all ages are aware of the potential for harm around water bodies will contribute to delivering objectives 1, 2 and 5.
PKC Place making Guide Vision for water – rivers, burns, pools & lochs (PKC website)	Vision to make the most of rivers, burns and lochs provide for nature, people (encourage safe use), reduce flood risk and maintain. The Council will warn public of hidden dangers but public have duty to have regard for their own safety.

Appendix 2

Guidance for the Risk Assessment Procedure (RAP) for Water Safety

Community Greenspace

January 2016

Contents

1 Introduction

This guidance provides a working practice for officers involved with the risk assessment of public spaces in relation to water. It is linked to the Water Safety Policy adopted by the Environment Committee in January 2016 and replaces the previous risk assessment procedure guidance. The Policy provides background and rationale including information on water rescue incidents and should be used as a reference alongside this procedure.

The aim of the Water Safety Policy is to ensure that effective, efficient and sustainable water safety arrangements are applied consistently across Council land. It aims to reduce accidental and deliberate entry to the water. The RAP is identified as the appropriate means of ensuring the appropriate response in the context of the wider site character and its amenity value.

The risk assessment procedure (RAP) is not just the responsibility of the designated officer who carries out the risk assessment of sites and identifies the most appropriate water safety provision. It also involves all those who have roles with inspecting sites or public rescue equipment (PRE), organising events on sites, redesigning public spaces or replacing and maintaining infrastructure. Table 1 shows the main responsibilities for officers in relation to water safety.

1.1 Risk assessment responsibility and frequency

The Community Greenspace (CG) Coordinators (infrastructure) risks assess Greenspace sites. Within countryside areas the public are expected to be more aware of risk and accept responsibility for their own safety to a greater extent. Water safety signage (WSS) will now be installed at countryside sites. No public rescue equipment (PRE) will be provided on the basis that there are no known and recurring water safety incidents and that PRE cannot be regularly inspected and maintained.

RAP inspections take place every four years unless:

- An incident occurs – RAP to be carried out for the appropriate site within 5 working days of a report being received
- Site conditions change – RAP to be carried out for the appropriate site within 1 month of the recorded change

2 Quick guide to officer responsibilities in relation to water safety.

In all cases this only applies where water occurs within the public space involved.

Work priority	Application of procedure	Lead Section
Provision of off-site information to raise the level of public education regarding water safety.	Ensure website, media, leaflets, talks and other events provide useful and appropriate information to the public. In particular the Guidance notes for Anglers must continue to highlight the water safety advice and must be issued with all permits.	CG Policy & Projects & CG Communities
Design/redesign of public spaces including water features, routing of paths, siting of play areas, barriers and viewing facilities.	Ensure that water safety is embedded into design of the site. Consult and inform the officer responsible for RAP regarding any changes planned.	CG Projects & Policy
CG events planning – whether by PKC or third party.	Ensure water safety is embedded in all event RAPs taking place on Council land.	CG Communities
Replacing and maintaining infrastructure such as bridges or barriers	Ensure they are adequate to prevent accidental entry to water. Inform the officer responsible for RAP of any significant change.	CG Infrastructure
Site inspections	Check that all signage and PRE is fit for purpose (see below). Inform officer responsible for RAP of any significant change to site conditions with implications for water safety.	CG Communities & CG Infrastructure
PRE inspections	Ensure all PRE is checked and any faulty or missing PRE is replaced within 2 working days (see below). Checks to be carried out weekly (April – Oct), monthly (Nov – March) in greenspace areas and daily in Tay Street/ Perth Bridge area.	Operations (grounds maintenance & street sweepers)
RAP	Risk assess sites and keep appropriate records.	CG Infrastructure

3 The Risk Assessment Process (RAP)

Actions identified to reduce risk (controls) must be identified within the context of the wider site character and its amenity value. Seasonal variations and access for emergency responders in case of an incident must be taken into account.

Prevention of drowning – the main factors recognised as contributing to accidental drowning are:

- ignorance, disregard or misjudgment of danger
- unrestricted access to hazard
- absence of adequate supervision
- inability of the person to save themselves or be rescued

In addition, it is known that some people, who enter the water deliberately due to extreme emotional distress or attempted suicide, want to be rescued and respond to rescue attempts.

The RAP can only partly address the above, off-site education regarding the risks of swimming or entering the water contributes to the first point, although on-site signage may be appropriate where risks are not obvious, or there is a known site issue.

The RAP aims to:

- assess the level and type of risk in relation to potential hazards
- identify how to reduce the level of risk where appropriate
- ensure actions (controls) are put in place within a reasonable timescale
- check controls are satisfactory

In relation to water safety particular considerations apply which include:

- The nature of the water - depth, flow rate or current, temperature and quality and the extent to which this can be seen from the bank
- The nature of the water's edge - proximity of deep water to the edge, the size of any drop from edge to the water, gradient of the bank, the accessibility to water from the edge, whether the edge may be slippery or likely to lead to slips, trips or falls
- Hinterland activities - numbers and ages of people likely to be near the water, whether people may be under the influence of alcohol or emotionally unstable
- Water based activity – water sports especially swimming

Controls may include:

- Designing paths, play areas away from water's edge
- Ensuring surfaces adjacent to the water's edge are secure (slips, trips, falls unlikely)
- Creating man-made barriers (fences etc.)
- Managing vegetation to ensure the water's edge is obvious (pruning and/or mown grass borders)
- Creating vegetated barriers to dissuade access to the water's edge
- Warning the public of hazards (on site WSS)
- Providing public rescue equipment (PRE)

3.1 Main water safety considerations – further information.

The risk assessor must take all relevant site characteristics into account to identify the level of risk and appropriate control. The formal banding guide referred to in the previous PKC guidance is no longer promoted by RoSPA so is not included within this RAP. Section 7 provides detailed guidance on appropriate controls based on site characteristics.

