

BLACK SLUICE

INTERNAL DRAINAGE BOARD



Audit & Risk Committee Meeting

Tuesday, 30th April 2024 at 2pm

Station Road, Swineshead, Lincolnshire PE20 3PW



Black Sluice Internal Drainage Board

Station Road
Swineshead
Boston
Lincolnshire
PE20 3PW

01205 821440

www.blacksluiceidb.gov.uk

mailbox@blacksluiceidb.gov.uk

Our Ref: DW/JB/B10

Your Ref:

Date: 23rd April 2024

To the Chairperson and Members of the Audit & Risk Committee

Notice is hereby given that a Meeting of the Audit & Risk Committee will be held at the offices of the Board on Tuesday, 30th April 2024 at 2pm at which your attendance is requested.

D. Withnall

Chief Executive

A G E N D A

1. Recording the meeting.
2. Welcome guests and apologies for absence.
3. Declarations of interest.
4. To receive and, if correct, sign the Minutes of the Audit & Risk Committee Meeting held on the 24th October 2023 **(pages 1 - 11)**
5. Matters arising.
6. A presentation from the Internal Auditor, Fiona Roe, and to receive the following:
 - (a) Internal Audit Report 2023/24 **(pages 12 - 20)**
7. To review the format of the Period 11 Management Accounts **(pages 21 - 26)**
8. To review the following Board policies:
 - (a) Policy No. 01: Risk Management Strategy **(pages 27 - 50)**
 - (b) Policy No. 07(a): H&S Booklet **(pages 51 & 52)**
 - (c) Policy No. 10 : Delegation of Authority **(pages 53 - 56)**
 - (d) Policy No. 13: Emergency Response Plan **(under separate cover) (confidential information redacted)**
 - (e) Policy No. 27: Control of Ragwort **(pages 57 & 58) (Defra Code of Practice on website only)**
 - (f) Policy No. 28: Land Drains discharging into Board Maintained Watercourses **(page 59)**
 - (g) Policy No. 29: Control of Rabbits, Rats & other Rodents **(page 60)**
 - (h) Policy No. 31: Publication Scheme **(pages 61 - 64)**
 - (i) Policy No. 34: Gift and Hospitality **(page 65)**
9. To receive the Risk Register **(page 66)**
10. To review the Board's Catalogue of Policies **(page 67)**
11. To consider the continuation of the Board's current Health & Safety Consultants **(pages 68 - 72)**
12. Any other business.

BLACK SLUICE INTERNAL DRAINAGE BOARD

MINUTES

of the proceedings of a meeting of the Audit & Risk Committee

held at the offices of the Board on
24th October 2023 at 2pm

Members

Chairperson - * Mr M Brookes

* Mr W Ash

* Mr V Barker

* Mr M Leggott

* Mr J Fowler

* Cllr M Geaney

Cllr Z Lane

* Member Present

In attendance: Mr D Withnall (Chief Executive)
Mrs A Chamberlain (Finance & Admin Director)

2213 Recording the Meeting - Agenda Item 1

Members were informed that the meeting would be recorded.

2214 Apologies for absence - Agenda Item 2

Apologies for absence were received from Cllr Z Lane.

The Chairperson welcomed Cllr M Geaney and Mrs A Chamberlain to their first Audit & Risk Committee meeting.

2215 Declarations of Interest - Agenda Item 3

No declarations of interest were received.

2216 Minutes of the last meeting - Agenda Item 4

Minutes of the last meeting held on 25th April 2023, copies of which had been circulated, were considered and it was AGREED that they should be signed as a true record.

2217 Matters arising - Agenda Item 5

(a) Insurance arrangements - Minute 2139

The Chief Executive confirmed that all the recommendations for the insurance cover have been carried out and have been through another renewal on 30th September 2023. The costs of the renewal were displayed on screen, noting that the management liability policy has a minimum premium of £5,000 plus the insurance premium tax.

The Chief Executive added that when the Board insured with Towergate, the management liability was combined with other IDBs and so there wasn't a minimum like there is now with the NFU. There were no other options that the NFU could do through their underwriters, but they are going to look for alternative options for next year's renewal.

Mr J Fowler questioned what management liability covers as opposed to professional indemnity? It was confirmed that management liability includes the following cover:

- Executive Liability and Company Reimbursement (wrongful executive act)
- Corporate Liability (wrongful corporate act)
- Employment Practices Liability (wrongful employment act)
- Fraud Losses (dishonest act)

(b) Policy No. 1: Risk Management Strategy - Minute 2141(b)

Risk 8.1 Risk of loss of telemetry

The Chief Executive reminded the committee that night and day pumping levels had been set up due to the difference in electricity price for day and night to minimise electricity expenditure. However, the difference in the day rate and night rate is now minimal (larger pumping stations 1-2pence difference per kWh, smaller pumping stations 3-4 pence difference per kWh). The decision has therefore been taken, whilst in the current emergency rainfall event, to bring the daytime levels down to the same as the night levels (they were lowered further yesterday in order to 'make room' for further forecast rain). Once out of the emergency situation, the levels will return to usual day time levels but will not return to the day and night regime. Reference was also made to the standing charges and that they are currently high. It is believed that this is to fund upgrades to the system by National Grid.

Risk 8.2 Risk of loss of telephone communications

The Chief Executive noted that the Board's telephones are now ten years old, noting that the phones are not supported by Avaya (provide telephone connection system). There have been issues with the ability to receive incoming calls, which has been overcome for the time being, but will need to look at upgrading the telephone system in the long term. The Chief Executive therefore suggesting that it will be included in next years budget. It was noted that, if necessary, the phones should be replaced earlier than the next financial year to ensure that they are available and working during an emergency (c£2,500 cost).

Risk 8.4 Risk of Network Failure

The Chief Executive informed the committee that some issues with the internal network have been experienced recently and that HBP (IT support contract) are only managing temporary solutions. The Finance and Admin Director is therefore going to chase HBP for a permanent solution. The Chief Executive noted that the switches were only installed last year, and this seems to be the common factor when there are issues as rebooting them resolves the issue temporarily.

This was further discussed at Minute 2221, the review of the risk register.

2218 To receive the Annual Return including External Auditor's Opinion for 2022/2023 - Agenda Item 6

The Annual Return including External Auditor's opinion was presented, it being noted that there were no matters to report from the external audit.

The Chairperson, and committee, expressed their thanks to all the team involved.

2219 To review the following Board's policies - Agenda Item 7

The Chief Executive explained that these are policies that have been identified for review and any changes have been made in red, noting that employee title changes have also been highlighted in red, but that these are only a result of the recent organisational structure change following the retirement of the previous Chief Executive.

(a) Policy No. 3: Financial Regulations

The Finance and Admin Director highlighted the following proposed changes:

- 5.2 - Income - Cheques can now be paid in using the Bankline App and so the policy has been amended to reflect this. The Finance and Admin Director confirmed that the deposit limit is £5,000 for one cheque and £15,000 total per day.

Mr V Barker questioned how many rate payers pay by cheque now? It was estimated that the Board process around 400 cheques annually, but it is a declining figure.

- 9.6 - Treasury Management / Banking Arrangements - The Chief Executive is to review all the Director's credit card statements and the Projects Director (Deputy CEO) will review the Chief Executive's.

The Committee RESOLVED to recommend that the Financial Regulations (No. 03) be approved at the next Board meeting.

(b) Policy No. 4: Procurement Policy

The Chief Executive noted that the Projects Director (Deputy CEO) reviewed this policy and radical changes were anticipated, however, there is only one minor proposed change, as follows:

- 4.4 Items below £500 - Currently the policy refers to 'small incidental purchases' being purchased from the most appropriate local supplier without following the policy. However, it is felt that this is getting abused and so is proposed to change the wording so that only 'unexpected purchases required to complete works on site or emergency repairs' can be purchased from the most local supplier without getting two quotes (if under £500).

Mr M Leggott questioned how it is getting abused? It was confirmed that multiple purchases around the £50-£60 price range were being purchased and using 'small incidental purchase' rather than getting prices from different suppliers.

The Committee RESOLVED to recommend that the Procurement Policy (No. 04) be approved at the next Board meeting.

(c) Policy No. 5: Investment Strategy

The Chief Executive noted the following proposed amendments:

- 1.1 Introduction - Removing the reference to the credit crunch (2008-2009) and the COVID-19 pandemic.
- 1.2 Introduction - Update to reference the Department for Levelling Up, Housing and Communities (formerly Department of Communities and Local Government & Office of the Deputy Prime Minister).
- 3.3 Specified Investments – Change to the Government guarantee from £50,000 to £85,000.

The Committee RESOLVED to recommend that the Investment Strategy (No. 5) be approved at the next Board meeting.

(d) Health and Safety Committee Terms of Reference

The Chief Executive noted that he completed his National Examination Board in Occupational Safety and Health (NEBOSH) qualification earlier in the year, part of which covered the importance of communication and involvement of employees in health and safety. Therefore, following his promotion to Chief Executive, a Health and Safety (H&S) Committee has been formed.

Composition – The Chief Executive noted that he didn't want the committee to be made up of too much management. The committee has met three times and seems to be working well.

The Chairperson made the suggestion of a Board Member being on the H&S Committee. Mr M Leggott noted that he has been appointed onto Witham 4th IDB's H&S Committee, noting that the composition is very similar. Mr M Leggott noted that he has attended one Witham 4th H&S Committee meeting, noting that there is a mature level of conversation and that they seem pleased to see a Board Member taking an interest in their welfare. Mr M Leggott noting that it shows all inclusivity and how seriously H&S has to be taken.

Cllr M Geaney highlighted her only concern of intimidating other committee members by having a Board Member present. Mr M Leggott noted that from experience on Witham 4th's H&S Committee, it doesn't intimidate them at all. Further noting that the committee members are very much of the opinion of achieving better H&S in a practical way that suits everybody's job role. Mr M Leggott noted that the only current drawback is that as a farmer there are certain times of the year where he could not attend meetings. The Chief Executive noted that the H&S Committee are currently meeting monthly due to the level of work required reviewing the policy, risk assessments, safe systems of work etc.

It was felt that having a fixed Board Member would be beneficial for continuity and building a relationship with the committee members.

All AGREED to add a Board Member to the composition of the H&S Committee. It was confirmed that the Board or Nominations Committee should decide on the Board Member. Mr M Leggott declared an interest in joining the H&S Committee.

The Chief Executive added that some suggestions have already been materialised e.g., the suggestion of tourniquets and chainsaw specific first aid kits. By purchasing these and showing that the workforce representatives are being listened to has shown to them that it is being taken seriously and is encouraging good conversation and debate.

Mr M Leggott noted that it seems like the Board are a little behind with health and safety. The Chief Executive responded that that is why steps are being taken to rectify this.

Discussion took place around who should chair the meeting, it being felt that it should be the Chief Executive and that the Chief Executive should always have an involvement.

Role – The role of the committee has been taken from NEBOSH guidance.

Reporting – The H&S Committee will report to the Board through the annual H&S report.

The Committee RESOLVED to recommend that the Health and Safety Committee Terms of Reference be approved at the next Board meeting.

(e) Policy No. 7: Health and Safety

Cope Safety Management (H&S Consultant) previously produced and reviewed this policy, and it has never been to the Board for review before. The newly formed Health and Safety (H&S) Committee have reviewed it and therefore presented it to the Audit & Risk Committee for review today.

The Chief Executive only became aware of this policy when completing his National Examination Board in Occupational Safety and Health (NEBOSH) qualification earlier in the year. It was also noted that the Internal Auditor has previously been asked to look in detail at H&S so as to bring to light the work that is required. It was felt that the Board are now taking steps to improve H&S, which can be highlighted to the Internal Auditor next year.

Some of the elements within the policy were covered by stand alone Board policies. In these cases, the Board's policy has been merged into the relevant section of the H&S Policy, with the proposal of no longer needing the Board stand alone policies, these are:

- Policy No. 21: Control and management of asbestos
- Policy No. 22: Control of noise at work
- Policy No. 23: Display Screen Equipment
- Policy No. 24: First aid and accident reporting
- Policy No. 25: Lone Worker
- Policy No. 36: Manual Handling
- Policy No. 37: Managing Stress
- Policy No. 38: Vibration at work

All AGREED that the above policies should be ceased in light of them now being included in the H&S Policy (No. 7).

The Chief Executive led the committee through the H&S Policy, highlighting the following:

2.3.5 Responsibilities of the Health and Safety Consultant

Mr J Fowler questioned the role of Cope Safety Management going forward? The Chief Executive explained that previously Cope Safety Management have done the Board's health and safety for the Board, continuing that he doesn't wish to continue with this approach and wants the Board to take ownership of health and safety. Cope Safety Management will still be retained and will attend twice a year to complete audits and provide recommendations.

2.3.2 Responsibilities of Managers and Supervisors

The table of responsibilities was highlighted, it being noted that the section references are to be added and that there is currently nothing within the policy relating to two of the responsibilities, H&S Committee and H&S Policy Development, and so a section about each of these will be added.

Mr V Barker noted that there are no responsibilities of Board Members. Mr V Barker referenced a previous time in which he witnessed Board employees on the weedscreen deck not wearing the correct PPE (life jackets, hard hats). He therefore questioned his responsibility as a Board Member observing this? It was felt that the correct route would be for the Board Member to inform the Chief Executive of the infringement / risk. Mr V Barker noted that he feels he has a fair relationship with the employees of the Board and wouldn't like them then to think of him as a 'tell-tale'. Cllr M Geaney questioned how Mr V Barker would feel if somebody died or was injured through such an act and it had been observed and not reported.

It was therefore felt that there should be an added section for responsibilities of the Board / Board Members, ALL AGREED as follows:

- Concerns reported to the Chief Executive
- Provision of resources for health and safety
- Review of Health and Safety Policy

Mr M Leggott referred to the above responsibility of 'the provision of resources', noting that it is not only the initial providing of equipment that is important, but also ensuring that they are replaced / repaired within a sufficient renewal date. The Chief Executive noted that all the Board's equipment is inspected for insurance purposes and so would be brought to attention if not adhering to required renewal dates.

Cllr M Geaney questioned whether it states in the employee's terms and conditions that they must wear the appropriate PPE and the consequences of not doing so? It was confirmed that it is clearly stated within the Employee Code of Conduct and within 3.16 Personal Protective Equipment of this H&S Policy and any breach of this would be classed as misconduct and would therefore dealt with accordingly.

3.1 Asbestos

It was noted that the Grant in Aid Manager (Georgina Nichols) has a report for asbestos in pumping stations that she is going to share with the Chief Executive. She also has previous experience in concrete and can see no sign of aerated concrete on the pumping station plans either.

3.2 Confined Spaces

The H&S Committee had lengthy discussion around confined spaces and there is more work to be done with regard to working under pumping stations behind the weedscreen bars, which, although is not actually classified as a confined space, the system still needs to be looked at as to how to get somebody out and up the bank.

3.3 Construction (Design and Management)

It will be ensured that any work in the future that should be done under CDM is done so.

3.5 Display Screen Equipment (DSE)

It was noted that the display screen equipment assessment is also now in electronic format. All office users have completed their DSE assessment and those that work from home are also required to complete another DSE assessment.

3.6 Electricity

Mr J Fowler noted that overhead wires are also of importance within the farming industry and that his farm has a procedure where every employee must be provided with maps showing all overhead wires and sign for them upon receipt. Mr J Fowler noted that this should also extend to contractors.

Mr M Leggott noted that Witham 4th IDB employees must complete a risk assessment on their tablet before they start any operation. Within completing this risk assessment, it includes all the mapping for overhead wires etc. Mr M Leggott also added that it stops any risk assessments being completed retrospectively, as the tablet provides the date and time stamp.

The Chief Executive responded that the Board are starting with uploading policies, risk assessments etc. to SharePoint. Noting that for a system like Witham 4th IDB's each member of the workforce would require a 10" tablet. The Chief Executive felt the health and safety and associated documents needed developing manually first in the short term, with a long term aim for an electronic system.

The Chief Executive referred specifically back to electricity and that the Board has a safe system of work for working around overhead cables and are also part of the Overhead Cable forum. Further noting that the Board has not had any overhead cable strikes. It being further noted that all the workforce have a map set which includes showing overhead cables.

It was noted that Welland and Deeping IDB do not operate underneath overhead cables at all.

The Chief Executive noted that the Board's workforce measure the height of the wire, call it into the supervisor, set their height limiter and ring to confirm when clear of the wire.

All AGREED to the addition of signing on receipt of map set showing overhead wires for both employees and contractors.

3.7 Fire

It was noted that the fire management plan has not been included in this policy, but instead left separate (Policy No. 35). There is currently only a fire plan for the office / depot and so a plan also needs developing for the pumping stations.

3.8 First Aid and Accident Reporting

It was noted that the flow chart within this section to help decide if an incident needs to be reported is slightly incorrect, with the corrected version shown on screen (the addition of the circumstance of a non-worker being taken directly to the hospital from the incident scene).

3.11 Lifting Operations and Lifting Equipment

It was noted that at the recent insurance inspection, a two-tonne weight was used for the excavator to be signed off for lifting purposes (alarm has to go off before the tracks come off the ground), in addition to excavating purposes.

3.12 Lone Working

The Board continue to use the lone working app, Peoplesafe.

3.13 Manual Handling

Manual Handling training is scheduled for the training day in December 2023.

Mr M Leggott noted that it is a beneficial course, but the ideal is to engineer the manual handling requirement out of the workplace. The Chief Executive acknowledged this, noting that it is the fundamental of health and safety in general to engineer the risk out of any situation, with mitigation through the use of PPE being the last resort.

3.15 Noise

The Chief Executive noted that the Board's Officers are looking to purchase a dosimeter to measure sound level in various circumstances, especially within pumping stations when the pumps are running to determine where ear protection is required.

Mr J Fowler referred to headphones / ear pods and that on his farm, earphones are banned for anybody moving around the yard due to the decrease in hazard perception it causes and the danger around being unaware of moving vehicles etc.

The Chief Executive noted that he has experience of using electronic ear defenders and has suggested them at the health and safety committee meetings, although the employee representatives felt they were not necessary and that normal ear defenders are sufficient.

Mr J Fowler referred to the initial point about the danger of wearing music headphones, suggesting it should perhaps be part of the policy that they are not to be worn in areas of movement. Mr V Barker added that he has a similar policy in which if two or more people are working together, then tractor radios should be switched off so that the person in the cab has communication with the person outside the cab.

It was questioned where this, danger of music headphones, would fit best within the policy? The Chief Executive suggested that it be picked up on each risk assessment as a constant consideration. All AGREED.

3.18 Safety Signs and Signals

The Chairperson highlighted the reference to road traffic signs, questioning if the Board's workforce are trained so they know the correct distances etc. for managing traffic? The Chief Executive responded that some have previously completed Street Works training, however, this has not been maintained due to using external contractors for such works.

3.22 Work equipment

The Chief Executive noted that this will involve input from the H&S Committee about what equipment and plant they would prefer. For example, one of the excavator drivers has noted that he prefers one make of excavator over another. Therefore, things such as this will be considered and reviewed. The Finance and Admin Director is going to complete an exercise looking at the cost over the life span of the machine for the renewal of the next excavator, for example.

3.23 Working Time

It was noted that most of the workforce have voluntarily opted out of the 48-hour week working time limit, in order for them to be able to work extra during emergency events. It was noted that they opt-out by a one-off signatory declaration.

Cllr M Geaney noted that there is no reference to anybody with disabilities throughout this policy. The Chief Executive responded that each of these policies would apply also to somebody with a disability. Further noting that a specific risk assessment would have to be completed for them and also assess whether they could safely carry out the work required of them under the working conditions i.e., lone working, with any reasonable adjustments.

Review Period – The Chief Executive suggested that the policy is reviewed annually by the Chief Executive and every three years by the Audit & Risk Committee and therefore Board. All AGREED.

The Committee RESOLVED to recommend that the Health and Safety Policy (No. 7) be approved at the next Board meeting, with the above amendments.

(f) Policy No. 41: Public Sector Co-operation Agreement (PSCA)

The Finance and Admin Director has carried out an exercise to determine if the 10% addition is sufficient to cover the cost of all the work involved and it has been identified that it is, there being no proposed amendments.

The Committee RESOLVED to recommend that the Public Sector Co-operation Agreement (No. 41) be approved at the next Board meeting.

(g) Policy No. 43: Electronic Information & Communication Systems

The Finance and Admin Director highlighted the only proposed change, other than title changes:

- 4.3 Equipment and Passwords – Amendment to reflect that Dual Authentication is now in place (from April 2022) to gain access to the Board's network.

The Committee RESOLVED to recommend that the Electronic Information & Communication Systems (No. 43) be approved at the next Board meeting.

(h) Policy No. 51: Drone Flying (New Draft Policy)

The Chief Executive noted that the previous Chief Executive (Ian Warsap) produced this policy before his retirement. It was noted that it has been suggested to ensure all abbreviations are written in full.

Mr V Barker noted that he has witnessed the Environment Agency (EA) using drones to survey the SFFD and that they have not always been in control of the drone.

Cllr M Geaney referenced the following sentence: *'You should never put people in danger.'* She felt the word *'should'* should be *'must'*, likening it to a pilot flying a larger aircraft and that there should be no doubt around it. All AGREED to amend to *'You should take all reasonable steps to not put people in danger'*.

Mr J Fowler noted that the policy is adequate for the weight of drone the Board has, but that if the Board find it useful and wish to upgrade drone, the policy will also require enhancing. The Chief Executive noted that the Board would likely use a specialist for a larger drone.

The Committee RESOLVED to recommend that the Drone Flying Policy (No. 51) be adopted at the next Board meeting.

2220 To receive the catalogue of Board Policies with recommended approval dates – Agenda Item 8

It was explained that those policies highlighted in yellow are to be removed from the catalogue due to now being within the H&S Policy (No.7). Due to the removal of these policies, the other policy review dates have been rescheduled to create a more even distribution in the following meetings. Due to this, some of the policies will exceed their review date (by no more than six months / the next meeting) and so these have been highlighted in red.

Mr M Leggott made reference to Policy No. 39, H&S Wearing of seatbelts in Board Vehicles, and suggested it should be within the H&S policy. The Chief Executive noted that it is not covered by any health and safety legislation which is the basis for the policy. It was therefore AGREED to keep it as a separate policy but remove any reference to H&S in the title and also with any other policies to avoid confusion.

The Committee AGREED that the Catalogue of Board Policies be adopted.

2221 To review the Risk Register - Agenda Item 9

The risks with a Risk Score of 6 were reviewed:

- *Risk 1.9 Insufficient finance to carry out works* – It was felt that due to the current rainfall emergency event and extent of pumping required, this should remain at a risk score of 6.

Following previous discussion at Minute 2217(b), the Chief Executive suggested the following changes:

- *Risk 8.2 Loss of telephone communications* – Potential impact of risk to remain at Low, Potential likelihood of risk to increase to Medium, giving a Risk Score of 2.
- *Risk 8.3 Loss of internet connection* – The Chief Executive noted that although the internet connection can sometimes be slow, he doesn't believe there is risk of losing it completely. Further noting the option of Starlink that can be explored and that work has been completed in the village to suggest that fibre could soon be available.
- *Risk 8.4 Network Failure* – Potential impact of risk to remain at High, Potential Likelihood of risk to increase to Medium, giving a Risk Score of 6. Therefore, making it something that the committee and Board will continue to monitor until the risk score can be lowered.

The committee AGREED that the Risk Register be accepted with the above amendments.

There being no further business the meeting closed at 15:35.



Black Sluice IDB






Assurance Review of Annual Governance
and Accountability Return

2023/24

April 2024

Internal Audit
FINAL

Executive Summary

<p>OVERALL ASSESSMENT</p>	<p>KEY STRATEGIC FINDINGS</p>								
 <p>The diagram shows a circular gauge with 'Substantial Assurance' in the center. To the right, four horizontal bars represent assurance levels: Substantial Assurance (green), Reasonable Assurance (yellow), Limited Assurance (orange), and No Assurance (red). The 'Substantial Assurance' bar is highlighted.</p>	<ul style="list-style-type: none">  Black Sluice Internal Drainage Board (BSIDB) has good systems in place and the governance, risk and control framework is working well.  BSIDB use the "Opera" suite of software to manage their accounts, which supports accurate accounting and good record keeping. 								
<p>ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE</p>	<p>GOOD PRACTICE IDENTIFIED</p>								
<p>The audit covers all areas required by the Annual Governance and Accountability Return (AGAR) and includes, where appropriate, the key risks for a drainage board.</p>	<ul style="list-style-type: none">  The Black Sluice IDB has a very informative website which is easy to navigate, well populated with useful and key information.  The Black Sluice IDB has good governance, risk and control procedures in place with appropriate reporting to the Board and Committees. 								
<p>SCOPE</p>	<p>ACTION POINTS</p>								
<p>The purpose of the review was to undertake sufficient audit work to be able to sign off the Annual Governance and Accountability Return for Internal Audit.</p>	<table border="1"> <thead> <tr> <th>Urgent</th> <th>Important</th> <th>Routine</th> <th>Operational</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Urgent	Important	Routine	Operational	0	0	0	0
Urgent	Important	Routine	Operational						
0	0	0	0						

Assurance - Key Findings and Management Action Plan (MAP)

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
No recommendations were made.							

PRIORITY GRADINGS

1 **URGENT** Fundamental control issue on which action should be taken immediately.

2 **IMPORTANT** Control issue on which action should be taken at the earliest opportunity.

3 **ROUTINE** Control issue on which action should be taken.

Operational - Effectiveness Matter (OEM) Action Plan

Ref	Risk Area	Finding	Suggested Action	Management Comments
No Operation Effectiveness Matters were identified.				

ADVISORY NOTE

Operational Effectiveness Matters need to be considered as part of management review of procedures.

Findings





Directed Risk:


Failure to properly direct the service to ensure compliance with the requirements of the organisation.


Ref	Expected Key Risk Mitigation	Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
GF	Governance Framework There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.	In place	-	-
RM	Risk Mitigation The documented process aligns with the mitigating arrangements set out in the corporate risk register.	In place	-	-
C	Compliance Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.	In place	-	-


Other Findings

- 

All the Organisation's Policy and Procedures can be easily accessed on their website. Review of a number of Policies confirm relevant and comprehensive guidance is in place for all aspects of the IDB, including Financial Regulations; Risk Management Strategy; Procurement Policy; Health and Safety Policy; Delegation of Authority; Fraud and Corruption Policy; Data Protection Policy. Appropriate version control is present throughout the Policies with dates of review and approval, as well as the approving body.
- 













Non-confidential Board agendas and minutes can be easily accessed through the website. A review of the meeting minutes from 13th June 2023, 22nd November 2023 and (draft) 6th February 2024 confirmed that management actions have been resolved, and arising matters have been identified and discussed, with the decisions made being recorded accordingly. Committee agendas and minutes can also be easily accessed through the website. A review of the following confirms decisions and actions have been documented appropriately: Audit & Risk Committee (24th October 2023); and Executive Committee (23rd May 2023).
- 

The Risk Management Strategy and Policy were approved on 13th June 2023 and are reviewed annually.
- 

The organisation's key objectives have been included in the Risk Register, with the relevant risks and their corresponding likelihood and impact being identified. Details of the mitigating controls and actions taken for each risk have been included within the Risk Management Strategy.
- 

Accounting Records for the IDB are held and managed through the Pegasus Opera 3 accounting software. Monthly accounts are circulated and discussed at every Board Meeting as per the Financial Regulations, including drainage rates and special levies. Up to date records ensure that members of the Board are aware of the current financial position.

Other Findings

-  The IDB's Creditor's Report dated November 2023 shows the accounts payable are documented and signed off by the Finance and Admin Director.
-  A review of the purchase ledger dated 21st February 2024 confirmed that all purchase orders have been well-documented. Invoices have been received and matched with the corresponding purchase orders and payments have been signed off by the Chief Executive in accordance with the Financial Regulations.
-  The five largest payments within the year were selected for testing. The corresponding purchase order, invoice and nominal ledger entries were reviewed and found to be in order.
-  A review of Board Meeting Minutes dated 14th February 2023 showed that the Chairperson and Chief Executive have authorised a sealed rate for the year (Sub-District No. 1 (8.765p) Sub-District No. 2 (17.53p)) yielding an estimated £1,458,980 of drainage rates payable. Special levies for the local councils have also been included.
-  The Debtors Report dated 18th January 2024 shows 11 unpaid accounts totalling £197,837.25 of which only £329.16 has been outstanding over three months.
Review of an email sent to the Executive Committee confirmed that debtors outstanding over three months had been reported as per the requirements of the Financial Regulations.
-  Review of Rates Write Offs & Irrecoverables Document shows a small number of write offs throughout the year. The policy for what amounts can be written off and by whom has been detailed within the Delegation of Authority Policy. The Chief Executive confirmed that the Financial Regulations will be amended to include a small section on write-off procedures.
-  A review of petty cash documentation dated November 2023 confirms all petty cash transactions have been recorded and signed off by the Finance and Administration Director. Receipts have been included within the November 2023 Petty Cash Document. Review of the receipts and vouchers confirm the payments have been recorded accurately, including VAT.
-  A review of the Payroll Summary for P09 showed that all aspects of payroll have been well documented including details on gross pay, tax, NI, pension, debts and expenses. The December 2023 Salaries spreadsheet further documents employees' monthly pay, overtime calculations, callout charges and mileage claims.
Review of December 2023 Payroll BACS Document confirms that employees' net pay has been correctly paid out with the appropriate NI and Tax deductions. This has then been approved and signed off by the Chief Executive.
-  Review of HMRC Tax & NI Deducted P09 Document confirms that the total PAYE and NI amount has been correctly paid out to HMRC.
The Payroll Summary P09 shows pension deductions for all employees. A review of LLC Pensions P09 Document confirms these deductions have all been correctly paid to the Local Authority.
-  The Asset Register 2023/24 is up to date at 31st March 2024 and includes all plant and vehicle assets. The cost of each asset has been recorded, as well as their depreciation. Any profit/loss at the point of disposal is documented.
-  All bank statements have been well documented and consistently reconciled to the IDB's cash book.
-  A sample of sums feeding into the accounting statements were reviewed and verified to be correct.



Delivery Risk:

Failure to deliver the service in an effective manner which meets the requirements of the organisation.

Ref	Expected Key Risk Mitigation	Effectiveness of arrangements	Cross Reference to MAP	Cross Reference to OEM
PM	Performance Monitoring There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.	In place	-	-
S	Sustainability The impact on the organisation's sustainability agenda has been considered.	In place	-	-
R	Resilience Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.	In place	-	-

Other Findings

- The Board Meeting Minutes (draft) dated 6th February 2024 shows Management Accounts, including budget data, have been shared and discussed. A review of the Management Accounts for Period 9 confirms the correct financial and budget data have been reported.
- A reconciled report for the Board's Reserve Account has been provided including corresponding bank statements. A section on reserves is present within the Financial Regulations, providing clear guidance on maintaining the long term aims of the IDB.
- The IDB operates a 10-year forecast which provides estimates for annual budgets on expenditure and income for all aspects of the organisation. The annual increase in rates has also been included, with an expected increase of 7.47% for 2024/25.
- The Financial Regulations detail the procedures for collection of all income. Payments received by cheque are to be paid to the Board's bank account within a week, whilst payments received in cash can be transferred to the petty cash float.
- A review of the November 2023 Drawings Account, Call Account and Reserve Account reconciliations, in addition to the July 2023 NatWest 35 Day Account reconciliation, confirmed that bank reconciliations have been regularly undertaken. Furthermore, corresponding bank statements show that the reconciliations are accurate.
- The Board's objective to conserve and enhance the environment wherever practical and possible to ensure there is no net loss in biodiversity has been included in the Risk Register, with the associated risks identified and a biodiversity action plan in place.
- Good practice is adopted by the Board to respond to business interruption events, and to enhance the economic, effective and efficient delivery of its services. The Risk Register sets out relevant business objectives, which are discussed in Board meetings in relation to matters arising.

EXPLANATORY INFORMATION

Appendix A

Scope and Limitations of the Review

1. The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan. As set out in the Audit Charter, substantive testing is only carried out where this has been agreed with management and unless explicitly shown in the scope no such work has been performed.

Disclaimer

2. The matters raised in this report are only those that came to the attention of the auditor during the course of the review, and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

Effectiveness of arrangements

3. The definitions of the effectiveness of arrangements are set out below. These are based solely upon the audit work performed, assume business as usual, and do not necessarily cover management override or exceptional circumstances.

In place	The control arrangements in place mitigate the risk from arising.
Partially in place	The control arrangements in place only partially mitigate the risk from arising.
Not in place	The control arrangements in place do not effectively mitigate the risk from arising.

Assurance Assessment

4. The definitions of the assurance assessments are:

Substantial Assurance	There is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.
Reasonable Assurance	The system of internal controls is generally adequate and operating effectively but some improvements are required to ensure that risks are managed and process objectives achieved.
Limited Assurance	The system of internal controls is generally inadequate or not operating effectively and significant improvements are required to ensure that risks are managed and process objectives achieved.
No Assurance	There is a fundamental breakdown or absence of core internal controls requiring immediate action.

