

HM Naval Base Clyde

Health & Safety

Annual Report

Progressing Positive, Pro-active Safety Culture

During 2009/10 we made good progress in realising our Health and Safety objectives, which were built on previous learning and improvement, and continued towards our ambition of ensuring that every person entering HMNB Clyde goes 'home safe, every day'.

- Our processes and procedures continued to be sharpened to reflect best practice.
- All areas now have robust, maturing Health and Safety improvement plans and we continue to challenge so that there is no place for complacency.
- We put a special focus on Alcohol and Drugs through a tailored wellbeing programme.
- We continued to invest in developing 'Leaders of Safety' through our IIF Programme which is the backbone of our behavioural approach to safety.
- We encouraged one of the most comprehensive independent Peer reviews ever conducted at HMNB Clyde. A group of specialists from other sectors of the nuclear industry and representatives of regulatory organisations were invited to assess our organisation and arrangements against their best practice and learning. Their report was positive and we are taking forward suggestions on further improving our safety performance.
- To reach audiences internally and externally, we organised or took part in events such as exhibitions and Roadshows demonstrating our commitment to a positive safety culture.

During the year under review, we finalised our new Safety Strategy which sets out our long term objectives on Safety, Environment, Nuclear and Social practices that should be expected of the Base. For 2011/12 our objectives will be prioritised to ensure the highest of standards in improvement measures.

HMNB Clyde is to become the Submarine Centre of Specialisation. This will result in a greater focus on Fleet Time Operational activities. We are committed to ensuring that a positive and proactive safety culture is integral to the operational capabilities that will sustain this increased status of HMNB Clyde.

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1. Introduction

HMNB Clyde is continuing to drive an ambitious programme of improving safety. Our Challenge on Safety is shaping a uniform culture, embracing everyone who lives, works or visits here and has resulted in significant improvements in safety performance.

Every objective, task or initiative is required to be sustainable and reflect our commitment to safety to meet our aspiration for an incident and injury-free Base. Our safety initiatives include

- Capability Clyde, a competency framework
- Single Event Reporting/Recording
- REDF (Radioactive Effluent Disposal Facility) life extension
- SHEF Website
- Point of Work process
- NARO (Nuclear Accident Response Organisation) response improvement
- Environmental drive (a 'Kazan' approach with defined Safety Performance Indicators).

Throughout the year under review, our Incident & Injury Free® (IIF®) Programme engaged 4000 MoD/RN Base personnel, FASFL0T (Faslane Flotilla) and Babcock employees in 'Orientation' Workshops. More than 150 Supervisors/Team Leaders attended special Skills Workshops. We started Leaders of Safety the second Phase of our IIF® Programme, 85 people were enrolled and a further 300 proactively engaged in supporting a programme which empowers local teams and encourages individuals to take ownership of safety in their work areas.

Overall we had another successful year in which accidents reduced by 9%. A measure of cultural change was a 74% increase in the number of near-accidents reported, demonstrating that our people are more alert to hazards and aware of their surroundings and have engaged in our 'positive' reporting culture. Our challenge for 2010/11 is to build on this success.

1.1 Performance against Objectives and Targets (2009/2010)

Requirements

Develop Heads of Departments (HoD) Safety Improvement Plans

All HoDs have tailored Safety Improvement Plans reflecting the risks in their areas of the business.

Establish a Just Culture

A Just Culture seeks to encourage people to report errors and incidents and gives clear guidance on the line between acceptable and unacceptable behaviour. We are working with the Trade Unions to introduce this in 2010/11.

Complete/Establish Directorate IIF® Safety Leadership Teams

This progressed extremely well. Most Directorates now have IIF® Safety Leadership Teams championing the IIF® cultural changes. These teams, mainly shop floor workers, are key to dealing with issues raised by peers and are supported by local management, the IIF® Leadership Team and the Divisional SHEF Committees.

Learning and Development

Deliver an IIF® Roadshow

An event involving the IIF® team provided the platform for an even more ambitious Roadshow in the year ahead. A Joint Safety and IIF® team was formed to plan and stage a Roadshow with more drama events, workshops and safety exhibitors.

Produce and Implement an Induction programme for Base employees

Complete

Update VCIC Computer Based Training (CBT) package

Complete

Develop and Implement SHEF Training Strategy

From mid 2010-2011, following extensive benchmarking of comparable industries, British Safety Council Stage 1 training is being provided in-house for Industrial staff, Administrators and Specialists. IOSH-Managing Safety will be provided for all employees who manage people.

All Trade Union Safety Representatives to spend a week in Safety Department

A programme of visits was scheduled from September, 2010. All workstations are being fully used, eg internship and with graduates on departmental rotation.

Combined Nuclear & Conventional Safety Culture

Establish a Site Control Office

This has progressed well and will 'go live' mid 2010/11 when everyone arriving at the Naval Base will be required to attend induction training. There will be a facility where contractors will be monitored to enable information to be provided on a daily basis as to which contractor's onsite, where working, work being carried out and details of sponsor.

Review and Improve Safety Performance Indicators (SPIs)

We are continuing to review SPIs to remove unnecessary statistical data and to build in more 'Leading Indicators', especially for process safety.

Communication

Launch Time Out For Safety (TOFS)

Considerable effort has gone into benchmarking other industries. It is recognised that to be meaningful and have a positive impact on cultural change, printed material has to be pertinent to those receiving it. Before launching across the Base, a pilot will be introduced in the Fleet and Nuclear Activities departments.

Update SHEF video

Complete

Produce an in-house Lessons Learned video

A video entitled Duncan's Story has been produced. This recounts the experiences of an HMNB Clyde employee injured at home and temporarily blinded in one eye. The video will be used in Phase 2 of the IIF® Programme.

Process Initiatives

Control of Contractors Phase 2, review and improve vendor assessment process for Babcock and MoD

Simpler forms produced by the procurement team were reviewed by the safety & environmental department which also participated in a working group to improve the vendor assessment process. As a result, the Clyde Code of Practice for Contractors has been reviewed and amended for publication/re-issue during 2010/11.

Complete rollout of CoSHH Management Programme

Complete

Continue to improve reporting of near misses

In line with our principle of commitment to preventing accidents, the success of the near miss initiative has been crucial in our commitment to becoming incident and injury free. Throughout the year special campaigns promoted near miss reporting, including a hotline number emblazoned on buses. This campaign will be refreshed and maintained.

Review of the provision and selection of PPE
Ongoing

Launch Alcohol and Drug policy

Considerable progress has been made in developing this policy in conjunction with Occupational Health, HR and the Trade Unions. Prior to launch, agreement is being sought on random testing. Benchmarking with like industries has re-enforced the view that random alcohol and drug testing is a positive step in protecting both workforce and individual. Key to the policy is the support available to employees who feel they may have a problem with alcohol and/or drugs.