3.2 The nature of the water

Deep and/or moving water is generally more hazardous than shallower or still water. While a river in flood is an obvious hazard, during low water summer conditions it may appear relatively low risk to the public, however hazards are likely to include very cold water, uneven river bed with deeper pools and strong localised currents.

These water conditions may not be apparent from the bank and anyone entering the water to swim or wade, even if a competent swimmer, may experience cold body shock, or be swept away in strong currents and be unable to reach safety. For this reason WSS should be placed where there have been recurring instances of people entering the water.

In ponds algal blooms may develop at certain times of year and temporary warning signs may be appropriate to warn people to keep their dogs out of the water. In practice warning signs are only placed at ponds where there is no water movement if an algal bloom is reported.

3.3 The nature and accessibility of the water's edge

Where there is a steep or slippery slope, or drop to the water's edge, there is likely to be a higher risk of someone slipping or falling into the water and anyone entering the water may be unable to climb back out. More gentle gradients reduce the risk of anyone falling in but natural water edges (riverbanks etc.) are likely to be uneven and slippery in wet or cold weather and slips, trips or falls may occur. Controls such as separation through the use of fences where there are sheer or steep drops (1:1 or steeper), and establishment of long, uncut vegetation margins to dissuade access for lower gradients are likely to be required. Where edges are constructed (viewing platforms, pond borders, path surfaces) edges must be secure and obvious to minimise slips or trips. WSS will also be required where there is deep/fast water adjacent to a public facility (path or play area). WSS may be located at main site entrances, and additionally at the water's edge where a particularly hazardous area exists.

3.4 Hinterland activities

The numbers and types of people (ages, abilities) and the nature of the waterside attraction should be considered. If, for example, a popular path, play area or pub is close to the water, controls including barriers, particularly in urban areas, may be required. Mental health issues can lead to distressed people jumping into water as a 'cry for help', they may want to be rescued so provision of PRE where there are known issues, including around the Perth bridges, is valid.

3.5 Water based activities

Swimming in, or jumping into (tombstoning), deep and/ or fast flowing water is high risk and should be discouraged, particularly where there are known hot spots. WSS is required in these situations. Ice on water is an obvious hazard, however, on Council ponds, if there are known incidences of people venturing onto the ice, temporary warning signs are appropriate. Anglers on Council beats receive water safety guidance with their permits and are generally more familiar with the water. Those using public slipways for organised water sports are responsible for their own safety, but WSS and PRE is also required (and is provided) at slipways.

NB Organised events taking place on Council land must have event RAPs which should be checked as appropriate through the booking system (CG Communities section).

4 Council water safety control considerations

4.1 Edge protection

(Section 7.1 provides detailed guidance on appropriate controls based on site characteristics).

The design of public areas aims to increase public amenity while considering water safety. Paths, play areas, and other features attracting people should be routed or located away from the water's edge. Play areas should be at least 6m away from the edge and paths should be at least 2m from the edge. Where viewing platforms or other constructed edges facilitate direct access to the water's edge, secure edges and /or barriers may be required to reduce the risk of slips, trips and falls. Where paths are unsurfaced and are near to steep drops into water, particularly in countryside sites, localised path surfacing improvements may be appropriate to reduce the risk of slips. Constructed barriers include railings, fencing and walls. Existing barriers have been installed in accordance with water safety considerations. Where new barriers are required these should be appropriate to the site conditions (see table 7.1 for further guidance).

The management of vegetation at and near the water's edge is crucial to providing for water safety and can either facilitate or dissuade access to the water's edge.

Where direct access to the water's edge is considered integral to public amenity vegetation should be maintained to ensure the edge and water is obvious. This is appropriate where there are shallow gradients and still, shallow water, and where there is a relatively small area at the water's edge, usually at ponds. Pruning and removing of trees or shrubs which may obscure the edge and maintenance of a wide mown grass edge is required.

Where access to the water's edge is not considered essential and/or extensive natural water's edge exists, vegetation can be managed to create a wide margin of long growth (grass/weeds/shrubs) along the water's edge which dissuades people from access. Biannual cutting in autumn is required to maintain views over the water especially where there are viewing areas and seating.

Within ponds planting within the water is likely to discourage paddling or swimming and encourage wildlife.

Note that in some circumstances (as indicated below) WSS and/or PRE in addition to barriers may be required.

4.2 Water Safety Signage (WSS)

Council WSS, as shown below, is of a standard form and complies with all relevant legislation. It is designed to be highly visible and easy to understand, warns of specific dangers and aims to deter people from entering the water. It advises anyone witnessing an incident to phone 999, although this crucial advice is not immediately obvious.

The Perth & Kinross Water Safety Partnership (PKWSP) has recently replaced the above sign format by the sign format below. The advice to dial 999 is more obvious and for this reason these signs must be used where new signs are required. This sign also includes a space to enter the grid reference which must be accurately completed, the ability to quote an accurate location to emergency services may be crucial to a successful rescue.

WSS should be placed in all relevant greenspace areas, including countryside sites where water safety risks exist. To date warning signage at countryside sites is general and is located at main access only, an example is shown below.

Location of WSS

(Refer to section 7.2 for detailed guidance)

All WSS must be located to be highly visible to site users. Where possible locate WSS at main site access points. Where existing threshold signs exist, WSS signs should be located alongside them. All new threshold (welcome) signs should incorporate WSS if required for the site. Where there are no obvious site access points, WSS can be located at the water's edge, ideally at viewpoints or other key obvious locations. Additional WSS at the water's edge can be used to reinforce those at main access points if required due to the presence of deep/fast water immediately adjacent to a public facility (play area, path), or an area where there is a known and recurring entry to the water. A minimum number of signs should be used and they should be fixed to existing posts or structures to avoid unsightly clutter.