Acknowledgement

5. We would like to thank staff for their co-operation and assistance during the course of our work.

Release of Report

6. The table below sets out the history of this report.

Stage	Issued	Response Received
Audit Planning Memorandum:	7 th September 2023	7 th September 2023
Draft Report:	11 th April 2024	17 th April 2024
Final Report:	18 th April 2024	

AUDIT PLANNING MEMORANDUM

Appendix B

Client:	Black Sluice IDB		
Review:	Annual Governance and Accountability Return		
Type of Review:	Assurance	Audit Lead:	William Railton
Outline scope (per Annual Plan):	The purpose of the review was to undertake sufficient audit work to be able to sign off the Annual Governance and Accountability Return for Internal Audit.		
Detailed scope will consider:	<p>Directed</p> <p>Governance Framework: There is a documented process instruction which accords with the relevant regulatory guidance, Financial Instructions and Scheme of Delegation.</p> <p>Risk Mitigation: The documented process aligns with the mitigating arrangements set out in the corporate risk register.</p> <p>Compliance: Compliance with statutory, regulatory and policy requirements is demonstrated, with action taken in cases of identified non-compliance.</p>	<p>Delivery</p> <p>Performance monitoring: There are agreed KPIs for the process which align with the business plan requirements and are independently monitored, with corrective action taken in a timely manner.</p> <p>Sustainability: The impact on the organisation's sustainability agenda has been considered.</p> <p>Resilience: Good practice to respond to business interruption events and to enhance the economic, effective and efficient delivery is adopted.</p>	
Requested additions to scope:	(if required then please provide brief detail)		
Exclusions from scope:	None		
Planned Start Date:	22/01/2024	Exit Meeting Date:	N/A
		Exit Meeting to be held with:	Ian Warsap and Daniel Withnall

SELF ASSESSMENT RESPONSE

Matters over the previous 12 months relating to activity to be reviewed	Y/N (if Y then please provide brief details separately)
Has there been any reduction in the effectiveness of the internal controls due to staff absences through sickness and/or vacancies etc?	N
Have there been any breakdowns in the internal controls resulting in disciplinary action or similar?	N
Have there been any significant changes to the process?	N
Are there any particular matters/periods of time you would like the review to consider?	N

Black Sluice Internal Drainage Board

Project Summary

2023/24

Period 11 - February 2024

Description	Period Current Year			Year To Date					Last Year	
	Actual	Budget	Variance	Actual	Budget	Variance	Forecast	Variance	Actual YTD	Variance to Current Year
Rates & Levies	3,295	86	3,209	2,976,741	2,987,630	(10,889)	2,978,651	(1,910)	2,323,593	653,148
Interest & Grants	7,520	2,397	5,123	411,185	199,386	211,799	412,707	(1,522)	94,002	317,183
Development Fund	0	0	0	0	0	0	0	0	0	0
Other Income	630	1,062	(432)	22,029	18,686	3,343	20,847	1,182	180,026	(157,997)
Rechargeable Income	3,958	46,203	(42,245)	387,846	372,533	15,313	432,620	(44,774)	587,896	(200,050)
Solar Panel Income	800	949	(149)	23,877	19,786	4,091	24,067	(190)	18,507	5,370
Total Income	16,203	50,697	(34,494)	3,821,678	3,598,021	223,657	3,868,892	(47,214)	3,204,024	617,653
Schemes	43,420	0	(43,420)	459,624	715,063	255,439	608,003	148,379	121,097	(338,527)
Pumping Station Schemes	15,460	5,000	(10,460)	156,763	277,980	121,217	335,409	178,646	38,226	(118,538)
Pumping Station Maintenance	32,225	25,473	(91,491)	356,145	929,031	(115,345)	944,070	(100,306)	246,393	(568,660)
Electricity	183,962	99,223	(84,740)	688,232	656,398	(31,834)			229,323	0
Drain Maintenance	34,020	54,273	20,253	742,582	857,229	114,647	838,855	96,273	730,098	(12,484)
Environmental Schemes	1,051	743	(308)	12,845	16,932	4,087	19,890	7,045	17,087	4,242
Administration & Establishment	63,978	48,160	(15,818)	638,504	595,080	(43,424)	624,064	(14,440)	564,873	(73,631)
EA Precept	0	0	0	276,552	276,552	0	276,552	0	276,552	0
Rechargeable Expenditure	3,978	42,979	42,959	359,781	346,543	(13,238)	398,844	39,063	559,145	(388,532)
Solar Panel Expenses	0	0	0	250	3,238	2,988	3,238	2,988	546	296
Total Expenditure	378,094	275,851	(183,024)	3,691,277	4,674,046	294,537	4,048,925	357,648	2,783,339	(1,495,834)
Surplus / (Deficit)	(361,891)	(225,154)	(136,737)	130,401	(1,076,025)	1,206,426	(180,033)	310,434	420,685	(290,284)
Movement on reserves										
Plant Reserve	(14,663)	0	14,663	(204,633)	0	204,633	(205,182)	(549)	(217,253)	(12,620)
Pump Engineer Oncost	1	0	(1)	(3,088)	0	3,088	0	3,088	4,427	7,516
Wages oncost Reserve	(5,481)	0	5,481	(41,793)	0	41,793	0	41,793	(38,430)	3,364
Grants Manager	0	0	0	0	0	0	0	0	0	0
Surplus / (Deficit)	(341,749)	(225,154)	(156,880)	379,915	(1,076,025)	956,912	25,149	266,102	671,940	(288,543)

Black Sluice Internal Drainage Board Drainage Rates & Special Levies

2023/24

Period 11 - February 2024

Drainage Rates & Special Levies Due

Drainage Rates

Annual Drainage Rates - Land and/or buildings	1,451,545.17	
Land/Property - Value Decreased	(10,814.22)	
Land/Property - Value Increased	9,706.17	
New Assessment	756.22	
Write Offs & Irrecoverables	(5.23)	
Adjustments required for Special Levy		
Summons Collection Costs	275.00	

Balance	1,451,463.11	48.66%
----------------	--------------	--------

Special Levies

Boston Borough Council	1,139,128.16	
South Holland District Council	213,985.74	
North Kesteven District Council	97,415.80	
South Kesteven District Council	80,851.16	

	1,531,380.86	51.34%
--	--------------	--------

Total Due	2,982,843.97	100.00%
------------------	--------------	---------

Drainage Rates & Special Levies Collected

B/F Arrears/(Allowances)	(1,842.22)	
Payments Posted	1,438,300.73	
Returned Amount		99.58%
Paid Refund	(342.88)	
Bourne North Fen Trust Contribution	9,244.69	
Special Levies Received	1,531,380.86	100.00%

Total Received	2,976,741.18	
-----------------------	--------------	--

Drainage Rates & Special Levies Debtors

Special Levy Outstanding	0.00	0.00%
Drainage Rates Outstanding	6,102.79	0.42%

	6,102.79	
--	----------	--

	2,982,843.97	
--	--------------	--

Black Sluice Internal Drainage Board
Income & Expenditure Summary
2023/24
Period 11 - February 2024

	This Year	Last Year	Variance
Drainage Rates	1,445,360	1,133,243	312,118
Special Levies	1,531,381	1,190,351	341,030
Recoverable	387,846	587,896	(200,050)
Misc Income	434,667	275,542	159,125
Solar Panel Income	23,877	18,507	5,370
	3,823,132	3,205,539	617,593
Employment Costs	1,398,961	1,244,632	(154,329)
Property	838,853	282,620	(556,234)
General Expenses	212,128	211,855	(273)
Materials / Stock	21,614	14,159	(7,455)
Motor & Plant	308,769	257,393	(51,375)
Miscellaneous	662,891	522,952	(139,940)
Recharges	(575,165)	(600,790)	(25,625)
Plant	575,165	600,777	25,613
Total Expenditure	3,443,217	2,533,598	(909,619)
Net Surplus / (Deficit)	379,915	671,941	(292,026)

Black Sluice Internal Drainage Board

Balance Sheet at Period End

2023/24

Period 11 - February 2024

	<u>This Year</u>		<u>Last Year</u>	
	£	£	£	£
Operational Land & Buildings Cost	1,009,350		1,009,350	
Pumping Stations Cost	3,861,354		3,861,354	
Non-operational Property Cost	165,000		165,000	
Vehicles, Plant & Machinery Cost	1,118,471		1,046,359	
Fixed Assets		<u>6,154,175</u>		<u>6,082,063</u>
Stock	56,311		49,636	
Debtors Control	98,282		64,255	
VAT	64,298		11,077	
Car Loans	4,683		8,757	
Prepayments	74,194		70,292	
Drawings Bank Account	(2,294)		2,314	
Call Bank Account	409,999		310,000	
Petty Cash	246		316	
Highland Water	0		0	
Work in Progress	(123,359)		573	
Nat West Government Procurement Card	(1,528)		(840)	
Brewin Dolphin Investment	405,146		425,694	
Natwest Reserve Account	328,362		1,131,872	
Natwest 35 Day Notice Account	1,500,000		501,547	
Total Current Assets		<u>2,814,341</u>		<u>2,575,493</u>
Trade Creditors	181,635		326	
PAYE & NI Control Account	(32,006)		(24,889)	
Superannuation Contrl Account	(28,175)		(18,080)	
Accruals	(478,328)		(127,666)	
Total Liabilities		<u>(356,874)</u>		<u>(170,309)</u>
Pension Liability		446,000		(2,703,000)
		<u>9,057,643</u>		<u>5,784,247</u>
Capital Reserve	5,933,400		5,759,896	
Pension Reserve	446,000		(2,703,000)	
Brewin Dolphin Revaluation	(94,854)		(74,306)	
Total Capital		<u>6,284,546</u>		<u>2,982,590</u>
Revenue Reserve	1,432,256		1,262,024	
Development Reserve	560,531		478,907	
Plant Reserve	272,371		314,310	
Wages Oncost Reserve	128,023		74,476	
General Reserve	379,915		671,941	
Total Reserves		<u>2,773,096</u>		<u>2,801,657</u>
		<u>9,057,643</u> 0		<u>5,784,247</u>
<u>Cash & Bank Balances</u>				
Drawings Account		(2,294)		
Call Account		9,999	409,999	
Natwest Reserve Account @ 1.46% wef 15/08/23		328,362		
Natwest 35 Day Notice Account @ 3.25% wef 15/08/23		1,500,000		
Petty Cash		246		
Chargecard		(1,528)		
Loughborough BS @ 5.65%		200,000	12 Month Fixed Term Deposit	
Vernon BS @ 6.00%		200,000	12 Month Fixed Term Deposit	
		<u>2,234,784</u>		

Black Sluice Internal Drainage Board Investment Summary 2023/24 Period 11 - February 2024

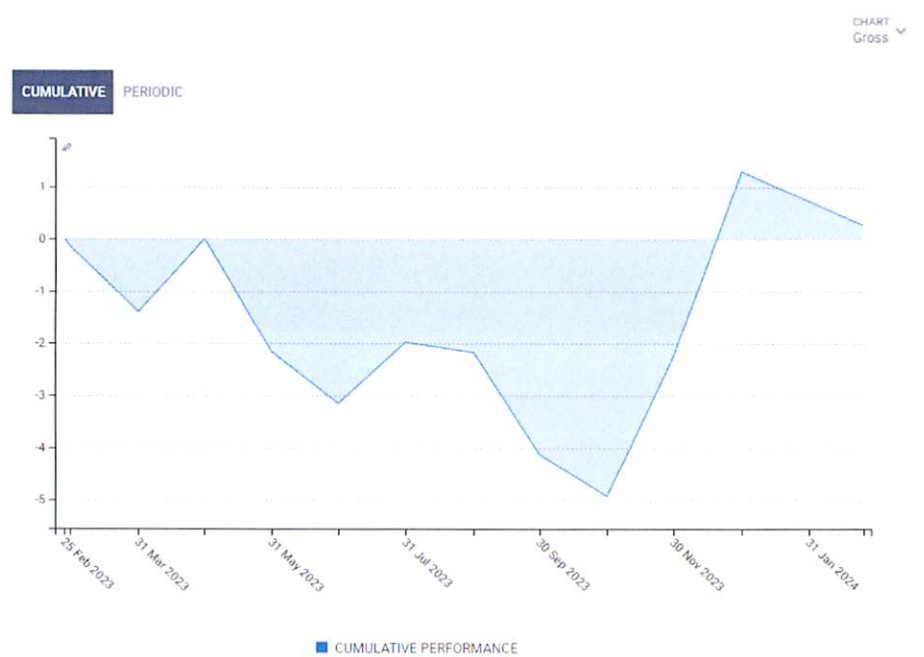
PORTFOLIO P1684056 VALUATION DATE 28 Feb 2024 ⓘ

📅 25 Feb 2023 - 25 Feb 2024 ▾

PORTFOLIO OVERVIEW

LAST 12 MONTHS PERFORMANCE	0.27% ↑
TOTAL VALUE	405,146.29 GBP
ESTIMATED ANNUAL INCOME	14,763.25 GBP

PERFORMANCE



PORTFOLIO SUMMARY

BOOK COST	OVERALL GAIN OR LOSS	ESTIMATED ANNUAL INCOME	ESTIMATED YIELD %
445,362.60 GBP	-9.03% ↓	14,763.25 GBP	3.64% ↑

Black Sluice Internal Drainage Board BFF Investment Summary 2023/24 Period 11 - February 2024

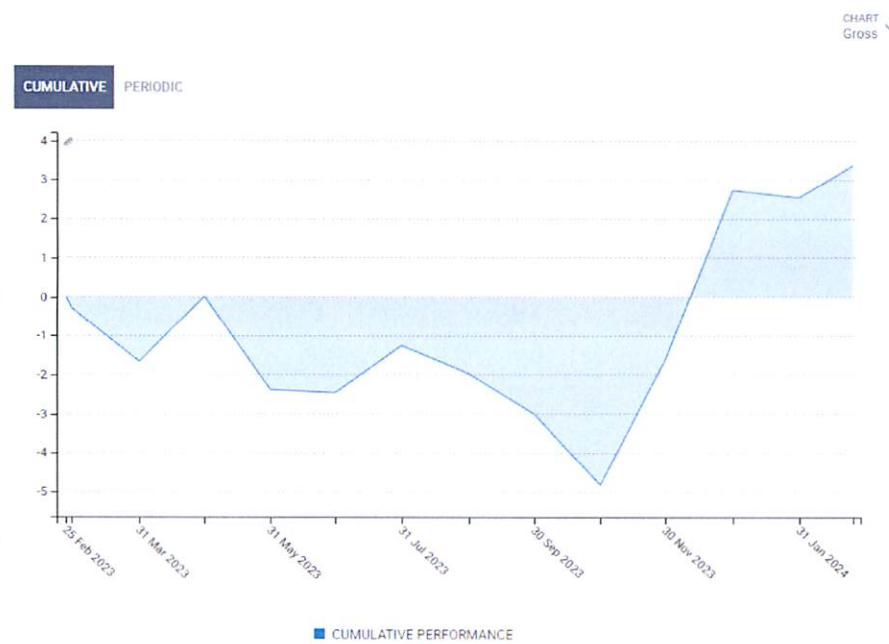
PORTFOLIO P0000789299 VALUATION DATE 28 Feb 2024

25 Feb 2023 - 25 Feb 2024

PORTFOLIO OVERVIEW

LAST 12 MONTHS PERFORMANCE	3.38%
TOTAL VALUE	324,515.13 GBP
ESTIMATED ANNUAL INCOME	11,256.02 GBP

PERFORMANCE



PORTFOLIO SUMMARY

BOOK COST
312,664.37 GBP

OVERALL GAIN OR LOSS
3.79%↑

ESTIMATED ANNUAL INCOME
11,256.02 GBP

ESTIMATED YIELD %
3.47%↑

Black Sluice Internal Drainage Board

Risk Management Strategy

Risk Management Policy

Risk Analysis

Updated	30 April 2024
Board Approved	
Due for Review	Annually

Contents

1. Purpose, Aims & Objectives
2. Accountabilities, Roles & Reporting Lines
3. Skills & Expertise
4. Embedding Risk Management
5. Risk and the Decision Making Processes
6. Supporting Innovation & Improvement

Appendices

- A – Risk Management Strategy Statement
- B – Risk Management Policy Document
- C – Risk Analysis
- D – Risk Register

Risk Management Strategy

1. Purpose, Aims and Objectives

1.1 The purpose of the Boards Risk Management Strategy is to effectively manage potential opportunities and threats to the Board achieving its objectives. See attached Risk Management Policy Statement, Appendix A.

1.2 The Boards Risk Management Strategy has the following aims and objectives;

- Integration of Risk Management into the culture of the Board
- Raising awareness of the need for Risk Management by all those connected with the delivery of services (including partners)
- Enabling the Board to anticipate and respond to changing social, environmental and legislative conditions
- Minimisation of injury, damage, loss and inconvenience to staff, members of the public, service users, assets etc. arising from or connected with the delivery of the Board services
- Introduction of a robust framework and procedures for identification, analysis, assessment and management of risk, and the reporting and recording of events, based on best practice
- Minimisation of the cost of risk

1.3 To achieve these aims and objectives, the following strategy is proposed;

- Establish clear accountabilities, roles and reporting lines for all employees
- Acquire and develop the necessary skills and expertise
- Provide for risk assessment in all decision making processes of the Board
- Develop a resource allocation framework to allocate (target) resources for risk management
- Develop procedures and guidelines for use across the Board
- Develop arrangements to measure performance of Risk Management activities against the aims and objectives
- To make all partners and service providers aware of the Boards' expectations on risk, both generally as set out in its Risk Management Policy and where necessary in particular areas of the Boards' operations.

1.4 The Black Sluice Internal Drainage Board has adopted the following definition of Risk:

'Risk is the threat that an event or action will adversely affect the organisation's ability to achieve its objectives and to successfully execute its strategies'.

2. Accountabilities, Roles and Reporting Lines

- 2.1 A framework has been implemented that has addressed the following issues:
- The different types of risk – Strategic and Operational
 - Where it should be managed
 - Roles and accountabilities for all staff.
 - The need to drive the policy throughout the Board
 - Prompt reporting of accidents, losses, changes etc.
- 2.2 In many cases, risk management follows existing service management arrangements.
- 2.3 Strategic risk is best managed by the Board.
- 2.4 The Board's Chief Executive will be responsible for the Boards overall risk management strategy, and will report directly to the Board.
- 2.5 The Board's Chief Executive will be responsible for the Boards overall Health and Safety policy and will report to the Board.
- 2.6 It is envisaged that the development of a risk management strategy will encourage ownership of risk and will allow for easier monitoring and reporting on remedial actions / controls.

3. Skills and Expertise

- 3.1 Having established roles and responsibilities for risk management, the Board must ensure that it has the skills and expertise necessary. It will achieve this by providing Risk Management Training for Employees and Board Members, where appropriate providing awareness courses that address the individual needs of both the manual workforce and office staff.
- 3.2 Training will focus on best practice in risk management, and awareness will also focus on specific risks in areas such as the following:
- Partnership working
 - Project management
 - Operation of Board vehicles and equipment
 - Manual labour tasks e.g. Health and Safety issues

4. Embedding Risk Management

Risk management is an important part of the service planning process. This will enable both strategic and operational risk, as well as the accumulation of risks from a number of areas to be properly considered. Over time the Board aims to be able to demonstrate that there is a fully embedded process.

This strategy and the information contained within the appendices provides a framework to be used by all levels of staff and Members in the implementation of risk management as an integral part of good management.

5. Risks and the Decision Making Process

- 5.1 Risk needs to be addressed at the point at which decisions are being taken. Where Members and Officers are asked to make decisions they should be advised of the risks associated with recommendations being made. The training described in the preceding section will enable this to happen.
- 5.2 The Board will need to demonstrate that it took reasonable steps to consider the risks involved in a decision.
- 5.3 There needs to be a balance struck between efficiency of the decision making process and the need to address risk. Risk assessment is seen to be particularly valuable in options appraisal. All significant decision reports to the Board (including new and amended policies and strategies) should include an assessment of risk to demonstrate that risks (both threats and opportunities) have been addressed.
- 5.4 This process does not guarantee that decisions will always be right but it will demonstrate that the risks have been considered and the evidence will support this.

6. Supporting Innovation and Improvement

- 6.1 Managers have been made aware that there are a number of tools that can be used to help identify potential risks:
- Workshops.
 - Scenario planning.
 - Analysing past claims and other losses.
 - Analysing past corporate incidents/failures.
 - Health & safety inspections.
 - Induction training.
 - Performance Review & Development interviews.
 - Staff and customer feedback.
- 6.2 Having identified areas of potential risk, they must be analysed by:
- An assessment of impact.
 - An assessment of likelihood.

This is to be done by recording the results using the risk matrix below:

RISK ASSESSMENT MATRIX

Likelihood of occurrence ↑ HIGH MEDIUM LOW ↓	HIGH	Low Impact High Likelihood 3	Medium Impact High Likelihood 6	High Impact High Likelihood 9
	MEDIUM	Low Impact Medium Likelihood 2	Medium Impact Medium Likelihood 4	High Impact Medium Likelihood 6
	LOW	Low Impact Low Likelihood 1	Medium Impact Low Likelihood 2	High Impact Low Likelihood 3
		LOW	MEDIUM	HIGH
		← Impact on the Business →		

The high, medium and low categories for impact and likelihood are defined as follows:

IMPACT

- *High* – will have a catastrophic effect on the operation/service delivery. May result in major financial loss (over £100,000). Major service disruption (+ 5 days) or impact on the public. Death of an individual or several people. Complete failure of project or extreme delay (over 2 months). Many individual personal details compromised/revealed. Adverse publicity in national press.
- *Medium* – will have a noticeable effect on the operation/service delivery. May result in significant financial loss (between £20,000 and £100,000). Will cause a degree of disruption (2 – 5 days) or impact on the public. Severe injury to an individual or several people. Adverse effect on project/significant slippage. Some individual personal details compromised/revealed. Adverse publicity in local press.
- *Low* – where the consequences will not be severe and any associated losses and or financial implications will be low (up to £20,000). Negligible effect on service delivery (1 day). Minor injury or discomfort to an individual or several people. Isolated individual personal detail compromised/revealed. NB A number of low incidents may have a significant cumulative effect and require attention.

LIKELIHOOD

High	Very likely to happen	Matrix score 3
Medium	Likely to happen infrequently and difficult to predict	Matrix score 2
Low	Most unlikely to happen	Matrix score 1

7. Risk Control

7.1 Using the risk matrix produces a risk rating score that will enable risks to be prioritised using one or more of the “four T’s”

Tolerate	Score <= 2	Accept the risk
Treat	Score 3 to 5	If possible take cost effective in-house actions to reduce the risk.
Transfer	Score 6 to 8	Let someone else take the risk (eg by Insurance or passing responsibility for the risk to a contractor).
Terminate	Score 9	Agree that the risk is too high and do not proceed with the project or activity.

7.2 Risk assessment and risk matrices provide a powerful and easy to use tool for the identification, assessment and control of business risk. It enables managers to consider the whole range of categories of risk affecting a business activity. The technique can assist in the prioritisation of risks and decisions on allocation of resources. Decisions can then be made concerning the adequacy of existing control measures and the need for further action. It can be directed at the business activity as a whole or on individual departments/sections/functions or indeed projects.

8. Supporting Innovation and Improvement

8.1 Risk Management will be incorporated into the business planning process for the Board with a risk assessment of all business aims being undertaken as part of the annual Estimates process.

8.2 The Board’s internal auditor will have a role in reviewing the effectiveness of control measures that have been put in place to ensure that risk management measures are working.

RISK MANAGEMENT STRATEGY STATEMENT

The Board believes that risk is a feature of all businesses. Some risks will always exist and can never be eliminated: they therefore need to be appropriately managed.

The Board recognises that it has a responsibility to manage hazards and risks and supports a structured and focused approach to managing them by approval each year of a Risk Management Strategy.

In this way the Board will improve its ability to achieve its strategic objectives and enhance the value of services it provides to the community.

The Boards Risk Management objectives are to:

- Embed risk management into the culture and operations of the Board
- Adopt a systematic approach to risk management as an integral part of service planning and performance management
- Manage risk in accordance with best practice
- Anticipate and respond to changing social, environmental and legislative requirements
- Ensure all employees have clear responsibility for both the ownership and cost of risk and the tools to effectively reduce / control it

These objectives will be achieved by:

- Establishing clear roles, responsibilities and reporting lines within the organisation for risk management
- Incorporating risk management in the Board's decision making and operational management processes
- Reinforcing the importance of effective risk management through training
- Incorporating risk management considerations into Service / Business Planning, Project Management, Partnerships & Procurement Processes
- Monitoring risk management arrangements on a regular basis

The benefits of Risk Management include:

- Safer environment for all
- Improved public relations and reputation for the organisation
- Improved efficiency within the organisation
- Protect employees and others from harm
- Reduction in probability / size of uninsured or uninsurable losses
- Competitive Insurance Premiums
- Maximise efficient use of available resources.

RISK MANAGEMENT POLICY DOCUMENT

In all types of undertaking, there is the potential for events and consequences that may either be opportunities for benefit or threats to success. Internal Drainage Boards are no different and risk management is increasingly recognised as being central to their strategic management. It is a process whereby Internal Drainage Boards methodically address the risks associated with what they do and the services which they provide. The focus of good risk management is to identify what can go wrong and take steps to avoid this or successfully manage the consequences.

Risk management is not just about financial management; it is about achieving the objectives of the organisation to deliver high quality public services.

The failure to manage risks effectively can be expensive in terms of litigation and reputation, the ability to achieve desired targets, and, eventually, the level of the drainage rates.

Internal Drainage Boards need to keep under review and, if need be, strengthen their own corporate governance arrangements, thereby improving their stewardship of public funds and providing positive and continuing assurance to ratepayers. The Board already looks at risk as part of their day to day activities but there is now a need to look at, adapt, improve where necessary and document existing processes.

Members are ultimately responsible for risk management because risks threaten the achievement of policy objectives. As a minimum, the members should, at least once each year:

- a) take steps to identify and update key risks facing the Board;
- b) evaluate the potential consequences to the Board if an event identified as a risk takes place; and
- c) decide upon appropriate measures to avoid, reduce or control the risk or its consequences.

This Risk Management Policy document is designed to be a living document which will be continually updated when new risks are identified or when existing risks change.

The assessment of potential impact will be classified as high, medium or low. At the same time it will assess how likely a risk is to occur and this will enable the Board to decide which risks it should pay most attention to when considering what measures to take to manage the risks.

After identifying and evaluating risks the responsible officer will need to decide upon appropriate measures to take in order to avoid, reduce or control the risks or their consequence.

RISK ANALYSIS**1. TO PROVIDE AND MAINTAIN STANDARDS OF NEEDS BASED SUSTAINABLE FLOOD PROTECTION****1.1 Risk of Being Unable to Prevent Flooding to Property or Land**

The Board's main objective is to provide satisfactory water level management within the Board's area.

Flooding could occur in the following ways:

- From failure of coastal defences which are maintained by EA
- From EA Watercourses
- From IDB watercourses
- From riparian watercourses
- From sewers maintained by other authorities
- From surface water

(a) Coastal flooding from failure or overtopping of defences

Consequence: Land and Properties could be subjected to flooding (EA Risk) and IDB Pumping Stations could be required to deal with substantial additional flows

How risk is managed: Board works with lead local flood authority, Environment Agency and the Wash Frontage Group.

Future Work: Lobbying of government representative

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	Low	3

(b) Fluvial flooding from failure or overtopping of defences

Consequence: Land and Properties could be subjected to flooding and IDB Pumping Stations could be required to deal with Substantial additional flows

Given the increased overtopping experienced from Storm Babet and Storm Henk in Winter 2023/24, and the water entering our system through the banks of 4 of our northerly pumping stations, I suggest the likelihood be increased until the identified low spots are raised/repaired

How risk is managed: Board works with lead local flood authority
Pumping Stations Additional Resilience Partnership working with EA including PSCA
Agreement with EA to remotely implement emergency profile levels as per the emergency plan, if levels reach 2.7m ODN at Black Hole Drove PS.

EA Management Plan on the operation of the sluice and nav lock at Black Sluice Pumping Station included as an appendix to the Emergency Response Plan.

Future Work: To engage with the Lower Witham Flood Resilience Project.

To engage and support the Fens 2100+ project developing options for the Fens to achieve future flood resilience.

Work with the Environment Agency to raise bank levels where overtopping has been experienced including but not limited to Dunsby PS, Quadring PS, Scredington, Helpringham Footbridge, Threekingham, Develop options to submit the Outline Business Case to achieve funding to repair the banks below the pumping stations where water flows through when levels are high.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	MEDIUM	6

(c) Flooding from failure of IDB pumping stations or excess rainfall

Consequence: Land and Properties could be subjected to flooding and IDB Pumping Stations could be required to deal with Substantial additional flows

Structural Integrity of the Boards ageing Pumping Stations following concerns raised in relation to Swineshead Pumping Station following an inspection by a Structural Engineer.

How risk is managed: Board works with lead local flood authority
Comprehensive programme of maintenance works
PTO gear boxes and generator connections.

Further Work: Consider if additional surveys are required at all our Structures and identify funding.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

(d) Flooding from Sewers or riparian watercourses

Consequence: Small areas of land and maybe some properties could be subjected to flooding
During the storms of 2023/24 we saw an increase in contact from the general public seeking advice and assistance. This could be due to being more accessible than other Risk Management Authorities or they had been told it wasn't their responsibility and they were sent our way.

How risk is managed: Board works with lead local flood authority
The Board has permissive powers for the supervision of drainage in the Board's catchment and in the extended catchment on behalf of Lincolnshire County Council under PSCA.

Further Work: Increase the profile of the Board and manage the expectations of the general public.
Engage with partners to agree methods to pass information between Risk Management Authorities instead of directing the member of the public to contact another public body.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.2 Risk of Loss of Electrical Supply

The Board relies on electrical power for all pumping stations. Loss of supply could be encountered for a number of reasons in the future.

Consequence: Pumping stations would fail to operate
Office and Depot would be unable to function
Telemetry system fails to operate

How risk is managed: Dual drive gearboxes installed at pumping stations to enable pumps to be operated by a tractor
Large pumping stations have generator connections but the Board would have to hire in generators which may be in short supply
UPS system fitted to telemetry computer, Main server and Phone System

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

1.3 Risk of Pumps Failing to Operate

Consequence: High water levels and possible flooding
Extra expenditure on pumping station maintenance

How risk is managed: Pumping Engineer checks at regular intervals
Refurbishment of plant is continuously programmed
Continued investment planned for pumping stations

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

1.4 Risk of Board Watercourses being Unable to Convey Water

- Consequence: High water levels and possible flooding from over topping
 Extra expenditure on drain maintenance
 2023/24 storms has increased the number of slips requiring repair exceeding the budget allocated in 2024/25.
 With increased flows we are seeing more Culverts failing blocking water courses.
- How risk is managed: Asset conditions are shown on a database
 All watercourses are cleared of weed growth once each year
 All watercourses are desilted on a regular basis
 Board regularly check and clear out culverts
- Further work: Continue to review asset conditions in asset database
 Look to prioritise available funds to maximise increased maintenance requirements.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	MEDIUM	4

1.5 Risk of Operating Machinery to Maintain Watercourses

The Board operates excavators and tractor mounted machines to remove weed growth and silt from watercourses. There are risks in operating this machinery.

- Risk: Hitting overhead electrical services
 Hitting underground electrical services
 Machines falling into watercourse
 Parts of machine hitting people or other vehicles
- Consequence: Damage to Third parties
 Damage to plant & vehicles
 Injury to staff
- How risk is managed: Machinery is regularly serviced
 Machinery is checked twice each year by a qualified engineer
 Health and Safety Policy, reported annually to the Board
 Health and Safety Consultant employed
 All drivers are suitably trained
 All drivers are provided with the required safety equipment
 All machinery is insured by the Board

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.6 Risk of Claims from Third Parties for damage to property or injury

Risk: The Board could cause damage to property or injury due to their actions
 Hitting overhead/underground electrical services
 Machines falling into watercourses
 Damage to Third parties
 Damage to plant & vehicles

Consequence: Injury to staff
 Uninsured costs
 Extra work for staff

How risk is managed: The Board has adequate insurance including legal cover
 The Board train staff to undertake works safely
 Risk assessments are carried out

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.7 Risk of Third Parties damage to Board maintained assets

Risk: Damage to Board Maintained Assets
 Damage to Board Owned Assets

Consequence: Assets not performing as they are designed to.

How risk is managed: Managed Assets – Board Byelaws
 Owned Assets - Insurance

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.8 Risk of Unplanned Loss of Senior Staff

Consequence: Inability to operate efficiently

How risk is managed: Should staff from the Emergency response Team not be available during a prolonged event cover should be implemented as per the emergency response plan
 Hire in temporary staff from Agencies or other local Drainage Boards
 Formalised arrangements to share staff from other drainage boards

Further Work: Contingencies for Senior roles to be considered further.
 Work ongoing to develop a more resilient structure to coincide with the retirement of the current CEO.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	MEDIUM	4

1.9 Insufficient Finance to Carry Out Works

Consequence: Watercourses not maintained in satisfactory condition
Pumping Stations more at risk of failure
Increased risk of poor drainage and flooding
Significant unexpected costs to respond to incidents or extended periods of wet weather.
Excessive Electricity Costs

How risk is managed: Ten year budget to ensure adequate funding
Reserves to be increased to a level that would allow electricity bills to be paid if wet conditions experienced for two consecutive years. Financial Regulations updated.
Ongoing continuous liaison with Precept paying Councils

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	MEDIUM	6

1.10 Reduction in Staff Performance

Consequence: Reduced standards of maintenance

How risk is managed: Ongoing continuous supervision, advice, training, line management motivation and appraisal.
Management systems

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

1.11 Insufficient Staff Resources

Consequence: Reduced standards of maintenance
Reduced value for money
Environment Consultants are in short supply following retirements.

How risk is managed: Review by senior management
Reports to Executive Committee
Terms of Employment regularly reviewed to remain competitive

Further Work: Work ongoing to develop a more resilient structure to coincide with the retirement of the current CEO.
Recruiting Environment and GIS Officer

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

2. TO CONSERVE AND ENHANCE THE ENVIRONMENT WHEREVER PRACTICAL AND POSSIBLE TO ENSURE THERE IS NO NET LOSS OF BIODIVERSITY

2.1 Risk of Prosecution for not Adhering to Environmental Legislation

The Board have responsibilities to promote nature conservation and the environment

Consequence: Prosecution for damage to habitat
Injury or death of fish, birds or mammals
Environment Consultants are in short supply following retirements

How risk is managed: Board employs an environmental consultant for reports and advice
Workforce are trained in environmental matters
Working within the restraints of the Board's Biodiversity Action Plan
Environmental clean-up liability Insurance (£1m)
Environmental Impairment Liability Insurance (£2m)

Further Work: Recruiting Environment and GIS Officer

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

2.2 Non Delivery of Objectives

Consequence: Biodiversity Action Plan not complied with

How risk is managed: Projects included in capital plan

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

3. TO PROVIDE A 24 HOUR/365 DAY EMERGENCY RESPONSE FOR THE COMMUNITY

3.1 Emergency Plan Inadequate or Not up to Date

Consequence: Difficulties in emergency situation

How risk is managed: Regular review of plan

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

3.2 Insufficient Resources (Staff and Equipment)

Consequence: Inability to provide adequate response
Unable to recruit sufficient workforce

How risk is managed: Shared resources with neighbouring Boards
Use local farmer/landowner resources
Review resources available
Review remuneration considering local circumstances

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

3.3 Risk of Critical Incident Loss of Office

Consequence: Risk of an incident preventing the use of anything at the offices

How risk is managed: Insurance for additional cost of working/business interruption (£100k over a 12 Months period)
Remote Backups to HBP servers kept for 365 days
Well-practiced procedures for working from home by all office based staff if required. Invested in technology to enable.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

4. TO PROVIDE A SAFE AND FULFILLING WORKING ENVIRONMENT FOR STAFF

4.1 Risk of Injury to Staff and Subsequent Claims and Losses

Consequence: Injury to staff
Claims for losses
Senior staff liable under Corporate Manslaughter Legislation

How risk is managed: Health and Safety Policy, reported annually to the Board
Health & Safety Committee formed to review and monitor Safety Management System including all levels of personnel in the Board from Board member to Drainage Operative.
Health and Safety Consultant employed
Staff are trained for the duties that they are required to perform
Risk assessments are carried out for all activities
Employers Liability Insurance (£15m)
Personal Accident Insurance (£60k & £100pw)

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

4.2 Risk of not complying with Health & Safety Legislation

If Health & Safety legislation is not complied with there is a risk of work being stopped and officers being prosecuted.

Consequence: Fines and serious delays in work programme

How risk is managed: A health and safety consultant is employed to advise on policy, monitor legislation and to check Health & Safety risk assessments

Health & Safety Committee formed to review and monitor Safety Management System including all levels of personnel in the Board from Board member to Drainage Operative.