Behavioural Safety

Launch a Recognition and Reward Scheme

The IIF® Leadership Team and representatives of departmental IIF® Teams have prepared a 'Reward and Recognition Toolkit' for endorsement by the Joint Base Board.

Develop 2nd Phase Orientation Training

The Phase 1 IIF® Orientation training programme started two years ago has engaged more than 3000 Base employees, Royal Navy and Lodgers. To support and work in parallel with Phase 2, training the Leaders in Safety programme was started. A Phase 2 IIF® Orientation training package is being developed to be delivered by in-house trainers. The intention is to encourage shop floor employees to become trainers.

Environmental

Implement the MoD requirements for Sustainability Appraisals of projects

A project was undertaken to establish the work involved in carrying out a sustainable appraisal and the circumstances that would require a full appraisal. The completed report was passed to Projects for implementation.

Capture the total carbon footprint for HMNB Clyde, including electricity.

Currently, only the CO₂ from gas and oil use is recorded as part of the EU Emission Trading Scheme. An energy programme is under way to determine the carbon footprint of the Base.

Implement action plan for compliance to the Water Environment (Oil Storage)(Scotland) Regulations 2006

An independent survey identified the actions required to meet all legislative requirements and these are now part of an implementation plan.

Develop the reporting required for the Carbon Reduction Commitment (CRC)

Captain, Base Safety provided guidelines for CRC reporting. Estates Director Clyde will continue to send energy figures to MoD for the calculation of carbon usage.

Organise annual Energy and Environmental Awareness week

A successful Energy and Environment week, covering Faslane and Coulport, was well attended. External exhibitors included Toyota, The Carbon Trust, The Energy Saving Trust, Wm Tracey Ltd, Veolia Water and the Forestry Commission.

1.2 CoSHH Management System

During 2009/10 the Clyde CoSHH Management System was developed to operate via the internet. New user-friendly work areas have been developed, new users and passwords set up to allow read-only and full read and write access for each department. These have been introduced through departmental SHEF meetings. The new internet-based CoSHH Management System is available to all Team Leaders at Faslane and Coulport via a link on the Health and Safety Department Website.

1.3 Health and Safety Exhibition

A Safety Exhibition staged by the Health and Safety Team in October 2009 for everyone working at the Base featured exhibits and stands from leading safety equipment manufacturers, designers and suppliers. The Health and Safety Team answered questions and provided advice on specific issues and received very positive feedback about the quality and relevance of the exhibitors. The intention is to hold the event annually to coincide with European Health and Safety Week.

1.4 VCIC and Control of Contractors

One of the year's objectives was to expand the Visitor and Contractor Induction (VCI) process to gain further control over contractor movements and to ensure everyone entering the Base (including external MoD personnel and Service Personnel) passes through the VCI Centre (VCIC) before accessing the site. The VCIC database has been upgraded and a new card introduced for temporary visitors. A new induction video was commissioned and the Computer Based Training (CBT) induction package was updated with new base processes and policies such as LEAF (Lifting Equipment Accessories Facility) and the mandatory wearing of hard hats on jetties.

1.5 Induction Video

The induction video is used at the VCIC for infrequent visitors not required to sit the full induction test and includes upgraded footage from the CBT Induction package.

1.6 Health and Safety Website

The Health and Safety Department website, available for all Babcock Clyde computer users, is now regularly updated to ensure site information is relevant and current. The site is intended to promote best practice, to provide a library of relevant Toolbox Talks, Safety Alerts and SHEF Bulletins and to host the minutes of departmental SHEF Committee Meetings.

The website will host the Fire Awareness computer-based Training Module and a booking system for the Incident and Injury Free® Orientations sessions and other IIF® briefings and seminars.

1.7 Incident & Injury Free® (IIF®)

The Incident & Injury Free® Programme has continued to expand. IIF® Orientations were sustained throughout 2009/2010 engaging almost 4000 MoD/RN, contractors and Babcock employees. Initial planning and development of Phase II IIF® Orientation has started, building on the awareness created through Phase I.

The contribution of Orientation Leader volunteers cannot be underestimated; their personal commitment and enthusiasm for creating an IIF® environment has been appreciated by participants. The Naval Base Commander acknowledged this commitment by presenting Orientation Leaders with his Commendation for their outstanding contribution to safety.

The Joint Base Board makes monthly IIF® commitment visits. Accompanied by an IIF® champion, Board members visit work areas to chat informally about IIF®. With the help of the Building Co-ordinators these visits are covering the Base to ensure that the IIF® message is communicated, particularly to the hard to reach.

The IIF® Departmental teams established at the end of 2008/2009 have progressed with IIF®, focusing on localised issues and bringing deeper understanding and practical knowledge of potential hazards

and areas for improvement. The IIP[®] Department supports localised activities and has empowered these teams to make positive changes.

The Estates IIP[®] Departmental Team has been liaising with Strathclyde Fire & Rescue on safety in the home to reinforce the message that IIP[®] does not start or finish in the workplace. Representatives of Strathclyde Fire & Rescue attended an on-site orientation session to gain a better understanding of what we are trying to achieve through IIP[®] and delivered Fire Awareness sessions to employees from key areas of the Base and to the Estates Team.

The IIP[®] Team organised Christmas Cards and 2010 Calendar competitions for primary school age children with a relative working at the Base. The Christmas Card competition invited children to draw a picture of what they thought Incident & Injury Free[®] should look like, but with a festive theme. The winning drawing by seven year old Isabelle Neilson, was produced as the Babcock Corporate Christmas card, which is sent to customers and suppliers associated with the Babcock International Group.

The Calendar competition was also a huge success. The IIP[®] team was inundated with entries, based on what Incident & Injury Free[®] looks like to them and what their relative does at the Base to keep safe. The top twelve drawings were produced as a calendar and distributed to all employees. The 1st, 2nd and 3rd winners and runners up from each competition received a special prize from Santa who arrived by Fire Engine.

A dedicated IIP[®] venue, officially opened in January 2010, was a milestone for the IIP[®] Team in its effort to unite the site in an Incident & Injury Free[®] culture and demonstrates the commitment of the Joint Base Board.

The IIP[®] Leaders of Safety Programme has been included in our Phase II plan. The programme, piloted in the Hotel and Catering Department with a cross section of staff in a three day workshop, is designed to create a sustainable IIP[®] Leaders of Safety team of committed, skilled Babcock employees who can coach colleagues. Over the course of the programme, facilitators observe and assess participants to determine each person's strengths. Some are encouraged to give presentations and lead sessions while others conduct practical safety inspections and task observations. At the end of the programme, each participant compiles a Personal Action Plan of commitments for the coming months. After six weeks a one day feedback session is undertaken to share views and experiences. The Incident & Injury Free[®] Leadership Team is looking at how to move the programme forward from the success of the Hotel and Catering department pilot.