4.3 Public rescue equipment (PRE)

PRE comes as throw lines or lifebelts and both are difficult to use effectively and may distract witnesses from the need to contact emergency services immediately, which must be their first priority. As such, PRE must only be placed at slipways and where there is a known recurring issue with people entering the water. PRE must be located to be highly visible, where it can be used effectively, can be inspected easily and, ideally, where it is overlooked by nearby properties so that it will be less prone to tampering. In most cases this will be next to the water's edge. If PRE is repeatedly vandalised this may be removed and replaced with WSS.

Throw lines are the most common PRE and are designed to be thrown from water level over a distance (up to 25 m line provided) across the water. Lifebelts can only effectively be dropped from a height or thrown a short distance. They are an appropriate choice near high bridges and there are currently two in place on Tay Street near Perth Bridge. Where visual amenity is a significant factor, for example the viewing promontory on Tay Street, and there are no instances of people entering the water here, the PRE should be relocated.

PRE should be accompanied by WSS (within the site). Where PRE and WSS are both located at the waterside, WSS and PRE should be mounted on the same pole, or other fixing, to be most effective and minimise clutter.

4.4 Monitoring of RAP

It is important to monitor the effectiveness of controls and revise them in the light of issues raised or reported incidents. This information will usually be provided through scheduled site inspections or public reporting.

5 Site and PRE Inspections

Site and PRE monitoring inspections are carried out by those who are on site most frequently to carry out a variety of site management functions. Site inspections are carried out by Community Greenspace officers (Rangers) and PRE inspections are undertaken by the Operations squads.

5.1 Community Greenspace Rangers monitor sites at a frequency given within the inspection schedule. Most sites involving water safety considerations are inspected on a six monthly basis. Faults are recorded on the database, and any necessary work schedule to remedy faults such as repairs to barriers or path surfacing is created. In all cases priority should be given to these actions.

Checks required and possible actions arising from site inspections:

- Barriers, edges & surfaces - check to ensure they remain structurally sound. Create work programme to remedy any issues, place temporary notice/barrier to restrict access if required
- Path surfaces – check for slip hazards where there are steep drops next to the path. Create work programme or volunteer task to remedy any issues
- Signs - dirty or obscured by vegetation. Clean/clear as required
- PRE - missing or faulty require to be reported to Operations for replacement
- Any significant natural changes to the site relevant to water safety need to be reported to the officer responsible for the site RAP (includes erosion of water's edge, obvious desire lines leading to water's edge)

5.2 Operations inspect all PRE within:

- Tay Street and the area of the bridges in Perth daily
- Greenspace areas on a weekly basis between April and October and monthly between November and March

Spare PRE should be carried in the vehicle so that any damaged or missing PRE can be immediately replaced. A record of inspections must be kept and include locations and dates of all repairs and replacements of PRE. Further stocks of PRE can be ordered through CG Infrastructure.

Checks required with possible actions arising from PRE checking

- Check all PRE casing with lid is in place with markings to standard
- Check all PRE contents of casings are in place – throw-lines & life belts
- Replace any missing or faulty PRE

The images below show new PRE –throw line casing with instructions for use, bagged throw line, lifebelt casing with instructions for use and life belt with rope attached.




6 RAP responsibilities

The CG officer who carries out the risk assessment is responsible for the RAP for the site so needs to be kept informed of any changes to site conditions and any problems with PRE. Appropriate decisions regarding how best to provide for water safety on Council sites can only be made with knowledge of all relevant information. The CG Infrastructure Coordinator will also ensure any re-orders of PRE are made and keep a record of numbers used.

Key decisions will include:

- Where a significant change to the site has been noted – reassess the site within 1 month and change site controls if required
- Where a water safety incident has been reported – reassess the site within 5 working days and change site controls if required
- Where a PRE is repeatedly vandalised or stolen – consider removing and replacing with a sign or other control measure

6.1 Keeping records

- An electronic file for all water safety RAP information will be maintained and available to all relevant officers. This will include:
- Site risk assessments – clearly labelled with site and date assessed. Should include map based location of all barriers, WSS & PRE & photo records of same.
    - All relevant information from site inspections will be stored here
    - Periods for temporary signs will be recorded
    - PKC wide to include:
    - Master sheet of dates of all site RAPS & record of controls per site, including temporary signs
    - Number of PRE ordered and locations and dates of vandalised PRE
    - Key contacts details e.g. *PKWSG

NB Key contacts: Keep contact details of relevant water safety groups including *Perth & Kinross Water Safety Group (PKWSP).

NB Temporary signs: Placement and removal of temporary warning signs in relation to toxic water (algal blooms) and ice are used only at ponds where there is still water and no through flow (Scone, Norrie Millar & South Inch ponds). Ice warning signs are erected for the winter season (Nov-March). Toxic water warning signs are erected if requested by TES Environmental Health, or following enquiries from the public.

7 Guidance based on Site Characteristics

This section provides flow diagrams with accompanying tables to help the risk assessor identify the most appropriate way to reduce the level of risk in relation to water safety based on the characteristics of the site. The proximity of the public facility such as a play area or path to the water's edge is the main consideration.
The boxes on the flow charts which help characterise the site are numbered, and correspond to the reference number on the accompanying table.

Fig 7.1 Guide to Appropriate RAP Controls based on Site Characteristics (diagram and accompanying table). The diagram provides a quick check of critical features at the water's edge in relation to public facilities and shows the control indicated. The table explains the site characteristics with examples and the appropriate controls.

Fig 7.2 Guide to Appropriate Locations for WSS and PRE (diagram and accompanying table). The diagram provides a quick check of site characteristics to indicate where to place any WSS and PRE which is indicated for the site. The table provides further information.