Board Health & Safety policy is developed under their guidance

Regular training of all staff

Insurance for Manslaughter Costs and Safety Legislation costs (£1m each)

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

5. TO MAINTAIN FINANCIAL RECORDS THAT ARE CORRECT AND COMPLY WITH ALL RECOMMENDED ACCOUNTING PRACTICE

5.1 Risk of Loss of Cash

Very little cash collected at office

Consequence: Loss of income

How risk is managed: Money placed in safe and banked as soon as possible
Insurance (£500 out of safe overnight to £5,000 during business hours)
A maximum of £500 petty cash is held

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

5.2 Risk of Loss of Money invested in Building Societies & Banks & Managed Funds

Consequence: Loss of income

How risk is managed: Money is placed with known Building Societies and banks on the FCA Register
 A maximum of £300,000 is invested in an individual organisation as per the Investment Policy
 Maximum of £500,000 invested in a managed fund.
 The Executive Committee of the Board reviews the investments on a regular basis

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

5.3 Risk of Fraud by Senior Officers

Consequence: Loss of money

How risk is managed: Two Officers always have to sign/approve each mandate for a transaction
 All purchase ledger transactions are reviewed by the Board
 The Board has adequate insurance

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

5.4 Risk of Inadequacy of Internal Checks

Consequence: Risk of incorrect payments being made

How risk is managed: All items resulting in payments being made by the Board are checked before being processed
 All Payments made through the Board's Bank Accounts are authorised by two authorised signatories as per the Financial Regulations
 Additional independent checks carried out with supplier to avoid "Mandate fraud"

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

5.5 Fraudulent use of Credit Cards

Consequence: Loss of money

How risk is managed: **Only Directors hold Board Credit Cards**
 The Board has insurance for **Unauthorised use of credit cards £10,000** (Card limits £5k, £5k, £2,500 & £2,500)
 Card expenditure is reconciled monthly and certified by both CEO & FM

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	MEDIUM	2

6. TO ENSURE THAT ALL ACTIONS TAKEN BY THE BOARD COMPLY WITH ALL CURRENT UK AND EU LEGISLATION

6.1 Risks to Board Members

There are 21 Board Members who make decisions on the operation of the Board

Risk: Board Members make decisions that involve the Board in extra expense

Consequence: Liability of Board Members

How risk is managed: Insurance (£3m Executive Liability & Company Reimbursement Legal Liability Cover, £3m Corporate Liability)
Qualified and experienced staff advise the Board

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

6.2 Risk of not complying with all Employment Regulations and Laws

There is a risk that the Board may not comply with all regulations and laws.

Consequence: Claims against the Board

How risk is managed: Insurance (£2m £1m Employment Practices Liability Cover)
Advice from consultants and solicitors and the industry
The Board employs a Qualified HR Adviser

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

7. A COST EFFICIENT IDB THAT PROVIDES VALUE FOR MONEY SERVICE

7.1 Risk of Collecting insufficient Income to Fund Expenditure

Consequence: Inability to pay staff and creditors
Inability to maintain drains and pumping stations in a satisfactory condition

How risk is managed: Monthly finance reports sent to Members of Executive Committee
Reports to Board Meetings
Cash flow forecasting by Finance & Admin Director
Comprehensive Annual Budgets and ten year estimates produced
Ongoing continuous liaison with Precept paying Councils
Reserves to be increased to a level that would allow electricity bills to be paid if wet conditions experienced for two consecutive years. Financial Regulations updated.

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

7.2 IDB abolished or taken over

Consequence: Loss of direction from local members

How risk is managed: Association of Drainage Authorities lobbies on behalf of IDB's
Regular dialogue with local MP's

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

8. INFORMATION TECHNOLOGY & COMMUNICATIONS

8.1 Risk of Loss of Telemetry

Consequence: If the telemetry fails then it will be more difficult to manage the pumping stations

How risk is managed: Continual review of hardware and software
Back up computers
Workmen already assigned to pumping stations can be sent to check on conditions
High Capacity UPS (Battery Backup) in place in case of power cut
Upgraded the Telemetry Systems including the ability for remote operation.
All Directors trained during winter 2023/24 storms

Further Work: Continue to maintain trained staff to monitor telemetry

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

8.2 Risk of Loss of Telephone Communications

Consequence: Inability to communicate decisions

How risk is managed: All staff have mobile telephones
Soft Phones available via an app on computers and mobiles
14 VOIP phones (All with soft phones on computers and mobiles)
2 Analog lines on site
UPS (Battery Backup) on Communications Cabinet
Mobile Broadband contract maintained with WiFi router.
Phones on separate Broadband line and network as rest of the network

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
LOW	LOW	1

8.3 Risk of Loss of Internet Connections

- Consequence: Unable to remotely connect to office and Telemetry resulting in Employee having to be on site in an event
 Unable to make bank payments
 Unable to access information on internet
 Recent limitations on the network due to low upload speeds
- How risk is managed: Two Fibre Broadband internet lines into office (Fibre to cabinet)
 Mobile Broadband contract maintained with WiFi router.
- Further Work: Full Fibre has been installed in the village and availability is being monitored.
 Consideration to Starlink if not available in short order

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

8.4 Risk of Network Failure

- Consequence: All computers and information inaccessible
- How risk is managed: Proactive IT Maintenance Contract with external consultants including disaster recovery
 4 hour response for server or Network failure
 Staff with limited training and remote support

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
HIGH	LOW	3

8.5 Risk of Breach in Cyber Security

- Consequence: All computers and information inaccessible
 Risk of Data Protection Breach
 Security of Information
- How risk is managed: Proactive IT Maintenance Contract with external consultants
 4 hour response for server or Network failure
 Staff with limited training and remote support
 Staff Training (All staff have completed classroom and online training provided by our IT consultants and Defender AV as a minimum)
 WatchGuard Firewall and Microsoft Defender AV system installed and subscription maintained
 All information taken off site digitally is encrypted and password protected
 Remote Backups to HBP servers ~~kept for 365 days.~~
~~Monthly backups taken and removed from site.~~
 Introduction of Electronic Information and Communication Systems Policy (was part of the 'White Book' previously)
 Dual Authentication system for any access to the Board's Network or Microsoft Cloud systems

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

8.6 Risk of Network Security Breach

Consequence: Unauthorised access to the Network and information stored on the network

How risk is managed: WatchGuard and Microsoft Defender AV installed and subscription maintained
Dual Authentication system for any access to the Board's Network or Microsoft Cloud systems

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

8.7 Risk of Virus being introduced to Network

Consequence: Malicious damage to hardware and information by various types of virus

How risk is managed: Microsoft Defender AV installed on all servers, desktop computers and laptops and managed centrally
Hard Firewall installed to prevent unauthorised person introducing virus
Emails filtered off site by Microsoft 365 Spam Filtering to reduce likelihood of malicious attachments

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

8.8 Risk of Loss of Accounting Records

All of the Board's records are retained on the main server in the communications room

Consequence: Inability to pay staff
Inability to pay creditors
Difficulty in finalising accounts

How risk is managed: Insurance for Business interruption £100k for up to 12 months
Computer systems are regularly reviewed by trained staff and external IT consultants
Volume Shadow software copies back up every six hours
Remote Backups to HBP servers kept for 365 days

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	LOW	2

8.9 Risk of Loss of Rating Records

All of the Board's records are retained on the main server in the communications room

Consequence:	Inability to check who has paid rates Loss of income Loss of records of occupiers of land DRS will no longer be supported from 31 March 2025
How risk is managed:	Insurance for Business interruption £100k for up to 12 months Volume Shadow software copies back up every six hours Computer systems are regularly reviewed by trained staff and by external IT consultants Remote Backups to HBP servers kept for 365 days
Further Work:	Working with National ADA to develop a new version of the Drainage Rating System

Potential Impact of Risk	Potential likelihood of Risk	Risk Level
MEDIUM	MEDIUM	4

Working Near Water - Life Jackets and Safety Harnesses

Life jackets must always be worn by all employees:

- When involved in operations during periods of high flow and working on floating plant (work boats, weed cutting boats, etc);
- Where there is any drowning risk when carrying out maintenance work on pumping stations or working over water in general;
- When identified by risk assessment.

When involved in weed screen clearing operations you should ensure you wear a safety harness which is attached to an anchorage point.

Eye Protection

Goggles should be worn when cutting, hammering, breaking up, chipping, abrading etc. any material or where there is a risk of objects or particles entering the eye. Other face shields will be provided as necessary for certain operations.

Hearing Protection

Under the Control of Noise at Work Regulations 2005, where noise levels exceed the Lower Exposure Action Value of 80 dB(A), hearing protection must be provided on request. However, there is no mandatory or legal requirement to wear the hearing protection. Where noise exposure exceeds the Upper Exposure Action Value of 85 dB(A) noise induced hearing loss may occur with prolonged exposure. Therefore, where the noise level exceeds 85 dB(A) you must wear the hearing protection provided. Disciplinary action may be taken against anyone who fails to wear hearing protection in a designated area.

You must always wear hearing protection for noise generating activities, such as hammering or grinding, or where mandatory hearing protection signs are displayed. Remember to alert your fellow workers to ensure they are able to don hearing protection prior to you starting any noise generating activity.

Hard Hats

Hard hats should be worn on any site where there is an excavator or similar plant operating, or where there is a risk of items falling or as instructed.

High Visibility Clothing

High visibility jackets or tabards should be worn at all times.

Accident Reporting and First Aid

All accidents are to be recorded in the Accident Book which is located in Station Road Office. Details of all accidents are to be notified to your Line Manager as soon as possible. It is the responsibility of the Operations Manager to notify the Incident Contact Centre when it is required, and or prompt an investigation. It is the responsibility of all employees to provide complete and accurate information when reporting an accident.

Near Misses

All near misses should be reported to Simon Harrison

First Aid

First Aid Boxes are located in the Kitchen, Drawing Office, Workshop, Pumping Stations and machines.

All employees are Emergency First Aid at Work trained.

First Aiders:

- Daniel Withnall
- Simon Harrison
- Tom Lee

Mental Health First Aiders:

- Jessica Baxter
- Amy Chamberlain
- Simon Harrison

Forestry First Aiders:

- Daniel Affection

IF YOU ARE UNSURE ABOUT ANYTHING IN THIS HEALTH AND SAFETY POLICY PLEASE ASK!

The Management of Health and Safety at Work Regulations require that health and safety arrangements are reviewed at suitable intervals. To ensure the validity of this policy, it is recommended that this document is reviewed within 12 months of the date shown on the front page.



BLACK SLUICE
INTERNAL DRAINAGE BOARD

HEALTH AND SAFETY BOOKLET

1 August 2024

This booklet is a summary of the information contained in the Black Sluice Internal Drainage Board Health and Safety Main Policy Document, which is available to all employees on request.

Signed:

Daniel Withnall - Chief Executive

Black Sluice Internal Drainage Board
Station Road
Swineshead
Lincolnshire
PE20 3PW

Tel: 01205 821440
Email: mailbox@blacksluiceidb.gov.uk

1. THE HEALTH AND SAFETY POLICY OF BLACK SLUICE INTERNAL DRAINAGE BOARD

Our policy is to provide and maintain safe and healthy working conditions for all our employees and any contractors and casual labour working on our behalf. In addition, we will seek to ensure that the work we carry out does not affect the health and safety of others, e.g. members of the public and our customers.

2. THE ORGANISATION FOR CARRYING OUT THE

POLICY Responsibilities of the Board

The Board of Black Sluice Internal Drainage Board recognise and accept their overall responsibility for health and safety, and will ensure that arrangements are in place to satisfy the health and safety regulations and codes of practice that are applicable to the industry.

Responsibilities of the Managers and Supervisors

Managers and Supervisors are responsible for ensuring that all health and safety arrangements are adhered to in the area of work for which they have control and responsibility.

Responsibilities of All Employees

It is your responsibility to co-operate in the implementation of this Health and Safety Policy within your areas of influence. You have a legal duty to ensure your own safety and the safety of others (for example your fellow workmates, contractors working on the same premises and customers and visitors to the premises) under the Health and Safety at Work Act 1974. You must therefore:

- i) Comply with safety rules, operating instructions and working procedures, laid down in your area of work, and take reasonable care, to the best of your knowledge, to avoid injury to yourself and others.
- ii) Use all equipment and protective clothing where and when it is required, and in the correct manner. In addition, you must report any fault or deficiency in the equipment, immediately to your Manager or Supervisor.
- iii) Report all accidents, injuries, near misses, spillages and any other potential safety hazards, promptly to your Manager or Supervisor.
- iv) Not misuse anything provided in the interests of health and safety.

Responsibilities of Contractors

All contractors working for Black Sluice Internal Drainage Board are required to adhere to Black Sluice Internal Drainage Board's safe working procedures as well as any procedures detailed in their own health and safety policy. In addition to their general responsibilities under the Health and Safety at Work Act 1974, specific responsibilities include:

1. All plant, machinery and other work equipment and tools brought onto site by contractors must be in a safe condition.
2. Contractors must be familiar with the work they are required to carry out and any relevant safety requirements, method statements, etc.
3. Contractors must report all accidents, injuries and dangerous occurrences to Black Sluice Internal Drainage Board.
4. Contractors must ensure that appropriate action is taken to rectify unsafe systems or actions.

3. IMPLEMENTATION OF THE POLICY

This section provides guidance for those responsible for health and safety (*that means you!*), on how to minimise health and safety risks.

The Safe Use of Plant and Machinery

It is your responsibility to use plant and work equipment in the correct manner. You must report any damage or defects to plant and machinery immediately to your Manager or Supervisor.

- Do not operate machinery that you are not trained and authorised to use.
- Never ride on any vehicle unless the vehicle is fitted with a passenger seat.
- NEVER carry out maintenance tasks with the engine running and ALWAYS use safety bars or props when working under extended hydraulic rams.
- ALWAYS ensure that power take off guards are fully serviceable with the guard being held stationary by retaining chains or other suitable method.
- ALWAYS wear seatbelts where fitted.

Ensure that you replace all guards and that safety devices are working. NEVER tamper with them or make them inoperative.

Working Around Electrical Services

When working in the vicinity of overhead electricity lines, the following procedure should be followed.

- a) Prior to commencing work or moving machines, and after every break, check ahead for overhead lines. Do not work in a length unless you have visually checked ahead for overhead lines. As soon as you see an overhead electricity line you should leave your machine and place a warning sign 20 metres from the line on the side you are working. You should never work/move within 100 metres of an overhead electricity line without carrying out this operation.
- b) When you reach the warning sign you should inspect the site to see whether you consider that it is safe to work/move under the wires. If you decide that it is safe to proceed, set and test the height limiter on the machine, if fitted, and proceed with caution.
- c) No scaffolding should be erected near overhead lines before the Electricity Board advice has been sought and wires either sheathed or isolated.
- d) If you have any doubts whatsoever about whether to proceed or not contact your supervisor for further advice.
- e) Particular care must be taken when carrying long metal objects such as level staffs, ladders, scaffold poles etc.

Lifting Operations

Lifting operations shall only be planned and carried out by authorised persons (on site both driver and banksman to be authorised persons).

All lifting shall be carried out with tested equipment (including excavators) with the safe working load clearly marked on it. The weight of any object to be lifted shall be known before planning the lift — contact the Office if unknown.

Before commencing lifting, all equipment should be visually inspected for defects. Defective equipment shall not be used, but returned to the depot clearly marked as defective.

Excavations

The main hazards from excavations are; collapse of the sides, materials, people or vehicles falling into the excavation and the build up of dangerous gases in the excavation.

- Spoil should not be dumped close to the sides. The general rule of thumb is that the spoil heap should be as far back as the excavation is deep (e.g. excavation = 1 metre deep, distance of spoil heap from edge of excavation = 1 metre).
- If excavations are found to be waterlogged they should be pumped out. Ensure that the sides are not undermined during pumping out.
- Use a ladder to get in and out of excavations. Do not climb up shoring.
- If whilst in the trench you can smell rotten eggs (hydrogen sulphide or methane) or the sides begin to collapse - stop work and get out immediately.

Personal Hygiene

Good standards of personal hygiene are very important in minimising contact with oil, drainage water and other hazardous substances that may be present.

- 1) Keep hands clean by making full use of the cleansing materials and facilities provided.
- 2) Ensure that you clean your hands thoroughly before and after the toilet and before eating, drinking or smoking.

Weils Disease

Those employed in the drainage and water industries are two of the main groups at risk of contracting Leptospirosis (Weils Disease). The various forms and routes of entry into the body of Leptospirosis (cuts and scratches, lining of the mouth, throat and eyes) means that anyone who is in contact with river water, or exposed to rats or rat urine is at risk. If untreated or incorrectly diagnosed the disease can be fatal.

You must therefore conform with the following handling procedures:

- i) Do not touch rats with unprotected hands. Wear appropriate Personal Protective Equipment, e.g. gloves.
- ii) Cover all cuts and broken skin with waterproof plasters, after they have been cleaned thoroughly, both before and during work.
- iv) Cleanse your hands after handling any animal, contaminated clothing or materials, and always before eating, drinking or smoking.
- v) Report any illness to your doctor, telling him you work in the drainage industry. Both diseases start with flu-like illness with a persistent and severe headache.

Tetanus

Tetanus may be contracted from contaminated soil. You are reminded that you should cover all cuts with waterproof plasters and check that your tetanus vaccination is kept up to date.

Hepatitis A

Hepatitis A can be contracted from skin contact with sewage and gives jaundice-like symptoms. It can be vaccinated against. As with any work involving open water courses, good personal hygiene is important, as is the use of appropriate personal protective equipment, e.g. rubber gloves.

Black Sluice Internal Drainage Board

Policy No: 10

Delegation of Authority Policy

Review Dates:

Reviewed	Audit & Risk Committee 30 April 2024
Board Approved	

DELEGATION OF AUTHORITY TO COMMITTEES

Executive Committee

1. Approve salary levels for members of staff.
2. Recruitment of Senior Officers.
3. Set levels of rents for Board's property and land.
4. Approve awards of large contracts following tender or quotation submission.
5. Approve orders for plant expenditure in excess of £20,000 within annual budget estimate.
6. Approve any changes to the investment portfolios of the Board and Bourne Fen Farm Account.
7. Any formal consent which requires determination before the next Board Meeting, which officers cannot approve.
8. Approve any item of expenditure up to a value of £50,000.

Minutes of all actions taken by the Executive Committee should be presented to the following meeting of the Board

Works Committees

1. Any formal consent which requires determination before the next Board Meeting which officers cannot approve.
2. Approve any individual works or scheme up to a value of £25,000.

Minutes of all actions taken by the Works Committees should be presented to the following meeting of the Board.

Structures Committee

1. Determine applications for the renewal of Bridges and Culverts and the level of any contribution required from the ratepayer

Minutes of all actions taken by the Bridges & Culverts Committee should be presented to the following meeting of the Board.

Environment Committee

1. Approve expenditure of the Environmental budgets to the level set in the annual budgets.

Minutes of all actions taken by the Environment Committee should be presented to the following meeting of the Board.

Audit & Risk Committee

1. To investigate any activity within its responsibilities
2. To seek any information that it requires from any Officer or employee of the Board and all employees are directed to cooperate with any request made by the Committee
3. To obtain outside legal or independent professional advice, and secure the attendance of outsiders with relevant experience and expertise if it consider this necessary

Minutes of all actions taken by the Audit & Risk Committee should be presented to the following meeting of the Board.

Nominations Committee

1. Prepare nominations for approval of the Board in the Board meeting following an election and any vacancies mid-term.

Minutes of all actions taken by the Nominations Committee should be presented to the following meeting of the Board.

DELEGATION OF AUTHORITY TO BOARD MEMBERS AND OFFICERS

Chairperson of the Board

1. Sign agreements on behalf of the Board.
2. Negotiate purchases and sales on behalf of the Board.
3. Approve expenditure and arrangements for inspections, meetings, visits and other similar items.
4. Setting the agenda, type and tone of the Board discussions and chairing Board meetings, to promote effective decision making and constructive debate;
5. Providing leadership to the Board;
6. Taking responsibility for the Board's composition and development;
7. Ensuring proper information is made available to the Board;
8. Planning and conducting Board meetings effectively;
9. Getting all Board members involved in the Board's work;
10. Promoting effective relationships and open communication, both inside and outside the Boardroom, between the non-executive Board members and the Executive Committee;
11. Overseeing the induction and development of Board members;
12. Ensuring the Board focuses on its key tasks;
13. Engaging the Board in assessing and improving its performance;
14. Ensuring effective implementation of Board decisions;
15. Establishing a close relationship of trust with the Chief Executive and **Directors**, providing support and advice, while respecting executive responsibility;
16. Representing the Board and presenting the Board's aims and policies to the outside world;
17. Understanding the views of ratepayers, contributing councils and key stakeholders and ensuring that effective lines of communication exist with the board;
18. Ensuring that the Board engages effectively with the community they represent;

19. Ensuring Board compliance with legislative and Governance requirements;
20. Reviewing value for money and setting benchmark targets.
21. Approve discretionary payments to employees over the overtime limit.

Chairpersons of Works Committees

1. Approve minor works.
2. Approve consents for relaxing Bye-Laws:
 - Relaxation to 4.5 metres from the centre line when a watercourse is piped.
 - Relaxation to 6.0 metres if a clear strip of land is left clear adjacent to the watercourse for the sole use of the Board.
 - Relaxation to allow bushes to be planted 4.5 metres and trees 6.0 metres from the brink of a small or medium sized drain.

Chief Executive

1. Day to day operation of the Board.
2. Recruitment of staff and workforce.
3. Approve expenditure up to a value of £20,000 on maintenance of plant and items which are included in annual estimates, and regular budgeted expenditure (e.g. Electricity) in excess of £20,000.
4. Sign Board cheques and instructions to the bank with the Finance and Admin Director, with the Capital Projects Director and/or the Maintenance Director if required.
5. Sign agreements and consents on behalf of the Board as set out in the Board's policies.
6. Delivering the operational performance of the IDB, as dictated by the Board's overall strategy;
7. Formulating and successfully implementing Board policy;
8. Developing strategic operating plans that reflect the longer term corporate objectives and priorities established by the Board;
9. Maintaining an ongoing dialogue with the Chairperson of the Board;
10. Ensuring that the operating objectives and standards of performance are not only understood but owned by the management and other employees;
11. Providing leadership to the management and employees;
12. Assuming full accountability to the Board for all IDB operations;
13. Building and maintaining an effective executive management;
14. Deriving and delivering improved value for money.
15. Closely monitoring the operating and financial results against plans and budgets;
16. Taking remedial action where necessary and informing the Board of significant changes;
17. Representing the IDB at meetings with major ratepayers contributing councils, professional associations and key stakeholders;
18. Advising the Board on changes in legislation or regulations that affect the operation of the Board;
19. Arranging for the review and audit of the IDB processes and procedures.
20. Responsible Financial Officer. Section 151 of the Local Government Act 1972.
21. Board's Data Protection Officer, as per the Data Protection Act 2018.
22. Approve the write-off of Drainage Rates up to a value of £250.
23. Approve the investment of Board funds in accordance with the Board's Financial Regulations.

~~24. Arranging for the review and audit of the IDB processes and procedures~~

Directors (Capital Projects, Finance and Admin, Maintenance)

1. Capital Projects Director only: Approve expenditure up to a value of £20,000 on maintenance of plant and items which are included in annual estimates, and regular budgeted expenditure (e.g. Electricity) in excess of £20,000.
Other Directors: Regular purchases of equipment, materials and services agreed in a scheme of work or for maintenance operations within budgets up to £20,000.
2. Sign Board cheques and instructions to the bank with the Chief Executive.
3. Ensuring that adequate operational planning and financial control systems are in place;
4. Closely monitoring the operating and financial results against plans and budgets;
5. Taking remedial action where necessary and informing the Chief Executive, who will inform the Board of significant changes;
6. Representing the IDB at meetings with major ratepayers contributing councils, professional associations and key stakeholders;
7. Advising the Board on changes in legislation or regulations that affect the operation of the Board;
8. Sign agreements on behalf of the Board as set out in the Boards policies.

Black Sluice Internal Drainage Board

Policy No: 27

Policy for the Control of Ragwort

Review	Audit & Risk Committee on 30 th April 2024
Board Approved	Board on
Reviewed	Within 5 years



INTRODUCTION

The DEFRA “Code of Practice on How to Prevent the Spread of Ragwort” expects that larger organisations will have written policies for the control of ragwort on land under their control. This Policy was originally adopted by the Board on 7th July 2004.

Assessing the Risk Posed by Ragwort

Common ragwort is a specified weed under the Ragwort Control Act 2003 and the Code of Practice recommends it should be controlled, if practical wherever it presents a medium to high risk to animal welfare;

High Risk: Within 50 metres of land used for grazing by horses or other animals or land used for feed/forage production.

Medium Risk: Within 100 metres of land used for grazing by horses or other animals or land used for feed/forage production.

Low Risk: Greater than 100 metres from land used for grazing by horses or other animals or land used for feed/forage production.

The distances given above are guidelines only and when assessing risk, account should also be taken of particular local circumstances and other relevant factors such as prevailing winds, topography, shelter belts, natural barriers, soil type and vegetation cover of receiving land. Whether or not the density of ragwort is high or low, the risk factor will be determined by the likelihood of it spreading to land used for grazing and/or feed/forage production.

Control of Ragwort

Section 9 of the Code of Practice states:

“When seeking to prevent the spread of ragwort it is expected that all landowners, occupiers and managers will co-operate and, where necessary, take collective responsibility for ensuring that effective control of the spread of ragwort is achieved”.

The Board therefore will only undertake Ragwort control if:

- (a) All other parties in the area have agreed to collectively carry out control.
- (b) There is sufficient resource to undertake the work.

The Board's policy is only to carry out control of ragwort in exceptional circumstances.

Biology

Common ragwort is normally a biennial. In the first year it forms a set of basal leaves and overwinters; in the second year it sends up a single leafy stem with flower heads at the top. It flowers June – October and then dies. However if damaged, such as by pulling, it will act as a perennial flowering every year.

Methods of Control

Cutting: Method of last resort. It is used to reduce seed production and dispersal. Cutting will stimulate growth the following year.

Pulling: If root fragments are not removed, weak re-growth follows. Best done when ground is damp. A special fork is marketed.

Spraying: Can only use chemicals approved for use near or in water, ~~they are 2,4-D and~~ which is Glyphosate (Roundup). The Environment Agency must be notified.

Biological: Cinebar moth eggs and caterpillars are marketed.

The risk assessment carried out before control may dictate the method of control. In general pulling/digging will be tried first and monitored. Where this is not successful spraying will be considered. Other methods are not ruled out.

Health and Safety

Ragwort contains pyrrolizidine alkaloides (PAs) which are toxic to animals and man. Anecdotal evidence indicates that PAs can be absorbed through the skin and therefore protective gloves and trousers shall be worn when pulling or handling ragwort.

Disposal of Pulled Ragwort

Ragwort remains toxic when dead and becomes more palatable to livestock. Dead plants can still set seeds. Plants in flower should be placed in plastic bags and disposed of by landfill at an approved facility.

Code of Practice on How to Prevent the Spread of Ragwort



Common Ragwort look-alike plants



Marsh Ragwort *Senecio aquaticus*
Photo: Dr Chris Gibson/
Natural England



Hoary Ragwort *Senecio erucifolius*
Photo: Dr Chris Gibson/
Natural England



Oxford Ragwort *Senecio squalidus*
Photo: Dr Chris Gibson/
Natural England



Fen Ragwort *Senecio paludosus*
Photo: Dr Chris Gibson/
Natural England



Field Fleawort *Tephrosieris integrifolia*
Photo: Ron Porley/
Natural England



Tansy *Tanacetum vulgare*
Photo: Dr Chris Gibson/
Natural England



Common Fleabane *Pulicaria dysenterica*
Photo: Dr Jonathan Cox/
Natural England



Common Fleabane *Pulicaria dysenterica*
Photo: Dr Chris Gibson/
Natural England (Close-up of flowers)



Square-stalked St. John's Wort
Hypericum tetrapterum
Photo: Dr Chris Gibson/
Natural England



Perforate St. John's Wort
Hypericum perforatum
(Close-up of flowers)
Photo: Dr Chris Gibson/
Natural England



Yellow Loosestrife *Lysimachia vulgaris*
Photo: Dr Chris Gibson/
Natural England



Goldenrod *Solidago virgaurea*
Photo: Dr Chris Gibson/
Natural England

Code of Practice on How to Prevent the Spread of Ragwort

Introduction

As Minister for the Horse, I am delighted to endorse this “Code of Practice on How to Prevent the Spread of Ragwort”. Ragwort poisoning can have a devastating effect on horses in particular, as well as being damaging to cattle and other animals. Ingestion of Common Ragwort *Senecio jacobaea* either in its green or dried state, can cause serious liver damage, which can have tragic consequences for both animals and owners. Ragwort is the only one of the five weeds covered by the Weeds Act 1959, which is harmful to equines and other animals. However, in the right place, and where there is no risk to animal welfare, ragwort contributes to the biodiversity of the flora and fauna in our countryside.

At the end of 2002, The British Horse Society supported John Greenway MP in initiating a Private Member’s Bill, with my full support and that of the Government, to amend the Weeds Act 1959. This resulted in The Ragwort Control Act 2003. The Act provides for a code of practice to be prepared to give guidance on how to prevent the spread of ragwort. Last July, I launched a draft code of practice at the Royal International Horse Show at Hickstead. Many landowners and occupiers used this as a guide for their ragwort control activity last summer. As required by the Ragwort Control Act, a formal consultation on the code was carried out earlier this year amongst stakeholders representing a wide variety of interests. I now welcome the publication of the final code.

By promoting good practice and good neighbourliness, the Code aims to reduce significantly the risk that horses and other livestock might be poisoned. It is intended for use by all landowners and occupiers. It will be particularly relevant for large scale organisations managing significant land areas, including local authorities and public bodies.

The Code provides comprehensive guidance on how to develop a strategic and more cost-effective approach to weed control. It gives advice on:

- Identification of Common Ragwort
- Risk assessment and priorities for ragwort control
- Control methods – their suitability and efficacy
- Environmental considerations
- Health and safety issues

The Code does not seek to eradicate ragwort, but only seeks to control it where there is a threat to the health and welfare of animals. We place a particular emphasis on protecting horses whose digestive system makes them particularly vulnerable. The Code provides comprehensive guidance on when, where and how to control ragwort, but pays specific attention to the needs of the environment and the countryside as part of the process. The Code should benefit the environment by ensuring there is less damage to non-target species, by setting out clear parameters on when it is necessary to control ragwort and by recommending the use of non-chemical options for control where feasible.

Code of Practice on How to Prevent the Spread of Ragwort

Publication will make it easier to prosecute those who disregard the need to control ragwort since the Code will be admissible in evidence in enforcement proceedings under the Weeds Act 1959. The Act empowers the Secretary of State for Environment, Food and Rural Affairs to serve notice requiring an occupier of land on which Common Ragwort (or four other injurious weeds) is growing to take action to prevent it from spreading. The Code should provide a yardstick against which compliance with an enforcement notice served under the Act can be measured. This will ensure that all parties know in advance what is considered reasonable action to comply with an enforcement notice.

The Code is very much a combined effort, reflecting upon the importance of balancing the variety of interests involved. It has been drawn up in consultation with a Steering Group comprising The British Horse Society, Network Rail, English Nature, Wildlife and Countryside Link, the British Beekeepers Association, ADAS and representatives of Local Government. I should like to thank the Group for its efforts. It has not been an easy task to reconcile the different interests and I am grateful for the co-operative spirit shown by the members of the Group. The result is a balanced, but effective and useable Code of Practice, which is a major step forward in protecting horses and animal welfare against the threat of Ragwort poisoning. I urge all landowners and land managers to work with horse and animal owners to adopt the recommendations of the code.

Rt Hon Alun Michael MP
Minister of State for Rural Affairs and Local Environment Quality
and Minister for the Horse
July 2004

	Page	Para
Introduction		
Code of practice		
Scope	1	1
Aim	1	2
Introduction	1	3–5
Legal framework	2	6–8
Responsibility to control the spread of ragwort	2	9–11
Assessing the risk posed by ragwort	3	12–13
Action to be taken by owners of livestock	4	14
Action to be taken by producers of conserved forage	4	15
Action to be taken by owners/occupiers of land	4	16
Control methods	5	17
Control policies	7	18–21
Local Control Strategies	7	22
Advice	8	23–24
Enforcement	8	25–26
Appendix 1 – Grassland Management		
Pastures	9	1–5
Uncultivated or semi-natural areas	10	6–7
Appendix 2 – Biology and Identification		
Introduction	11	1
Biology	11	2–3
Distribution	11	4
Habitat	11	5
Other species of ragwort	12	6
Identification	12	
Appendix 3 – Control techniques		
Introduction	14	1–3
Grazing	14	4
Cultural	14	5
Avoiding bare ground	14	6
Pulling and levering	17	7–8
Cutting	17	9–10
Burners	17	11–12
Chemical	18	
– Use of herbicides	18	13–18
– Legal restrictions	18	19–20
– Training and certification of spray operators	19	21
– Restrictions on use of pesticides in or near water	19	22
– Grazing restrictions	19	23–24
– Environmental restrictions	20	25
– Methods of application	20	26–28
– Environmental safety	20	29–31
Biological	21	32–33

Code of Practice on How to Prevent the Spread of Ragwort

Appendix 4 – Particular categories of land

Introduction	23	1
Set-aside	23	2
Organic farming	23	3
Agri-environment schemes	23	4
National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and other statutorily designated wildlife sites	23	5–8
Non-statutorily designated wildlife site/sites with nature conservation interests	24	9
Scheduled monuments	24	10
Common land	24	11
Other land used for grazing	25	12–13
Forage production	25	14–15
Amenity grassland	25	16
Highways	26	17–19
Railways	26	20–22
Aquatic areas	27	23
Woodland and forestry	27	24
Development, waste, derelict land, land used for mineral extraction	27	25
Defence land	27	26
Bridleways	28	27

Appendix 5 – Disposal

Disposal	29	1–5
----------	----	-----

Appendix 6 – Safety guidelines

Handling ragwort plants	30	1–2
Operator safety	30	3–9
Prior authority for access to land	31	10
Use of herbicides	31	11

Appendix 7

Government Departments, Agencies and Statutory Authorities	32	
--	----	--

Appendix 8

Useful publications	34	
---------------------	----	--

Appendix 9

Sources of technical advice on ragwort control	36	
--	----	--

Appendix 10

Environmental appraisal	39	1–27
-------------------------	----	------

Scope

- 1 This code applies to Common Ragwort (*Senecio jacobaea*) and all subsequent references to "ragwort" in this code refer to "Common Ragwort". This code applies to England only (although a separate code applies in Wales).

Aim

- 2 The Code aims to define the situations in which there is a likelihood of ragwort spreading to neighbouring land where it will then present an identifiable risk of ingestions by vulnerable animals, and to provide guidance on the most appropriate means of control, taking into account both animal welfare and environmental considerations.

Introduction

- 3 Ragwort is a native species of the British Isles. It is a specified weed under the Weeds Act 1959. It contains toxins which can have debilitating or fatal consequences, if eaten by horses and other grazing animals. Ragwort is less likely to be rejected by stock if dried and contamination of forage (hay, haylage and silage) is a particular problem. Humans may be at risk from ragwort poisoning through direct contact (e.g. hand pulling) or the consumption of contaminated food. Research undertaken for the Government in the 1990s suggested that the risk to human health in the UK through the contamination of staple foods i.e. grain, milk, eggs and honey is likely to be insignificant.
- 4 This code does not seek to eradicate ragwort. Ragwort, as a native plant, is very important for wildlife in the UK. It supports a wide variety of invertebrates and is a major nectar source for many insects. In many situations ragwort poses no threat to horses and other livestock. It is a natural component of many types of unimproved grassland and is used by some invertebrate species that have conservation needs. However it is necessary to prevent its spread where this presents a high risk of poisoning horses and livestock or spreading to fields used for the production of forage. A control policy should be put in place where a high and medium risk is identified.
- 5 Ragwort is a highly successful species and in certain situations it can be difficult to control particularly where it has not been effectively managed for a number of years. As a result it might be necessary to use a variety of control methods over an extended period to reduce populations if, on the basis of the risk assessment, they have been found to be problematic.