1.8 Apprentice Liaison

The Health and Safety Department has appointed a Safety Advisor for apprentice safety, during their time at college and while on placements within HMNB Clyde.

First year apprentices took part in a two-day Health and Safety workshop, facilitated by the Health and Safety Team, introducing them to subjects such as Permits to Work, Safe Systems of Work, Fire Awareness and Noise Induced Hearing Loss. The apprentices were challenged to suggest effective methods of highlighting their on-site presence as inexperienced workers and helping those working around them to take into account their initial unfamiliarity with their surroundings. The apprentices opted for a fluorescent stripe on their coverall sleeves and a different colour of collar.

Point of Work checks are being introduced for apprentices during training at college, to instil familiarity and acceptance of the systems in place and to teach them how to assess their working environment before a task.

1.9 Personal Protective Equipment (PPE) Review

During the latter half of 2009, a review of the availability, standard and quality of Personal Protective Equipment (PPE) was conducted. The review included surveys in a cross section of operational activities throughout HMNB Clyde and Fleet Services, Nuclear Activities, Hotel and Catering, Strategic Weapons Systems, Estates Management, Logistics, Projects and Planning and Babcock Support Services Limited.

The surveys conducted with Arco representatives, assessed each department's specific requirements, including scope of equipment, suitability, maintenance, storage, training and procurement.

A report detailing the process for the current provision of PPE from both MoD and external procurement, and making a number of recommendations, has formed the basis of an objective for further improving the provision and use of Personal Protective Equipment in 2010/2011.

1.10 Industrial Best Practice Workshops (T.U. Benchmarking)

Trade Union Safety Representatives from HMNB Clyde took an active role in forming a Marine Division Industrial Best Practice Working Group to: "Create an environment for members to exchange information on Safety, Health and the Environment and to pursue their common interest in reducing occupational accidents, ill health and damage to the natural environment".

The group has developed objectives to enhance safety across the Marine Division and has helped transfer knowledge and best practice in:

- Slip/trip identification
- Apprentice head protection
- Point of Work Safety Checks
- Ladder safe Tool bags
- Risk assessments at machines
- Common learning/training standards (Institute of Occupational Safety & Health and British Safety Council Level 1)
- Site-tours
- Just Culture
- SHEF alerts/bulletins
- Increased networking
- Hearing Protection

The Way Forward

For the future the group is looking forward to developing:

- Common Personal Protective Equipment matrix
- Common Employee handbook
- Site Health and Safety synopsis (quarterly)
- Apprentice Pan-Site Health and Safety Forum

1.11 Accident Toolkit

An Accident Toolkit developed for Line Managers, with the help of the engineering graduates, has been based on a Microsoft Excel Programme. The Toolkit contains core information e.g. Accident Number, Injured Person name etc and guides users through a series of forms with drop down boxes and free text, allowing a thorough and detailed investigation to be recorded. A 'Help' function shows examples of completed forms at each stage of the process.

The Toolkit allows users more time to investigate incidents with less time form-filling and reduces paper by being saved electronically and attached to the Single Event Reporting system for future reference.

1.12 Risk Assessment Fleet Production

Fleet Production Department is conducting an in-depth review of how risk assessments are undertaken within their various sections. The review process encourages Managers and Team Leaders to be proactive in managing workplace risks.

The review process includes:

Phase 1 - Initial review of section risk assessments.

Phase 2 - Section Managers / Team Leaders provide information that identifies fixed work areas / activities and significant work-related hazards under their control.

Phase 3 - A Health and Safety Advisor accompanied by the Section Manager / Team Leader conducts a hazard identification survey of fixed work areas and discusses potential hazards related to external work activities, to ensure that all significant hazards have been identified.

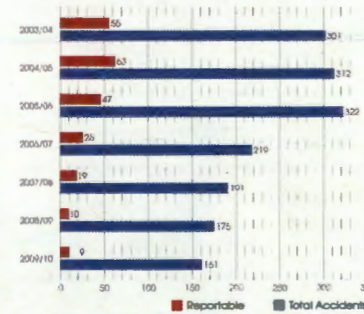
Phase 4 - An action plan for reviewing / amending risk assessments is compiled, with timescales based on degree of risk.

Phase 5 - New control measures identified during the review monitored through to completion.

This process will be formalised and will form part of a comprehensive Risk Management Model disseminated throughout HMNB Clyde.

2. Statistical Analysis

2.1 Injury Accidents



The HMNB Clyde Journey Long Term Comparator

The graph shows how far we have come on our journey towards an Incident and Injury Free environment.

Our accident peak was in 2005/06 and we have managed to sustain a year on year reduction since then.

2.2 Comparing 08/09 09/10

While there was a slight fall in the number of injury accidents we have not reduced the number of RIDDOR Reportable accidents as much as intended.

Of 175 accidents in 2008/09, ten were reportable, compared with 159 for 2009/10, nine of which were reportable. Three RIDDOR Major Injury accidents were reported compared with none the previous year.

- Caledonia: Employee was struck by the top half of a stable door resulting in a head injury
- Fleet Production: Drill in 30 x 6mm flat bar jammed and spun, breaking employee's wrist
- Estates: Employee on work-break broke ankle after stumbling on uneven ground

July was the peak month for accidents with 21 injuries reported, against 12 for the previous year. In 2008/9 our peak month was December with 21 reported accidents, reduced to 12 for December 2009/10.

2.3 Near Misses

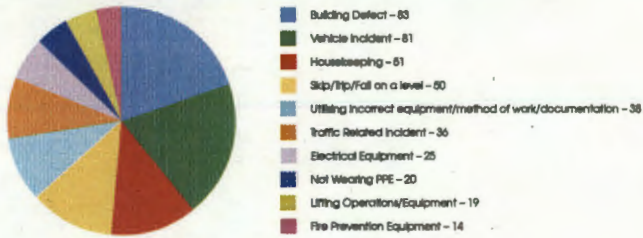
To consolidate reporting arrangements and to ensure that all incidents and near misses are captured systematically, considerable effort has gone into encouraging people to report Unsafe Acts and Conditions (Near miss events).

These events can reveal hidden risks to staff unless corrective measures are taken, so identifying the potential risk is the first step.

With this focus on improving the recording of near misses, in 2009/10, 608 reports were made, 331 relating to Unsafe Acts and 277 to Unsafe Conditions.

For all categories

Top 10 Immediate Causes of Near Miss



3. Nuclear Safety Event Reporting (NSER)

3.1 NSER Process Developments

A review of the NSER part of the Single Event Reporting system resulted in the re-introduction of a specific Process Map (PM) for the NSER. This clarifies how the NSER integrates into the Single Event Reporting System to meet the requirements of regulatory bodies and clarifies the interface and protocol arrangement between NIRPA and the Base when raising Events.