7.1 Guide to Appropriate RAP Controls based on Site Characteristics (see table 7.1

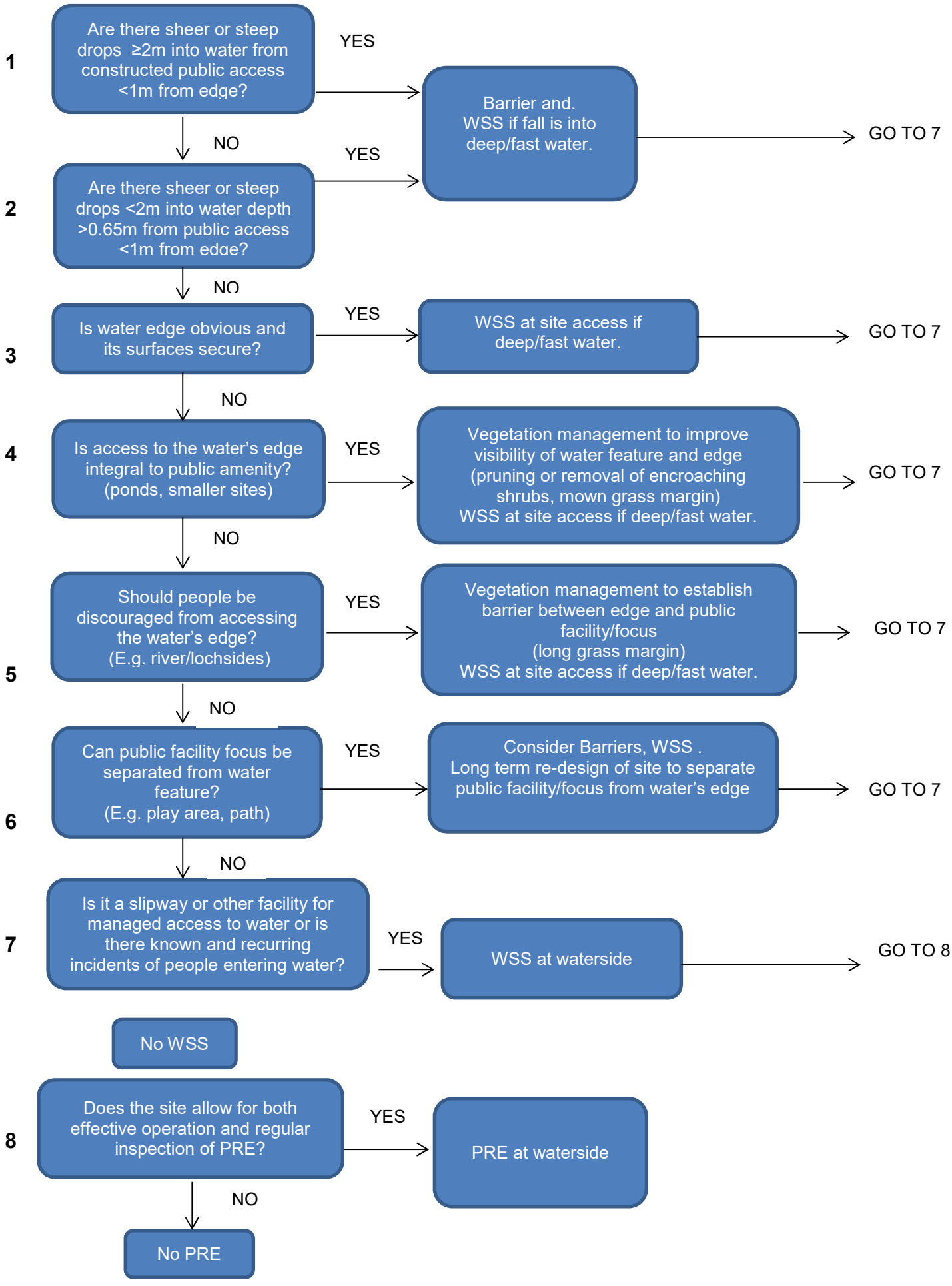


Table 7.1 Guide to Appropriate RAP Controls based on Site Characteristics (table 7.1 refers to diagram 7.1)