Legal framework

6 Under the Weeds Act 1959 the Secretary of State for the Environment, Food and Rural Affairs can, if satisfied that injurious weeds are growing upon any land, serve a notice requiring the occupier to take action to prevent the spread of those weeds. An unreasonable failure to comply with a notice is an offence. The Weeds Act applies to:¹

- Common Ragwort (*Senecio jacobaea*)
- Spear Thistle (*Cirsium vulgare*)
- Creeping or Field Thistle (*Cirsium arvense*)
- Curled Dock (*Rumex crispus*)
- Broad-Leaved Dock (*Rumex obtusifolius*)

The Natural Environment and Rural Communities Act 2006 delegates the functions available to the Secretary of State under the Weeds Act to Natural England, a Defra agency. This delegation of functions enables Natural England to investigate complaints where there is a risk that injurious weeds might spread to neighbouring land. Natural England gives priority to investigating complaints where there is a risk of weeds spreading to land used for grazing horses or livestock, land used for forage production and other agricultural activities.

7 The Ragwort Control Act 2003 gives this Code evidential status in any proceedings taken under the Weeds Act 1959. This means that a failure to follow this Code is not an offence but non-compliance may be used as evidence in any legal action. Equally, owners/occupiers should be able to establish a defence if they can demonstrate that they have adopted control measures that comply with this Code's guidance.

8 The provisions of the Weeds Act only apply to Common Ragwort and do not apply to other ragwort species. Other species of ragwort may be equally toxic to horses or other livestock, but are less common or relatively rare. In some situations they may need to be controlled. Some species, such as Fen Ragwort (see picture on inside front cover), are protected. It is important to make correct identification of Common Ragwort before considering any control measures. Obligations and restrictions under SSSI designations or other land management agreements must also be considered and discussed with the appropriate authorities (see Appendix 4) before control action is initiated.

Responsibilities to Control the Spread of Ragwort

9 Responsibility for control rests with the occupier of the land on which ragwort is growing. This responsibility applies to ragwort and the other weeds specified under the Weeds Act. When seeking to prevent the spread of ragwort it is expected that all landowners, occupiers and managers will co-operate and, where necessary, take a collective responsibility for ensuring that effective control of the spread of ragwort is achieved.

¹ The Secretary of State is empowered to add to this list if necessary.

- 10 The most effective way to prevent the spread of ragwort is to preclude its establishment through strategic management rather than last minute control. In managed grasslands, good agricultural management will minimise the chance of Common Ragwort establishing itself. In amenity areas, highway verges, railway land and woodland, any activities which cause disturbance to the soil and the loss of ground cover may increase the risk of ragwort becoming established.
- 11 Occupiers of all land, including uncultivated land, derelict and waste areas, should be vigilant for the presence of ragwort. Action to prevent its spread should be taken where ragwort poses a high risk to land used for grazing, or forage production. Detection at an early stage will enable any potential problems to be more easily, safely and economically dealt with. The implementation of a control strategy will ensure that persistent problems are dealt with in a timely manner.

Assessing the Risk Posed by Ragwort

- 12 Where land is affected by ragwort the owner/occupier should make an assessment to determine whether action should be taken to prevent the spread of ragwort to neighbouring land by establishing the risk posed to grazing animals or forage production.
- 13 The following three risk categories are provided as *guidelines* for assessing risk:

High Risk:

- Ragwort is present and flowering/seeding within 50m of land used for grazing by horses and other animals or land used for feed/forage production

Medium Risk:

- Ragwort is present within 50m to 100m of land used for grazing by horses and other animals or land used for feed/forage production

Low Risk:

- Ragwort or the land on which it is present is more than 100m from land used for grazing by horses and other animals or land used for feed/forage production.

The distances given above are guidelines *only* and when assessing risk, account should also be taken of particular local circumstances and other relevant factors such as prevailing winds, topography, shelter belts, natural barriers, soil type and vegetation cover of receiving land. Whether or not the density of ragwort is high or low, the risk factor will be determined by the likelihood of it spreading to land used for grazing and/or feed/forage production.

Code of Practice on How to Prevent the Spread of Ragwort

Action to be taken by Owners of Livestock

- 14** Livestock owners are responsible for the welfare of their animals and they should satisfy themselves that their stock is not exposed to the risk of ragwort poisoning. In particular they should:
- ensure pastures are maintained in good condition and are not under or overgrazed (see Appendix 1)
 - inspect grazing land regularly for ragwort (see Appendix 2) when animals are present
 - move stock to ragwort free land where practicable taking into account the experience of stockmen on the likelihood that particular animals will ingest ragwort (see paragraph 6, Appendix 4)
 - remove ragwort plants where necessary using an appropriate control technique (see Appendix 3) taking account of the status of the land (see Appendix 4)
 - dispose of ragwort plants in an approved manner (see Appendix 5)
 - follow safety guidelines (see Appendix 6)

Action to be taken by Producers of Conserved Forage

- 15** Producers of conserved forage should:
- ensure managed grassland is maintained in good condition (see Appendix 1)
 - inspect land regularly for ragwort (see Appendix 2) in the growing season
 - remove ragwort plants using an appropriate control technique (see Appendix 3) taking account of the status of the land (see Appendix 4)
 - dispose of ragwort plants in an approved manner (see Appendix 5)
 - follow safety guidelines (see Appendix 6)

Action to be taken by other Owners/Occupiers of Land

- 16** Owners/Occupiers should:
- identify land on which ragwort (see Appendix 2) is present
 - review the risk of spread to land used for grazing or conserved forage production (see paragraph 11) on a six-monthly basis
 - ensure managed grassland is maintained in a good condition (see Appendix 1)
 - where appropriate and safe to do so avoid removing ground cover in amenity areas, roadside verges and on railway land unless provisions are made for the appearance of ragwort
 - pay particular attention to areas of bare/disturbed land

- where a **high risk** is identified
 - take **immediate** action to control the spread of ragwort using an appropriate control technique (see Appendix 3) taking account of the status of the land (see Appendix 4)
- where a **medium risk** is identified
 - establish a control policy to ensure that where a change from a medium to a high risk of spread can be anticipated, it is identified and dealt with in a timely and effective manner using appropriate control techniques (see Appendix 3) taking account of the status of the land (see Appendix 4)
- where a **low risk** is identified
 - no immediate action is required (see paragraph 21)
- dispose of ragwort plants in an approved manner (see Appendix 5)
- follow safety guidelines (see Appendix 6)
- monitor the impact of clearance action to ensure its effectiveness for up to six months or to the end of the growing season if sooner

Control Methods

17 A summary of possible control methods are shown at Table 1 (overleaf). In many cases a single control method or single application will not be completely effective and consideration should therefore be given to combining more than one control/management technique. Effective control might not be achieved in one season, particularly where it is a dense infestation, which has been inappropriately managed in the past. The cost categories shown in the table do not provide a reliable guide to costs where linear land such as roads and highways is concerned. Control techniques are considered in more detail at Appendix 3.

Table 1. Summary of control methods

Method	Labour requirement	Cost	Prevention of flowering	Success of control – long term	Grazing removal period (days)	Number of treatments required per year	Repeat time scale (years)	Optimum time of treatment	Suitable for large areas	Suitable for dense ragwort colonisations	Remarks
Cutting	*	*	**	*	0(1)	1/2	1	F	***	***	Emergency treatment to prevent seeding. It is essential to cut before seed heads are mature and must be followed with a control technique
Levering out	***	*	***	**	0(1)	1/2	1	F	*	*	Tools available for digging up plants. Best results when soil is wet. Very dependent on spotting plants, some may be missed requiring further treatment.
Herbicide citronella oil derived product (3)	***	***	***	***	7(2)	1-2	1	R and F	*	*	Very dependent on spotting plants, resulting in some being missed. Large plants may need respraying two weeks later. Will control broad-leaved plants.
Herbicide selective spraying (3)	*	**	***	***	21(2)	1-2	1	R	***	***	Most products will kill other broad-leaved plants sprayed.
Herbicide spot treatment (3)	***	**	***	***	21(2)	1-2	1	R or F	***	*	Very dependent on spotting plants, some may be missed requiring further treatment.
Herbicide weed wipes (3)	*	**	**	**	21(2)	1-2	1	F	***	***	Only tall ragwort plants will be affected.
Pulling by hand	***	*	***	**	0(1)	1/2	1	F	**	*	Gloves must be worn. Best results when soil is wet. Very dependent on spotting plants, some may be missed requiring further treatment.
Pulling by machine	*	**	***	**	0(1)	1	1	F	***	***	Selects plants for pulling on height difference and leaves shorter plants.
Biological	*	***	*	?	N.B. Not suitable as a method of control on grazing land	1	1	R or F	***	***	Biological control using the cinnabar moth is at the early stages of development in the UK.

Key: * Low ** Medium *** High: R – When rosettes start growing; F – early summer before flower heads mature;

(1) – Provided ragwort cuttings are removed; (2) These timings are only a guide – follow the manufacturer's guidelines; (3) Always follow the manufacturer's guidelines.

For further advice on grazing removal periods, refer to paragraphs 23 and 24 of Appendix 3.

For a list of suitably qualified spray contractors, contact the National Association of Agricultural Contractors (NAAC). See Appendix 9 for details.

Control Policies

- 18 Where a medium or high risk has been identified, owners/occupiers and managers of land, including private and public land, highways, waterways, railways, conservation and amenity areas and land awaiting development, should put in place and implement a ragwort control policy. Such policies should take account of the need for vegetation management, including weed control and identify ragwort as a specific weed that should be controlled. The nature conservation status and biodiversity attributes of the land, and the contribution to them made by the ragwort, must also be considered when determining a policy.
- 19 When considering what is practical owners/occupiers/managers should balance the risk against the time and cost of taking the action, and consider whether the cost of control is proportionate to that risk. For some categories of land e.g. railway land and trunk roads this might make regular inspections of all land holdings impractical. In such situations complaints should be used to accumulate information on ragwort "hotspots". Where ragwort is present in areas that will cause a high risk (see paragraph 13 above) during the flowering/seeding season, or a medium risk anticipated to become a high risk, there should be a presumption that action to manage the spread of ragwort will be necessary, even where the cost of control is potentially high.
- 20 A control policy should encourage collaboration and co-operation with neighbours to achieve effective control of the spread of ragwort. Wherever practicable control action should be taken at early stages of growth in order to reduce the risk of seed dispersal and thereby achieve more effective long-term control.
- 21 Where a low risk is identified (see paragraph 13 above), but the presence of ragwort is likely to present a risk in the future, contingency plans should be prepared for its control. Where there is no immediate risk the presence of ragwort should be recorded and the situation should be monitored six monthly to ensure that the risk is reassessed should circumstances change.

Local Control Strategies

- 22 At local levels, it may be useful for those responsible for the management of the land or adjacent land and those with a statutory or advisory remit for nature conservation and animal welfare to get together to form a Local Ragwort Strategy Group. These groups may be particularly effective in areas where there is a conservation and wildlife interest and where ragwort management is a difficult issue. As well as considering the wider biodiversity interests being sustained by the ragwort, attention will need to be given to maintaining populations of the plant's natural predators to assist in the control process. Such groups could agree a way forward on ragwort control which would be endorsed by all parties.

Code of Practice on How to Prevent the Spread of Ragwort

Advice

- 23** Defra and Natural England produce a range of guidance on the Weeds Act, which is listed at Appendix 8. Technical advice and advice on ragwort control is also available from the organisations listed at Appendix 9.
- 24** Advice may also be available from organisations which are responsible for the management of land in their ownership and/or control i.e. Highways Agency, Local Highway Authority, Network Rail, British Waterways, Natural England, Forest Enterprise, Ministry of Defence and Local Authorities (Appendix 7).

Enforcement

- 25** Natural England will take enforcement action under the Weeds Act where ragwort poses a high risk to horses, other livestock, the production of conserved forage or other agricultural activities. Where a potential problem is identified contact should first be made with the owner/occupier or relevant body responsible for the land on which the ragwort is growing to attempt to resolve the matter informally, before contacting Natural England. Organisations that control or own land are listed in Table 2.

Table 2 – Organisations that own and/or control land

Location	Owner/Occupier
Private and commercial property and land and private roads	Owner/Occupier
Agricultural land and land used for livestock other than animals kept for non-agricultural business or recreational purposes	Owner/Occupier
Motorways and trunk roads	Highways Agency
All other public roads	Local Highway Authority
Railway Land	Network Rail
Canals and Towpaths	British Waterways
Site of Special Scientific Interest (SSSI)	Owner/Occupier
National Nature Reserves	Natural England/Owner/Occupier
Local Nature Reserves	Owner/Occupier
Common Areas/Common Land	Local Authority/Owner
Ministry of Defence Land	MoD
Development Land	Owner/Occupier
Parish/Town/Community Council Land	Parish/Town/Community Council
Private Woodland/Forestry	Owner/Occupier
Forestry (Forest Enterprise)	Forest Enterprise

- 26** Where, having been requested to do so, the owner/occupier/relevant body fails to take any action to prevent the spread of ragwort or fails to demonstrate compliance with this Code, Natural England should be notified (Appendix 7).

Pastures

- 1 Pasture management plays a crucial role in preventing the establishment and spread of ragwort. It is not possible in a Code of this nature to provide comprehensive guidance on pasture management. Best practice varies according to specific circumstances and a different approach would be appropriate in different circumstances e.g. in relation to managed grassland or unimproved semi natural grassland. Comprehensive guidance is available from a variety of sources and key references are provided at the end of this appendix.
- 2 Horses are very selective grazers and will eat down some areas until they are almost bare. Coarser grasses can dominate, particularly in those areas where horses dung or urinate, and the grass is left to seed creating a very uneven sward. Bare patches can develop resulting in ideal conditions for the establishment of ragwort. Horse pastures in particular must be very carefully managed to prevent this. Leaving horses out in wet winter conditions can exacerbate the situation causing the ground to become poached (i.e. churning up of land by animals) damaging the grass sward and providing an opportunity for ragwort to establish in the bare ground.
- 3 To maintain horse pasture in good condition:
 - stocking densities should be appropriate to the size of grazing area and available herbage
 - dung should be collected and removed or spread regularly
 - plants poisonous to livestock should not be allowed to proliferate
 - prevent poaching by keeping horses off fields in wet conditions, wherever practicable and maintain drainage
 - remove any stale, dry fodder such as hay
- 4 Agriculturally improved grassland should be managed to achieve a dense ground cover of grasses.
 - Nutrient and pH levels should be maintained through the appropriate application of fertilisers and lime (application rates should be determined by a soil analysis)
 - Appropriate stocking levels should be maintained to avoid under and overgrazing
 - Where pastures deteriorate to such an extent that other methods do little to improve the sward cover renovation through reseedling may be necessary
 - Poaching should be minimised to prevent sward damage
- 5 Where grassland is being managed for its ecological value, but is also being used for grazing, different constraints will apply. Here it will be necessary to keep the population of weeds designated under the Weeds Act to a minimum level consistent with the ecological requirements of the site, the species of conservation significance living there, and the welfare of the grazing animals.

Uncultivated or semi-natural areas

- 6 Wherever possible uncultivated land with low levels of ragwort should remain undisturbed. Where an open sward is maintained and ragwort can be expected to be a natural component of grassland, other control methods might be necessary to prevent ragwort becoming a problem.
- 7 Anyone planning to change uncultivated or semi-natural areas to intensive agricultural use should find out whether they need to make an application under the *Environmental Impact Assessment (uncultivated land and semi-natural areas) Regulations 2006*. Land types covered includes unimproved grassland, heathland, moorland, scrubland and wetlands. Agricultural intensification may include cultivation, soil spreading, drainage, reclamation, increased application of fertilisers or pesticides, and increased grazing by livestock. Anyone planning such work should contact the EIA helpline (0800 028 2140) and read the guidance on the Defra website at www.defra.gov.uk/farm/environment/land-use/eia.

Where to go for more information?

- ADAS
- The British Horse Society
- Buglife – Management of Priority Habitats for Invertebrates 2003
- English Nature – Ragwort Information Note 2003
- English Nature – The Herbicide Handbook – guidance on the use of herbicides on nature conservation sites, 2003
- English Nature – The Lowland Grassland Management Handbook 1999
- English Nature – The Upland Management Handbook 2001
- Farming and Wildlife Advisory Group
- National Association of Agricultural Contractors
- Royal Society for Protection of Birds – A practical guide to the restoration and management of lowland heathland 2003
- Surrey Horse Pasture Management Project

Introduction

- 1 Common Ragwort (*Senecio jacobaea*) is an erect plant usually 30-90cm high, but may exceed 100cm. The stems are tough and often tinged red near the base, but brighter green and branched above the middle. A basal rosette of leaves usually dies before flowering but the stem leaves persist. They are deeply dissected, with irregular, jagged-edged lobes. All the leaves are dark green and rather tough and may be sparsely hairy on the lower side. The inflorescence is a conspicuous, large, flat-topped head of densely packed yellow flowers with ray florets and disc florets, all of which are bright yellow. The seeds are borne singly and have a downy appendage making them readily dispersible.

Biology

- 2 Common Ragwort is normally a biennial (rosette 1st year and flowering 2nd year). During its first year of growth it establishes a rosette of basal leaves and over winters in this way. During the second year the rosette sends up one or more leafy stem, up to one metre in height, which is unbranched and produces numerous flower heads at the top. The flower heads are carried in a large flat-topped cluster. Flowering usually occurs from June until late October after which the plant dies.
- 3 Common Ragwort can also behave as perennial (flowering every year) after damage to the crown such as cutting, grazing, hoof damage, damage by machinery and following incomplete/ineffective hand pulling in dry weather. It can also remain in the rosette stage for several years under intensive cutting regimes such as may be practised on amenity grassland.

Distribution

- 4 Common Ragwort is widespread throughout the UK and can be found on wasteland, development land, roadside verges, railway land, amenity land, conservation areas, set-aside, woodland and grazing land. Common Ragwort may also be found on land used for grazing horses and other stock. Poor quality and poorly managed horse pastures are particularly susceptible to high densities of ragwort and every effort should be made to control ragwort and improve pasture management in these situations.

Habitat

- 5 Common Ragwort can be found over a large range of soil types and climatic conditions and can be characteristic of badly managed grasslands, where trampling breaks the sward, where patches of turf have died in drought or where there is over or under grazing. However, well-managed acid/calcareous grasslands may naturally contain ragwort. Disturbance to grass verges, embankments and woodland areas which leads to open soil are also favourable conditions for seedling establishment.

Other species of Ragwort

- 6 Marsh Ragwort (*Senecio aquaticus*) is locally abundant in wet areas of fields, ditch banks and marshes. Hoary Ragwort (*Senecio erucifolius*) occurs mainly on roadsides, semi-natural meadows and field boundaries. Oxford Ragwort (*Senecio squalidus*) grows widely on roadsides, railway land, old walls and unmanaged land. Fen Ragwort (*Senecio paludosus*) grows on fens and stream sides, and the native site is currently (June 2004) restricted to one ditch and six further (ungrazed) sites.

Identification

Species which may be confused with Common Ragwort (*Senecio jacobaea*)

Other widespread Ragwort species

Marsh Ragwort *Senecio aquaticus*

Hoary Ragwort *Senecio erucifolius*

Oxford ragwort *Senecio squalidus*

Rare Ragwort Species

Fen Ragwort *Senecio paludosus*

Welsh Groundsel *Senecio cambrensis*

York Groundsel *Senecio eboracensis*

Other similar species

Field fleawort *Tephrosia integrifolia*

Tansy *Tanacetum vulgare*

Fleabane *Pulicaria vulgaris*

St. John's worts *Hypericum spp.*

Yellow Loosestrife *Lysimachis vulgaris*

Goldenrod *Solidago virgaurea*

Agrimonies *Agrimonia spp.*

Mulleins *Verbascum spp.*

Other tall yellow composites

Heath Groundsel *Senecio sylvaticus*

Hawkweeds *Hieracium spp.*

Hawk's beards *Crepis spp.*

Hawkbits *Leontodon spp.*

Cat's ears *Hypochaeris spp.*

Sow Thistles *Sonchus spp.*

Elecampane *Inula helenium*

Ox's tongues *Picris spp.*

Goatsbeard *Tragopogon pratensis*

Goldilocks aster *Aster linosyris*

Photographs of the above listed species can be found on the inside of the back and front covers of the Code.

Introduction

- 1 Where the risk that ragwort will spread is such that control action is required or where ragwort is present on grazing land/land used for the preparation of conserved forage, three primary control methods are available:
 - cultural
 - chemical
 - biological

Each method can be employed in a number of ways depending on the location, the population density and the extent of control required. In many cases effective control will only be possible if a combination of methods is employed. Repeat treatment over several seasons might also be required to deal with long established populations of ragwort.

- 2 The decision tree in Figure 1 will assist with selecting the most appropriate method of control.
- 3 On managed grassland or other pasture land management techniques have an important role to play in controlling the spread of ragwort by preventing its establishment (see Appendix 1).

Grazing

- 4 All grazing animals are susceptible to the toxic effects of ragwort and therefore the deliberate control of ragwort by grazing horses, sheep, goats or other livestock should *not* be undertaken on animal welfare grounds.

Cultural

- 5 Several cultural methods can be used to prevent the spread of ragwort. These include pulling and avoidance of bare ground areas. Figure 2 will assist with selecting the most appropriate method of cultural control.

Avoiding bare ground

- 6 Bare ground areas resulting from heavy poaching and/or overstocking are to be avoided where at all possible. This can be achieved by removing animals from ground to prevent poaching (i.e. churning up of land by animals) of land in wet weather conditions, particularly December to March, and by avoiding over grazing of land at other times. Control of rabbit populations may also be necessary to maintain ground cover.

Figure 1. Decision Tree to Assist Selecting the Most Appropriate Control Method

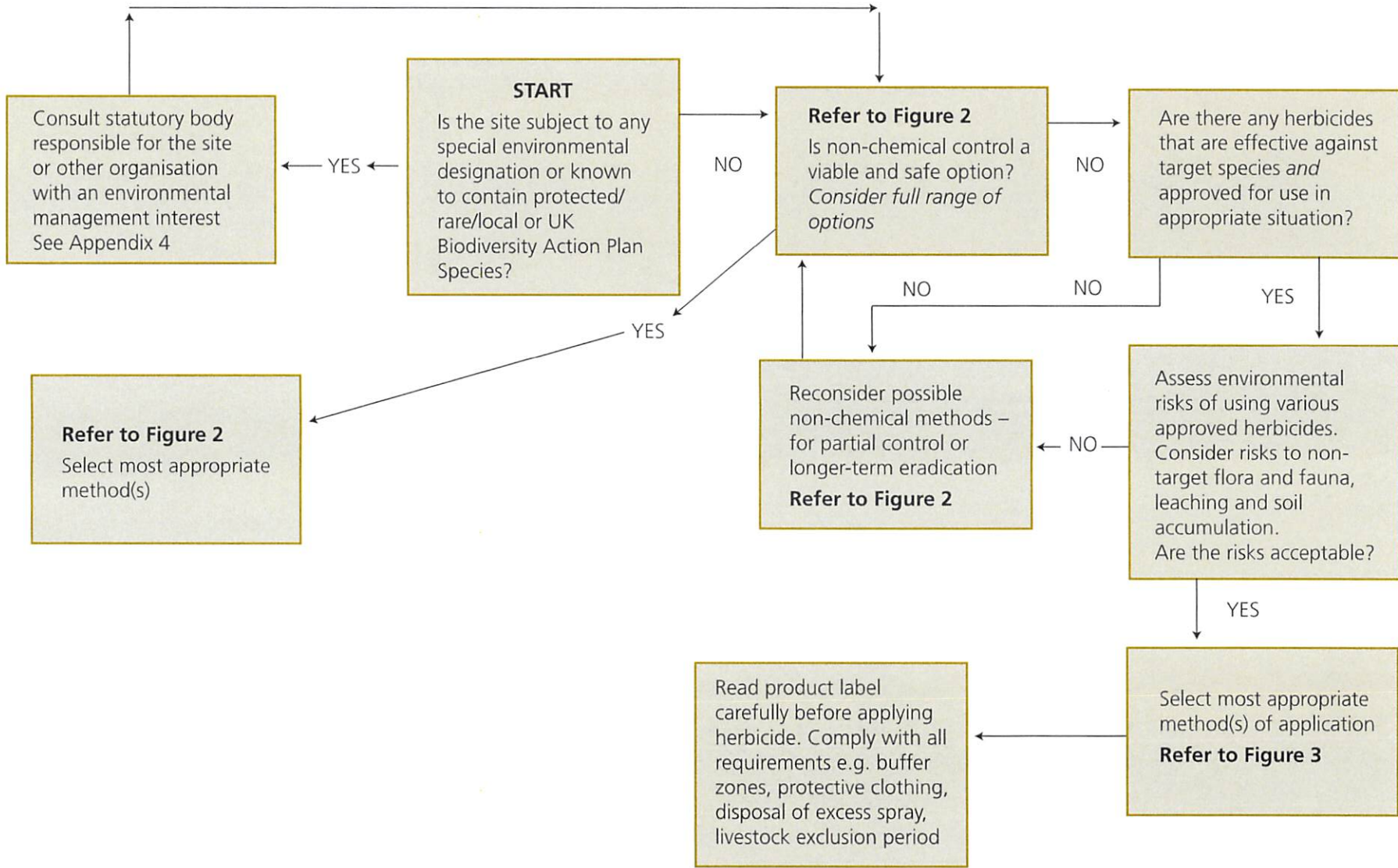
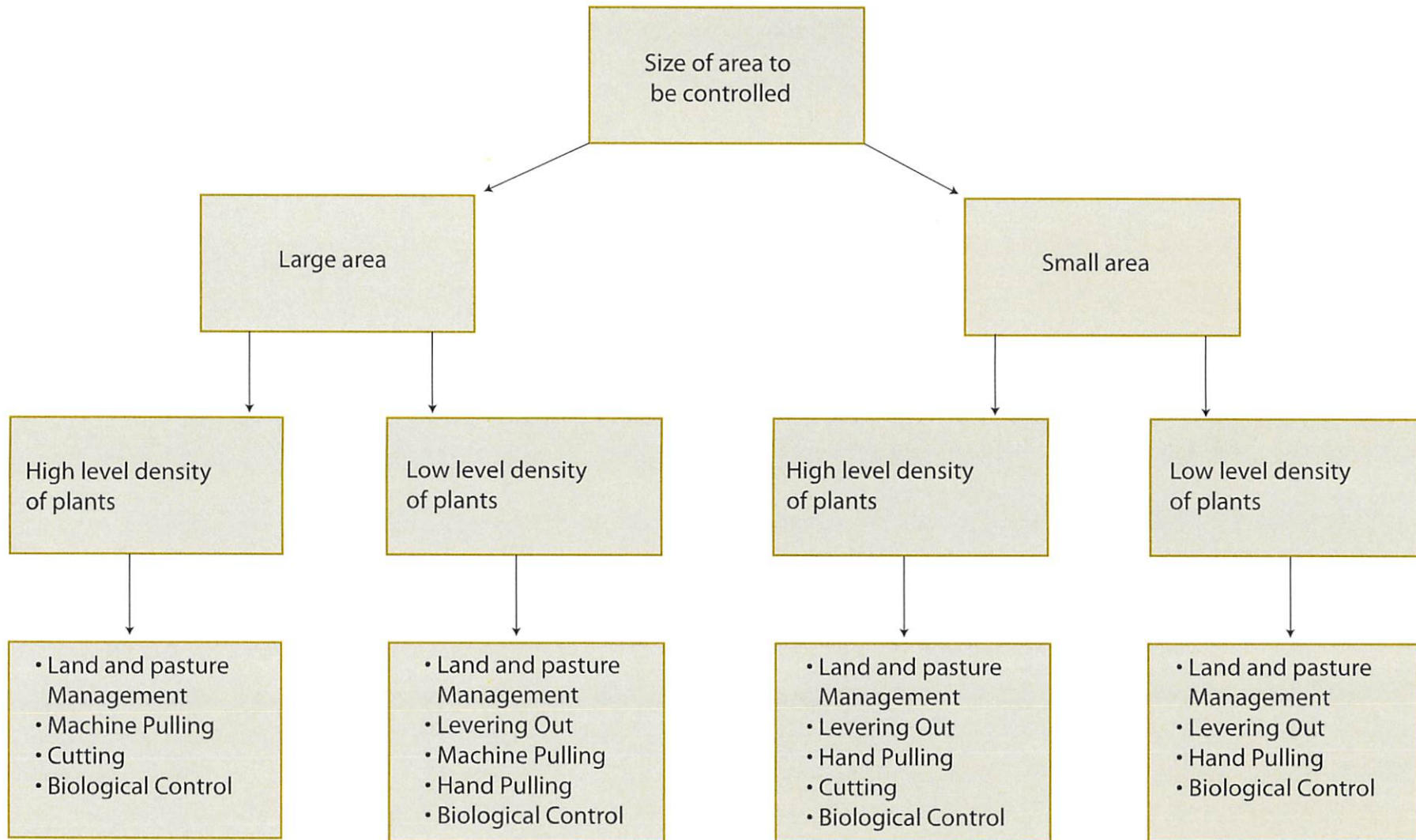


Figure 2. Selecting the Most Appropriate Cultural and Biological Control According to Size of Area and Level of Density of Plants



Pulling and levering

- 7 Pulling or levering up plants can prevent seed spread and can give long-term control although any root fragments not removed can produce weak growth. Hand pulling is appropriate for smaller areas but for larger areas the use of machine pulling should be considered. Machine pulling requires a height difference between the ragwort and other plants and is only suitable on certain soil types and topographies. Various hand tools are available for levering. Best results are achieved when the soil is damp and before ragwort has seeded.
- 8 A combination of manual/mechanical pulling or levering and reducing disturbance to soil can be effective against ragwort, if repeated over a number of years, without having to resort to herbicide use. Ragwort which has been either manually or mechanically pulled or levered should be disposed of safely (see Appendix 5) to prevent re-seeding.

Cutting

- 9 Cutting is a control method of last resort and should only be used to reduce seed production and dispersal where other more effective control methods cannot be used. Cutting stimulates growth and plants subsequently re-flower later in the season. Cutting and stem removal at the early flowering stage reduces seed production but does not destroy the plant, turning it from a biennial into a perennial habit and therefore repeat treatments will be required to prevent the ragwort from seeding.
- 10 Cut plants left lying in the field are a serious risk to grazing animals, as they remain toxic, are more likely to be eaten and may still set seed. Plants must be removed and safely disposed of (see Appendix 5) before returning grazing animals to the field.

Burners

- 11 Spot burners (hand held flame guns) can be used at rosette stage. Success can be variable ranging from 93% kill of ragwort seeding plants to rapid re-growth occurring. Consideration will need to be given to the potential damage that might be done to surrounding vegetation and the risks of fire. Operator safety will also need to be considered carefully. In most circumstances the use of spot burners is unlikely to be suitable except on hard surfaces and paved areas.
- 12 Where the use of spot burners is a preferred method of control a suitable and sufficient risk assessment must be undertaken prior to use.

Code of Practice on How to Prevent the Spread of Ragwort

Chemical

Use of Herbicides

- 13 Herbicides must only be used after a risk assessment has been completed. This must include consideration of any potential effects on the environment and on human and animal health. Risk assessments should also consider the likely ecological impacts of taking no action, which can sometimes outweigh any negative effects of a herbicide treatment.
- 14 Herbicides can be a time efficient and effective method of preventing the spread of ragwort. Total control cannot be guaranteed with one application. However, an annual chemical control programme will generally prevent the spread of ragwort.
- 15 Only herbicides and uses approved under the Control of Pesticides Regulations 1986 (as amended) or the Plant Protection Products Regulation can legally be sold, supplied, stored, advertised and used. Current lists of approved products can be found on the Pesticide Safety Directorate (PSD) website at www.pesticides.gov.uk. All herbicides must have an appropriate standard or 'off-label' approval for use in a relevant situation.
- 16 Always read the product label before using a herbicide and comply with all statutory conditions. Where a herbicide is to be applied under the terms of an off-label approval, users must obtain and read the relevant Notice of Approval (published by the Pesticides Safety Directorate). Users should be aware that pesticides used under an off label approval are done so at the user's own risk and may not be as effective.
- 17 Because herbicides are not equally effective at all stages of plant growth, repeated treatments at different times of year are recommended for optimum control. However, the time of year that a herbicide is applied might be constrained by legal requirements stipulated on the product label. Decisions should take into account the efficacy of the herbicide against the target species (e.g. many herbicides are more effective when applied to actively growing weeds) and any probable impacts of different timings on other non-target species at that site.
- 18 In deciding which chemical to use, it will be helpful to refer to the Environmental Information sheets that are being produced for all pesticide products under the Voluntary Initiative, a programme of measures agreed by the pesticide industry with Government to minimise the environmental impact of pesticides. Further details can be found on the Voluntary Initiative website: www.voluntaryinitiative.org.uk

Legal Restrictions

- 19 The advertisement, sale supply and use of agrochemicals are regulated by Part III of the Food and Environment Protection Act 1985, Control of Pesticides Regulations 1986 as amended by the Plant Protection Products (Basic Conditions) Regulations 1997, and the Health and Safety at Work Act 1974. These are supplemented by two statutory codes: the Code of Practice for the Safe Use

of Pesticides on Farms and Holdings (The Green Code) and the Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry (The Yellow Code). Following public consultation, in 2004, the Green Code was revised and issued as the Code of practice for using plant protection products (PB 11090) in 2006. Further details are available on the Pesticides Safety Directorate website at: www.pesticides.gov.uk

- 20 The Control of Substances Hazardous to Health (COSHH) Regulations 2002 require that pesticides (including herbicides) should only be used where necessary, and where the benefits significantly outweigh the risks to human health and the environment. Non-chemical control options must, therefore, be considered and herbicides should only be used in situations where alternatives do not exist, or are impractical or likely to be inadequate.

Training and Certification of Spray Operators

- 21 Spraying should only be carried out by a competent person who is suitably trained and qualified and in accordance with the pesticides and health and safety legislation. No person who was born later than 31 December 1964 can use a pesticide approved for agricultural use unless that person has obtained a recognised Certificate of Competence. Irrespective of their age, all persons who use pesticides as part of a commercial service (i.e. as a contractor on land not in the ownership or occupation of the contractor) must hold a Certificate of Competence, or work under the direct personal supervision of a person who holds such a certificate. Surplus chemicals must be disposed of according to the Code of Practice for the Safe Use of Pesticides on Farms and Holdings.

Restrictions on Use of Pesticides in or Near Water

- 22 Regulations made under the Food and Environment Protection Act 1985 control the use of herbicides/pesticides where pollution of water might occur.

Grazing Restrictions

- 23 The application of herbicides to grazing land will result in grazing restrictions. Each product has a specified grazing interval i.e. the period between treatment and grazing. The grazing interval provides sufficient time for the applied product to work on the growing plants and does **not** indicate that it is safe to graze.
- 24 It is only safe to graze fields once any ragwort and other toxic weeds present have disintegrated and are **not** accessible to grazing animals. The same principle also applies to grassland treated which is intended to be conserved for hay and haylage.

Code of Practice on How to Prevent the Spread of Ragwort

Environmental Restrictions

- 25** The use of herbicides to control ragwort will affect other plant species within the treated area. Areas protected by legislation, e.g. SSSIs and agri-environment schemes, also restrict the use of certain chemicals and the relevant authority should be consulted prior to operations (see Appendix 4).

Methods of Application

- 26** Efficacy and environmental safety are directly affected by the method of application, which must comply with statutory requirements and the specific conditions of approval set for the pesticide concerned. Effective targeting of herbicides is important, particularly when non-selective herbicides are used. Non-selective, translocated herbicides present the highest risk to non-target plants. The method used to apply a herbicide will be influenced by:
- the extent and distribution of the target species
 - height and structure of the target species
 - height, structure and sensitivity of surrounding/adjacent non-target species
 - approval and label requirements
- 27** Weed-wipers provide a method for the targeted treatment of weeds that are taller (at least 10 cm taller) than the associated non-target vegetation. Weed-wipers are available for different scales of operation – from small hand held wipers to large tractor-mounted equipment.
- 28** The most widely used type of hand-held sprayer is the knapsack sprayer, which is suitable for spot-treatment of ragwort on small areas and on very rough or steep terrain. Sprayers mounted on tractors or ATVs are more suitable for larger areas of relatively even ground.

