

**RenewableUK
Health & Safety Training & Approvals Update & FAQ's
July 2010**

RenewableUK has made a commitment to ensuring that Health & Safety ("H&S") is given top priority in the wind energy and marine renewables sector. Promoting and delivering best practice health and safety training and competence standards is central to this commitment¹.

This document provides an update on the revisions to the existing RenewableUK training standards, the implementation of a new accreditation & approvals scheme and the development of a new basic health and safety qualification. It also sets out a list of FAQ's aimed at employers, workers and training providers.

Current training developments

From 1st January 2010 RenewableUK took control of the standards and approvals protocols for health and safety training for wind energy and marine renewables sector in the UK. Substantial progress has been made in recent months and we expect to make significant announcements over the coming weeks and months on the revised standards and approvals protocols. Details of the progress made to date are set out below including an estimate of the key timelines where applicable.

Administration

RenewableUK are now responsible for the administration of health and safety training standards and approvals for the sector. RenewableUK have recently appointed a full time health and safety manager who will provide the central co-ordination for the delivery of the new training protocols for the industry. The position is overseen by RenewableUK's Director of Health and Safety with the additional input and support of RenewableUK's Health & Safety Training Group and the Health & Safety Strategy Group.

Whilst these collective resources are more than sufficient for the short to medium term needs of the sector, RenewableUK will ensure that following industry consultation, review the need for additional resources to ensure that a fully independent and accountable management system is maintained.

Standards

RenewableUK currently recognise and approve two training standards. These are the Work at Height and Rescue Training Standard and the Marine Survival Training Standard. Both of these standards are being updated as follows.

Work at Height and Rescue Training Standard

A full review of this standard has been completed. The revised standard is currently out for consultation. The new standard was approved on 13/07/2010.

Marine Survival Training Standard

A partial review of this standard has been completed. However further work is required to produce a robust standard that takes full account of industry experiences from recent years and the shared knowledge from the offshore sector. Details of the expected timings of this review are set out below.

¹ Further information is set out in RenewableUK's Health & Safety Training Strategy – July 2010

Until the consultation process has been completed the requirements of the existing standards remain current.

Future training standards – Basic Safety Qualification

RenewableUK have set out clearly that it has no intent to compete with other organisations who offer relevant training standards / qualifications that interface with the health and safety issues within the sector. However we will take lead responsibility for training standards for health and safety matters as they directly relate to the risks particular to our sector.

Recent engagement with members and key stakeholders have identified a potential need to develop and recognise a basic safety qualification to ensure a common approach to addressing industry specific risks. At present there are no suitable schemes or qualifications that can easily address the identified gaps in knowledge. RenewableUK will therefore consult with members and the wider industry supply chain to scope the content of any industry specific basic safety qualification and as necessary recommend a particular scheme.

Irrespective of any scheme or standard that may in the future be approved, duty holders and in particular employers are reminded of their primary responsibility to ensure employees and contractors are adequately trained and deemed competent for the work they perform.

The demand or otherwise for approving any other training in the future will be dependent on requirements and priorities of the industry. This will take account direct feedback from members, experiences and lessons learned from the sector and consultation with key stakeholders.

Accreditation & Approval

A new accreditation and approval process is being finalised by RenewableUK with the expectation this will be signed off during July 2010. The scheme will require all current and future training providers to demonstrate a robust quality management system to ensure that all training provided is to the highest quality and that delegate safety is assured at every stage. Details will be set out in separate guidelines but will cover arrangements to ensure that training providers:

- Administration and quality assurance of the training are robust and fulfil the requirements of the relevant training standard;
- Provide evidence of the experience and competence of the trainers, assessors and supervisors involved in delivering the training;
- Facilities, apparatus and equipment are suitable, safe and as necessary inspected and tested to ensure delegate safety at all times;
- Have adequate procedures to deal with first aid and other foreseeable emergencies; and
- Audit and review all aspects of the training and delivery to ensure that it remains up to date and that the quality of the delivery is maintained.

RenewableUK expect to publish guidelines for training providers on the revised accreditation and approvals process during July/August 2010

Training records

RenewableUK in conjunction with approved training providers have maintained a record of all training carried out to RenewableUK training standards since 01/01/10. RenewableUK will not consider the introduction of a centralised registration system until firstly the revisions to the current training standards have been completed and secondly the new accreditation and approval system has been finalised.

Following this RenewableUK will review the need and scope of any registration scheme taking account the variety of similar schemes currently operating and the costs and benefits of any selected approach. Full and open consultation with the industry and key stakeholders will be carried out before any final decisions are taken.

Timeline

The following timelines represent our best assessment of the timescales we are aiming for in delivering the work streams set out above. They are presented in good faith but the precise timings will be dependent on a number of factors not least ensuring that adequate time is given to consulting with members and stakeholders.