These additions to the established NSER system and process were required to review and improve processes. In addition, the rationalisation of investigation reports to one type for each event was aimed at reducing the administrative burden on ship staff and Line Managers. Where appropriate, joint investigations will be carried out by both ship and base staff, again to reduce duplication and to promote fair and open investigation reporting.

3.2 Operational Feedback, Experience, Reports and Trend Analysis

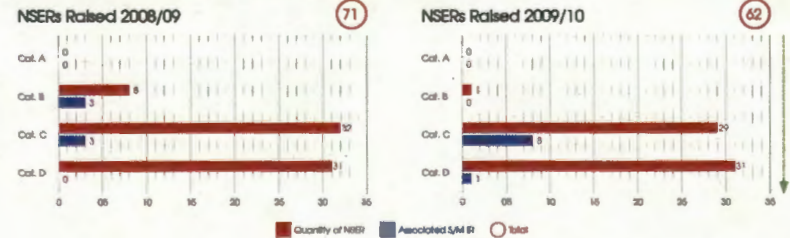
Closed NSERs are copied to the Naval Nuclear Propulsion Programme Operational Experience Learning Group (NNPPOELG) members (HMNB Devonport, BAE, VULCAN, NIRPA and NPOS SM) and the National OELG. Completed NSERs are also returned to the Reporter and copied to other Base departments involved in an Event. If required, an Event Review Board (ERB) will discuss the event and make appropriate recommendations, reflecting on feedback and preventative requirements.

NSERs are reported routinely to the Clyde Nuclear Safety Committee (CNCS) and to DNSR as required by regulation. Arrangements are in place to notify DNSR immediately for serious incidents.

3.3 Statistics 2009/10

- 62 NSERs were raised in the period from April 2009 to March 2010. Stats up to 25/01/10
- 54 of these have been closed in this period April 2009 to March 2010
- 8 of these remain open, either under investigation or awaiting confirmation that actions have been completed and 2 have to be completed
- 19 NSERs carried over from previous periods were closed in the period April 2009 to March 2010

3.4 Breakdown of the NSER



There are four categories used, A through to D and consequences are summarised below:

- A. High potential for or actual radioactive release to the environment or overexposure of radiation
- B. Actual or potential for a contained release within a building or submarine or any unplanned level of radiation exposure
- C. Potential for future release or exposure by failure to adopt good practice and continuous improvement
- D. No or little potential for release or exposure

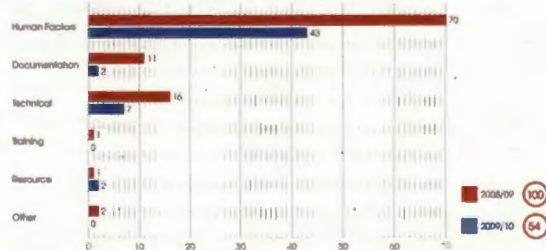
3.5 Analysis

- Clyde had no Category A Events in 2009/10
- The number of Category B Events decreased significantly, with only one this was down from eight the previous year and seven in 2007/08
- Category C Events were broadly comparable to the previous 12 months
- About 25% of all Events recorded are [redacted] these are recorded as Category D Events. The figures have greatly reduced - accounting for one quarter of the total compared to half of the 2008/9 total
- The number of Nuclear Safety Events in the period April 2009 to March 2010 reduced by 12% from the previous year

3.6 Root Causes

There is usually more than one root cause of an NSER, as shown in the graph.

Breakdown of Closed-out NSERs by Principal Root Cause



Root Cause Groups above are a general heading for the root causes identified.

4. Environment

4.1 Environmental Management System (EMS) Developments

The HMNB Clyde Management System (CMS) continues to develop with the Environmental Compliance Module now available to guide users on environmental requirements. The updated Aspects Records were completed during 2009 with managers taking ownership. Environmental Health checks were introduced during the second half of 2009 and three were completed, with the reports available on CMS.

Maintain ISO 14001 registration

HMNB Clyde EMS continued to meet the requirements of ISO 14001 and had two further surveillance visits during 2009 and early 2010. Six minor non-conformances were raised at Coulport and Faslane. All previous outstanding non-conformances were closed during 2009 by Lloyds Register Quality Assurance (LRQA).

Pollution Prevention Control (PPC) Permits

SEPA has granted permission for the manual chlorination of pipework in the Northern Utilities Building (NUB) pending the replacement of four valves. During the year SEPA has given the NUB PPC an overall score of "excellent" which means fewer inspections in 2010/11.

EU Emission Trading Scheme

Coulport and Faslane were again verified under the emission trading scheme with total emissions less than last year, therefore, neither had to buy carbon credits.

Water Environment (Oil storage) (Scotland) Regulations 2006

Non-compliant tanks and pipework are being replaced. New diesel and petrol tanks at the water front have been commissioned. All areas with 200 litre drums were audited and advised on requirements for compliance by April 2010. Most areas were found to be compliant and the others will have banded pallets by the time the legislation comes into force.

Environmental Aspects Records

The Aspects Records have been replaced and put onto CMS. Managers are taking responsibility for these documents which will be reviewed in light of any changes in their work areas. Work started on Aspect Records for areas not previously covered.

4.2 ISO Certification

The first two surveillance visits after certification took place during 2009. All existing non-conformances from the recertification audit were closed and six new non-conformances raised - four at Faslane and two at Coulport. The system continues to develop: Aspect Records have been set in the new format and others are being developed as mentioned above. The environmental team is assisting the Lodger Units to develop their own Aspects Records.

4.3 Integrated Pollution, Prevention and Control (IPPC)

During 2009, one incident was reported under the NUB permit. A tanker filling underground tanks spilled some fuel, which was cleared immediately and SEPA was informed. No action was required.

The only outstanding issue on the NUB permit relates to the chlorination unit, where four valves need to be replaced before initial cleaning of the system. We have permission from SEPA to continue with manual dosing until the valves are replaced.

SEPA's inspection visit in early 2010 gave the NUB an overall rating of Excellent.

4.4 Utility Policy and Strategy

The Utilities Policy and Strategy were both updated during 2009 to reflect changes at HMNB Clyde. During 2010 the Energy Management Plan will be added to the strategy document outlining the short, medium and long term goals for reducing energy use.

From April 2010, the Carbon Reduction Commitment requires HMNB Clyde to reduce CO₂ levels and produce an energy management plan that will be monitored by the Environment Agency.