This table provides further information on the flow diagram which identifies the appropriate controls based on site characteristics. The table provides detail on the circumstances where each control is most appropriate and includes examples of sites where each control response has been applied.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
1	Sheer and very steep (60 degrees or more) potential falls into water from a height of 2m or greater. Constructed Features which promote access to the water edge such as viewing platforms and paths which are adjacent (<1m distance) to the edge. Examples include: sections of Perth lade footways, viewing platforms in parks & countryside sites (e.g. North Inch, Norrie Millar Pond, Dunkeld Riverside car park, Birks of Aberfeldy, Black Spout, Pitlochry).	**Surfacing and edges:** Constructed waterside surfaces and edging should be secure with no trips. However, it is appropriate to differentiate between formal settings within towns and villages and informal countryside paths, particularly where they access steep sites such as within the Birks of Aberfeldy. Here the nature of the site and terrain is likely to result in a degree of uneven surfaces and informal stone steps (without consistent risers). **Barriers:** **Protective Barriers** (normally a rigid construction of timber or metal) To be provided to prevent falls into water of 2m or greater from constructed access features such as viewpoints. Barriers should be attractive and/or discreet and in character with the location, robust and low maintenance. Note that they often double up as 'leaning' points for people to appreciate the landscape and view. Walls should be designed to discourage sitting on them, or walking along them	**RoSPA key guidance:** The water edge should be secure & obvious with a gentle gradient. Or there should be fencing/barriers to deter/prevent access to water. Where the risk is high, fencing can be used. However, it should be noted that this is an expensive option which needs careful consideration. **Council Policy:** The Council will continue to consider installing new barriers in relation to water safety only in circumstances indicated by the RAP being where there is a sheer or steep drop (60 degrees or more) into water from an adjacent (within 1m) public facility. Designs which are appropriate to the risk and site character and are low maintenance will be used.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
	Informal rural paths. In rural locations due consideration should be given to the character of the site and that it is reasonable for the public to anticipate a lesser measure of control and a greater level of informality within rural areas. Here the WSS signs at site entrances are considered important to promote public awareness, care and responsibility. Examples include: Rumbling Bridge Gorge, Falls of Acharn. Black Spout, Pitlochry. .	**Fence** (usually post and wire) Where the potential fall into water is from an informal rural path a simple post and wire fence may be sufficient to stop people getting too near the edge. In some situations barriers may not be required depending on site conditions. In rural locations it is appropriate to consider the terrain and potential barriers / fencing together. For example, an unavoidably steep and winding section of path, possibly also with informal steps, located within 1 m of the path edge at height (>2m) into deep or fast flowing water, is more likely to require a fence or barrier. In countryside sites fewer barriers are provided where there are steep drops near to paths. Localised path improvements may be more appropriate such as improved drainage to minimise erosion and/or informal steps. It is also appropriate to consider other functions of a fence or barrier such as providing an informal handrail to aid access for the less mobile or leaning point if there is a viewpoint. NB Existing barriers have been installed in accordance with water safety considerations and should be sufficient.	**PKC previous practice where it may differ from Policy:** Appropriately designed barriers are generally in place where there are sheer drops from viewing areas, bridges and pathways. Barriers are frequently in place where there are very steep drops near to pathways. This guidance provides both a gradient of steepness and a distance from a public facility such as a path to increase consistency. NB An issue has been raised with the Council previously regarding a section within Norrie Millar Riverside Park (near the pond) where there is no barrier to prevent a sheer drop of over 2m to the river. Substantial barrier exists over most areas where the path comes near to the river's edge. Where there is no barrier the constructed path is set well back from the edge (3m) and the area between the path and edge is largely level. A wide margin of unmown grass has been established to dissuade access to the edge. The assessors view is that the risk is obvious to users, they are remote from the edge and amenity of the site and unique views across to the Town would be compromised by the erection of a barrier.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
		Water Safety signage (WSS): To be provided only as part of welcome site signage at main access points. May be provided at focal points such as viewpoints where there are many accesses or where the risk is significant. All signs must adhere to the approved format and locations (see 4.4 & 7.2) Please also see 7 below. **Public rescue equipment (PRE):** Not usually required on the basis that the barrier minimises accidental entry to water. Please also see 8 below. Note also in relation to WSS & PRE: Constructed public facilities can be a focal point for the site (e.g. viewing platforms) so may be the best available location for any WSS or PRE indicated for the wider site.	(see 7 & 8 below for Policies relating to placement of WSS & PRE)

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
2	As above in 1 but with sheer or steep drops of less than 2m into water of a depth of 0.65m or more and/or is fast flowing from a constructed public facility such as viewing platform or footway/path. Examples sheer drops: Low viewing areas. Examples steep drops: short sections of paths in parks or countryside settings	The appropriate RAP response is as in **1 above**, the only exception is in the consideration of potential protective barriers or fence as described in the situations above, which would only be appropriate here where the edge is not obvious and where the water depth is 0.65m or above and/or is fast flowing. Note that rain can substantially increase the depth of the water to more than 0.65m and increase the flow speed.	as 1 above
3	The water's edge is obvious and its surfaces are secure. Water edges are obvious and can be easily seen from the wider area (3m). There are no hidden dangers at the water's edge and accidental falls into water are unlikely.	**Surfacing and edges:** Where the surfacing at the edge is constructed to prevent slips and trips. **Design of ponds:** Where ponds are constructed or redesigned edges must be secure and/or have gentle gradients. Water depth should be shallow at the edge and should not exceed 0.65m so that anyone accidentally entering the water can easily stand up and climb out. Planting and growth of appropriate water plants should be encouraged to discourage access and encourage biodiversity.	**RoSPA key guidance:** The water edge should be secure and obvious with a gentle gradient. Shallow water (less than 0.66m) should extend a minimum of 2m from the water edge with a 1:3 gradient. With depths from 0.65 -1.36m a margin of 1.75m should be maintained from edge with gradient of 1:2.5. Planting as an alternative to grading where a steep gradient or shallow gradient (swimming temptation) exists, the planting of vegetation can act as a deterrent.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
	Usually designed pond areas with managed edges. Examples: South Inch & Norrie Millar Ponds.	**Water Safety signage (WSS):** Not usually required at ponds. To be provided where there is deep and/or fast flowing water adjacent to a public facility usually only as part of welcome site signage at main access points. Please also see 7 below. Temporary signage may be required to warn of toxic water such as blue green algae, or ice. This will only occur in ponds where there is low or no water flow. (i.e. Norrie Millar Pond, Scone & South Inch Ponds). **Public rescue equipment (PRE):** Not required. Please also see 8 below.	**Council Policies:** The Council will: • Continue to ensure water safety is a key consideration in relation to design of ponds and other water features. Ponds will have secure edges with gentle gradients. Water will be shallow (0.65m or less), particularly at edges and water plants will be established to dissuade entry to the water and encourage biodiversity. • Continue to place temporary signs when required at pond locations where there is no water flow to warn people of the risk of toxic water and ice. **PKC previous practice where it may differ from Policy:** (See 6 for design of public places) The SUDS pond on the North Inch is managed to create an obvious vegetated barrier around the pond to discourage access to the edge while allowing views into the pond area. Water plants flourish within the pond, it appears to be a wildlife pond and it is not likely that anyone would enter the water (PRE is provided but there is no WSS).