Item & Description	Status	Start Date	Closing Date	Contact ²	Notes
Standards - Work At Height & Rescue Training Standard	Open	02/06/10	30/06/10	RJ	Full & open consultation on revisions to the standard
Standards – Marine Survival Training (Internal review)	Open	01/07/10	31/07/10	RJ	Full internal consultation on revisions to the standard
Standards – Marine Survival Training (External review)	Open	01/08/10	30/09/10	RJ	Full external open consultation on revisions to the standard
Standards – Basic Safety Qualification – Scoping Workshop	Open	Nov 10	Nov 10	CS	Details of date & venue to be announced
Accreditation – Open consultation on new approvals system	Open	01/07/10	31/08/10	RJ	Details via website & RJ
Accreditation – Applications to become a technical training auditor under the new approvals system will be announced	Open	01/07/10	31/08/10	CS	Initially covering work at height and rescue only.
Accreditation – Applications to become a training provider under the new approvals system will be start.	Open	01/09/10	-	RJ	Initially covering work at height and rescue only.

FAQ's

² Rhys Jones – RenewableUK Health & Safety Training Manager – r.jones@renewable-uk.com
 & Chris Streatfeild – RenewableUK Director of Health & Safety – c.streatfeild@renewable-uk.com

Due to the sheer size of the industry and that RenewableUK represents the interests of members across the lifecycle of renewable energy projects it is not realistic or sensible to provide a simplistic summary of the training requirements for the industry. In the UK employers are primarily responsible for ensuring employees are provided with adequate health and safety training and are deemed competent to perform the work they are required to carry out³. Practically this would normally require an employer to:

- **Assess:** Assessing the training needs taking account the findings of relevant risk assessments and lessons learned from accident and incident data;
- **Prioritise:** Identifying the training priorities taking account the requirements of health and safety legislation and in particular those situations where a lack of information and/or training might result in serious harm;
- **Deliver:** Selecting and using the most effective means of training delivery and that information provided is easy to understand and delivered by competent trainers; and
- **Review:** Assessing the effectiveness of training delivered to ensure that employees both understand the training provided but also that this is reflected in their safety behaviours on a daily basis.

There are numerous reference sources to assist employers in scoping and delivering best practice health and safety training⁴. In every situation suitable advice should be taken from the nominated competent persons for health and safety and the input from employee representatives.

The FAQ's below are primarily aimed at answering the training issue questions for employees working in the wind sector and specifically wind technicians and contractors working during the construction and operational phases for large scale wind projects⁵. They do not aim to address the wider training needs of the industry or the training for activities and operations that interface with the sector.

FAQ's for Employers

- *What is minimum health and safety training requirement for anyone working in the renewable sector during the construction phase?*
 - During the construction phase the primary training requirements are set out in the Construction Design and Management Regulations 2007 and the supporting Approved Code of Practice⁶. This would include as a minimum:
 - Suitable site induction; and
 - Any further information and training needed for the particular work. In addition to general construction risks particular attention may be required to address the particular issues and risks associated with but not limited to:
 - Working at Height
 - Electrical Safety
 - Extreme weather
 - Remote working
 - First Aid
 - Marine survival (offshore only)

³ This should be conducted on recruitment and extend to situations where employees are exposed to new or increased risks. Training must also be repeated periodically to take account of any new or changed risks to the health and safety of the employees concerned. (UK H&S legislation sets out a comprehensive framework of training requirements relevant to the industry. Further details are set out in RenewableUK Health and Safety Guidelines 2010.)

⁴ Such as HSE document INDG345, Health and Safety Training, What you need to know.

⁵ Turbines with a swept area of >200m²

⁶ HSE, Managing health and safety in construction (2007) – L144

- *What is minimum health and safety training requirement for anyone working in the renewable sector during the operation and maintenance phase?*
 - During the operation and maintenance (“O&M”) phase the training requirements will be set out in general and specific health and safety regulations and the findings of relevant risk assessments conducted for the tasks being performed⁷. In addition to general O&M risks particular attention may be required to address the particular issues and risks associated with but not limited to:
 - Working at Height
 - Electrical Safety
 - Extreme weather
 - Remote working
 - First Aid
 - Marine survival (offshore only)

Additional training is also likely to be required to address company, site and turbine specific health and safety arrangements including any designated “rules”⁸ or operating procedures that may apply.