Environmental Safety

- 29** An evaluation of environmental risks is essential wherever herbicides/pesticides are used and should always consider both short and long-term, local and remote effects, impacts on animals as well as plants and possible indirect effects (e.g. through destruction of nesting sites, deoxygenation of ponds caused by organisms decomposing dead vegetation etc.)
- 30** To minimise the effects of herbicides on non-target species:
- use a weed wiper or spot treatment wherever practicable
 - spot treat, if possible, and use a guard on the sprayer lance to more effectively target sprays and reduce drift
 - use a selective herbicide that is less damaging to non-target species
 - leave an unsprayed buffer zone between treated and vulnerable species/habitats

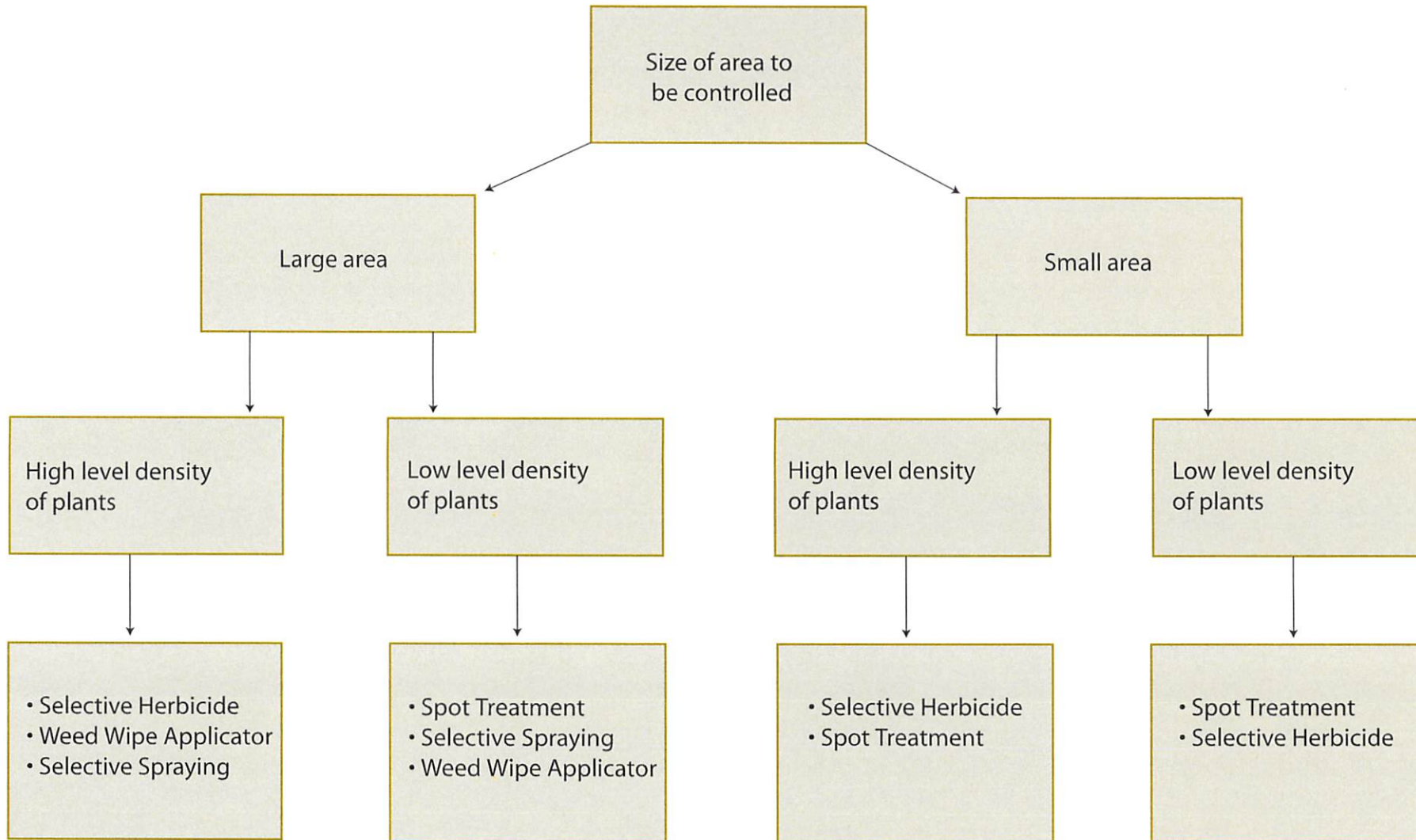
- avoid fine sprays – use medium-coarse droplet nozzles
- keep spray nozzles as close as possible to target plants
- consider use of low drift nozzles
- avoid spraying in unsuitable weather e.g. when wind speed is greater than Beaufort Force 2 or on very calm, warm days

31 Figure 3 (overleaf) will assist with selecting the most appropriate method of chemical control.

Biological

- 32 Biological control is aimed at controlling ragwort by using the plant's natural enemies to lower its density, thereby suppressing ragwort populations and allowing other plants to re-establish. High densities or "plague levels" of cinnabar moths can destroy complete ragwort populations. Many species feed on ragwort including; cinnabar moth (*Tyria jacobaea*), ragwort flea beetle (*Longitarsus jacobaea*) and ragwort seedfly (*Pegohylemia seneciella*). However their natural spread might not always be as wide-ranging as that of ragwort. Other potential biological control agents include several fungal pathogens (rust diseases). None of these significantly reduce ragwort populations.
- 33 The introduction of a biological control agent has a potential advantage in areas where chemical/mechanical control is unachievable or undesirable. However, it can be difficult to maintain sufficient predator populations to provide adequate control and may only result in a reduction rather than a control of spread. Biological control is therefore best used as part of a long-term strategy. **Biological control by cinnabar moths is not suitable for the control of ragwort on grazing land or land used for forage production.** Approval is required from the local Natural England Area Team before this technique is used on SSSIs.

Figure 3. Decision Tree to Assist Selecting the Most Appropriate Herbicide Treatment According to Size of Area and Level of Density of Plants



Introduction

- 1 Where land has a special designation, attracts support payments which place conditions on the way the land is managed or has a specific biodiversity/wildlife interest no action to prevent the spread of ragwort should be taken without the approval of the competent authority. In the case where an area of land falls within more than one category, all the relevant considerations need to be taken into account.

Set-aside

- 2 Land set-aside from agricultural production is a potential source of ragwort and is subject to the provisions of the Weeds Act in the same way as other land. Action may be taken to control ragwort at any time by means of pulling, cutting, spot burning or herbicide. Full details of the rules for weed control on set aside land are included in the Single Payment Scheme Handbook and Guidance for England: 2006 Edition (SP 5) and Cross Compliance Handbook for England: 2006 Edition (PB 11035) available from Defra.

Organic farming

- 3 Where land is farmed organically there will be limitations on the control options that can be used. If in any doubt about the standards covering this area farmers should contact their Certification Body. Further advice on practical measures should be obtained from suitably experienced organic consultants.

Agri-Environment Schemes

- 4 Agri-environment schemes cover Environmentally Sensitive Areas (ESAs) and land subject to Countryside Stewardship and from 2005 Environmental Stewardship Entry Level and Higher Level Schemes. The control of weeds, including Common Ragwort on land covered by an ESA or other agreement is included in the terms of individual agreements. Where ragwort is present on land within an ESA or other agreement and poses a high risk to the health and welfare of grazing animals and/or the production of feed or forage it should be adequately controlled. Although individual agreements may limit the options for control, it should not rule out control. Guidance is available from Natural England (Appendix 7).

National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and other statutorily designated wildlife sites (including sites that support Red Data Book Listed, Nationally Scarce or Biodiversity Action Plan Priority species)

- 5 Several species of ragwort and closely related species occur as native plants on many statutorily designated wildlife sites such as NNRs and SSSIs. Some species of ragwort are rare. Management of plant life is crucial to the ecology of NNRs and

Code of Practice on How to Prevent the Spread of Ragwort

SSSIs and in such situations weed control, including the control of Common Ragwort, may be potentially damaging to the nature conservation interests of the site. With regard to NNRs and other SSSIs, the local Natural England Area Team must be consulted in advance of action and consent sought as to the most appropriate control method (Appendix 7).

- 6 On sites where grazing management is required and there is a wildlife interest associated with the ragwort then a risk assessment should be undertaken. If ragwort poisoning becomes a risk then grazing animals should be excluded from the areas for the period of risk, or the ragwort removed. However, the risk assessment may take into account the susceptibility of the particular grazing animals (species, breed, age, experience, foraging behaviour), the presence of abundant alternative palatable herbage and prevailing weather conditions.
- 7 Where sites do not require grassland management for grazing, ragwort may be acceptable providing the presence of such ragwort is not a threat to horses and stock grazing land neighbouring the site, or adjoining land used for feed/forage production. The key factor will be the level of ragwort present relative to the risk of seeds spreading to land used for grazing and/or forage production.
- 8 Emphasis should be placed on 'preventing' the establishment of ragwort by management, rather than 'controlling' populations of ragwort once they have occurred. Where control of the ragwort population is necessary, cultural control methods are the preferred option.

Non-statutorily designated wildlife sites/sites with nature conservation interests (including sites that support Red Data Book Listed, Nationally Scarce or Biodiversity Action Plan Priority species)

- 9 It is recommended that the approach adopted in paragraphs 5 to 8 above should generally apply to non-statutorily designated wildlife sites.

Scheduled Monuments

- 10 Control on or removal from land which is protected as a Scheduled Monument under the Ancient Monuments and Archaeological Areas Act 1979 may also require Scheduled Monument Consent (SMC). English Heritage must be consulted and advice sought as to the most appropriate method of control (Appendix 7).

Common Land

- 11 Common land can sometimes be populated by a number of species including Common Ragwort. Where ragwort is identified as putting at risk animals grazing on the common, or to neighbouring land used for grazing and/or feed/forage production, it must be controlled. Responsibility for control lies with the registered owner of the land and/or the person entitled to the occupation of the land

Appendix 4 – Particular categories of land

(normally the landowner but not exclusively so), the common right holders are not normally deemed to be the owners or occupiers. As common land may often be designated SSSIs, it may be helpful to refer to paragraphs 5 to 8 above.

Other Land used for Grazing

- 12 On land used for grazing horses and other animals control of ragwort is the responsibility of the occupier (owner or tenant) of the land. The presence of ragwort within a grazing area can pose a high risk to grazing stock, particularly horses, which are highly susceptible to the toxic effects of ingested ragwort
- 13 Particular attention must be given to the presence of ragwort seedlings which are less visible than the rosette stage and more likely to be eaten. Where ragwort is identified as posing a high risk to animals, suitable control measures should be taken or animals removed from the source of risk.

Forage Production

- 14 Grassland conserved for forage production including: hay, haylage, silage and crops grown for dried grass can contain ragwort. Ragwort cannot easily or readily be detected once dried. It remains highly toxic and cannot be easily discarded. In its dried form it is more likely to be eaten and poses a higher risk of poisoning to the animal than in the grazing situation. Where ragwort is identified in fields used for feed/forage production suitable control measures must be taken.
- 15 Any feed or forage that contains ragwort is unsafe to feed to horses and other animals and must be declared 'unfit' as animal feed and be disposed of safely. The Agriculture Act 1970 and the Feeding Stuffs Regulations 2000 govern the sale of animal feed and forage. Regulation 14 makes it an offence to sell any material for use as a feeding stuff which is found, or discovered as a result of analysis, to be unwholesome for or dangerous to any farmed animal, pet animal or human being. Trading Standards should be notified if feedstuffs are found to contain ragwort as an offence may have been committed.

Amenity Grassland

- 16 Amenity grassland which includes sports grounds, playing fields, village greens and grassed areas around buildings and gardens, are usually intensively managed and would normally pose a low risk of ragwort spreading to grazing land and land used for feed/forage production. However, where land is less intensively managed it can pose a risk if ragwort is allowed to proliferate in areas not frequently cut and/or on the perimeter of the amenity area. In such situations where ragwort poses a high risk of contaminating neighbouring land used for grazing and/or feed/forage production then effective control measures must be taken to prevent the spread of ragwort. Control methods should take into account public access and safety and a suitably sufficient risk assessment must be undertaken prior to control.

Highways

- 17 Ragwort is frequently found growing by the side of highways including motorways and other trunk roads, other public roads and private roads. It can pose a serious risk of spreading to grazing land and land used for feed/forage production within the locality. Where ragwort is present on roadside verges and the spread of ragwort poses a high risk to grazing animals and/or feed/forage production it must be controlled. The vast extent of the road network and the land surrounding it means that ragwort will be likely to spread on to highway verges.
- 18 The control of roadside vegetation including Common Ragwort is the responsibility of the Highways Agency in the case of motorways and other trunk roads, and the Local Highway Authority in respect of all other public roads. Private roads are the responsibility of whoever owns them. Control of ragwort on highway land should only be undertaken by appropriately trained and qualified persons who have had access to the relevant safety and environmental information to ensure that their specialist work does not compromise the safety of road users or contravene environmental legislation.
- 19 Particular problems arise where road improvements or other disturbances of the highway verge have occurred. If turf is removed, properly stored and replaced when the works have been completed, there should be much less bare ground for ragwort to colonise. Post works special measures should be avoided or minimised. Seeding measures should be followed up by several mowings during the first year which would promote growth of grass/clover etc, and reduce growth of ragwort.

Railways

- 20 Ragwort can be found growing by the side of railway lines and, due to the size of the railway network, can pose a risk of contaminating grazing land and land used for feed/forage production within the locality. Similarly, the number of neighbours surrounding the 30,000 hectare network means that ragwort will undoubtedly spread on to railway property.
- 21 The control of vegetation on railway land, including the control of ragwort, is the responsibility of Network Rail and is undertaken to ensure the risks posed to trains, railway personnel and the travelling public are reduced to as low as is reasonably practicable. Ragwort is controlled on a reactive basis, dealing with incidents on a site-specific basis. Weed control on private railway land is the responsibility of whoever owns the land.
- 22 Where ragwort is present on railway land and the spread of ragwort poses a high risk to grazing animals and/or feed/forage production it must be controlled. Control of ragwort on surfaces belonging to statutory undertakers operating railways may require the carrying out of special safety procedures, including temporary track closures. The work may fall to be co-ordinated with other activities in order to avoid excessive costs and inconvenience to passengers. Personnel involved have access to safety and environmental information

Appendix 4 – Particular categories of land

to ensure that the control activities do not compromise the safe running of the railway or contravene environmental legislation. Accordingly, where someone is concerned about ragwort on railway land it would be helpful to discuss with statutory undertakers what would be a reasonable period of time for clearance work to be carried out, before making a complaint to Natural England at Bristol.

Aquatic Areas

- 23** Land immediately adjacent to water (this includes rivers, streams, brooks, canals, side ponds/side canals, ponds and reservoirs) can be a source of ragwort, in particular the rarer species, such as Fen Ragwort, which flourishes in damp conditions. Where Common Ragwort is present on land adjacent to waterways and the spread of Common Ragwort poses a high risk to grazing animals and/or feed/forage production it must be controlled. However care must be taken to distinguish Common Ragwort from Fen Ragwort, which is protected and should not be controlled. The Food and Environment Protection Act 1985 places a special obligation on all pesticide users to prevent pollution of water. The Environment Agency must be notified prior to use of herbicides/pesticides in or near water. Downstream and opposite riparian owners should also be consulted when pesticides are applied near water.

Woodland and Forestry

- 24** Ragwort in woodland and forestry generally represents a low risk to grazing animals and to feed and forage production. Where ragwort is present and the spread of ragwort poses a high risk to grazing animals and/or feed/forage production then it must be controlled.

Development, Waste, Derelict Land, Land Used for Mineral Extraction

- 25** This category includes brown field sites awaiting development, abandoned land, and land not utilised or managed surrounding development areas. Land within the urban environment generally represents a low risk to grazing animals and to feed and forage production. Where ragwort is present on development, waste and neglected land and the spread of ragwort poses a high risk to grazing animals and/or feed/forage production, then it must be controlled. It is expected that owners, occupiers and managers of such land will have in place policies for the identification, monitoring and control of ragwort on land for which they are responsible. In some circumstances, this type of land can have benefits for biodiversity and this should be borne in mind when developing a control policy.

Defence Land

- 26** The Defence Estates (an Executive Agency of the Ministry of Defence) administer the defence estate and are responsible for ensuring that the appropriate standards of weed control are maintained on defence land under its jurisdiction. Where

Code of Practice on How to Prevent the Spread of Ragwort

ragwort is present on defence land and there is a high risk that it may spread to neighbouring land used for grazing and/or feed/forage production the Ministry of Defence will take measures to control the ragwort and reduce the risk of it spreading. Some Ministry of Defence land has conservation status and requires grazing. In these circumstances, where a low risk has been assessed to animal welfare (see paragraph 6 of this Appendix), animals may graze defence land where ragwort is present. The Ministry of Defence will take action to reduce this risk if it becomes medium or high risk. The Ministry of Defence will not control ragwort where there is unexploded ordnance present.

Bridleways

- 27 Ragwort should be controlled on bridleways where the bridleway runs across grazing land or land used for forage production and where grazing animals may be at risk. Where there is no risk, it should not be necessary to control ragwort simply because horses will be ridden along the bridleway. It is the rider's responsibility to ensure that a horse when ridden or led on a bridleway does not ingest ragwort.

Appendix 5 – Disposal

- 1 Safe disposal is an important part of ragwort control.** Options for disposal will depend on the amount of ragwort to be disposed of and the local resources available for disposal.
- 2** Cut and pulled flowering ragwort plants may still set seed and all parts of the ragwort plant remain toxic when treated or wilted. Cut and pulled plants will therefore continue to pose a risk to horses and other grazing stock and should be removed from areas where they could be ingested by vulnerable animals.
- 3** Options for disposal of ragwort plants include, sealing in plastic bags for incineration or landfill, or by disposing in an environmentally acceptable way, whereby it will not be a risk to grazing animals and the seed will not be spread. When plants are incinerated this must be undertaken in accordance with the Code of Practice for the Protection of Air (Appendix 8) and Local Byelaws. Landfill sites must be an approved Local Authority facility. The Environmental Services Department of your Local Authority will be able to identify the nearest waste reception centre. When transporting pulled ragwort, care should be taken to ensure that it is either in a sealed container or well-covered to prevent the spread of seed.
- 4** Composting in the open is not recommended. If the composting process does not kill the seeds, there will be a risk of spread of ragwort. Composting should therefore not be used for disposal of ragwort, unless the temperatures reached are sufficient to destroy viable seed.
- 5** *Since the Code was published in 2004 Defra has published a more detailed publication on this subject entitled *Guidance on the disposal options for common ragwort (PB 11050)* available from Defra Publications.*

Handling Ragwort Plants

- 1 Ragwort is a toxic plant and suitable precautions must be taken when handling live and dead plants. Hands must be protected by wearing sturdy waterproof gardening type gloves. Arms and legs should also be covered. A facemask should be used to avoid the inhalation of ragwort pollen.
- 2 If skin comes into contact with ragwort the area should be thoroughly washed in warm soapy water, rinsed and dried.

Operator safety

- 3 Care must also be taken to ensure operator safety when undertaking ragwort clearance. This is particularly important when clearance takes place on road verges and other public areas accessed by motor vehicles.
- 4 If assistance is provided by volunteers they must be competent to undertake the task and have adequate training (including road safety). They should be supervised to ensure that they are not a danger to themselves or to others. This is particularly important when clearing ragwort from roadside verges on the public highway. Volunteers are not permitted to operate on land owned by Network Rail or other railway undertakers.
- 5 Before clearance commences a sufficient and suitable risk assessment should be undertaken which:
 - identifies the hazards
 - decides who may be harmed by them
 - evaluates the risk and decides whether the existing precautions are adequate or whether more should be done
 - records the findings
 - reviews the assessment and revises it if necessary

Further guidance on undertaking risk assessments is available from the Health & Safety Executive (see Appendix 7).

- 6 When digging or pulling ragwort adjacent to a public highway i.e. roadside verge, public footpath, bridleway or byway open to all traffic, it is essential that operators can be seen by other road/highway users. All operators should wear high visibility clothing and generally work facing the traffic. Basic road safety training should be provided to raise the awareness of road safety hazards. No attempt should be made to dig or pull ragwort in poor visibility or during the hours of darkness on roads.
- 7 Any vehicles used to transport operators to the location where ragwort is being controlled must be parked safely and must not be parked in such a way as to obstruct the public highway.
- 8 Standard road works signing should be set up in accordance with standard practice governing the type of road. On trunk roads including motorways different rules apply and traffic signing needs to be approved by the Trunk Road Agent and Police prior to being erected or works beginning.

- 9 On high-speed dual carriageways where the speed limit exceeds 50 mph, special traffic management requirements are called for under the terms of the Highways Agency document “Guidance for Safer Temporary Traffic Management”, published by the Transport Research Laboratory Ltd (Appendix 8).

Prior Authority for Access to Land

- 10 It is essential that prior authority be obtained before clearance of ragwort is undertaken. Access to land without prior authority would amount to trespass and could lead to a charge of criminal damage. Authority should be obtained as follows:
- Private land – authority must be obtained from the owner/occupier of the land
 - Public land – prior authority should be obtained from the relevant public body responsible for the management of that land, i.e. parish council, town council, local authority or other public body
 - The public highway, i.e. road side verges – clearance should only be undertaken with the prior notification and authority of the relevant local highway authority, i.e. normally the Highways Department of the County Council
 - Trunk roads including motorways – these are the responsibility of the Highways Agency
 - Railway land – this is the responsibility of the railway undertaker concerned. Unauthorised persons must not under any circumstances enter nor purport to authorise entry by any other person. Only the railway undertaker concerned is in a position to authorise entry by persons in possession of appropriate railway safety certification meeting the requirements of undertakers’ Railway Safety Cases approved by the Railways (Safety Case) Regulation 2000 (as amended). A failure to comply with this instruction is likely to place the persons concerned in breach of duties under the Health and Safety at Work etc Act 1974. The person(s) authorising entry may in such circumstances also render themselves liable to prosecution in their personal capacity.

Use of herbicides

- 11 All herbicides are potentially hazardous if not used in accordance with their approval, and where appropriate, environmental risk and COSHH assessments. (See Appendix 3). Such products should only be used where absolutely necessary. Unnecessary use is uneconomic, can lead to pesticide resistance and, in some cases may also damage the non-target vegetation. A risk assessment must be carried out before application. The risk assessment should determine the risks to operators and other people (including members of the public) and should specify the measures required to adequately control those risks. Any measures e.g. substitution of the product (by a less hazardous one), engineering controls etc deemed appropriate and necessary by risk assessment should be implemented, and protective equipment required by and stipulated on the product label should be worn. Information relating to first aid and medical treatment in the event of accidental exposure to the chemical is also given on the product label.

Appendix 7 – Government Departments, Agencies and Statutory Authorities

British Waterways

Willow Grange, Church Road, Watford, WD17 4QA Tel: 01923 201120
Website: <http://www.britishwaterways.co.uk>

Department for Environment, Food & Rural Affairs (Defra)

Nobel House, 17 Smith Square, London SW1P 3JR
Defra Helpline (Public Enquiries) Tel: 08459 335577
Website: <http://www.defra.gov.uk>

English Heritage (EH)

1 Waterhouse Square, 138 – 142 Holborn, London, EC1 2ST Tel: 020 7973 3000
Website: <http://www.english-heritage.org.uk>

Environment Agency (EA)

Rio House, Waterside Drive, Aztec West, Almondsbury, Bristol BS32 4UD
Tel: 08708 506506 Website: <http://www.environment-agency.gov.uk>

Forestry Commission (FC)

231 Corstorphine Road, Edinburgh EH12 7AT Tel: 0131 334 0303
Website: <http://www.forestry.gov.uk>

Health & Safety Executive (HSE)

HSE Information Services, Caerphilly Business Park, Caerphilly, CF83 3GG
HSE InfoLine Tel: 0845 345 0055 Website: <http://www.hse.gov.uk>

Highways Agency (HA)

123 Buckingham Palace Road, London, SW1W 9HA Tel: 08457 50 40 30
Website: <http://www.highways.gov.uk>

Natural England – Bristol – Injurious Weeds and Wildlife Licensing Unit

Natural England, Burghill Road, Westbury-on-Trym, Bristol BS10 6NJ
Tel: 0117 959 8622 E-mail enquiries: wildlife@naturalengland.org.uk

Natural England – Public Enquiries

Natural England, Northminster House, Northminster Road, Peterborough PE1 1UA
Tel: 0845 600 3078 E-mail enquiries: enquiries@naturalengland.org.uk

Natural England – Head Office

Natural England, 1 East Parade, Sheffield, S1 2ET Tel: 0114 241 8920
Website: <http://www.naturalengland.org.uk>

Network Rail

40 Melton Street, London NW1 2EE Tel: 08457 11 41 41
Website: <http://www.networkrail.co.uk>

Pesticide Safety Directorate (PSD)

Mallard House, Kings Pool, 3 Peasholme Green, York YO1 7PX Tel: 01904 455775
Website: <http://www.pesticides.gov.uk>

Appendix 7 – Government Departments, Agencies and Statutory Authorities

Scottish Executive Environment and Rural Affairs (SEERAD)

Pentland House, 47 Robb's Loan, Edinburgh EH14 1TY Tel: 0131 556 8400

Website: <http://www.scotland.gov.uk>

Welsh Assembly Government Department for Environment, Planning & Countryside

National Assembly for Wales, Cardiff Bay, Cardiff CF99 1NA Tel: 0845 010 5500

Website: <http://www.wales.gov.uk>

Defra Publications

- The Weeds Act 1959 Preventing the spread of harmful weeds (2002)*
- The Weeds Act 1959 Guidance on the methods that can be used to control harmful weeds (PB 7190) (2002)
- Weed Identification (PB 4192) *Provides guidance on weed identification including ragwort species* (1999)
- Guidance on the disposal options for common ragwort (PB 11050) (2005)
- Code of practice for using plant protection products (PB 11090) *Updated code providing guidance on the safe use of pesticides on farms and holdings* (2006)
- Code of Good Agricultural Practice for the Protection of Air (MAFF, 1998 PB 0618) *Provides guidance on avoiding air pollution from odours, ammonia and smoke*
- Code of Good Agricultural Practice for the Protection of Water (MAFF, 1998 PB 0587) *Provides guidance on pesticide storage, use and disposal*
- Single Payment Scheme Handbook and Guidance for England: 2006 Edition (SP 5) *Guidance on weed control on set-aside land*
- Cross Compliance Handbook for England: 2006 Edition (PB 11035) *Guidance on weed control on set-aside land*

Copies of all numbered Defra publications can be obtained from:

Defra Publications
Admail 6000
London SW1A 2XX
Tel: 08459 556 000

And are also available on the Defra website (www.defra.gov.uk)

*Only available on the Defra website.

Other Publications

- The Safe Use of Pesticides for Non-agricultural Purposes (HSE 1995) (ISBN 0-71760-5426) *An approved code of practice giving practical guidance on the use of non-agricultural pesticides in accordance with the requirements of the COSHH Regulations 1994*
- The UK Pesticide Guide (CAB Publishing) (ISBN 1-84593-2293) *Annual publication of available pesticides and adjuvants in the UK for use in agriculture, horticulture, forestry and amenity situations*
- The Orange Code – Code of Practice for the Use of Approved Pesticides in Amenity and Industrial Areas (National Association of Agricultural Contractors with British Agrochemicals Association) (ISBN 1-871140-12-9) *Voluntary Code of Practice*

Appendix 8 – Useful publications

- English Nature – The Herbicide Handbook: Guidance on the use of herbicides on nature conservation sites, 2003. ISBN 1 85716 746 5. Available on www.english-nature.org.uk
- English Nature Information Note – Towards a Ragwort management strategy 2003 *Information note on the control of common ragwort*
- “A Guide to Animal Welfare in Nature Conservation Grazing” (Grazing Animal Project 2001). Available from GAP Office, The Kiln, Mather Road, Newark, Nottinghamshire NG24 1WT. Tel: 01636 670095. E mail: enquiries@grazinganimalprojects.info *Provides guidance on the management of stock on nature conservation sites.*
- “Guidance for Safer Temporary Traffic Management”, published by the Transport Research Laboratory Ltd ISBN 0 9521860 98 (www.trl.co.uk).

Appendix 9 – Sources of technical advice on ragwort control

ADAS

Provide chargeable consultancy advice

ADAS, Woodthorne, Wergs Road, Wolverhampton WV6 8TQ

Tel: 0845 766 0085

<http://www.adas.co.uk>

AGRICULTURAL INDUSTRIES CONFEDERATION

Member companies supply and distribute agrochemicals

Confederation House, East of England Showground, Peterborough, PE2 6XE

Tel: 01733 385230

<http://www.agrindustries.org.uk>

AICC (Association of Independent Crop Consultants)

Provide chargeable consultancy advice

AICC, Agriculture Place, Heath Farm, Heath Road East, Petersfield, Hampshire, GU31 4HT

Tel: 01730 710095

<http://www.aicc.org.uk>

ALVAN BLANCH

Supplier of the 'Eco-Puller' a mechanical tall weed pulling machine (including ragwort)

Chelworth, Malmesbury, Wiltshire SN16 9SG

Tel: 01666 577333

<http://www.alvanblanch.co.uk>

BARRIER ANIMAL HEALTHCARE

Supplier of Citronella Oil derived product

36 Haverscroft Industrial Estate, New Road, Attleborough, Norfolk NR17 1YE

Tel: 01953 456363

<http://www.barrier-biotech.com>

BASIS Registration Ltd

Runs the accreditation scheme for advisors of pesticide use

BASIS, 34 St John Street, Ashbourne, Derbyshire DE6 1GH

Tel: 01335 343945

<http://www.basis-reg.com>

THE BRITISH HORSE SOCIETY

National organisation for horse owners and riders

Stoneleigh Deer Park, Kenilworth, Warwickshire CV8 2XZ

Tel: 08701 202244 Fax: 01926 707800

<http://www.bhs.org.uk>

BRITISH INSTITUTE OF AGRICULTURAL CONSULTANTS (BIAC)

Provide chargeable consultancy advice

BIAC, The Estate Office, Torry Hill, Milstead, Sittingbourne, Kent ME9 0SP

Tel: 01795 830100

<http://www.biac.co.uk>

Appendix 9 – Sources of technical advice on ragwort control

CENTRE FOR ECOLOGY AND HYDROLOGY (CEH)

Control of injurious weeds in or near water

The Centre for Ecology and Hydrology, CEH Wallingford, Maclean Building,
Benson Lane, Crowmarsh Gifford, Wallingford OX10 8BB

Tel: 01491 838800 Fax: 01491 692424

<http://www.ceh.ac.uk>

CROP PROTECTION ASSOCIATION

Member companies can supply technical literature

Crop Protection Association, 20 Culley Court, Orton Southgate,
Peterborough PE2 6WA

Tel: 01733 367213

<http://www.cropprotection.org.uk>

FARMING AND WILDLIFE ADVISORY GROUP (FWAG)

Advice on farming and conservation

Farming and Wildlife Advisory Group, Stoneleigh Park, Kenilworth,
Warwickshire CV8 2RX

Tel: 024 7669 6699

<http://www.fwag.org.uk>

GARDEN ORGANIC

Organic gardening, including weed control

Garden Organic, Ryton Organic Gardens, Coventry, Warwickshire CV8 3LG

Tel: 024 7630 3517

<http://www.gardenorganic.org.uk>

LAZY DOG TOOL LTD

Supplier of ragwort lifting tools and weeding brigades

Hill Top Farm, Spaunton, Appleton-le-Moors North Yorkshire YO62 6TR

Tel: 01751 417351

<http://www.lazydogtoolco.co.uk>

MACHINERY RINGS ASSOCIATION OF ENGLAND AND WALES (MRA)

Co-operative supply of machinery and labour

Association Secretary: Mr Angus Campbell, RAMSAK Ltd, Weald Granary,
Seven Mile Lane, Mereworth, Maidstone, Kent ME18 5PZ

Tel: 01622 815356

<http://www.machineryrings.org.uk>

NATIONAL ASSOCIATION OF AGRICULTURAL CONTRACTORS

*Member companies can provide contracting services in agriculture amenity
and industrial land based areas*

National Association of Agricultural Contractors, Samuelson House, Paxton Road,
Orton Centre, Peterborough PE2 5LT

Tel: 01733 362920

<http://www.naac.co.uk>

Code of Practice on How to Prevent the Spread of Ragwort

NATURAL ENGLAND

Advice on Wildlife Sites

Natural England, Northminster House, Northminster Road, Peterborough PE1 1UA

Tel: 0845 600 3078

<http://www.naturalengland.org.uk>

THE ORGANIC RESEARCH CENTRE

Organic farming including horticulture and weed control

The Organic Research Centre, Elm Farm, Hamstead Marshall, Newbury, Berkshire

RG20 0HR

Tel: 01488 658298

<http://www.efrc.com>

RAG-FORK

Suppliers of ragwort lifting tools

Rag-Fork, 110 Sunderland Street, Tickhill, Doncaster DN11 9ER

Tel: 01302 746077

<http://www.rag-fork.co.uk>

RAGWORT-UK LTD

Cinnabar biological control agents

Ragwort-UK Ltd, 74 Roman Bank, Long Sutton, Lincolnshire PE12 9LB

Tel: 01406 365180

<http://www.ragwort-uk.com>

SURREY HORSE PASTURE MANAGEMENT PROJECT

Council supported advice on pasture management within Surrey

Horse Pasture Management Project, Surrey County Council South West Area

office, 3rd Floor Grosvenor House, London Square, Cross Lanes, Guildford,

Surrey GU1 1FA

Tel: 08456 009 009 and ask for Nicky West

Fax: 01483 517553

E-mail: nicky.west@surreycc.gov.uk

<http://www.surreycc.gov.uk/horsepastureproject>

The list is not exhaustive and the presence of any organisation on this list does not imply that the Code endorses the advice, guidance, information, products or services provided by those organisations.

Objectives of the Code of Practice and what it is seeking to achieve

- 1 The objective of the Code of Practice is to reduce significantly, through good practice, the risk that horses and livestock might be poisoned by ragwort. The Code seeks to achieve this by providing comprehensive guidance to horse owners and land managers on how to prevent the spread of Common Ragwort (*Senecio jacobaea*) where it poses a significant risk to horses, livestock or fields used for the production of feed and forage. The Code does not seek to eradicate or indiscriminately control the growth of Common Ragwort, and recognises the practical and resource difficulties of controlling it. Control is only recommended in those circumstances where there is a specific threat to animal welfare.