4.5 European Union (EU) Emissions Trading Scheme (ETS)

2009 was the second year of Phase 2 of the Emission Trading Scheme. SGS (Societe Generale de Surveillance) audited and verified emissions for the EU registry. For the third year running, both Faslane and Coulport were within allocations for CO₂ emissions therefore no internal trading was required. These allocations are on the registry for 2010 as shown in the following table.

Site	CO ₂ Allocation	Actual CO ₂ Emissions	Site Balance
Faslane	26755 tonnes	17921 tonnes	+32783 tonnes
Coulport	11220 tonnes	8332 tonnes	+12294 tonnes

4.6 Sulphur Content of Fuel Survey

The Base took part in a Department for Environment, Food and Rural Affairs (DEFRA) survey on the use of low sulphur fuels. Two small samples were provided to DEFRA and we await the results of the survey.

4.7 Water Environment (Oil Storage) (Scotland) Regulations 2006

During 2009 Clyde Marine Unit (CMU) diesel tanks were installed at Coulport and Faslane and a petrol tank at Faslane. As there is a possibility that some work required for compliance on general land-based oil storage may not be completed before the April deadline, a Base risk has been registered.

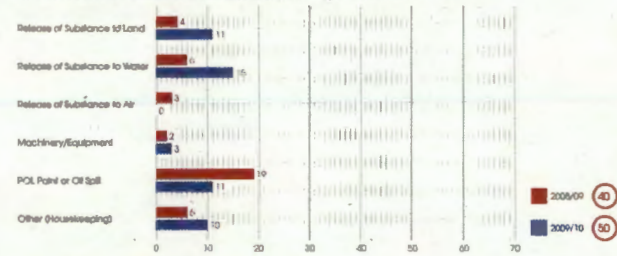
All areas holding 200 litres have been identified and recorded. The majority of the areas were already compliant.

4.8 Scottish Pollution Release Inventory (SPRI)

As one of the major industrial sites in the West of Scotland and a class A site under the Radioactive Substances Act 1993, HMNB Clyde is required to complete an annual SPRI return for both Faslane and Coulport. The SPRI is a public register of sites that release emissions to air, water, land or any combination of the three. The returns for HMNB Clyde were completed on line for 2009. The information provided is on the public register and SEPA sends the information to Europe for the European Pollution Release Inventory.

4.9 Environmental Incidents

Breakdown of Closed-out NSERs by Principal Root Cause



The number of reported environmental incidents was the same as 2008/09. Most incidents fell into the categories of oil spills, oil drums left on unbanded pallets at the jetty areas and sewage discharges. The reported oil spills had different causes but sewage incidents were due mainly to pump failures, resulting in sewage overflow. The use of banded pallets on the jetties continued to be monitored and all parties likely to place oil drums there were engaged in awareness discussions.

4.10 Energy and Environment Week

The third annual Energy and Environment Week, which took place in October over three days at Faslane and one day at Coulport, was well attended. The event, supported by Toyota, Wm Tracey Ltd, The Energy Saving Trust, The Carbon Trust, The Forestry Commission and Aquatrine.

4.11 Waste Management

The current MoD target is to recycle 40% of all waste by 2010 increasing to 75% by 2020. We exceeded the 2010 target by 4% in 2009. We have achieved this through improving processes in our Segregation facility and by making more cardboard cages and bottle banks available around the site. New, central toner recycling stations were located at Lomond Building, Bonaventure Building and the MT Garage/GPSS. Mixed recyclables collection was introduced at Coulport and facilities will be increased throughout 2010.

5. Fire

5.1 Fire Risk Assessment

Following changes in Fire Risk Assessment over the past two years, we are clarifying process with Building Co-ordinators and Managers. During the year under review, Co-ordinators' responsibilities were increased to maintain a more stringent process.

A more informative service has been introduced by Defence Fire Risk Management Organisation following a national survey of Fire Risk Assessment process.

A new Fire Risk Assessment form, to be completed by a fire professional and sent directly to the Head of Establishment, will help to ensure that appropriate funding is directed to life safety.

Fire Risk Assessments, Faslane 2009/10

Establishment	High	Medium	Low	Total
Faslane	2	28	1	31

5.2 Fire Incident Statistical Report

Year	Fires	Fire False Alarms - Equipment	Fire False Alarms - Good Intent	Fire False Alarms - Malicious	Fire False Alarms - Unwanted	Total
2007-2008	14	100	12	22	272	420
2008-2009	13	133	10	20	214	399
2009-2010	16	152	20	12	283	483

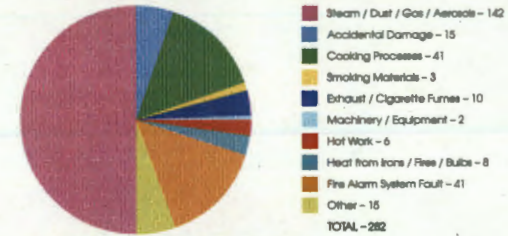
Although there was an increase in the number of fires (+23%) and fire incidents (+21%) any damage was superficial because of the prompt actions of staff.

While the replacement of old fire detection systems and rigorous new controls on living accommodation resulted in more false alarms (+14%), the increased sensitivity and complexity of the new equipment has helped prevent fires developing.

The positioning of smoke detectors adjacent to shower areas in living accommodation has contributed to a 32% increase in unwanted false fire alarms. Steps have been taken to address the issue.

A 40% decrease in malicious calls can be attributed to heightened discipline and education in fire safety for single service personnel.

Main causes of unwanted fire alarms



6. Occupational Health - Babcock

6.1 Treatments

The Table gives a breakdown of treatment of minor injury, incidental illness and primary care reviews (e.g. blood pressure checks, wound dressings), and physiotherapy

Treatment Type	2006/07	2007/08	2008/09	2009/10
Accident on Duty	111	99	139	144
Fitness For Work	63	42	29	76
Review	51	313	132	82
Physiotherapy	1147	1455	1572	1214
Incidental illness	330	516	372	341
Total	2010	2424	2244	1857

6.2 Workplace Visits

It is a priority of Occupational Health (OH) to understand specific work areas and practices and a proactive workplace visit programme was put in place to build team knowledge of all areas of the Base. OH is compiling a risk register identifying potential health hazards and instigating health surveillance, as appropriate.

From September 2009 there were 22 scheduled workplace visits covering Estates (Fastane and Cowlport), Fleet Services, Fleet Production and Nuclear Activities directorates.

The rolling health surveillance programme was updated to accommodate employees who had changed jobs or areas of work.

Health promotion events took place to raise awareness of back care and to advise on self management in view of the potential for musculoskeletal problems through manual handling and working in small / awkward spaces.

There was a focus on ergonomic assessment of work areas, including General Purposes Support Store (GPSS), plate wash in the Junior Rates Mess, vegetable and salad preparation in the Senior Rates Mess.

A report outlining findings and recommendations for change was prepared for management with the emphasis on prevention of musculoskeletal conditions.