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
			WSS & PRE – currently there is some inconsistency with WSS being in place at South Inch and Norrie Millar Ponds but not at other ponds such as Beatrix Potter Pond. PRE – Throwlines are currently provided at Norrie Millar Pond and the North Inch SUDS pond but not at other ponds. It is recommended that WSS and PRE is not usually required at ponds. (See 7 for appropriate locations of WSS & PRE)

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
4	Access to water's edge is considered integral to public amenity and is possible over a restricted area. Water edges and/or water feature may not be obvious from the public facility focus and wider area (3m). There may be hidden dangers at the edge, so trips and slips may be possible. Includes ponds in naturalised environments and some areas of natural water edges (river/loch banks). Examples of sites where this management has been applied: Beatrix Potter Pond, Loch Leven waterside within Kirkgate Park.	**Surfacing and edges:** Where the surfacing at the edge is constructed this must be secure with no trips. A gentle gradient into the water is preferable although not always possible. **Vegetation management:** If there is any hidden danger from the water feature and/or its edges being not obvious consider whether a different maintenance objective and/or a re-design of the area can remedy this (see options 4, 5 & 6). In sites where access to the water's edge is facilitated within a small area as an integral feature for public amenity the vegetation should be managed to ensure the edge and water feature is obvious and minimise the risk of accidental entry to water. This may be achieved through pruning or removal of obscuring trees or shrubs and/or maintaining a wide (3m or more) short mown grass margin around the water feature. This would include natural shallow beach areas. **Water Safety Signage (WSS):** To be provided where there is deep and/or fast flowing water adjacent to a public facility usually only as part of welcome site signage at main access points. Please also see 7 below. **Public rescue equipment (PRE):** Not required. Please also see 8 below.	**RoSPA key guidance:** The water edge should be secure and obvious with a gentle gradient. **Council Policy**: Where access to the water's edge is considered integral to the amenity of the site, the Council will continue to manage water edge vegetation to ensure the edge is obvious, for example at ponds. This can be achieved by pruning or removal of obscuring trees or shrubs and/or the maintenance of a wide mown grass border. **PKC previous practice where it may differ from Policy:** This form of management is used at ponds to ensure the edges remain obvious. In some cases this approach is used for only part of the pond edge where access is facilitated. For example, at Beatrix Potter Pond there is a viewing platform from the path while the remainder of the pond's edge is inaccessible due to shrubs.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
5	People should be dissuaded from accessing the water's edge. Water edges and/or water feature may not be obvious from the public facility focus and wider area (3m). There may be hidden dangers at the edge, so trips and slips may be possible. Access to the water's edge is not provided as integral to public amenity. A river or loch contributes to the amenity and enjoyment of a site but may be appreciated from a greater distance; and people should be dissuaded from accessing the water's edge. Access to the water's edge is therefore not encouraged or formalised (although the water feature remains a key feature for public	**Vegetation management:** The public should be discouraged from accessing the water's edge through the establishment and maintenance of a wide (3m or more) vegetated barrier of long grass/weeds and shrubs along the water's edge. Views should be maintained, particularly from seats and other viewpoints, through the periodic pruning or removal of large trees & shrubs. **Water Safety Signage (WSS):** To be provided where there is deep and/or fast flowing water adjacent to a public facility, usually only as part of welcome site signage at main access points. May also be required at waterside locations if evidence shows that people are taking regular access to particular places where there is deep or fast water close to the edge. Please also see 7 below. **Public rescue equipment (PRE):** Not required. Please also see 8 below.	**RoSPA key guidance:** The water edge should be secure and obvious with a gentle gradient. Or there should be a vegetative barrier to deter access to the water's edge. **Council Policy:** The Council will, where access to the water's edge is not considered integral to the amenity of the site, continue to manage water edge vegetation to discourage access, for example to separate a path from a natural riverbank. This can be achieved by the maintenance of a wide uncut margin of natural vegetation between the public facility and the water's edge **PKC previous practice where it may differ from Policy:** This form of management has been widely used along natural riversides where the river and banks are largely obvious but in places, or during poor weather, the edge may become less obvious, become slippery or be subject to erosion or partial flooding. WSS & PRE - currently there is some inconsistency with WSS provided at main accesses to Dunkeld Riverside Park but not at Blairgowrie Riverside Park. PRE is provided within the North

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
	amenity within the site). Usually natural riverbanks. Examples of sites where this management has been applied: SUDS pond North Inch, Blairgowrie and Dunkeld Riverside Parks, cycle path along the river Tay within the North Inch and extending to Almond mouth.		Inch but not in Blairgowrie or Dunkeld riverside parks. (See 7 for appropriate locations of WSS & PRE)

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
6	Where space allows the public facility focus (play area, path) should be moved away from the edge of any deep or fast flowing water. Edges to deep or fast flowing water may not be obvious from the public facility focus and wider area (3m). There may be hidden dangers at the edge, so trips and slips may be possible. Examples: There are no current examples. This standard should be applied when creating or refurbishing play areas.	**Redesign**: Where there is a public facility attraction such as a play area or path close to the water's edge (where there is deep/fast water) and where there is adequate space to move the public facility, such as a play area or path further from the water, this should be considered as a long term option. Play areas should be at least 6m and paths should be at least 2m from the water's edge. Play areas are within both Dunkeld and Blairgowrie Riverside Parks but have been placed as far from the water's edge as possible, being at least 6m away from the edge. In both cases access to the edge has been discouraged by establishing long vegetated margins along the riverbank. **Barriers:** To be provided where safe distances can't be met. **Water Safety Signage (WSS):** To be provided where there is deep or fast flowing water adjacent to the edge from a public facility as part of welcome site signage at main access points, and at the water's edge (until redesign only). Please also see 7 below. **Public rescue equipment (PRE):** Not required. Please also see 8 below.	**RoSPA key guidance:** Pathways should be designed away from the water edge to create a distance of vegetation between. Where a high risk is identified the path can lead visitors away from the water. **Council Policy:** The Council will continue to ensure design of public places, and in particular play areas, which are near to water bodies take water safety considerations into account. Where play areas and/or paths are located near deep and/or fast water a minimum separation margin, of 6m for play areas and 2m for paths, from the water's edge will be ensured.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
7	Slipways and other facilities for managed access to water. Areas where there are known and recurring incidences of people entering deep or fast flowing water for recreation or for self-harm. Examples: Perth slipways, Perth Bridges, Woody and Moncrieff Islands.	**Water Safety signage (WSS):** To be provided. **Public rescue equipment (PRE):** To be provided at slipways. Please also see 8 below. For appropriate location of WSS & PRE see diagram 2 and table 2.	**RoSPA key guidance:** Signage is particularly important to improve awareness of danger and hazards. All signage should be located as guided by the RAP and designed, placed and maintained to be highly visible. WSS should be placed with all (PRE). WSS should include emergency contact details and request that any incidents or faults should be reported to the Council. Local water sports bodies have responsibility for their own activities. However, site owners still have responsibility to ensure basic health and safety standards are attained. **Council Policy:** (see table 2 for Policy regarding locations of WSS) The Council will: • continue to place WSS in locations indicated by the RAP, being: o at slipways (facilities for managed access to water) o where deep and/or fast flowing water is adjacent to a public facility