Evidence of the need to take control action

- 2 Common Ragwort is one of five injurious weeds specified under the Weeds Act 1959. Under the Act, the Secretary of State for Environment, Food and Rural Affairs has a discretionary power to serve a notice on an occupier of land on which one or more of the injurious weeds is growing requiring the occupier to take action to prevent the spread of those weeds. An unreasonable failure to comply with such a notice is an offence. The vast majority of complaints about injurious weeds, (at least 90%), investigated by Defra concern ragwort, and the numbers have increased steadily year on year. In 2001 there were 105, in 2002 there were 160, and in 2003 there were 318 cases respectively. (The figure for 2003 is estimated) Defra has limited resources to investigate complaints about injurious weeds. The Code of Practice should encourage better land management to prevent the establishment of ragwort, and a greater awareness of when and where it is necessary to take control action, as well as providing guidance on the most appropriate control methods for the particular circumstances.
- 3 Common Ragwort contains pyrrolizidine alkaloids, which are poisonous to horses and other animals, such as sheep and cattle. With the exception of sheep, in most situations, grazing animals do not readily eat growing ragwort. Ingestion of ragwort, either in its green or dried state, causes cumulative liver damage, which can have fatal consequences. In its dried state, particularly in hay or other conserved forage, ragwort is less likely to be rejected by livestock and may present a greater risk than ragwort in its natural state. Horses appear to be more susceptible to ragwort poisoning than other animals. The International League for the Protection of Horses has estimated that the number of horses has doubled during the last 15 years, which is mirrored by an increasing number of horse owners with concerns about the spread of ragwort.
- 4 The scale and extent of illness and death in animals through ragwort poisoning is difficult to determine, as an autopsy would be required in every case to confirm the exact cause of death. There is no current test available to diagnose accurately whether an animal is suffering from ragwort poisoning, and certainly no test to help determine whether any such poisoning relates to ingestion of conserved or live ragwort. Dr Derek Knottenbelt at Liverpool University is carrying out research to establish a blood test to detect ragwort poisoning in horses. He has estimated

Code of Practice on How to Prevent the Spread of Ragwort

a figure of 500 horse deaths from ragwort poisoning in 2000. This figure is based on the number of confirmed horse deaths from ragwort poisoning seen by the Philip Leverhulme Large Animal Hospital Teaching Hospital at Liverpool University as a percentage of all the horse cases treated during the year, and grossed up to be representative of the total horse population. In 2003 the British Equestrian Veterinary Association (BEVA) carried out a survey on behalf of The British Horse Society in which members were asked to complete a questionnaire recording suspected and proven cases of ragwort poisoning in 2002. There were 84 replies to the survey (4% of the total BEVA membership) and the number of suspected or confirmed cases of ragwort poisoning from these replies totalled 283, with 62 of those responding having dealt with a proven case of ragwort poisoning.

- 5 Most cattle are usually slaughtered before the effects of ragwort poisoning become evident. Figures from the Meat Hygiene Service indicate that around 120 cattle carcasses were rejected in both 2002 and 2003 because of jaundiced livers, which can be a symptom of ragwort poisoning. However it is not possible to determine whether ragwort poisoning was the cause of jaundice in these cases. Very few cattle suffering from ragwort poisoning would be presented to be slaughtered for human consumption since they would be obviously affected with a serious abnormality detectable on veterinary examination. Whilst it is unsatisfactory not to have more accurate data on the number of animal deaths, there is no dispute that ragwort poisoning does present a serious health risk to horses and livestock, in some situations, and may be a common cause of death.
- 6 During recent years public concern about ragwort has increased, particularly in relation to roadside verges and on railway land. Horse owners consider that the threat of poisoning has increased due to reduced control as a result of the movement restrictions imposed during the outbreak of Foot and Mouth Disease in 2001, although there is no current evidence to support this. In future years there is a possibility that ragwort could increase as land management becomes less intensive. Changes in the populations of flora and fauna in the countryside are monitored by the Countryside Survey. Evidence in respect of ragwort populations for 2000 onwards will not be available until the next Countryside Survey in 2006. The most recent evidence from the last Countryside Survey covers the period 1990 to 1998. This found no specific increase in ragwort in fertile or infertile grassland (i.e. grazing land) during the period 1990 to 1998. However there was a significant increase in the frequency of ragwort in lowland woods and on arable land over the same period, though ragwort poses less of a threat to stock in these situations. The Countryside Survey is a national survey and may not detect special localised changes in frequency of ragwort. The concerns about horse and animal health welfare expressed by owners are genuine and properly fall to be dealt with under the legislative framework of the Weeds Act. These justify a need to control ragwort where it presents a threat to animal welfare.
- 7 The Animal Welfare Bill will make it an offence to keep an animal in such a way that suffering will be an inevitable consequence. This will enable prosecution of owners who keep animals on land where harmful weeds or plants, such as Common Ragwort, are growing, and there is a risk of ingestion. This is likely

to increase pressure on landowners and occupiers to ensure that surrounding land is kept free of ragwort, and other harmful weeds or plants, using appropriate control methods.

Options

- 8 The measures in the Weeds Act 1959 to prevent the spread of injurious weeds are applicable to “any” land without qualification. A Code of Practice that operated at this level would result in the blanket control of ragwort, which could have a detrimental effect on the environment and a significant and unsustainable impact on resources. Moreover, it is likely that ragwort populations are less prone to increase in designated areas subject to strict management measures. The aim of the Code is not to eradicate ragwort from the countryside, but to prevent the spread of ragwort to land used for horses, livestock and feed and forage production. In particular, the Code is intended to contain the spread of ragwort from low risk to high-risk areas, and therefore prevent the establishment of ragwort in high-risk areas. Where a heavy density of ragwort plants occur in a high-risk area, the complete removal of ragwort may be justified to ensure animal welfare.
- 9 The Weeds Act makes no distinctions as to the different control methods, which should be taken in respect of different categories of land. The draft Code of Practice provides the opportunity for Government to set out clearly the most appropriate methods of control that should be used depending on specific locations and land use. As a first measure, the draft Code of Practice advocates the need to encourage landowners to take preventative action to avoid the establishment of ragwort and the need for subsequent control actions by ensuring good land/pasture management in the first instance. Where control action is necessary, the draft Code of Practice sets out the different options for control: cultural, chemical and biological and the various methods available under these options. It explains clearly on which categories of land and in which circumstances the different options should be used. In particular, it sets out the circumstances under which chemical methods of control are suitable, and where these should not be permitted. In the circumstances where the use of herbicides is possible, the Code of Practice details the procedures to be followed, including the necessity for carrying out a risk assessment. By providing this information, the Code should help to prevent the inappropriate use of herbicides and encourage methods of control, which minimise any possible risks to the environment. In particular, the Code should ensure that the most appropriate methods of control are used on environmentally sensitive categories of land, and thus prevent damage to non-target species, other wildlife and natural habitats.

Environmental benefits associated with Ragwort

- 10 Common Ragwort (*Senecio jacobaea*) is a native species of the Compositae family found in many natural and semi-natural habitats. It supports many species of wildlife, including Common Broomrape (*Orobanche minor*), 14 species of fungi and many different invertebrates, such as moth caterpillars, thrips, plant bugs,

Code of Practice on How to Prevent the Spread of Ragwort

flies, beetles and mites. With the decline in flowering plant diversity in the countryside, ragwort has assumed an increased importance as a source of food for generalist nectar feeding insects in the late summer. Ragwort is the food plant of a least 77 species of foliage eating insects, including five “Red Data Book” and eight “nationally scarce” species. The most well known is the cinnabar moth (*Tyria jacobaeae*). At least 30 species of insects are confined to ragworts, the great majority of which are confined to Common Ragwort or the closely related Hoary Ragwort (*Senecio erucifolius*). Many species of insects may be seen on ragwort flowers. Some use them as territory markers or as vantage points to find passing prey or mates. Some species prey on the other insect visitors to the flowers, some are more closely associated with the ragwort flowers, taking ragwort pollen, and more than 170 species have been recorded feeding on ragwort nectar. Such an important source of insects is exploited by birds and mammals.

Anticipated actual impact on the environment

- 11 Common Ragwort occurs widely. In 1998 it was found in 11% of pastures, 9% of road verges and 4% of field boundaries in England and Wales.¹ The practical advice contained in the Code is designated to lead to greater efficiency in controlling the spread of Common Ragwort, and reduce any risk to grazing animals. There will be a general reduction in the number of unsuccessful attempts at control. Integrated strategic control programmes are likely to develop at landscape scale. However, there is still likely to be variation in the degree of success, with much depending on local conditions (soils, climate and management) at least initially. In particular, it may take several years for significant reduction to be achieved at sites where there is a long history of ragwort where the plant is well established, with new generations appearing from the seed bank. Large populations of Common Ragwort in high-risk areas should become scarcer. Conversely, Common Ragwort could well increase generally as a result of warmer, drier, summers resulting from climate change due to Global Warming.
- 12 It will be difficult to monitor the impact of the Code on the wildlife associated with Common Ragwort, not least because of the small size of many of the associated invertebrates and the shortage of entomologists competent at recording them. Most elements of the Common Ragwort fauna are already poorly recorded. Nonetheless, a reduction in the ragwort population will result in the loss of an important nectar source, food plant and habitat for a large number of wildlife species. Local declines of the invertebrates supported by ragwort are inevitable, and some species that are wholly associated with the plant will decline. The monitoring systems for recording these changes are not in place. There is also likely to be a localised impact on invertebrates that utilise Common Ragwort as a late summer nectar supply, particularly in areas where few other plants are in flower at that time. Many of these invertebrates are mobile and will find other nectar sources if these are available. However, since the Countryside Survey has shown a continuing decline in plant diversity in grasslands including road verges it is possible that ragwort control could have a detrimental effect on invertebrate populations unless successful measures can be put in place to increase other flowering plant diversity in the countryside.

¹ Source: Countryside Survey 2000

- 13 A reduction in the ragwort population could impact on biological control methods. The ability of the plant's natural predators to help control ragwort will be compromised if there are no populations of the plant to act as habitat reservoirs or refuges and the plants they do utilise do not persist long enough for the insects to complete their life cycles.
- 14 Given that the use of a broad-spectrum herbicide is generally the most effective means of controlling ragwort, it is possible that their use will increase, particularly on agricultural and amenity land. This might be offset to some degree if alternative more selective and cultural control methods are well presented. It is to be hoped that reference to the Code and strict compliance with statutory conditions of approval would result in all herbicides being applied in a responsible manner. However there is a risk that indiscriminate use of herbicides may occur as a result of those who either do not read the Code or label requirements, or have no regard for wider environmental considerations. Monitoring would need to be put in place to obtain data concerning any such changes in herbicide usage.
- 15 It is anticipated that there could be a negative impact on other plants which have some similarities in appearance to ragwort, due to their being misidentified as ragwort. However the prominent inclusion within the Code of suitable identification information, in particular photos and other illustrative material (see inside of front and back covers of the Code), seeks to minimise such misidentifications. We urge all users of this Code to examine these photographs to ensure that it is indeed Common Ragwort that they are considering controlling. Considerable pressure is also likely to develop on conservation organisation to control other species of ragwort as well as Common Ragwort.
- 16 Despite the recommendations in the Code for consultation in respect of control on environmentally sensitive land, it is likely that designated conservation sites and other sites with biodiversity value (e.g. road verges, brownfield sites, field margins and long-term set-aside fields) will come under increasing pressure for more rigorous control. Some of these non-designated sites have features of Site of Importance for Nature Conservation (SINC) or Site of Special Scientific Interest (SSSI) standard, and along with the protected sites may be damaged by inappropriate or ill-informed control measures.

Anticipated actual impact on animal welfare

- 17 The Code should have a major impact on animal welfare by reducing the number of animals exposed to ragwort when grazing and when consuming conserved feed and forage. It is reasonable to assume that a reduction in exposure will have a direct effect on reducing the incidence of poisoning, which should in turn reduce suffering and improve welfare. The Code will encourage horse and livestock owners to take appropriate measures to control ragwort on land within their control and to encourage control measures to be taken on neighbouring land, which poses a risk of spread.

Code of Practice on How to Prevent the Spread of Ragwort

- 18** There is a danger that if inappropriate control measures are taken then grazing stock may be subject to a higher risk of poisoning, than they otherwise would have been if no control measures were taken: e.g. through the careless use of herbicide to control ragwort, increasing palatability with inadequate exclusion intervals, or by cutting or topping ragwort without proper removal of the cut plant, leading to poisoning through the consumption of discarded plants. The Code will provide advice on these issues and should ensure that these risks are reduced.

Costs and benefits

- 19** With regard to the financial cost of implementing the Code, this has already been discussed in the Regulatory Impact Assessment to the Ragwort Control Bill. There will be no additional Government funds available for the investigation of complaints about ragwort as a result of the draft Code, nor is there intended to be any significant overall increase in costs for land managers, but ragwort will need to be controlled where it represents an identifiable risk to animal welfare. It should be noted that new systems introduced by Defra will lead to better use of the available resources focussing on enforcement, including the issuing of on the spot enforcement notices, where appropriate. The development of strategic control policies may present some initial start up costs, but in the longer term control costs are not expected to increase, particularly as the benefits of strategic control begin to take effect. The specific requirements for different methods of control depending on the category of land and disposal methods may also initially result in an increase in control costs in some cases.
- 20** In their response to the Regulatory Impact Assessment, environmental conservation organisations raised concerns about the costs for the conservation industry in implementing the Code of Practice in as far as compliance will entail an increase in current levels of control. The conservation industry manages 398,000 hectares of land and has a financial turnover in the region of £500 million. It plays an important role in the tourist and leisure industry. Supported by some 7 million members its voluntary organisations make a very significant contribution to the nation's quality of life. The nature conservation industry already devotes considerable resources to the control of ragwort. The effect of the Code is likely to require conservation organisations to devote more time to controlling the spread of ragwort. The Code will generally increase the efficiency of efforts to bring a much higher level of success. However conservation organisations have finite resources of manpower and capital and often limited equipment and technology. Many organisations are dependent on volunteer labour. Butterfly Conservation, for example, has estimated that on a 40-50 hectares dry calcareous grassland site, a heavy emergence of ragwort might require £400–£500 of contractor's labour in one summer, plus from 3 to 10 person days of volunteer help pulling and disposing of plants. However reserve management funds are limited, as is the availability of volunteer labour for the demanding task of hand pulling (this also dwindles rapidly in some years). The knock on effect of having to devote more resources to the control of ragwort will mean that other essential work will not be done.

- 21** A particular concern amongst conservation groups is that the public pressure surrounding the Code will compel land managers to carry out more extensive control measures than they would otherwise. The provisions of the Animal Welfare Bill could exacerbate this. There are concerns that the risks presented by ragwort on grazed nature conservation grasslands could lead to major changes in grazing regimes. These could conceivably include the abandonment of grazing on grassland and heathland sites, leading to the development of scrub and woodland which may have a consequential significant effect on biodiversity.
- 22** However, as has already been stressed it is not the intention of the Code of Practice to affect the balance of biodiversity. It should be remembered that the control of ragwort has been required long before the introduction of the Weeds Act 1959, which consolidates earlier legislation dating from 1921, without resulting in such drastic consequences.
- 23** Balanced against the concerns for the conservation industry, recent research estimates the horse industry is worth approximately £3.4 billion providing 50,000 jobs directly and up to 200,000 jobs indirectly. The cost of using chemical control to clear ragwort would cost an average horse riding stable around £10 per acre and possible around £100 per 5 acres where a contractor is employed. However, the majority of stables would probably hand pull ragwort, and therefore the true cost is in the person hours spent pulling the weed. In addition, the illness and ultimate death of a horse through ragwort poisoning, including veterinary fees, disposal and staff costs could be expected to cost around £ 1,000, with the replacement cost of the horse an additional £ 3,500 to £ 4,000, although show/competition animals could be valued at anything from £ 10,000 to £ 100,000. These figures do not include the costs of loss of business as a result of the loss or sickness of animals through ragwort poisoning. The Code will not be a statutory requirement and, the nature of the measure, makes it difficult to put a figure on the financial savings to the horse industry as result of the introduction of the Code. Any estimate of financial saving would be entirely speculative, but apart from financial considerations, there is the less tangible (but no less important) benefit of avoiding the trauma of illness and death of animals.
- 24** Aside from the financial costs and benefits, the draft Code provides the opportunity to ensure that land managers are aware of the need to take a balanced approach to the clearance of ragwort, which may have not been emphasised clearly enough in previous advice on ragwort control. The Code sets out both sides of the argument in respect of ragwort – the risks posed to animal welfare by ragwort poisoning and the contribution of ragwort to biodiversity and the environment. It provides comprehensive guidance on when, where and how to control ragwort, but pays specific attention to the needs of the environment and the countryside as part of that process. The Code should benefit the environment by ensuring that there is less damage to non-target species and by setting out clear parameters on when it is necessary to control ragwort. The horse industry should benefit from a more targeted approach to clearance of ragwort and the greater awareness amongst land managers promoted by the Code of Practice. There is also the benefit that organisations will be in a better position to defend undertaking control measures proportionate to the actual risks involved.

Arrangements for effective monitoring and evaluation

- 25** The most effective way to monitor whether the Code is successful in meeting its objective of significantly reducing ragwort poisoning would be by an accurate identification of the number of cases of ragwort poisoning. As has already been indicated above this would be very costly to achieve. The development of reliable blood testing should allow assessment of levels of sub-lethal accumulation in animal populations, but this is still some way off. However, it may be possible to set up a reporting scheme via the British Equine Veterinary Association to record confirmed and suspected cases of ragwort poisoning over a period of years. Defra already records the number of complaints about ragwort. In the immediate term the number of complaints is likely to increase as the Code will promote public awareness about ragwort. However, in the longer term these figures may serve as some indication of the success or otherwise of the Code.
- 26** As well as the effect of the Code on animal welfare, there will need to be an assessment of whether the Code makes any impact on the overall ragwort population. There will also be a need to monitor the environmental impact of the Code, particularly whether the Code results in an increased use of herbicides and avoidable damage to sites of biodiversity importance. The Countryside Survey will provide information on the ragwort population and environmental organisations will need to monitor the effect of the Code on sites of nature conservation interest.
- 27** New information from monitoring or research may justify a review of the information contained in this environmental appraisal.

Defra,
Farm Focus Division
June 2004

Common Ragwort look-alike plants



Great Mullein *Verbascum thapsus*
Photo: Dr Chris Gibson/Natural
England



Dark Mullein *Verbascum nigrum*
Photo: Dr Chris Gibson/Natural
England



Dark Mullein *Verbascum nigrum*
Photo: Dr Chris Gibson/Natural
England (Close-up of flowers)



Corn Marigold *Chrysanthemum
segetum* Photo: Dr Chris
Gibson/Natural England



Perennial Sow-thistle *Sonchus
arvensis* Photo: Dr Chris
Gibson/Natural England



Prickly Sow-thistle *Sonchus asper*
Photo: Dr Chris Gibson/Natural
England



Hawkweed *Hieracium* sp
Photo: Dr Chris Gibson/Natural
England



Hawkweed Ox-tongue
Picris hieracioides Photo: Dr Chris
Gibson/Natural England



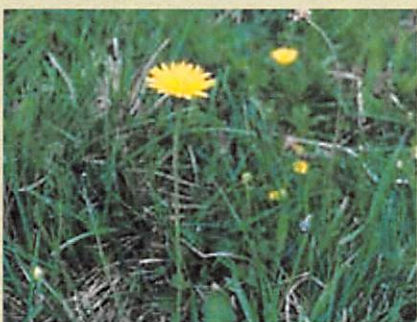
Bristly Ox-tongue *Picris echioides*
Photo: Dr Chris Gibson/Natural
England (Close-up of flowers)



Beaked Hawk's-beard *Crepis
vesicaria* Photo: Dr Chris
Gibson/Natural England



Elecampane *Inula helenium*
Photo: Dr Chris Gibson/Natural
England



Cat's-ear *Hypochaeris radicata*
Photo: Dr Chris Gibson/Natural
England



Goat's-beard *Tragopogon pratensis*
Photo: Dr Chris Gibson/Natural
England



Agrimony *Agrimonia eupatoria*
Photo: Dr Chris Gibson/Natural
England

© Crown copyright 2004

Copyright in the typographical arrangement and design rests with the Crown.

Thanks to Natural England for supplying the photographs.

This publication (excluding the logo) may be reproduced free of charge in any format or medium provided that it is reproduced accurately and not used in a misleading context. The material must be acknowledged as Crown copyright with the title and source of the publication specified.

Published by the Department for Environment, Food and Rural Affairs. Printed in the UK, June 2004, printed on recycled paper containing 80% post consumer waste and 20% totally chlorine free virgin pulp.



PB9840 revised March 2007

Ergon House
17 Smith Square
London SW1P 3JR

www.defra.gov.uk

Black Sluice Internal Drainage Board

Policy No: 28

Policy on Land Drains discharging into Board Maintained Watercourses

Review	Audit & Risk 30 April 2024
Board Approved	Board on
Due for Review	Within 5 years

INTRODUCTION

All new land drain outfalls discharging into Board maintained watercourses should be consented and approved by the Board.

Consent is not required for new land drain outfalls discharging into non-Board maintained watercourses.

The Conditions for land drains, specified on the application form, are as follows:

1. Where a land drain outfall enters a Board maintained watercourse it shall consist of a single three metre length of pitch fibre or rigid plastic pipe; the end of the pipe shall be laid flush with the existing batter with no protrusion, in order to facilitate mechanical flailing or mowing.
2. The land drain outfall should be fitted with a suitably approved Kwik Fit Type GRC outfall tray, manufactured by **J.K.H Drainage Units Ltd** of Mildenhall, Suffolk or similar approved, in order to protect the watercourse bank against scour or slips.
3. The Board to be absolved from any liability for any interruption to drainage by means of the land drains or any damage resulting there from.
4. The applicant and his successors in title to make good any damage or slips in the Board's maintained banks which may result from the operation or presence of the land drains.
5. The Board to be absolved from any suits, costs or claims arising out of the laying or operation or presence of the land drains into the Board's maintained watercourse.

If the Board carry out improvement works which involve the cutting back of the side of a watercourse which displaces the land drains and/or outfall trays, then the Board will, following the completion of the works, replace the outfall trays/land drains, or if the outfall trays have been damaged during the work, replace these with new outfall trays.

However, if there are no outfall trays fitted to the land drains, the landowner will be required to pay for the cost of the outfall trays that are required to be fitted to the land drains. ~~and the Board will fit these free of charge.~~

Black Sluice Internal Drainage Board

Policy No: 29

Policy for the Control of Rabbits, Rats and other Rodents in Board Maintained Watercourses

Review	Audit & Risk Committee on 30 April 2024
Board Approved	Board on
Due for Review	Within 5 years

Introduction

Historically the Board has routinely responded to requests to control rabbits, rats and other rodents in Board Maintained watercourses, this has become unsustainable both financially and ethically.

Policy

If a request is received from a ratepayer or a member of the public to control vermin, this should be passed to the Maintenance Director. The person taking the enquiry should inform the informant that the Board does not routinely carry out control of vermin, but will review the situation in relation to whether it is causing a flood risk. but the Works Manager will visit site to assess the situation before taking any action.

Methods of Control

A board employee will visit the site and take photographs

The Maintenance Director, in consultation with the Works Supervisor, will then make the following assessments:

- (a) Is damage being caused to the bank of the watercourse?
- (b) Is it clearly vermin that are causing damage?
- (c) Is the problem only in the watercourse, or is it associated with an adjoining site.
- (d) Can control be safely carried out?

If the Maintenance Director considers the damage to be such that if uncontrolled extra maintenance will be required to the bank, then control of vermin can be considered.

Control can also be considered if the landowner(s) concerned are prepared to also carry out control on adjoining land/properties.

Unless the Board has suitably qualified staff, all vermin control will be carried out by a pest control contractor.

If the Works Manager is unsure of how to proceed he should seek a second opinion from the Operations Manager.

The Board reserves the right to implement Byelaw 12 (Control of Vermin) and / or Byelaw 13 (Damage by animals to bank).

Black Sluice Internal Drainage Board

Policy No: 31

Publication Scheme

Review Dates:

Original Issue	16 th January 2013
Board Approved	
Reviewed	Audit & Risk Committee 30 April 2024

INTRODUCTION

What is and why does, the Black Sluice IDB use a Publication Scheme?

The Freedom of Information Act 2000 (“the Act”) gives a general right of access to recorded information held by public authorities and sets out exemptions from that right and places a number of obligations on public authorities. The Black Sluice Internal Drainage Board is deemed to be a non-departmental public body for the purposes of the Act. Further information about the Act can be obtained from The **Information Commissioner** (<https://ico.org.uk/>).

The Board is required to adopt and maintain a publication scheme setting out the classes of information it holds, the manner in which it intends to publish the information, and whether a charge will be made for the information. The purpose of a scheme is to ensure a significant amount of information is available, without the need for a specific request. Schemes are intended to encourage organisations to publish more information proactively and to develop a greater culture of openness.

What information is routinely available?

The IDB information is grouped into seven classes.

- 1. Who we are and what we do**
Organisational information, structures, locations and contacts.
- 2. What we spend and how we spend it**
Financial information relating to projected and actual income and expenditure, procurement, contracts and audited accounts.
- 3. What our priorities are and how we are doing**
Strategies and plans, value for money indicators, audits, inspections and reviews.
- 4. How we make decisions**
Decision making processes and records of decisions.
- 5. Our policies and procedures**
Current written protocols, policies and procedures for delivering our services and responsibilities.
- 6. List and registers**
All statutory and non-statutory registers.

7. The services we offer

Information about the services we currently provide including leaflets, guidance and newsletters produced.

How to access the information?

The information contained in each class may be accessed through a variety of means and in a number of formats where available. All information is available for inspection on request and by prior appointment, where appropriate copies can be made available. A charge may be applied to the information supplied; each case is considered individually. Information will be provided within 28 days, if the request is reasonable.

1. On the Black Sluice IDB web-site

It is the Board's intention to make as much information, as possible, available on the Board's website. ~~Some information will be available on the web-site.~~ This information is non-chargeable.

2. By e-mail

E-mail mailbox@blacksluiceidb.gov.uk with 'Freedom of Information Request' in the subject line.

3. By post To obtain paper copies of the information please contact:

Daniel Withnall

Chief Executive
Black Sluice IDB
Station Road
Swineshead
Boston
Lincs
PE20 3PW

Tel: (01205) 821440 <https://www.blacksluiceidb.gov.uk>

Please note that where hard copies of information will normally be supplied upon request, multiple copies cannot normally be provided.

4. In person

Please contact the office to arrange an appointment.

Charges and Exempt Information

Charges may be imposed for the provision of some of the information within this publication scheme. Where a class contains information which may levy a charge this is made clear with a £ symbol shown below. In adopting this scheme there has been an effort to be as open as possible but there are instances where, for legitimate reasons, certain information is not available. Where this is the case the reasons behind the decision to exclude certain information is clearly stated. Justification for excluding information is made in consideration of the general exemptions contained in the Act, the Environmental Information Regulations, the Data Protection Act or where it may be of a confidential or commercially sensitive nature.

All copyright is reserved by the Board.

The Information Available:

- 1. Who we are and what we do**
 - Constitution of the Board, including their structure & membership
 - Staffing Structure
 - Geographical area covered
 - Outline of responsibilities
 - Location of offices and contact details
- 2. What we spend and how we spend it (£)**
 - Annual accounts
 - Audit of accounts
 - Revenue and capital spending plans
 - Procurement Regulations
 - Funding; details of drainage rates, special levies, grants and other financial contributions
 - Staff and Board members allowances and expenses
 - Contracts awarded and their value
- 3. What our priorities are and how we are doing (£)**
 - Aims, objectives and plans
 - Performance against aims and plans
 - Programme of works
- 4. How we make decisions**
 - Board meeting and sub-committee minutes
 - Public consultations
 - Reports of advisory groups
 - Environmental Impact Assessments
 - Assessment of flooding risks
 - Other publicly available reports
- 5. Our policies and procedures**
 - Policies and procedures for the conduct of the Boards business
 - Policies and procedures about the provision of services
 - Policies and procedures about employment matters
 - Whistle blowing policy
 - Anti-fraud & corruption policy
 - Data protection policy
 - Freedom of Information Publication Scheme
 - Customer complaints procedure
 - Charging regimes and policies
- 6. List and registers (£)**
 - Register of Drainage Infrastructure
 - Nuisance Register
 - Complaints Register
 - Rate Book
 - Electoral Register (for the purposes of an Election of IDB Members)
 - Register of Members' Interests
 - Register of Gifts and Hospitality
 - Members Attendance Register
 - Freedom of Information Act disclosure log

7. **The services we offer (£)**

Regulatory role

Byelaws

Information for landowners, developments and operations

Notices, leaflets and guidance

Media releases

Details of the services for which the Board is entitled to recover a fee together with those fees

Feedback

Feedback, comments or complaints about this publication scheme should be directed to the Chief Executive or the Chairman of the Board, forwarded to the address stated in section 3 above; How to Access Information - 3. By Post. If you are not satisfied that information is being published in accordance with this scheme you can refer your complaint to the Information Commissioner:

The Case Reception Unit
Customer Services Team
Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

www.ico.gov.uk/complaints/freedom_of_information.aspx

*Approved by the Board on **DATE***

Black Sluice Internal Drainage Board

Policy No: 34

Gifts and Hospitality Policy

Reviewed	Audit & Risk Committee 30 th April 2024
Board Approved	Board on
Due for Review	Within 5 years

INTRODUCTION

The following paragraphs are given as guidance to members and employees who may be offered gifts or hospitality. Boards are required to have in place a policy on the acceptance of gifts and hospitality, and as a public sector organisation, the Board has a duty to ensure that its resources are utilised effectively. The arrangements outlined within this policy apply to all members and staff employed by the Board and for those carrying out work on behalf of or at the request of the Board.

The purpose of this policy is to provide guidance to members and staff on the action that can, or should, be taken in the event that they are offered gifts and/or hospitality. There is a limited set of exceptions and this policy sets out the standards and procedures that member's and staff should follow to protect both themselves and the Board. In any case of doubt or uncertainty they should consult the Chief Executive.

1. Employees and members should treat with extreme caution any offer of a gift in excess of £25, favour or hospitality that is made to them personally. Any offer of a gift, favour, tokens of goodwill or hospitality in excess of £25 will be brought to the attention of the Chief Executive for further discussion and registered in the Gifts & Hospitality Register held by the Chief Executive. The person or organisation making the offer may be doing or seeking to do business with the Board or may be applying to the Board for some decision to be taken in his favour or someone with whom he is connected.
2. There are no hard and fast rules about the acceptance or refusal of hospitality or tokens of goodwill. For example, working lunches may be an appropriate way of doing business provided they are approved by the Chief Executive and provided no extravagance is involved. In the same way it may be reasonable for staff to represent the Board at a social function or sporting event organised by outside persons or bodies. Persons attending such functions or events as part of an official Board delegation are exempt from the above registration requirement, providing their attendance has been approved by the Chief Executive.
3. Each member or employee is personally responsible for all decisions connected with the acceptance or offer of gifts or hospitality and for avoiding risk of damage to public confidence. The receipt and detail of gifts and hospitality should always be reported to the Chief Executive.
4. When hospitality has to be declined, those making the offer should be courteously but firmly informed of the procedures and standards operated by the Board and told why hospitality cannot be accepted.
5. Members and employees should not accept significant personal gifts in excess of £25 from contractors and outside suppliers, although the Board will allow members and employees to keep insignificant items or token value such as pens, calendars and diaries. These insignificant items do not require recording in the Gifts and Hospitality Register.
6. Acceptance by members and employees of hospitality through attendance at relevant conferences, courses, equipment/plant inspections, suppliers or services is acceptable where it is clear the hospitality is corporate rather than personal and where the member or employee is satisfied that any purchasing decisions will not be compromised or jeopardise the integrity of any subsequent purchasing decisions.

**BLACK SLUICE INTERNAL DRAINAGE BOARD
RISK REGISTER**

Objectives	Ref	Risk	Potential Impact of Risk	Potential Likelihood of Risk	Risk Score	Gaps in control	Action Plan
To provide and maintain standards of sound needs based sustainable flood protection.	1.1	Being unable to prevent flooding to property or land (a) Coastal flooding from failure or overtopping of defences	High	Low	3		
	1.1	(b) Fluvial flooding from failure or overtopping of defences	High	Medium	6		
	1.1	(c) Flooding from failure of IDB pumping stations or excess rainfall	High	Low	3		
	1.1	(d) Flooding from sewers or riparian watercourses	Medium	Low	2		
	1.2	Loss of Electrical Supply	High	Low	3		
	1.3	Pumps failing to operate	High	Low	3		Maintenance
	1.4	Board Watercourses being unable to convey water	Medium	Medium	4		Maintenance
	1.5	Operating machinery to maintain watercourses	Medium	Low	2		Training
	1.6	Claims from third parties for damage to property or injury	Medium	Low	2		
	1.7	Third Parties damage to Board maintained assets	Medium	Low	2		
	1.8	Unplanned loss of senior staff	Medium	Medium	4		
	1.9	Insufficient finance to carry out works	High	Medium	6		
To conserve and enhance the environment wherever practical and possible to ensure there is no net loss of biodiversity.	1.10	Reduction in staff performance	Medium	Low	2		
	1.11	Insufficient staff resources	Medium	Low	2		Review
To provide a 24 hour/365 day emergency response for the community	2.1	Prosecution for not adhering to environmental legislation	Medium	Low	2		BAP
	2.2	Non delivery of objectives	Low	Low	1		BAP
To provide a safe and fulfilling working environment for staff.	3.1	Emergency Plan inadequate or not up to date	Low	Low	1		Review
	3.2	Insufficient resources (Staff and Equipment)	Medium	Low	2		Review
	3.3	Critical Incident loss of office	High	Low	3	None	
To maintain financial records that are correct and comply with all recommended accounting practice.	4.1	Injury to staff and subsequent claims and losses	Medium	Low	2		Training
	4.2	Not complying with Health and Safety legislation	High	Low	3		Consultant
To ensure that all actions taken by the Board comply with all current UK and EU legislation	5.1	Loss of cash	Low	Low	1	None	
	5.2	Loss of money invested in building societies, banks and managed funds	High	Low	3	None	
	5.3	Fraud by senior officers	Medium	Low	2	None	
	5.4	Inadequacy of Internal Checks	Medium	Low	2		
	5.5	Fraudulent use of credit cards	Low	Medium	2		
A cost efficient IDB that provides a Value for Money service.	6.1	Board Members in making decisions	Low	Low	1		
	6.2	Not complying with all employment regulations and laws	Medium	Low	2		
Information Technology and Communications	7.1	Collecting insufficient income to fund expenditure	Low	Low	1		Accounts
	7.2	IDB abolished or taken over	Low	Low	1		
	8.1	Loss of telemetry	Medium	Low	2		Maintenance
	8.2	Loss of telephone Communications	Low	Medium	2		
	8.3	Loss of Internet Connection	Medium	Low	2		
	8.4	Network Failure	High	Medium	6		
	8.5	Breach in Cyber Security	Medium	Low	2		
	8.6	Network Security Breach	Medium	Low	2		
	8.7	Virus being introduced to Network	Medium	Low	2		
8.8	Loss of accounting records	Medium	Low	2	None		
8.9	Loss of rating records	Medium	Medium	4	None		

CATALOGUE OF BOARD POLICIES

		A&R Committee								To be reviewed												
		Review	Apr 20	Sep 20	Apr 21	Sep 21	Apr 22	Sep 22	Apr 23	Sep 23	Apr 24	Sep 24	Apr 25	Sep 25	Apr 26	Sep 26	Apr 27	Sep 27	Apr 28	Sep 28	Apr 29	
	Management Accounts	3 years			✓						✓						✓					
	Annual Accounts	3 years				✓						✓						✓				
A	Policy Statement Water Level & Flood Risk Management	5 years							✓									✓				
B	BSIDB Byelaws	5 years				✓										✓						
1	Risk Management Strategy	Annual	✓		✓		✓		✓		✓		✓		✓		✓		✓		✓	
2	Risk Register	Annual	To be reviewed at every Board and A&R meeting																			
3	Financial Regulations	3 years			✓				✓	✓		✓										
4	Procurement Policy	3 years				✓		✓	✓	✓												
5	Investment Strategy	5 years	✓							✓											✓	
6	Insurance Arrangements	3 years				✓	✓						✓							✓		
7	H&S Policy	3 Years (Reviewed annually by CEO)	Not previously reviewed by Board							✓												
7a	Black Sluice IDB H&S Booklet	3 Years	Not previously reviewed by Board								✓											
8	Relaxation of Board Byelaw No 10 (the 9m byelaw)	5 years				✓																
9	Structures Replacement	Annual	To be reviewed annually by Culverts & Bridges Committee																			
10	Delegation of Authority	3 years					✓				✓										✓	
11	Biodiversity Action Plan	Annual	To be reviewed annually by Environment Committee																			
12	Standing Orders	no review required	✓	No review required																		
13	Emergency Flood Response Plan	5 years	✓			✓																
14	Complaints Procedure	5 years										✓										
15	Employees Code of Conduct	5 years																				
16	Fraud and Corruption	5 years		✓																	✓	
17	Members Code of Conduct	5 years						✓													✓	
18	Whistle Blowing Confidential Reporting Code	5 years						✓													✓	
19	Anti Bribery	5 years						✓													✓	
20	Officers Car Loan	5 years		✓											✓							
26	Young Persons Safety at Work policy	5 years																			✓	
27	Control of Ragwort	5 years									✓										✓	
28	Land Drains discharging into Board Maintained Watercourses	5 years									✓										✓	
29	Control of Rabbits, Rats & other Rodents	5 years									✓										✓	
30	Pension Discretion LPF 2014	3 years						✓						✓							✓	
31	Publication Scheme	5 years									✓										✓	
32	Data Protection	5 years							✓												✓	
33	Smoking Policy	5 years											✓									
34	Gift and Hospitality	5 years									✓										✓	
35	Fire Management Plan	5 years	✓										✓									
39	Wearing of seat belts in Boards vehicles	5 years											✓									
40	Commercial Works	5 years										✓									✓	
41	Public Sector Co-operation Agreement	5 years								✓											✓	
42	Near Miss Reporting	5 years		✓										✓								
43	Electronic Information and Communication Systems	5 years					✓			✓											✓	
44	Development Control Charges and Fees Policy	5 years																			✓	
45	Mobile Phones & Devices	5 years										✓									✓	
46	Crop Loss Compensation	5 years																			✓	
48	Substance and Alcohol Misuse	5 years	New policy Sep 2022						✓												✓	
49	Health and Wellbeing	5 years	New policy April 2023						✓												✓	
50	Sickness absence management	5 years	New policy April 2023						✓												✓	
51	Drone Flying	5 years	New Policy Septemeber 2023						✓													✓

paul.nicholson@blacksluiceidb.gov.uk

Black Sluice Internal Drainage Board
Station Road
Swineshead
Boston
Lincolnshire
PE20 3PW

For the attention of Mr I Warsap

Quotation No. Q16143

21 March 2024

Dear Ian

Health and Safety Service

May we take this opportunity to thank you for your business; many businesses like yours rely on Cope to provide advice and support in health and safety. We hope that you consider that the health and safety culture within your organisation will improve by using the services of Cope.