6.3 Health Assessment/Surveillance

A variety of health assessments were carried out during the year. These included groups of employees (e.g. Mechanical Handling Equipment (MHE) drivers, radiation workers) who, by the nature of their work, might place themselves or others at risk if they develop certain medical conditions.

Health Assessment/Surveillance Type	2006/07	2007/08	2008/09	2009/10
Lifestyle Screening (Voluntary)	120	21	22	8
Display Screen Equipment	4	0	2	0
Night Workers	12	16	4	0
Food Handler	3	5	4	11
Audiometry	18	134	182	215
Lung Function	77	31	118	205
Skin	2	147	198	295
HAVS	2	4	116	277
Visual Acuity	135	95	67	43
Confined Spaces Medical	66	120	185	181
Safety Critical Medical (Driving / MHE)	99	67	146	188
Radiation Medical	15	13	8	11
Total	554	629	1052	1246

1. Safety critical and confined space medicals include visual acuity and are not shown separately in the table.

2. Confined space medicals include lung function and are not shown separately in the table.

6.4 Physiotherapy

Musculoskeletal disorders are one of the main health risks facing any business, as a cause of occupational injury, ill health and sickness absence. The physiotherapy service provides treatments that have been shown to impact employees' ability to remain at or return to work. The physiotherapist is also involved in workplace visits and health promotion with regard to ergonomics.

Total Number of Physio Appointments - 3 year comparison

Month	2007/08	2008/09	2009/10
April	120	139	123
May	181	116	86
June	139	106	109
July	110	157	86
August	141	153	76
September	108	135	78
October	129	140	97
November	115	151	89
December	97	119	56
January	118	127	111
February	101	118	131
March	96	111	172
Total	1455	1572	1214

6.5 Health Promotion

OH presented a rolling health promotion programme focusing on the prevention / reduction of occupational diseases and personal risk. The promotions used a variety of media including, poster, leaflets, Toolbox Talks and on-site campaigns.

Mental Health at Work

Presentations were made to all Heads of Department and Managers to raise recognition and understanding of mental health conditions. Health promotion events took place in Hotel and Catering and the GPSS using stress bio dots, Bach's Rescue Remedy samples, leaflets on Post Traumatic Stress Disorder, anger management, panic attacks, suicide, depression and eating disorders. All were very well attended with positive comments and feedback.

Hand Arm Vibration Syndrome (HAVS)

We have continued our focus on the early identification of HAVS symptoms through presentations to relevant departments and arranging health surveillance.

Nightshift Workers

Information distributed via notice boards and SHEF bulletins covered the link between shift work and health. Health assessment is available to all night shift workers.

Feel Good Food

A stand at the Health and Safety Exhibition was used to distribute free samples of breakfast cereal, fruit and nuts. The aim was to highlight the benefits of healthy snacks and the link between poor diet and low mood. Recipes and leaflets were also available.

Leptospirosis

Leptospirosis, more commonly known as Weil's Disease is transmitted to humans through contact with a water source contaminated by the urine of infected rats, cattle, foxes, rodents and other wild animals. Presentations were made to departments which could be at risk from this health hazard.

Back Awareness

Workplace visits identified employees who might benefit from interactive back awareness sessions. These 20 minute sessions are provided by the OH practitioner and the physiotherapist. Babcock employees who provide grounds and waste services found this beneficial.

6.6 Counselling

OH introduced counselling as a core service through two counsellors who have lengthy and varied experience including, Cognitive Behaviour Therapy, Neural Linguistic Programming, Substance Abuse and Medication. The referrals are co-ordinated in confidence via OH and with the employee's written consent. Work related issues have been identified as a contributing factor in 51% of cases.

7. Occupational Health – Ministry of Defence

7.1 Noise at Work

Employees in "hearing protection zones" pinpointed in a noise survey receive regular health surveillance, with an audiogram every two years, or more frequently if required.

Both occupational hygiene and occupational health sections of the O (OEHD) support the Health and Safety Department in an ongoing programme of noise assessments at HMNB Clyde. The OEHD runs the Medical Centre hearing conservation programme for all Servicemen, local MoD Police and Guard Agency (MDPGA) personnel as well as MoD civilian employees exposed to noise.

7.2 First Aid Training Outputs

The OEHD provides a variety of first-aid training courses, including Appointed Person and Emergency Medical Responder Training. Table 1 shows the breakdown of this provision in terms of Base-Partnered areas and the remainder which comprise service personnel, Base Lodger Units and Flag Officer Scotland, Northern England and Northern Ireland (FOSNNI) areas establishments. The ability to conduct internal First Aid courses rather than use external suppliers achieves a considerable saving for the Base and MoD.

Table 1: First aid training outputs

Training Outputs	2008/09	2009/10
Service personnel Sea Going	160	81
Service/Civilian personnel, HMNB Clyde Lodger Units and FOSNNI establishments	190	158

7.3 Statutory Medicals and Health Surveillance

The OEHD's health surveillance activities over the last year are summarised in Table 2.

Table 2: Statutory Medicals and Health Surveillance

Statutory Medicals and Health Surveillance Activities	2008/09	2009/10
Apprentice	11	0
Breathing Apparatus, Self-Contained Compressed Air (BASCCA)	55	42
Bloods	03	2
Confined Space	33	18
Defence Fire and Rescue Service (DF&RS)	-	25
Diving	17	22
Seafarer Medical Certificate (ENG 1) following examination by a Marine Coastguard Agency (MCA) Approved Doctor	99	91
Eye Testing	103	128
Fork Lift Truck/Mechanical Handling Equipment (FLT/MHE)	67	49
Food Handling	-	-
Health Surveillance (COSH)	-	-
Initial Health Assessment	11	11
Jetty Crane	12	2
Large Goods Vehicle/Passenger Carrying Vehicle (LGV/PCV)	21	14

Table 2: Statutory Medicals and Health Surveillance (cont.)

Statutory Medicals and Health Surveillance Activities	2008/09	2009/10
Medical Prelims	122	123
Oil fuel/Thallium	-	24
Overhead Crane	11	7
Spirometry/Vitalograph	157	135
Other Medicals (e.g. MSRO & AIR-CREW)	19	44

7.4 Health Promotion

OEHHD maintains an active programme of health promotion as shown in table 3. This programme is co-ordinated through the Base Health Promotion Committee working closely with colleagues in other departments, both medical and non-medical, and the Babcock Occupational Health Department to maximise the impact of health promotion activities across HMNB Clyde.