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
			○ where there are known and recurring incidents of entry to water • Now consider removing signage at locations where the hazard is obvious and the risk is low, for example at ponds. • Continue to provide anglers using Council fishing beats with water safety guidance when applying for a permit. **PKC previous practice where it may differ from Policy:** WSS & PRE are currently provided in Perth at slipways, at various locations on Tay Street and on the bridges, and near to Woody and Moncrieff Island in response to incidents of deliberate entry to water. WSS is provided at some ponds but not at others. This Policy will encourage a consistent approach to use of WSS.

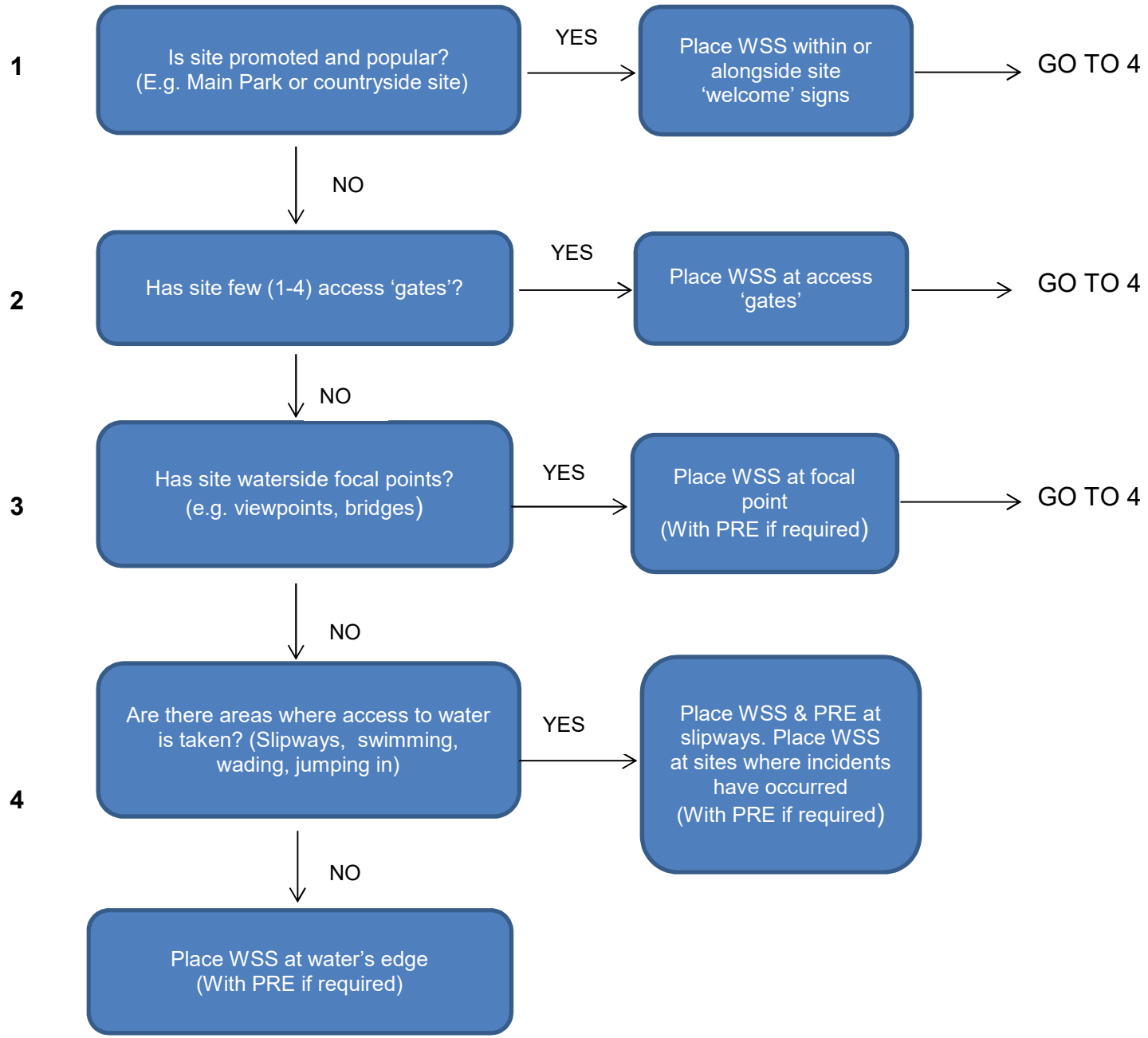
Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
8	Sites where both effective operation and regular inspection of PRE is possible and where PRE is otherwise indicated. Examples: Woody and Moncrieff Islands, Perth Bridges area. Kirkgate Park, Kinross.	**Public Rescue Equipment (PRE):** To be provided where PRE can be both used effectively and inspected on a regular basis and where there are known and recurring incidents of deliberate entry to water. PRE should be provided only where it is likely to reach a conscious casualty so will **not** be provided where: • High falls are likely to be fatal and rescuers are likely to put themselves in danger to operate PRE (e.g. countryside gorges) • Fast flowing water will carry casualty rapidly out of range of PRE • Regular (weekly) inspections of PRE is not practical due to remote location. If PRE is repeatedly vandalised making effective operation impossible, first consider an alternative location for the PRE where it is overlooked so will be less liable to vandalism. If this is not a feasible option replace the PRE with WSS and consider whether any further actions are required in relation to the particular site specific circumstances.	**RoSPA key guidance:** PRE is only useful as part of a drowning prevention strategy and is not a key risk control measure itself. The provision of PRE will need to be identified through the RAP and location will reflect points of access. Lifebelts are designed to be dropped into water from a steep bank. Throw lines are designed to be thrown on the same level e.g. from a riverbank. PRE should be checked and results recorded weekly at well used locations in summer. If PRE needs regular replacement due to vandalism, location and alternative safety method should be considered. **Council Policy:** The Council will: ○ continue to place PRE at locations as informed by the RAP being where: ○ there are known and recurring instances of deliberate entry to water ○ they are highly visible ○ they can be used effectively ○ they can be regularly inspected and maintained