Your present contract for health and safety services is due for renewal 1st June, 2024, and to this end I have enclosed our proposal for the 60 months, from 1st June, 2024 to 31st May, 2029, which I hope meets with your approval. This contract has been prepared on the basis of visits every 6 months to your operations, at a fee rate of £132.78 + VAT per calendar month, which takes into account the work undertaken to-date.

All documentation produced by Cope Safety Management Limited is provided electronically via our Members Area.

To accept this renewal contract, please sign and return one copy to our offices in order that we can schedule dates for site inspections for future visits. Upon receipt of the signed contract, our Accounts Department will be in contact regarding Standing Order Mandate/payment arrangements for the new contract period.

In order to provide continuity of cover, we will continue to invoice you at the fee rate above (£132.78 + VAT per month) until we receive back either the signed contract, or written advice that you do not wish to accept our proposal. During this period, no visits will be scheduled but telephone advice will be available.

We hope the above arrangements meet with your approval, and we look forward to continuing to assist Black Sluice Internal Drainage Board with health and safety.

Assuring you of our best attention at all times.

Yours sincerely,



Scott Butters
Managing Director

Terms:

Our terms are payment within 30 days of invoice date. Terms & Conditions Rev6 attached

Cope Safety Management Ltd
Boston Enterprise Centre, Venture House, Enterprise Way, Endeavour Park, Boston, Lincs. PE21 7TW.
Tel: 01205 367098 Fax: 01205 356417 www.jwcope.co.uk email: copesafety@jwcope.co.uk

Registered in England No. 0584 1451
VAT Registered No. 646 5210 46

HEALTH AND SAFETY SERVICES

Contract

Business Name: Black Sluice Internal Drainage Board	Commencement Date: 01/06/2024
Address: Station Road Swineshead Boston Lincolnshire PE20 3PW	No. of Employees: c.27
	Other addresses included in the contract:
Telephone No: 01205 821440	
Contact Name: Mr I Warsap	
Position: Chief Executive	
Trade/Profession: IDB	Specifics to Note: Q16143

Cope Safety Management Limited will visit Black Sluice Internal Drainage Board at Station Road, Swineshead, Boston, Lincolnshire, PE20 3PW and carry out site safety inspections on a 6 monthly basis. During these visits we will assist with the completion and/or review of risk assessments, safe systems of work, COSHH assessments, display screen equipment assessments and manual handling assessments, etc. Please note that whilst we endeavour to assist with the provision of concise and accurate documentation following observations, document reviews and interviews, we are not responsible for the upkeep of documentation once adopted. Whilst we will endeavour to support you with the review and revision of your documents this remains your responsibility.

During the visits that co-incide with the anniversary date of your Health and Safety Policy, we will assist you to review, update and reissue health and safety policy documentation such that your Policy reflects your current practices and demonstrates the commitment that **Black Sluice Internal Drainage Board** has to health and safety.

During the 24 month period covered by the contract you will receive updates containing news items and details of any news on changed legislation that may be applicable to your company, together with free telephone and email advice for the period and use of our name as your nominated health and safety advisor.


Acceptance of this contract will grant continued access to the Cope Web-Site Members Area for the duration of this health and safety contract.

All documentation produced by Cope Safety Management Limited will be provided electronically via our Members Area.

Our fee for the above will be an all-inclusive fee of **£132.78 per month** + VAT for a 60 month contract period. Terms and Condition of Sale/Service 11.15 Rev. 6 and Consultants Charter attached.

(Additional days may be purchased to cover specific identified requirements. A quotation for your approval would always be submitted prior to any work.)

Terms of agreement months.	60	Contract Start Date: 01/06/2024	Contract End Date: 31/05/2029	
Agreed fees (exc VAT) for full contract term	£ 7966.80	Payment Method (inc VAT at 20%) Invoice on monthly retainer basis	£ 159.34	per calendar month

Signed on behalf of client:	_____	Name:	_____	Date:	_____
Signed on behalf of Cope:		Name:	S Butters	Date:	21.03.24

Cope Safety Management Ltd
 Boston Enterprise Centre, Venture House, Enterprise Way, Endeavour Park, Boston, Lincs. PE21 7TW.
 Tel : 01205 367098 Fax : 01205 356417 www.jwcope.co.uk email: copesafety@jwcope.co.uk

Registered in England No. 0584 1451
 VAT Registered No. 646 5210 46

TERMS AND CONDITIONS OF SALE/SERVICE

Attention is drawn to the Terms and Conditions of service set out below.

Definitions

The "Company" shall mean Cope Safety Management Limited The "Buyer" shall mean any Company, Firm, Individual or Agent thereof desirous of receiving services from the Company upon the payment of a fee. The "Goods" shall mean the products, services and materials supplied by the Company. The "Client Contract" means the contract, quotation or agreement signed by the Buyer setting out the services.

Property in Goods

The Property in the Goods shall not pass to the Buyer until the Company has received full and final payment for the Goods.

Prices

The price of the Goods will be shown on the Company's Client Contract, and this same price will be shown on the Company's invoice. All prices are exclusive of VAT. Any other services requested by the Buyer and supplied by the Company and not included in the Client Contract will be charged at the Company's rates current at the date when the service is provided.

Terms of Payment

Payment in respect of the Goods shall be due thirty (30) days from the date of invoice (or part invoice), unless agreed in advance of the supply of the Goods, with the written consent of an authorised person.

Invoices may be raised for part of the overall value of the works, where the works are carried out over a period of greater than one calendar month. In these situations the invoice value will be calculated on a pro rata basis and submitted at the end of each month.

Termination of Client Contract

The Buyer shall have the right to terminate the Contract by giving not less than six months notice in writing.

Cancellation (not Retainer Contract)

The Company reserves the right to charge the Buyer for disruption caused as a result of short notice cancellation of any official order. Should the order be cancelled 14 days or less prior to commencement of works, the Company may charge up to 50% of the value of the proposed works.

Law

The laws of England in any disputes that may arise shall govern this agreement and all matters connected with it.

Force Majeure

The Company shall not be liable for any failure to perform any of its obligations under the Terms if such failure arises from circumstances beyond its reasonable control.

Confidentiality

The Company will treat all information provided by the Buyer as strictly confidential, and agrees not to disclose any information to any third party unless authorised by the Buyer or required as part of the contract. The Company also agrees that it will at no time seek information directly or indirectly for the purposes of using such information outside of the requirements of the contract, or providing such information to a third party. The Company will make every attempt to assist the Buyer in the process of gaining security clearance for its staff when and as required.

Loss of Business

The Company cannot accept any responsibility for loss of business on the part of the Buyer, caused directly or indirectly by the activities of the Company in executing the contract, other than where covered by standard Public & Employers Liability Insurance.

Cope Web Site - Members Area

The Company will invoice the Buyer on the terms agreed. Any non-payment of invoices may result in the suspension of the Members Area service, without any refund of monies. An Administration fee may be applied for any Reinstatement of Member Services, per User, per Site.

HEALTH AND SAFETY CONSULTANTS CHARTER

Under the Health and Safety at Work Etc. Act 1974 (S.36) we may be guilty of an offence if our acts or omissions cause you to commit an offence. We may be charged with that offence, even if you are not.

To that end, we promise to:

- Ensure a clear and unambiguous written agreement is provided before the commencement of work, which is revised when there is a change in circumstances or arrangements;
- Ensure that our relationship and any reports etc, arising remains confidential, with the exception of when the divulgence of information etc, is required by law; and
- Provide competent advisors to undertake the work within the agreement, and have such resources, including insurance, to fulfil the agreement.

Competence = training + experience + knowledge – acknowledgment of limitations

Under the Management of Health and Safety at Work Regulations 1999 (Reg.7) you have a duty to appoint one or more competent persons to assist with health and safety.

To that end, you promise to:

- Ensure there is adequate co-operation with ourselves, including suitable access to areas of the undertaking, relevant information and persons, as necessary to fulfil the agreement;
- Ensure enough time and resources are arranged in order that the agreement can be discharged properly, giving due regard to the size and nature of your undertaking; and
- Ensure we are informed of all factors that may affect the health and safety of persons as a result of your undertaking, including when there is a change in circumstances or arrangements.

Members of the Institution of Occupational Safety and Health (IOSH) are bound by a professional Code of Conduct, and therefore we reserve the right to cancel an agreement if faced with a dilemma challenging our professional standards or conscience.

Cope (Scott Butters) are registered with the voluntary Occupational Safety and Health Consultants Register – OSHCR

BLACK SLUICE INTERNAL DRAINAGE BOARD



‘Emergency Response Plan’

Control Copy Number	2 of 8
Original issued no	1
Original Issue for use only by	ER Team
Initial Issue date	3 rd March 2011
Revision date	April 2024
Prepared by	Daniel Withnall

Version 2.0

Index

Read Me First Section

- Introduction
- Command and Control
- Objective and key principals
- Plan assumptions
- Plan Distribution
- Invocation Procedure
- Recovery Strategy
- Testing and Maintenance

Emergency Response Section

- Summary
- A Tidal Emergency
- A Fluvial Emergency
- Emergency Response Phase
- ~~Action Task Lists~~ Actions to consider during an event

Appendices

- One – Contacts List
- Two – Emergency Operation of Dual Drive Gearboxes at Pumping Stations
- Three – Emergency Plan Team Roles
- Four – District Maps
- Five – Flood and Weather warnings
- Six – Environment Agency Procedures for the Black Sluice Complex

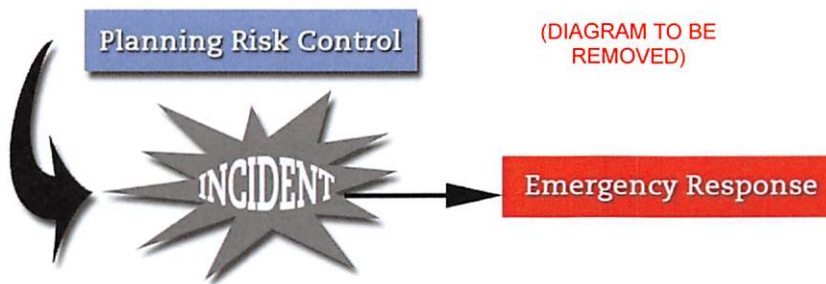
Introduction

The Emergency Response Plan (ERP)

This ERP provides overall guidance to the Board's Officers when responding to any significant incident. It works at the **worst case** level.

The main aim of the plan is to ensure that there are adequate systems in place to enable the Board to respond to an emergency situation and to support other agencies and emergency services where appropriate.

The plan also focuses on how officers should handle the issues that will arise after an incident has occurred. ~~This is illustrated as follows:~~



To some extent the risk planning process also addresses the adequacy of current risk controls and may have identified improvements. Such improvements, if implemented, will form an integral part of this document. The central feature of the plan is covering the entire response from the initial emergency through to the resumption of normal or near normal operations.

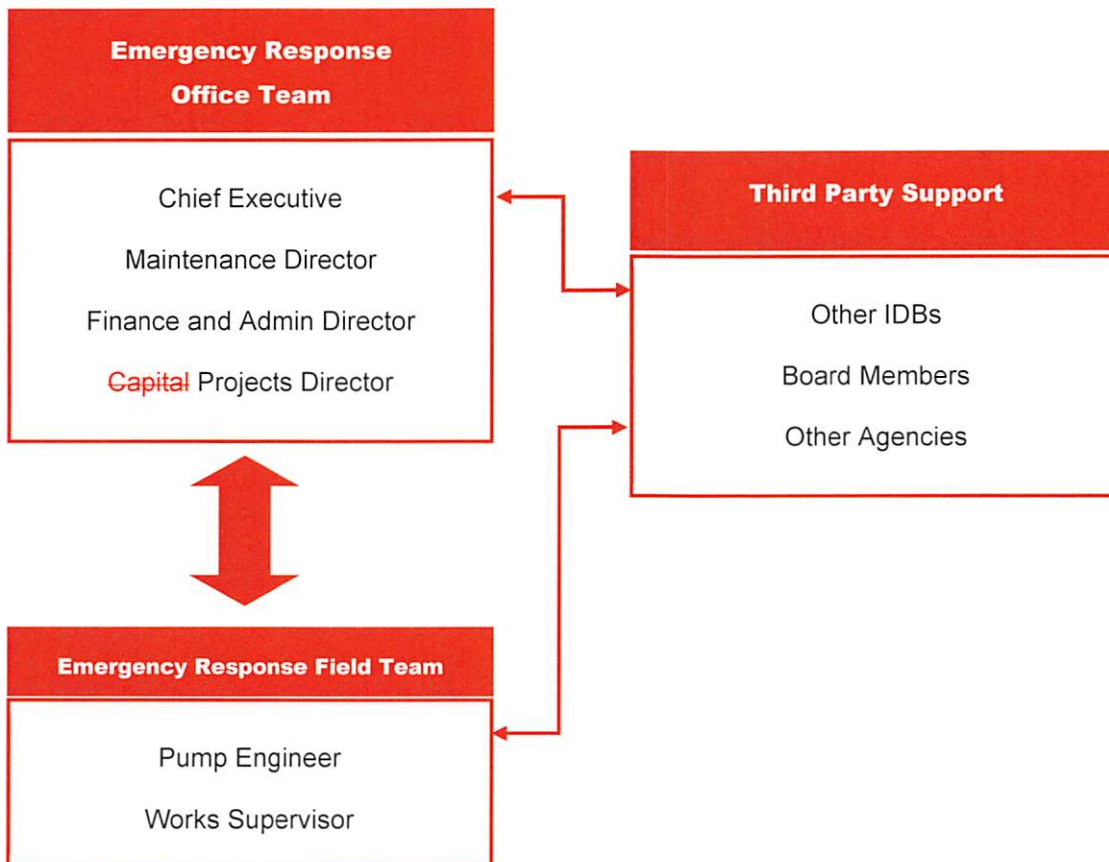
The key actions that may need to be performed and the key issues that are likely to arise are summarised. The pages are designed for use very much like checklists, helping to ensure that no major actions or issues are neglected.

A variety of procedures, guidelines and contacts, in support of these checklists, are included in the plan.

Command and Control

Incident Command and Control Arrangements

The Command and Control arrangements in managing a Major Incident are set out as follows:-



Emergency Response Plan Objective

The objective of the ERP is to ensure that the Board can provide and co-ordinate adequate resources to respond to a major event and to ensure that those resources have the experience and ability to handle such an event.

Key Principals Statement

The key principals to our response should be:

- (1) To ensure that the health, safety and well-being of employees engaged in any emergency response is protected.
- (2) To ensure the safety and continued use of the Board's pumping stations, assets, plant and equipment.
- (3) To ensure the functionality of the Board's operations are protected.

In fulfilling these principals the Board will be better able to carry out its primary function of land drainage and flood defence and in so doing, provide other Risk Management Authorities with the best opportunity to carry out their respective functions.

Plan Assumptions

In developing the plan, a number of assumptions have been made as detailed below

Assumption	
1.	There is a major flood event (one threatening death, injury or damage to property, or the environment, or disruption to the community)
2.	The Board are either dealing with the incident or are assisting another agency e.g. assisting the EA with an incident under their control
3.	The severity of the event will disrupt normal Board operations
4.	At least 75% of normal staff will be available to deal with the incident
5.	Staff will be expected to make themselves available to be utilised in any capacity that is required.

Plan Distribution List

Name	Title	Printed copy With Flashdrive	Electronic copy	Controlled Copy No
Daniel Withnall	Chief Executive	-	Issued	2
Kevin Methley	Pump Engineer	Full Plan	-	3
Simon Harrison	Maintenance Director	Full Plan	-	4
Paul Nicholson	Capital Projects Director	Full Plan	-	5
Amy Chamberlain	Finance and Admin Director	Full Plan		6
Keith Casswell	Chairman	Full Plan	-	7
Paul Holmes	Vice Chairman	Full Plan	-	8
Dale Roy	Works Supervisor	Full Plan	-	9

Access to Plans

ERP Team members should keep copies of their plans readily available at all times. It is suggested that they consider one or more of the following options:

- In the office
- In the car
- In a briefcase
- At home (by the telephone)
- Electronic storage (on a flash drive)

Chief Executive:



Date:

Invocation Procedure

Emergency Response Team

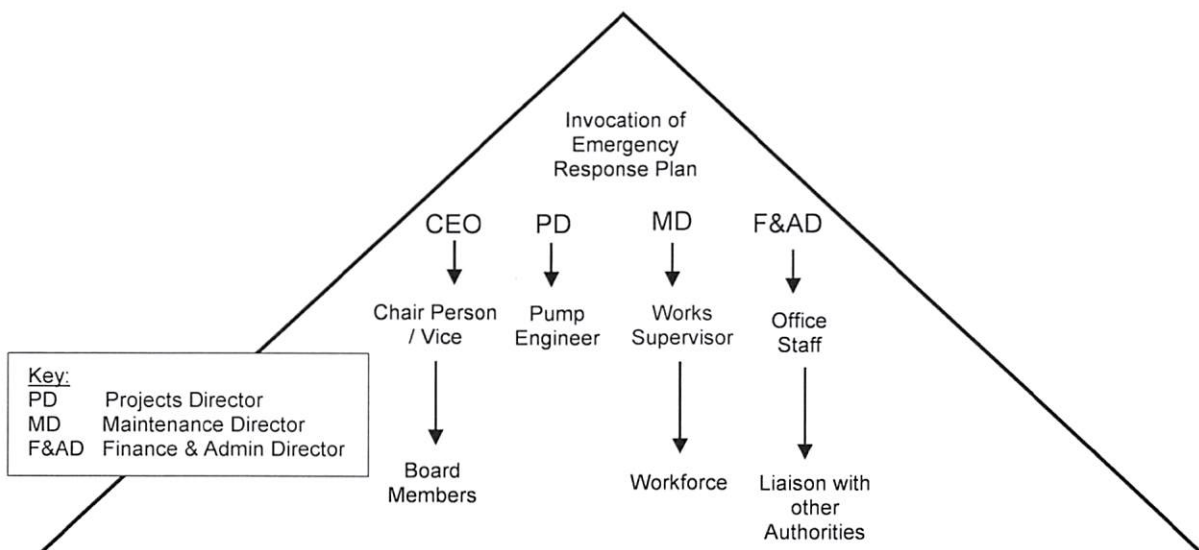
Name	Contact
Chief Executive #	See appendix one
Projects Director #	See appendix one
Maintenance Director #	See appendix one
Finance and Admin Director	See appendix one
Pump Engineer	See appendix one

Only the above members marked # can invoke the Plan.

In doing so, the ER Team will decide whether to authorise the invocation of the Plan in part or in full.

Issues to consider:

A	Are additional resources required further to normal operations?	The ER Plan will be invoked if additional resource is required.
B	Has the Board received a flood or weather warning?	The ER Plan will be invoked in accordance with the considerations set out in APPENDIX THREE. The ER Plan will be invoked if the water level at Black Hole Drove PS reaches 2.30m ODN.
C	Is the incident a major flooding incident in the Board's District?	The ER Plan will be invoked immediately.
D	Has the Board been contacted by another agency to offer support for an incident as set out in the above assumptions?	The ER Plan will be invoked immediately which may include Appendix Five — Silver Control Support.
E	Is the incident neither A, B, C nor D?	Further information is likely to be sought before a decision is made.



Recovery Strategy

In the event of a flood incident, the strategy for managing the crisis and recovering the situation is based upon the key objectives detailed below:

THE CRISIS	Objective	Strategy
1.	To ensure that the Board can provide and co-ordinate adequate resources to respond to a major event and to ensure that those resources have the experience and ability to handle such an event in order to:	To test this plan alongside other stakeholders to ensure that it is fit for purpose and that the information contained in the plan is both relevant and accurate. Training will be provided to key members of the ER Team to ensure they are capable of performing their role.
2.	Protect People from the risk of injury or death.	As above
3.	Protect domestic and commercial Property from flooding	As above
4.	Maintain Food Security by protecting agricultural land from flooding .	As above
THE RECOVERY	Objective	Strategy
5.	Flood Defence is maintained and does not suffer significant deterioration.	We are able to deliver services again quickly and any additional costs of operating will be recorded.
6.	Operations are not adversely affected, thus maintaining the quality of management and the ability to meet statutory requirements.	As above
7.	Members expectations and quality of service continue to be met, or managed, in such a way that ratepayers continue to get good service from the Board.	As above
8.	Reputation and image to stakeholders and the public are not negatively affected.	Proactive PR and management of the impact of the emergency event.

Testing and Maintenance

This plan must work. It is therefore essential that the plan be reviewed ~~every 6 months~~ **annually** by Board Officers and every three years (sooner if required) by the Board. Where this review reveals the need for any updating of the plan, maintenance must be carried out and this plan re-issued to those on the Distribution List within 4 weeks of the review. If the ~~6 monthly annual~~ **review** reveals no change is required, those on the Distribution List should be notified to keep this plan fresh in their minds.

In addition to the ~~6 monthly annual~~ **reviews** should the organisation undergo any major change, plans should be adjusted to reflect and address the changes.

Version	Date Tested/ Amended	Sections Tested/ Amended	Tested/ Amended By
1.1	January 2013	Whole plan	EFR Team
1.2	December 2013	Whole plan	EFR Team
1.3	April 2016	Whole plan	EFR Team
1.4	October 2018	Whole Plan	ER Team
1.5	January 2019	Invocation of Emergency Plan	Chief Executive
1.6	May 2020	Whole Plan	ER Team
1.7	October 2021	Whole Plan	ER Team
1.8	June 2022	Appendix 6 - Environment Agency Procedures for the Black Sluice Complex	ER Team
1.9	August 2023	Amendments due to retirement of current CEO and organisational structure change	ER Team
2.0	April 2024	Whole Plan	ER Team

Emergency Response Section

The object of the Emergency Response Plan (ERP) is to provide and co-ordinate resources to respond to a major event, which can be defined as:

- (1) A tidal event that overtops and/or breaches the defences.
- (2) A fluvial event where the level of the South Forty Foot Drain at Black Hole Drove exceeds 2.70m (19ft).
- (3) **Overtopping from non-Board assets that results in additional pumping for the Board.**
- (4) Failure of an IDB asset, which causes water to flood onto land adjacent to a watercourse.
- (5) A national/regional state of emergency that has effects on the operations of the Board.

Summary

(1) A Tidal Emergency

- Warnings would be received from the EA. (see table below)
- **Failure from sea defences and River Haven/Witham banks.**
- **Failure of Boston Barrier.**
- Wyberton Marsh PS and Kirton Marsh PS would be at risk of flooding.
 - Will we need to make a decision whether we have to switch down the pumping station (s) and/ or remove the motors?

(2) A Fluvial Emergency

- Flooding from any embanked watercourse (EA Main River) in the South Forty Foot Catchment.

(3) Overtopping from non-Board assets

- **May result in additional pumping for the Board.**

(4) An Emergency caused by an IDB or Riparian Asset Failure

- Flooding caused from any of the Board's assets (i.e. pumping station, watercourse, culvert, siphon etc) and/or any Riparian asset resulting in emergency flooding.

(4) A National/Regional state of emergency

- A state of emergency that affects for example; the Board's operations, staffing levels, the office opening, loss of equipment etc.

A Tidal Emergency It is anticipated that an event will unfold as follows:

3-4 days prior	Warnings received from EA
1 day prior	Likelihood of severe flooding predicted by EA Undertake work to mitigate damage at pumping station. Consider installing flood resilience doors at Allan House PS.
During the Event	Monitor & react to the situation safely
1 day after the Event	Check the areas around the pumping stations flooded. Make plans to operate pumps with emergency generators, if the pumps are none operational.
As soon as possible	Operate pumps to evacuate water.

A Fluvial
Emergency
1 day prior

Warnings received from EA
Operate IDB pumping stations to lower water levels.
Liaise with EA Operations Team

During the Event
(When levels have exceeded 2.3m ODN at Black Hole Drove Pumping Station)

The levels of the ~~catchment South Forty Foot Drain~~ will be monitored by the Board's telemetry ~~by the Duty Officer assigned to that shift~~. In the event of a complete failure of the telemetry, workmen will be stationed at Black Hole Drove (BHD), Gosberton and Donington North Ing Pumping Stations.

The South Forty Foot Banks are seen to be at risk of breaching if water levels are allowed to rise above 2.70 metres O.D.N. ~~(19ft on old gauge boards)~~. Therefore the Board has agreed the following course of action if these high water levels occur:

(1) When the level of the South Forty Foot Drain reaches

2.70 mODN on the telemetry system gauge board (19ft imperial) whilst the pumps are running.

NB: ~~Due to the historical equations, 10ft on the gauge board equates to 0.00m O.D.N.~~

In the discharge bay of Black Hole Drove Pumping Station (South Forty Foot Drain), then the pumps at the pumping stations shall start to be ~~switched off~~ ~~switched to emergency profiles by remote Telemetry Control as agreed by the ER Team at the same time switching all pumps~~ switched to their Emergency Profile Level as shown in the table on page 15. If the remote Telemetry Control fails, then pumps will be switched off manually. In this instance, the EA Lincoln Incident Room will need to be informed. If not open, then the FIDO or Area Based controller will need informing.

If levels reach 2.3m ODN at Boston and tide locked, then consider switching off Cooks Lock PS and Chain Bridge PS.

A staffing rota will be agreed to continuously monitor the telemetry until the end of the event. The following pattern will be followed:

No. of Directors Available	Shift 1	Shift 2	Shift 3
3/4	07:00 – 15:00	15:00 – 23:00	23:00 – 07:00
2	07:00 – 19:00	19:00 – 07:00	

Responsibility for workforce	
Normal operations supervision	06:00 – 21:00
Duty Officer assigned to that shift	21:00 – 06:00

A hand over should always be conducted between shifts.

(2) The pumps shall remain ~~switched off~~ at their emergency profile until the level of the water in the South Forty Foot Drain at BHD has dropped to:

2.30 mODN on the telemetry system gauge board (17ft and 6 inches imperial) with the pumps switched off. The pumps will remain in emergency profile until the level drops to 2.3 mODN at Black Hole Drove PS.

(3) If the situation continues the Board's Pumping Stations shall only pump sufficient water to hold water levels at the emergency profile level shown on page 15, until water levels begin to fall at Black Hole Drove PS in the South Forty Foot Drain.

If the event becomes more extreme then a decision will need to be made by the ER Team in conjunction with the Chairman of the Board on whether water levels in the Fens should be allowed to rise higher than the figures shown in the table on page 15.

	<p>There is always the possibility of a breach occurring in the banks of the South Forty Foot Drain or the highland carriers. The first indication of this will be:</p> <p>Either: Monitored levels on South Forty Foot Drain suddenly drop.</p> <p>Or: A report from a landowner or a member of the Board's staff.</p> <p>The EA should be informed of the situation.</p> <p>An assessment of how the breach can be repaired should be carried out as soon as it is safe to undertake this, a drone survey being the preferred option.</p>
Standing down the emergency	<p>Levels in the SFFD below 2.3m with all pumps returned to the appropriate Winter/Summer Profile.</p> <p>No workforce out without supervision (especially at night)</p> <p>Pumps not expected to fail causing flooding. Especially overnight 23:00 to 07:00. Will levels build to levels to cause a problem?</p> <p>Imminent storm/heavy rain or expected response from rain already experienced.</p> <p>What else would prolong a response?</p>

Summary

Emergency Response Phase

This phase covers the first minutes and hours following notification of a flood incident and the immediate actions that are likely to be required:

The phase covers:

- ER Team assembly
- Allocation of team roles
- Liaison with other authorities
- Pumping operations
- District Overview
- HR resource assessment
- Communication control
- IT assessment
- Admin support provision

Emergency Response Team Assembly

Look at **Appendix Two** to ensure that there is allocated responsibility for the primary tasks shown, using secondary roles where necessary. Use **ACTION TASK LISTS** below to ensure that all tasks are understood and actioned

Emergency Flood Response Team	Contact
Chief Executive	See appendix one
Maintenance Director	See appendix one
Pump Engineer	See appendix one
Capital Projects Director	See appendix one
Finance and Admin Director	See appendix one

Other Plans

Note: Depending on the type of incident it may be appropriate to refer to other plans and procedures developed for specific situations. Such as:

Operation of Pumping Stations

All pumping stations are set up to operate automatically.

The water levels and operation will initially be monitored by the Pump Engineer.

If the water level at Black Hole Drove PS reaches 2.30m (17.5ft on the gauge board) then an emergency situation is declared and the ER Team will take over the monitoring of the telemetry.

The instructions on "A Fluvial Emergency" should then be followed.

Catchment / Pumping Station	To be switched off in Emergency	Area /Ha	P Station Capacity litre/sec	Target Winter Levels	Target Summer Levels	Emergency Profile Level
Allan House	No		180	0.90	0.90	0.90
Bicker Eau	No	365	450	1.60	1.80	2.00
Bicker Fen	Yes	848	1,416	0.00	0.10	0.65
Billingborough	Yes	775	934	0.10	0.25	1.20 1.0
Black Hole Drove	Yes	4,150	5,776	-0.20	0.00	0.60
Chain Bridge*	No	2,509	3,695	-0.20	0.20	0.95
Cooks Lock*	No	2,902	3,907	-0.30	0.00	0.80
Damford	No	893	1,189	-0.75	-0.60	0.00
Donington North Ings	Yes	2,262	3,058	-0.25	0.20	0.90 (0.65)
Donington Wykes	No		421	0.90	1.20	1.50
Dowsby Fen	Yes	1,003	1,699	-0.20	0.20	0.45 (0.40)
Dowsby Lode	Yes	355	1,019	0.70	0.70	1.80 1.60
Dunsby Fen	Yes	568	651	-0.65	-0.20	0.60
Dyke Fen	No	1,862	2,660	-1.40	-1.00	0.00
Ewerby	Yes	1,141	2,237	-0.60	-0.20	0.45 (0.00)
Gosberton	Yes	2,885	3,992	-0.30	0.30	0.90
Great Hale	Yes	2,363	3,482	-0.20	0.30	0.90
Hacconby	Yes	503	850	-0.35	0.00	1.00
Heckington	No Yes	1,577	2,661	-0.20	0.00	0.05
Helpringham	Yes	814	1,331	0.15	0.50	1.10
Holland Fen	Yes	3,505	4,841	-0.55	-0.20	0.60 (-0.10)
Horbling	Yes	886	1,331	-0.05	0.20	0.90
Kirton Marsh	No	774	934	0.35	0.60	1.25
Mallard Hurn	Yes	365	566	0.30	0.45	0.80
Pinchbeck	Yes	655	906	0.50	0.70	1.20
Quadring	Yes	400	566	0.15	0.45	1.00
Rippingale	Yes	496	1,019	0.05	0.40	1.10 (0.9)
Sempringham	Yes	824	1,189	0.05	0.40	1.00
South Kyme	Yes	1,101	1,302	-0.80	-0.50	0.05
Swaton	Yes	851	1,133	0.30	0.50	1.35 (1.0m)
Swineshead	Yes	4,824	6,795	-0.30	0.40	1.00 (0.80)
Trinity College	No Yes	609	1,133	-0.80	-0.60	-0.25

Twenty	No	607	849	-0.40	-0.40	-0.40
Wyberton Marsh	No	1,982	2,803	-0.35	0.15	0.90

* If levels reach 2.3m ODN at Boston and tide locked, then consider switching off Cooks Lock PS and Chain Bridge PS.

The figures in brackets are temporary levels due to amendments being required to water level sensors included in the budget 2024/25.