Table 3: Health Promotion Activities 2009 -2010

Date of Activity	Health Promotion Activity
April	Health and lifestyle screening
May	Stress – presentations to senior management and toolbox talks, Asthma
June	Men's health week
August	Sexual health week, Skin Cancer Awareness
September	British Heart Foundation Campaign Mental health, Suicide Awareness week Workshop on understanding Self-Harm
October	Chest Heart and Stroke Awareness week Breast Cancer Care
November	Oral Cancer Awareness
December	Drink Aware

7.5 Departmental Activity Statistics

The activities of the OEHHD, other than health surveillance, for the last two years are summarised in Table 4.

Table 4: Summary of OEHHD Activity

Activity	2008/09	2009/10
Fresh Cases/Referrals	252	276
Total Reviews	336	213
Returns To Work	55	59
Accidents At Work	21	18
Workplace Visits	-	18
Phone Consultations/Management Advice	N/A	279
Contractors	273	268
Audios	790	581
Vaccinations	36	27
Health Promotion/Lifestyle Check	37	108

7.6 Control of Substances Hazardous to Health (COSHH)

A review of guidance was completed on the COSHH Regulations in Joint Services Publication (JSP) 375, which includes a new assessment form. Further deliberations will lead to a series of training/ information courses ranging from Awareness Level to Assessor.

7.7 Noise and Vibration

Requests for advice or assistance in noise monitoring (assessments) continued to be received during the year. A re-draft of the original Base policy document, which will clarify actions for reducing risk to health due to vibration, is being circulated throughout the Base.

7.8 Dangerous Substances and Explosive Atmospheres Regulations (DSEAR)

Work on the new petrol storage facility for the police and the subsequent activity for managing the facility under DSEAR progressed satisfactorily.

For MoD, the (JSP) leaflets describing the management requirements under DSEAR are being reviewed and discussed with the aim of reaching conclusions during 2010/11.

7.9 Other Issues

Office working conditions remain an important matter throughout the Base. A specialised light meter is improving information gathering and, in turn the nature and level of advice for office workers.

The MoD's revision of many of its Health and Safety policies relating to JSP 375, has increased the workload of MoD Occupational Hygienists.

A substantial amount of time and effort have been committed to monitoring changes in air pressure in submarines.

7.10 Statistical Summary of Occupational Hygiene Activities

The outputs are given in the same format as 2008/09 to differentiate the OH outputs from the Base partnered areas;

Table 5: OH Outputs for 2010 – 2009

Summary of Occupational Hygiene Activity	2008/09	2009/10
Advisory work; area role, external to the Base	11	5
Advisory work; internal to the Base, MOD only	8	9
Advisory work; Base work	17	10
OH visits; area role, external to the Base	9	4
OH visits; internal to the Base, MOD only	19	5
OH visits; Base work	13	16
OH meetings/policy work; MOD	5	40
OH meetings/policy work; Base only	21	12
Training/toolbox talks in OH; Base only	1	1

8. Environmental Health

8.1 Food Safety

The majority of food safety inspections were undertaken in conjunction with the Environmental Health Officer (EHO) from Argyll and Bute Council. There were no major findings. A substantial amount of reactive advice has been offered, in particular regarding the Supermess and Single Living Accommodation construction.

8.2 Pest Control

Extensive demolition and construction work throughout the Base have led to an increase in reports of rodents. Rat control is a very high priority and all reports were acted on promptly.

Ongoing control of pigeons and jackdaws in the Shiplift and under the jetties has reduced bird guano and in turn the exposure of personnel working in these areas.

Fox control on MoD land continued with culling resulting in a very successful lambing period for tenant farmers. ????? Does this have to be mentioned

The feral cat population at Faslane has remained constant following the re-homing of several kittens and the neutering of older cats.

8.3 Port Health

The Base continues to be represented at the Scottish Port Health Liaison Network, which meets quarterly in Glasgow and Inverness.

The Environmental Health Department is issuing the new Ship Sanitation Control Exemption Certificate (SSCEC), which replaced the Deratting Exemption Certificate and has briefed executive management on their responsibilities. The new system is working well, with certificates issued to Ships, Submarines, Royal Fleet Auxiliary and Commercial Vessels.

The Ship Sanitation Inspection (SSI) required prior to the issue of the SSCEC covers food safety and potable water management, habitability, communicable disease control and pest control.

8.4 Awareness Campaigns

Several articles were published in Internal Base publications highlighting issues within HMNB Clyde and the role and responsibilities of the Environmental Health Department, one of whose engagements was in National No Smoking Day.

8.5 Emerging Issues

Work on the Valiant Jetty has led to a marked increase in reported rodent sightings in the northern area of the Base, including the finger jetties. The Pest Control Officer ensured prompt action and remains vigilant.

The Environmental Health Department helped tackle rodent issues caused by building works at Rosyth and HMS Caledonia In Fife by giving advice and conducting a rodent survey now incorporated into a Safe System of Work within HMS Caledonia.

The populations of the Common Gull, Herring Gull and Black-back Gull continue to be monitored and additional controls put in place as necessary. We have applied for a Common Gull Licence from the Scottish Government to enable authorised personnel to deal with this protected bird when it nests in working areas.

A submarine was treated for an infestation of rust-red flour beetles ???. The source was found following a detailed inspection of the affected compartment. Progress has been made in obtaining clearance to safely use a more effective insecticide onboard vessels.

A Final Inspection of HMS Dauntless was conducted and advice given to HMS Astute on commissioning a potable water system.

8.6 Other Activities

The Pest Control Officer has attended Bird and Rodent Control courses to keep up-to-date with latest equipment and control methods.

The Naval Environmental Health Officer attended a Food Safety Training Day at Callendar House in Falkirk.

8.7 Achievement of 2009 – 2010 Objectives

No significant concerns were raised in inspections of the Wardroom Galley, Main Galley, Civilian Canteen and Spar Shop by the Argyll and Bute Council EHO, indicating that informal spot checks and regular contact with catering staff had raised the standard of food hygiene.

The implications of the International Health Regulations are fully understood by Captain, Faslane Flotilla Vessels with regard to the Ship Sanitation Inspection requirements and the issuing of the Ship Sanitation Control Exemption Certificates.

Incidents involving seagulls decreased due to proactive work by the Pest Control Officer i.e. Bird proofing, egg replacement and close liaison with Building Co-ordinators and Managers and Supermess Site contractors.

Statistical Summary of Environmental Health Activities

Activity	2008/09	2009/10
Ship Sanitation Inspections ¹ – Ships (Check Numbering)?	11	11
Ship Sanitation Inspections ¹ – Submarines	2	4
Ship Safety And Readiness Checks (Sarcs)	4	4
Food Safety Inspections – Shore Establishments ²	4	4
Food Safety Spot Checks	3	3
Pest Control Visits ³	249	411
Reactive Visits – Ships	2	6
Reactive Visits – Shore Establishments	10	6
Potable Water Sampling – Shore Establishments	5	1
Ship Water Sampling Reports Issued ^{4,5}	45	50
Lectures And Presentations	13	4

1. Since June 2007 Naval Medical Officer of Health (NMOH) inspections have been combined with deratting exemption inspections under the new title of Ship Sanitation Inspections (SSIs).
2. Conducted alongside Local Authority EHOs
3. Follow-up visits included
4. Routine water sampling on ships and submarines has now been delegated to the medical representative onboard
5. Reports issued by signal.