- *RenewableUK Training courses include reference to first aid. Do I need to provide additional first aid training?*
 - The First Aid content on RenewableUK training courses only provide a very basic introduction and familiarisation to the issues concerned. Employers must still conduct the necessary risk assessments to determine the nature and scope of any first aid training they provide employees in accordance with Health and Safety (First-Aid) Regulations 1981⁹.
- *What electrical safety training do I need to provide?*
 - Due to the high risk nature of any electrical work it is not appropriate to give a simple answer. In every situation anyone working with any electrical system must be competent. Determining the level of competence required needs to consider the specific type of work to be done and this should relate to the knowledge, training and experience of the individual concerned. Specialist advice should always be taken in determining the training requirements for all electrical work.
- *Do I have to use a RenewableUK approved provider?*
 - RenewableUK recommend that wherever possible RenewableUK approved training providers are used. However RenewableUK understand that employers for operational or health and safety reasons may elect to use alternative provision such as in house training resources or other training providers¹⁰. In such situations they are strongly advised to assess and verify the capabilities and competence of those providers to ensure they are delivering training to at least the equivalence of the RenewableUK training standard required.

⁷ Initial reference should be made to the Management of Health and Safety at Work Regulations 1999 Approved Code of Practice and guidance (2000) - L21 (HSE Books)

⁸ E.g. RenewableUK Wind Turbine Safety Rules (“WTSR’s”)

⁹ See latest information at <http://www.hse.gov.uk/firstaid/training.htm>

¹⁰ Note: Whilst the new accreditation and approval system is being put in place RenewableUK will not actively promote the use of approved training providers in order to ensure fair and open access to all training providers.

- *Does RenewableUK recognise training providers based outside of the UK?*
 - RenewableUK has not at the present moment recognised or approved any training provider outside of the UK. Due to the nature of the standards content and requirements with particular reference to jurisdictional differences all applications from training providers based outside of the UK will be considered on a case by case basis. Further guidance will be given in the future. All queries regarding the provision of training to RenewableUK approved standards should be addressed directly to the RenewableUK Health and Safety Training manager (contact details are available elsewhere in this document).
 - *Does RenewableUK recognise any other industry health and safety schemes?*
 - At present RenewableUK do not formally recognise any industry health and safety schemes (e.g. safety passport type schemes). A full review of their relevance to the sector will be conducted by RenewableUK in partnership with key stakeholders as part of the scoping of a basic safety qualification.
 - *We are looking at using helicopter access for our offshore projects. What training do we need to provide?*
 - The current Marine Survival Training (“MST”) standard does not cover Helicopter operations and emergency training including emergency breathing systems (Helicopter Underwater Escape Training using HUET or METS systems). There are training providers in the UK who can provide this training either as part of a BOSIET¹¹ training course (3 days) or as a stand alone HUET / EBS course (same content for helicopter operations and emergency training but without other Oil and Gas industry specific training elements and therefore 1 Day duration). Employers should be aware that the BOSIET does not cover relevant renewable specific risks (e.g. vessel/turbine transfers.). Employers should be further aware that at present due to the equipment being used currently for helicopter transfer to offshore wind turbines, specific equipment for Helicopter Underwater Escape Training maybe be required, therefore employers should discuss these requirements with helicopter operators before any training of personal commences. Further training on winching techniques is also likely to be required and this should also be discussed by employers with helicopter operators prior to any training taking place. RenewableUK will provide more details during the revisions of the MST.

FAQ's for Workers

- *I have heard the renewable industry is growing fast. What health and safety “ticket/passport” do I need to work in the sector?*
 - RenewableUK do not mandate any specific “tickets/passports”. In most situations technicians and contractors entering the industry will undergo an appropriate period of induction that will cover the relevant health and safety issues applicable to the job they were recruited for. However as a minimum training in working at height (Work at Height and Rescue Training) and marine survival training (offshore) would be regarded as essential.

¹¹ BOSIET “Basic Offshore Safety Induction and Emergency Training”

- *What other training will I expect to receive if I work in the sector?*
 - This will depend on the nature and scope of the job and task and activities being carried out and the role and responsibilities of the individual. Examples of training commonly provided by the industry include first aid; advanced rescue techniques; remote working; off road and defensive driving; electrical safety; industry safety rules; technology specific training; helicopter escape training (offshore).

FAQ's for Training Providers

- *How and when can I apply to become a RenewableUK training provider?*
 - Details will be provided in July 2010. However we expect that initial applications will start during September 2010.
- *How much will it cost to become a training provider?*
 - Details of costs will be published in July 2010. In addition to a fee for the initial application training providers will be charged an annual fee that covers the costs of the annual/periodic audits. A fixed candidate registration fee will also be payable.
- *Will existing providers have to be assessed against the new approvals process?*
 - Yes. All existing providers will be audited in accordance with the requirements set out in the new approvals scheme.
- *How independent is the approvals process?*
 - RenewableUK will ensure that all aspects of the accreditation and approvals process are independent and that conflicts of interest are avoided. In the event of any complaints an appropriate appeals process will be available.

For any further information please contact:

Rhys Jones
Health & Safety Training Manager
RenewableUK

T: 020 7901 3039
 E: r.jones@renewable-uk.com

Chris Streatfeild
Director of Health & Safety
RenewableUK

T: 020 7901 3017
 E: c.streatfeild@renewable-uk.com

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