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
			○ Continue to ensure all PRE is clearly marked with instructions on use and that WSS is provided nearby. ○ Now remove PRE which is repeatedly vandalised and consider relocation or replacement with WSS. ○ Now consider removal or relocation of existing PRE within sites with multiple PRE to ensure the most effective and sustainable placement of PRE. ○ Now inspect all Council PRE on Greenspace sites once a week between April and October and monthly between November and March, record any defects and replace with functional PRE within 2 working days. ○ Continue to inspect PRE on Tay Street daily throughout the year, record any defects and replace with functional PRE within 2 working days.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
			PKC previous practice where it may differ from Policy: PRE are currently provided at all the slipways in Perth and at various locations on Tay Street and around the bridges, and near to Woody and Moncrieff Island in response to incidents of deliberate entry to water. Throwlines have assisted in rescues in the Perth bridge area; however, the number of throwlines on Tay Street should be reduced and positioned at bridges, viewpoints and slipways only. One of the existing lifebelts (adjacent to Canal St) should be repositioned to be more available at the bridges from where they can be dropped. Within Kirkgate Park there are PRE (throwlines) spaced along the water's edge. These should be reduced in number and sited with WSS at main access points to the Loch Leven Trail within the park only. The numbers of replacement PRE ordered indicate that there are persistent issues with theft / vandalism in some locations.

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and PKC previous practice.
			The Policy will encourage the most effective placing of PRE and avoids overprovision, or placement of PRE where it may be ineffective, put rescuers in danger, encourage a false sense of security, or where it cannot be adequately inspected and maintained.

7.2 Guide to Appropriate Locations for Water Safety Signs (WSS) and Public Rescue Equipment (PRE) (see table 7.2)



Number and location of WSS & PRE:

Should be located to be highly visible. In most circumstances a few well-placed WSS or PRE should be adequate per site.
WSS should be located at main access points where possible. Where incidents of entry to the water are known additional WSS may also be appropriate at these locations. Where no obvious entry point can be identified the most visible waterside location should be used.

PRE should always be accompanied by WSS within the site. Where both WSS and PRE are located at the water' edge these should be mounted on the same pole. PRE should always be located at the water's edge either at focal points, or at the most visible location at, or close to, areas used for access to water.

If PRE is repeatedly vandalised this should be moved to an alternative more overlooked location. If this is not possible or vandalism persists it should be removed and replaced with WSS.

Table 7.2 Guide to Appropriate Locations for Water Safety Signs (WSS) and Public Rescue Equipment (PRE) (table 7.2 refers to diagram 7.2)

This table provides further information on the flow diagram which identifies the appropriate locations for WSS and PRE based on site characteristics. Diagram 1 and Table 1 clarifies where WSS and PRE are indicated.

1	Is the site promoted and popular? For example a main park or countryside site.	WSS should be positioned at main site accesses to ensure that most site users see it. Where threshold (welcome) signs exist WSS should be positioned beside these signs. Where new threshold signs are planned WSS should be incorporated into this signage with appropriate site specific advice. In all cases WSS should comply with the National Water Safety Signage Standard. Please also see 4 below.	RoSPA key guidance: Signage is particularly important to improve awareness of danger and hazards. All signage should be located as guided by the RAP and designed, placed and maintained to be highly visible. WSS should be placed with all (PRE). Three types of signs should be considered being: 1. Access signs – map at site entrance to explain risks and features of site, location of PRE and what to do in an emergency. 2. Sign at key locations – at risk area highly visible to warn of specific risk and what to do in an emergency 3. Nag signs – smaller to repeat key message. Council Policies: The Council will place and maintain WSS to ensure they are highly visible to most site users. A minimum number of WSS will be used tomaintain the wider public amenity value of the area and avoid clutter. WSS will be located at main site entrances where possible, or at site
2	Has the site few (1-4) access 'gates'?	WSS should be positioned at main site accesses to ensure that most site users see it. Where a site has a low number of main accesses WSS can be positioned at each access.	
3	Has the site got waterside focal points? For example viewpoints, bridges or slipways.	Where there are many or no specific accesses to a site it is more feasible to position WSS at any waterside focal point to ensure that most site users see it. Where a viewpoint or bridge is present these may provide good focal points. If PRE is required at the site position both WSS and PRE at the same waterside location and using the same mounting if possible.	
4	Are there areas where access to water is known to be taken?	Place WSS (with PRE if required) at the most obvious location by the waterside where access to the water is known to occur.	

		Where indicated by the RAP, this may be in addition to WSS at the main site access.	focal points, and/or by the waterside. PKC previous practice where it may differ from Policy: WSS are also provided (as noted above) at viewpoints and some path junctions on the N Inch. In other settlements WSS are positioned at key access points where paths and parks are near to deep/fast water. This Policy will ensure WSS are positioned in a more consistent manner, generally at site access points in all relevant areas including within countryside sites.
5	If none of the above apply	Place WSS at the water's edge in the most visible location available.	