For inclusion in Section 10 (c) Regulatory Authorities (Argyll and Bute Council Food Hygiene Inspections).

Routine inspections of the Operational Support Building Galley (Coulport), Kennedy's Bar (WO, SR & SNCO's Mess), CAF Van and Spar Shop. Records examined included HACCP, temperature monitoring and cleaning schedule.

9. Dangerous Goods

9.1 Introduction

All dangerous goods (including hazardous waste) transported by HMNB Clyde are classified, packaged, marked, labelled and documented in accordance with the provisions laid down in statutory instrument 1348 (The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009) and ADR (European agreement concerning the carriage of dangerous goods by road).

9.2 Volumes of Dangerous Goods Transported

Below is a detailed breakdown of all dangerous goods transported on the public highway by HMNB Clyde (including its outstations) throughout 2009.

Oil Fuel Depots	Class 3 (Flammable Liquids)	4593156 litres
RNAD Coulport	Class 1.1 (Explosives)	42063 kg
	Class 1.3 (Explosives)	1421 kg
	Class 1.4 (Explosives)	<1 kg
Medical Centre	Class 6.2 (Clinical Waste)	1434 kg
Crombie (RS 29)	Class 2.1 (Flam Gas L/R/D)	121 kg
	Class 2.1 (Flam Comp Gas)	14 litres
	Class 2.2 (Non Flam Comp Gas)	786 litres
	Class 2.2 (Refrigerant)	2548 kg
	Class 9 (Miscellaneous)	3775 kg
GPSS	Class 2.1 (Flam Gas L/R/D)	5740 kg
	Class 2.1 (Flam Comp Gas)	747 litres
	Class 2.2 (Non Flam Comp Gas)	10155.63 litres
	Class 2.2 (Refrigerant)	9457.2 kg
	Class 3 (Flammable Liquid)	5225.6 litres
	Class 4.1 (Flammable Solid)	48 kg
	Class 5.1 (Oxidizers)	679 kg
	Class 6.1 (Toxic Substance)	5 litres
	Class 8 (Corrosive Liquid/Solid)	14684 / 3212 kg
	Class 9 (Miscellaneous)	27820 kg / 319 litres
MT Garage	Class 7 (Various Isotopes/UN Nos)	1.64E+12 Bq
	Class 2.2 (Refrigerant)	3690 kg
	Class 3 (Flammable Liquid)	175 kg
	Class 9 (Miscellaneous)	209 kg

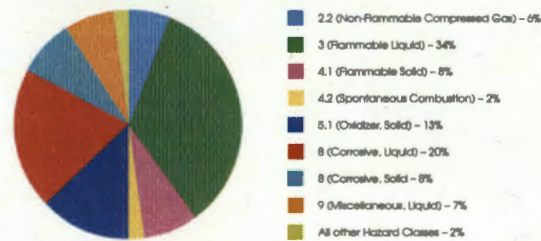
9.3 Material Assessment Centre – Hazardous Waste

HMNB Clyde produced 60,582 litres of liquid and 29,779 kilograms of solid waste subject to dangerous goods carriage legislation during 2009.

The vast majority of the waste falls within two hazard classes, Class 3, Flammable Liquids and Class 8, Corrosive Substances. As with last year, Class 5.1 (Oxidizers) has inflated figures due to the disposal of defective Emergency Oxygen Generators.

The increase in Class 4.1 hazardous waste was due to a diesel spillage (incident number 9663) and a clean-up operation that produced several contaminated booms.

Percentage of Hazardous Waste by Class



9.4 Dangerous Goods Incidents

Two dangerous goods incidents occurred during the reporting period, neither of which resulted in environmental spillage, damage to property or personal injury.

Incident No 9616 (21/07/09)

Type of Incident: Unsafe Loading/Restraint, Potential Exposure to Hazardous Substances and Falling Objects.

Incident No 10808 (05/01/10)

Type of Incident: Potential Exposure to Hazardous Substances or Materials

Both incidents were thoroughly investigated at Event Review, resulting in remedial actions.

10. Audit & Verification

Seven SHEF themed audits were planned from April 2009 to March 2010. Five were completed and two were postponed for operational reasons; Waste Management and Lifting Equipment were carried over into 2010 programme.

The Base-wide Audit Programme continued to include specific SHEF related themed audits and to incorporate SHEF issues into the scope of other corporate audits, as appropriate.

The 2010 Audit Programme has been published and key stakeholders from Environment and Safety were included in its design through a programme of risk assessments which determined the topics to be audited and their frequency over a three year period.

11. Objectives & Targets 2010/11

11.1 Introduction

The objectives and targets for 2010/11 will continue to build on the successes already achieved and to concentrate on areas where improvements are needed in managing health and safety and reducing workplace injuries and ill health.

We will continue on our journey to an incident and injury free workplace and look to increase near accident reporting. The following objectives and targets will underpin the cultural improvements already made under the banner of Our Challenge on Safety.

11.2 Requirements

- Implement an Alcohol & Drug policy, including random testing
- All HoDs to have Safety Improvement Plans

11.3 Learning & Development

- Complete Phase 2 IIF® Leaders of Safety
- Update and issue Contractors Code of Practice
- Carry out a review of all SHEF training including CB

11.4 Combined Nuclear & Conventional Safety Culture

- Establish a Base SHEF Strategy
- Implement 'Peer review' findings
- Complete Stage 1 Site Control process

11.5 Communications

- Launch Time Out For Safety (TOFS)
- Deliver a Safety/HSE/Environment Exhibition and Roadshow
- Produce Clyde Employee SHEF Handbook

11.6 Process Initiatives

- Review and update Stress policy
- Implement Driving on Company Business policy
- Carry out review of Confined Spaces Afloat/Ashore policies
- Review Working at Heights policy
- Fire Wardens in place and weekly fire alarm testing carried out

11.7 Behavioural Safety

- Launch Recognition and Reward Scheme
- Develop Phase 3 behavioural safety strategy
- Develop and Implement Phase 2 Orientation training programme;

11.8 Environment

- Implement the requirements of the Carbon Reduction Commitment as they relate to the Base
- Carry out a full Emissions Trading Scheme (ETS) review of both Faslane and Coulport permits
- Develop Energy Management Plan
- Develop an Environmental Programme showing all environmental based projects
- Develop a Base wide set of environmental Aspects

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