Notes:

1. All levels are metres Ordnance Datum Newlyn (mODN).
2. ~~The Board's drainage system is designed to provide approximately 1.00m freeboard to lowest land in 1:10-year flows.~~

~~Operation of Installing Allan House Pumping Station Flood Resilience Doors.~~

~~The pumping station is located in the Asda Car Park, off Lister Way, Boston. PE21 8EQ~~

~~Installation of flood door and cable entry cover~~

~~In the event of possible flooding around Allan House pumping station the flood door and cable entry cover will need to be manually installed to prevent water ingress into the station and control panel.~~

~~This procedure can be completed by 1 person and should take around 10 minutes.~~

~~All relevant doors/covers and fastenings are stored inside of the station.~~

~~1 x box of fastenings and allen key~~

~~1 x cable entry cover~~

~~1 x door flood barrier~~

~~Installation procedure~~

- 1) ~~Take small stainless steel cable entry cover and place over the cable entry hole on the outside of the building lining up the 4 fastening holes in the plate and wall. In the box of fastenings there are 4 bolts that are to be inserted into the cover plate and are to be tightened evenly into the wall until hand tight and a good seal is achieved.~~
- 2) ~~Take the main flood door, the rest of the fixings and the allen key from the box and place them outside of the station. Directly in front of the main door there is a channel along the floor, this has a blanking plate inside the channel that will need to be removed and left inside the station before closing and locking the main door. Insert the flood door with the 2 handles on top and the rubber seal facing the wall into the channel around the doorway. Push firmly down while inserting 4 allen screws into the 4 lower holes on either side of the channel and tighten until a good seal is achieved. Lastly take the 2 L brackets and insert them into the slots on the top of the channel either side of the door. Insert the remaining allen keys into the L brackets and tighten sufficiently so the door will not lift.~~

~~Once the threat has passed all items should be removed in reverse order of the procedure set out above and all items are to be stored back inside the pumping station.~~

Operational Headquarters

The Offices and Depot are located at Swineshead:

Station Road
Swineshead
Boston
PE20 3PW

Tel: 01205 821440

duty.officer@blacksluiceidb.gov.uk

Out of office hours the telephone will automatically transfer to the mobile telephone held by the Duty Officer. **The Duty Officer contact number can be changed as follows:**

<https://xspnet1.4com.im/commipilot/Login/>

Username: XXXXXXXXXX

1. Services
2. Hunt Group
3. Night Divert
4. Incoming Calls
5. Call Forwarding Always On
6. Type in new number
7. Apply

If in the unlikely event that Swineshead Offices and Depot cannot operate then arrangements will need to be made to operate from one of the following:

- Relocate to a neighbouring IDB's office/depot (Witham 4th IDB, Boston have offered their office in such an emergency)
- The Chief Executive, Finance & Admin Director, Maintenance Director and **Capital Projects Director** would work from home whilst the recovery took place. Our Administration, Finance and GIS would relocate to Witham 4th IDB offices or work from home, the Works Supervisor and Pump Engineer would be mobile until a time we locate temporary office space.
- We would negotiate and relocate our depot based equipment to a local unaffected farm yard.
- We would use an unaffected pumping station(s) as a secondary depot/base.

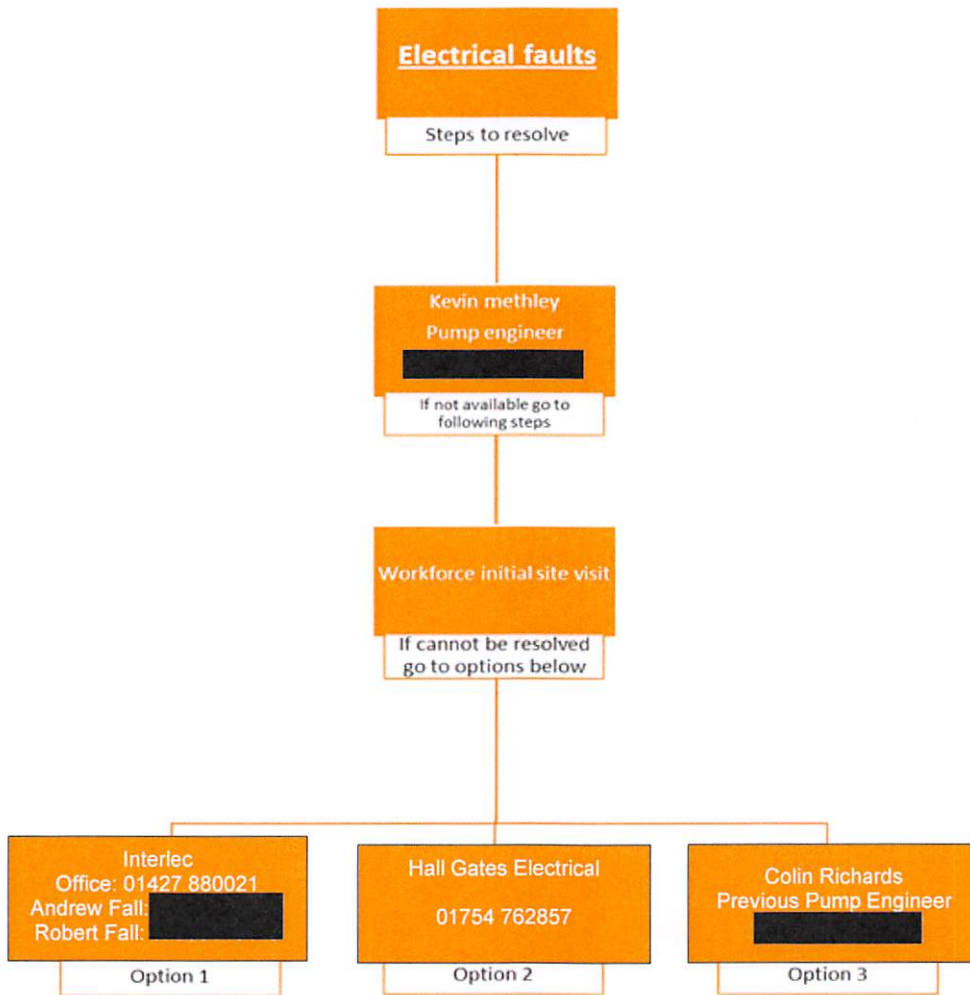
Operational procedures

The following Operational Procedures will be adhered to at all times:-

- The workforce will operate in teams of two during the hours of darkness or the risk involved deems it necessary to double up.
- Telemetry logging information will be passed over from the **Duty Officer Finance Manager** to all ER Team members.
- In the event of **County Emergency Centre Silver-Control** being opened an assessment of how the event is affecting our catchment will be made by the ER Team prior to agreeing attendance.
- An Event/Communication Log **(attached)** will be kept through WhatsApp by each member of the ER Team. **The administration team will collate this into a formal log following the event. This information will be placed on a live windows 'Event Data Log' as soon as possible throughout the event. An 'Event Data Log' shortcut will be available on all users computer desktop.**
- Following an initial review by the ER Team an early decision will be made regarding the offer of assistance to other authorities within or outside of the Board's catchments.
- All workforce inspections (sea defences, river banks, pumping stations etc) will have a mandatory 20 minutes reporting in procedure to the **Event Loggist: Duty Officer or Supervisor (dependant on who deployed and time of day/night)**.
- Should staff from the Emergency response Team be unavailable during a prolonged event, the following cover should be implemented:-

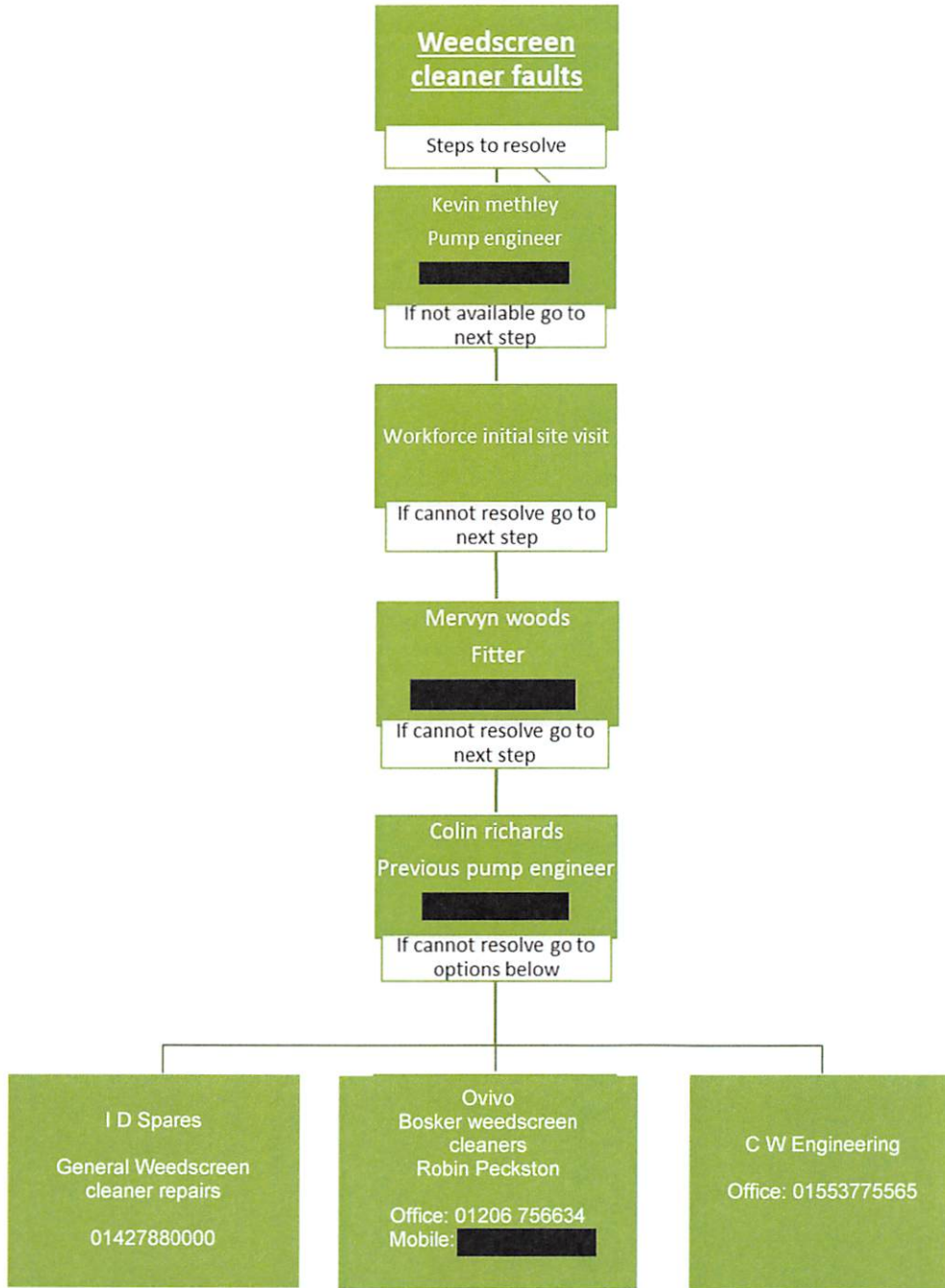
Chief Executive and Directors – please refer to Appendix 3 (ER Team Roles)

Pump Engineer – as set out below: -





Emergency Response



Use CW engineering for Dunsby weed screen cleaner ~~and Ovivo for all others as 1st option.~~

Action Task Lists — ~~To be used where an event in the district has occurred using the invocation procedure classification C or D, as A or B events will be managed by others.~~

First Action: Ring your spouse/partner and tell them you are going to be late

Actions to consider during an event

Overall Event Control

- Obtain your event/communications log, ensuring all decisions are recorded on WhatsApp sheets
- Receive advice of situation/ information
- Ensure Emergency Services have been contacted as appropriate
- Call out appropriate members of the ERT and meet at an agreed point
- Determine if evacuation is required
- Liaise with the Emergency Services, Facilities Management and Security
- Establish control of the incident
- Call out rest of ER Team and brief members
- Refer any media enquiries to another member of the Team
- Initiate instructions to all Management and staff using the call out/cascade arrangements
- Act as main point of contact at the incident site for the ER Team

Liaison with other Agencies

- Obtain your event/communications log, ensuring all decisions are recorded on WhatsApp sheets
- Meet up with ER Team Leader at an agreed point – establish common understanding
- Inform relevant RMAs of the event
- Manage requests for assistance to other RMAs
- Ensure regular updates are given to them
- Obtain visitors and contractors logs

Pumping operations

- Obtain your event/communications log, ensuring all decisions are recorded on WhatsApp sheets
- Meet up with ER Team Leader at an agreed point – establish common understanding
- Contact all pumping stations to establish resource requirements
- Contact attendants, assistants or reserves as necessary to arrange cover
- Contact suppliers for fuel or other needs as necessary
- Ensure regular updates are received from pumping stations and log these (where manned)
- Obtain visitors and contractors logs

District overview

- Obtain your event/communications log, ensuring all decisions are recorded on WhatsApp sheets
- Meet up with ER Team Leader at an agreed point – establish common understanding
- Record flood incidents across the district
- Record these on a map if possible to aid our response
- Liaise with works supervisor and agree response priorities
- Regularly update the Team Leader on response priorities

Communication control

- Obtain your event/communications log, ensuring all decisions are recorded on WhatsApp sheets
- Meet up with ER Team Leader at an agreed point – establish common understanding

- Prepare briefing notes to go to media and regularly update them
- Respond to media enquiries
- Respond to calls from the public

Controlling Human Resources

- Obtain your event/communications log, **ensuring all decisions are recorded on WhatsApp sheets**
- Meet up with ER Team Leader at an agreed point – establish common understanding
- Contact all staff and update them on the situation
- Contact Board members and others who are able to offer support
- Agree cover for the ER team if the event will last over 24 hours
- Log the hours worked by all those involved in the event
- Agree emergency payments if required

Maintenance of IT network

- Inform IT Contractors of the event to ensure there is no planned down time
- Manage the network to avoid disruptive events e.g. back up routines etc

Admin Support

- Ensure that there is support in the office for the ER Team 24/7
- Ensure that there is ample supply of drinks and food for the Team and those working in the district unable to leave their position
- Ensure there is enough Petty Cash to deal with emergency purchases

Event/Communications Log – **REMOVED**

APPENDIX ONE - Contact Lists

Telephone Number of Offices and Depot – 01205 821440

Emergency Response Team Members

Name	Title	Home Tel	Mobile (Work)	Mobile (Private)
Daniel Withnall	Chief Executive			
Paul Nicholson	Projects Director			
Kevin Methley	Pump Engineer			
Simon Harrison	Maintenance Director			
Amy Chamberlain	Finance & Admin Director			
Keith Casswell	Chairman			
Paul Holmes	Vice Chairman			
Dale Roy	Works Supervisor			

Other Office Employees

Name	Title	Home Tel	Mobile
Hayley Wood	Planning & Byelaw Assistant		
Andy Scott	GIS & Planning & Byelaw Officer		
Jessica Baxter	Executive Assistant		
Alexandra Emms	Finance Assistant		
Lee Whelan	Site Engineer		

Other Employees

Name	Home Tel	Work Mobile	Private Mobile
Daniel Affection			
Ryan Banham			
Pat Banham			
Stephan Brown			
Mark Green			
Martin Henton			
Mick Lancaster			
Tom Lee			
Stuart Hanger			
Ian Rose			
Adam Scott			
Rob Smith			
Andrew Waltham			
Mervyn Wood			

Flood Emergency Contacts List

EA Anglian Region Contacts	Office	Tel
Regional Communication Centre Lincolnshire Emergency Planning Unit (24 hrs)		
Emergency Hotline – ask for Anglian Region		
EA Flood Incident Duty Officer		
Flood Warning Duty Officer (FWDO) covering Lincolnshire and Northamptonshire Area		
Incident Communications Service Sheffield (communications outside of event)		
Area Control Room flood-control-room during Tidal and River flood risk periods		
Area Dissemination Room Flood warning dissemination Tidal and River flood risk periods		
Catchment Incident Room Operational Response during significant flood risk periods		
District Incident Room Catchment incident room open for tidal and fluvial risk periods in catchment		
Area Base Controller		
EA Area Duty Manager		
EA Incident Room - Lincoln		
EA Emergency Incident		
Floodline		
EA Lincoln Area Office		
Fire & Rescue	Boston	
Police	Boston	
	Lincoln	
	Skegness	
LCC Highways	Out of hours	
LCC Flood Line		

Utilities

Supplier	Office	Emergency No.
National Grid	Gas 24 hrs	
East Midlands	Power failure	
Western Power Distribution		
BT Faults		
Anglian Water		

Neighbouring IDBs

IDB	Office	Emergency No.
Witham Third	01522 697123	M Shilling
		G Hird
		I Coupland
		J Froggatt
Witham Fourth	01205 310099	L Quirk
		Ed Johnson
Welland & Deeping	01775 725861	N Morris (Operations Engineer)
		Julien Boden (Assistant Engineer)
		R Fisher (Foreman)
Upper Witham	01522 697123	M Shilling
		G Hird
		I Coupland
		J Froggatt
South Holland	01406 424933	L Quirk
		Dom Morris (Operations Manager)
North Level	01733 270333	P Sharman
		J Stublely
		N Day
NE Lindsey	01522 697123	M Shilling
		D Scott
		G Hird
		I Coupland
		J Froggatt
Trent Valley	01636 704371	L Quirk
		Matt Everet
Lindsey Marsh	01507 328095	Office phone forwards to Duty Officer
Lindsey Marsh Depot	01507 451349	Joanne Watson

Local Authorities Contact List

Authority	Office	Emergency Tel.
South Kesteven District Council		
South Holland District Council		
North Kesteven District Council		
Lincolnshire County Council		
Boston Borough Council		

Other Risk Management Authorities Contact Details

Authority	Office/Contact	Tel
Water Company – Anglian Water		
Environment Agency General Enquires		

Pumping Station Contact Details

Pumping Station	Address	Tel/Fax
Black Sluice Pumping Station		

Pump suppliers Contact List

Company	Location	Tel
Perry Pumps		
Metalcraft	Weedscreens	
Ovivo	Weedscreens	

Telecommunications – Contractors Contact List

Supplier	Company	Name	Work	Mobile
BT Faults				

General Support Contact List

Supplier	Company	Work Tel	Emergency Tel
Woldmarsh			
Plant Hire			
Engineering & Hire	Flails/buckets		
SLD Pumps			
Pell Plant Hire	Drott		
Dysart Plant Ltd			
Maurice Belton Ltd	Excavators		
Aquatic Control Eng			
A Plant Boston			
Wells Plant Hire	Excavators/Drott		
Electrical			
Interlec			
Oriel Systems	Telemetry		
Generator Hire			
SLD Pumps	Peterborough		
Aggreko	Doncaster		
C&J Supplies	Locks		
SG Baker	Sandbags		
Stone			
Creeton Quarry			
SJR Contractors	Haulage & stone		
Premier Lime & Stone	AS blast large		
Longwood Quarries	Limestone		
Cemex	Sand & gravel		
Breedon	Pitching stone		
Bardon Aggregates	Pitching stone		
Tyres			
BA Bush			

APPENDIX TWO

Emergency Operation of Dual Drive Gearboxes at Pumping Stations

If electricity is lost to pumping stations then the first action that can be taken is to operate one pump at the station concerned with a tractor driving the dual drive gearbox. Details of the stations with gearboxes, and the type of PTO required, are shown below:

If generators are available the power requirement and collection type are shown below.

The Board's Unimog is able to run all pumps with an adapter.

	Pump Speed	Dual drive gearbox speed	Number of splines on PTO	Tractor HP required	Generator size	Connection type
Allan House	960	n/a	n/a	n/a		
Bicker Eau	950	n/a	n/a	n/a		
Bicker Fen	485	1000	21	160		
Billingborough	580	540	7	100		
Black Hole	420	n/a	n/a	n/a	600kva	Bolt on lugs
Chain Bridge	580	1000	21	140	300kva	Bolt on lugs
Cooks Lock	480	1000	21	160	400kva	Bolt on lugs
Damford	730	540	7	100		
Donington Wykes	965	n/a	n/a	n/a		
Dowsby Fen	570	540	7	100		
Dowsby Lode	585	540	7	100		
Dunsby	720	540	7	60		
Dyke Fen	585	1000	21	160	300kva	Bolt on lugs
Ewerby	485	540	7	60		
Gosberton	483	1000	21	160	400 kva	Bolt on lugs
Great Hale & Little Hale	575	1000	21	140	300kva	Bolt on lugs
Hacsonby	740	540	7	140		
Heckington	482	1000	21	160		
Helpringham	483	1000	21	160		
Holland Fen	420	n/a	n/a	n/a	500kva	Bolt on lugs
Horbling	483	1000	21	160		
Kirton Marsh	580	540 n/a	21 n/a	140 n/a	200kva	Bolt on lugs
Mallard Hurn – Donington	720	540	7	60		
North Ing - Donington	570	540	7	120	300kva	Bolt on lugs
Pinchbeck	580	540	7	100		
Quadrang	720	540	7	80		
Rippingale	586	540	7	110		
Sempringham	580	540	7	140		
South Kyme	720	540	7	60		
Swaton	580	540	7	140		
Swineshead	420	n/a	n/a	n/a	600kva	Bolt on lugs
Trinity College	720	540	7	60		
Twenty	480	540	7	60		
Wyberton Marsh	575	1000	21	140	400kva	Bolt on lugs

Board Members and Farmers who can be contacted to hire tractors.

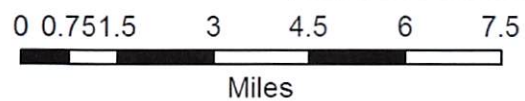
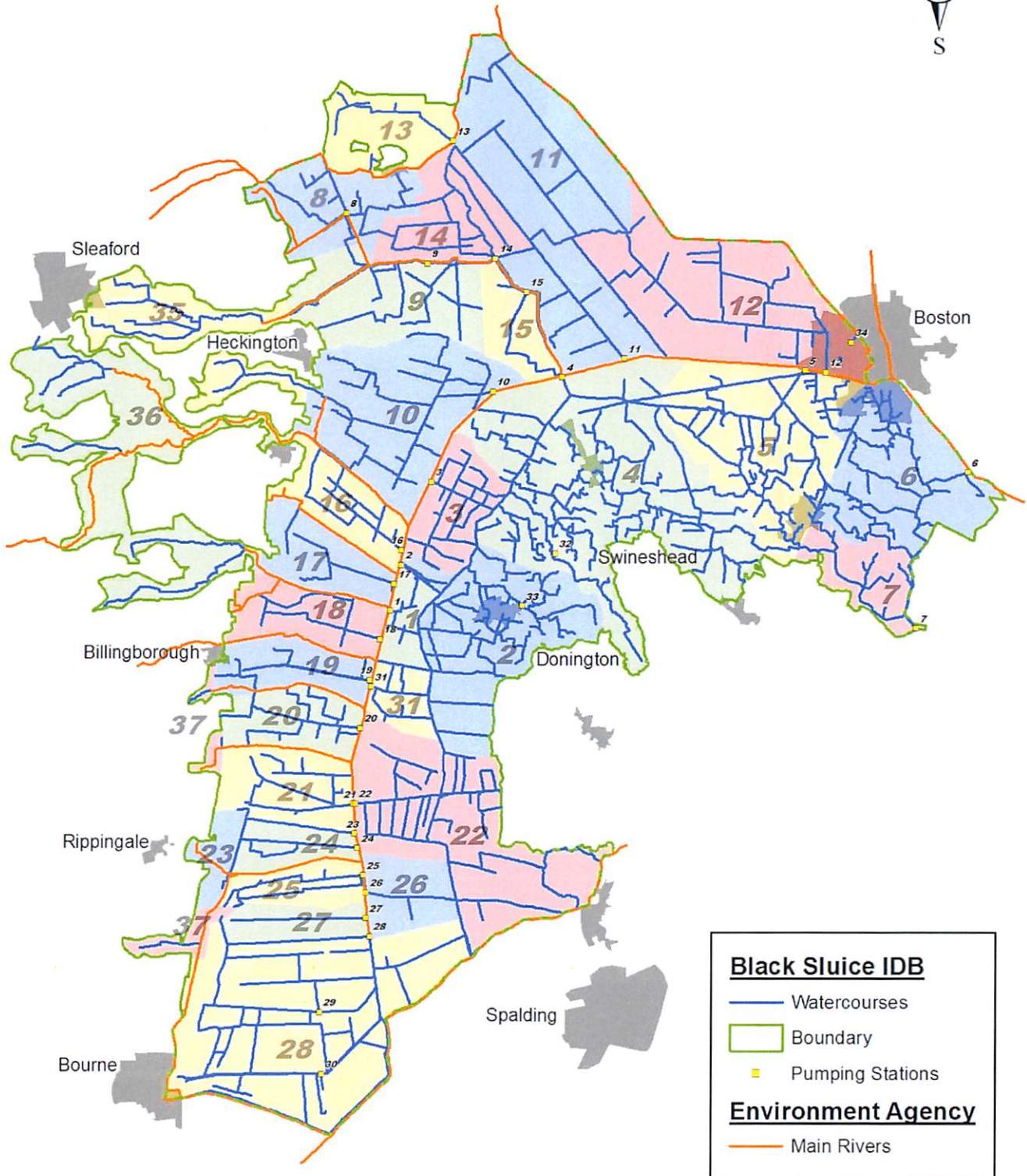
Name	Address	Contact Name	Office Tel	Home/Mob Tel
Dennis Estates		Andrew Welch		
VA Barker		V A Barker		
R Pocklington Ltd		James Pocklington		
HJ Mair		Andrew Mair		
GC Mowbray		Mark Mowbray		
F Casswell & Son		David Casswell		
JE Atkinson		John Atkinson		
F Richardson		Mark Taylor David Taylor		
Burtts of Dowsby				
AE Lenton		John Clubb		
Henry Tunnard Ltd		Paul Holmes		
Bannister Farms		Tom Macfarlane		
JG Fowler		Jonathan Fowler		
J Ashton & Sons		John Ashton		
GH Emerson & Son		Richard Emerson		
Mr C M Smith		C M Smith		
JH Dorrington		R Dorrington		
John Grant				
Wray Farms		Richard Wray		
JF Litherland		M Rollinson		
S&S Pugh & Son		Stephen Pugh		
J N Booth & Sons		JN Booth		
H Casswell & Son		Keith Casswell		
JH Casswell & Son		James Casswell		
JWE Banks		Harvey Smith		
JW Fulforth		John Fulforth		
B Howe & Son		William Howe		
ED & AS Cooke		Mick Baker		
LCJ Mountain		John Mountain		
EA Dring Farms		N J D Scott M J Scott		
L R Leggott & Sons		Mr M R Leggott		


APPENDIX THREE – ER Team Roles

To be used to record the primary and secondary roles and responsibilities of the Team. It should assist in ensuring that all key areas are covered should a member of the team not be available on the day:

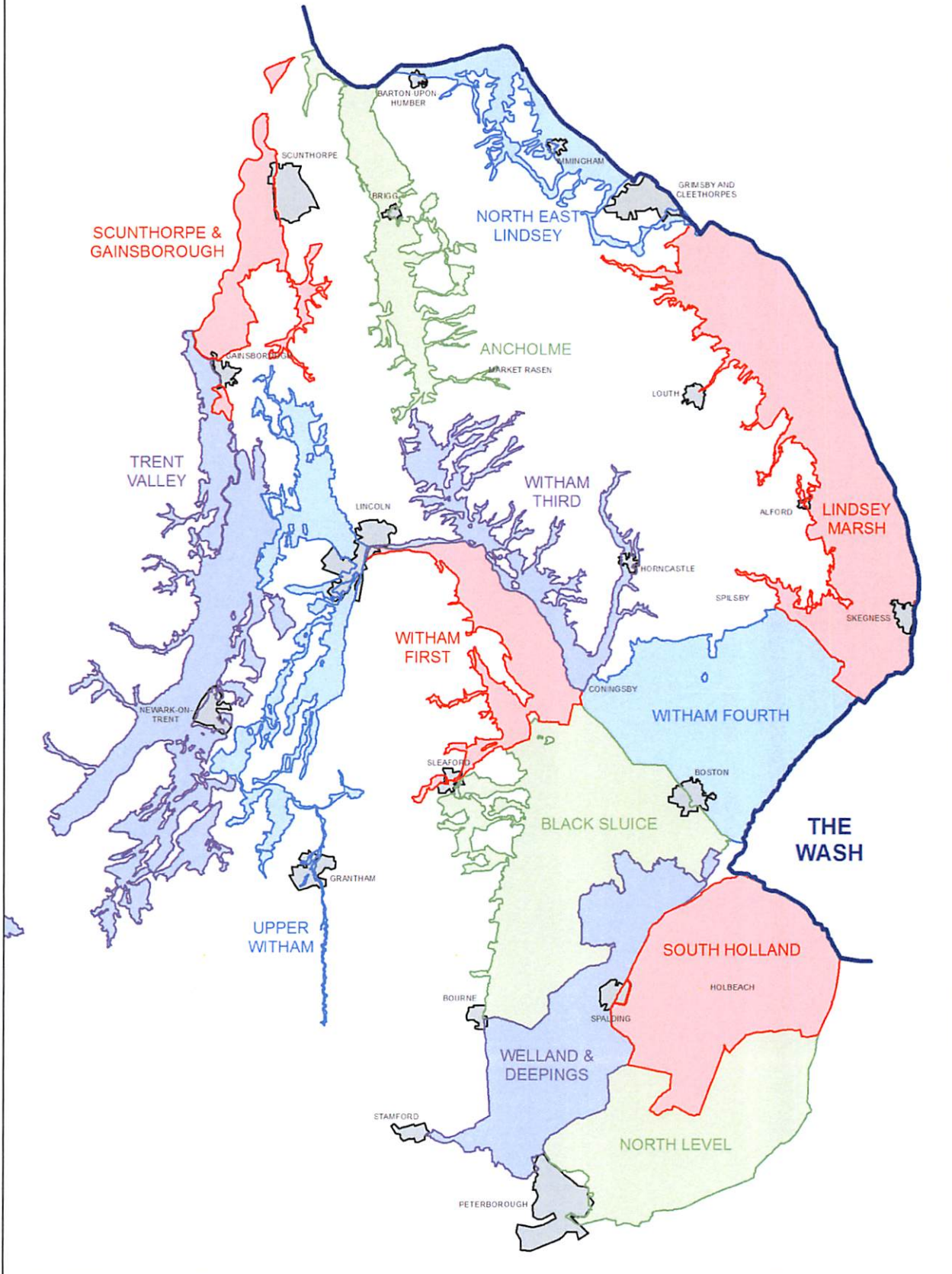
TASKS	Primary tasks	Primary responsibility	Secondary responsibility
Event Control	Overall event control	Capital Projects Director	Maintenance Director
	Liaison with other agencies	Finance and Admin Director	Chief Executive
	Pumping Operations	Pump Engineer	Capital Projects Director
	District Overview	Chief Executive	Capital Projects Director
Communication Control	Inform the public	Chief Executive	Capital Projects Director
	Media liaison	Chief Executive	Capital Projects Director
Controlling all Human Resources	Management of Employees or retired employees	Chief Executive	Finance and Admin Director
Maintenance of IT/telecom systems	To ensure that all internet and telephone communications are maintained	Finance and Admin Director	Executive Assistant
Administration support	To support the above during the Board's Emergency Response	Executive Assistant	Admin Assistant

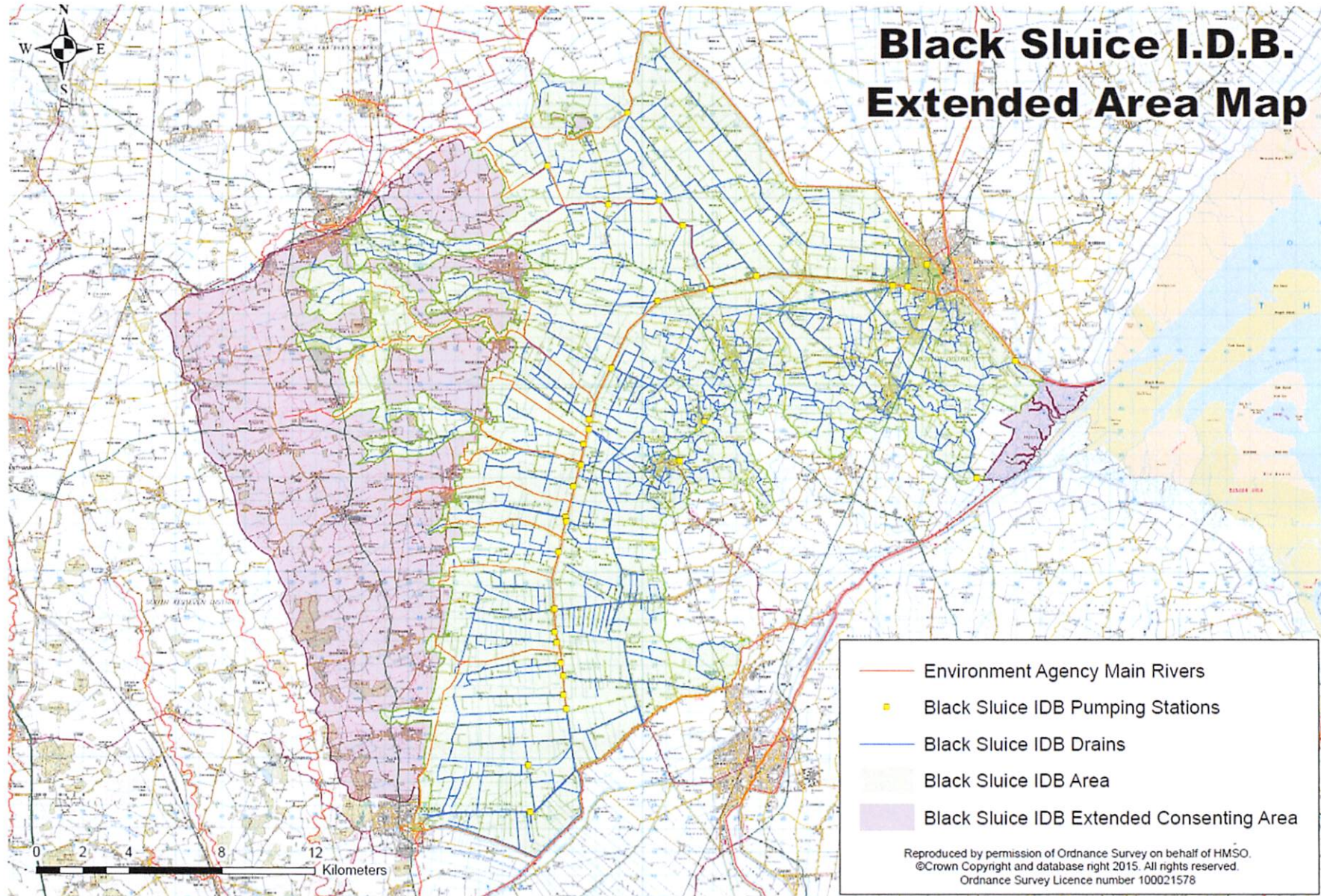
APPENDIX FOUR – District Maps



 <p>Black Sluice Internal Drainage Board Station Road, Swineshead Boston, Lincolnshire PE20 3PW Tel: 01205 821440 Email: mailbox@blacksluiceidb.gov.uk</p>	<p>Black Sluice I.D.B. Catchment Map</p>
	<p>Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2012. All rights reserved. Ordnance Survey Licence number 100021578.</p>

Lincolnshire Internal Drainage Boards





APPENDIX FIVE – Warnings

Flood and Weather Warning Response

The Board's response to warnings received from the Environment Agency, Flood Forecast Centre or Met Office should be appropriate to the severity of the warning. See Action Task Lists below for response. The responses listed in the Action Task Lists are compatible with the generic responses for Internal Drainage Boards listed in the Multi Agency Flood Plan.

Specific actions – weather warnings and flood forecasts

10 Day Outlook from Flood Forecasting Centre	no specific action other than monitor situation	<input type="checkbox"/>
5 Day Tidal Outlook from FFC	all staff & operatives made aware & ensure everything in order ready for response if needed	<input type="checkbox"/>
County scale Flood Guidance Statement from FFC issued daily for next 5 days	response as above plus consider lowering water levels in key watercourses	<input type="checkbox"/>
Flash Severe Weather Warning. Issued when the Met Office has 80% or greater confidence that severe weather is expected in the next few hours	response as above	<input type="checkbox"/>
Extreme Rainfall Alert	response as above	<input type="checkbox"/>

Consideration for implementing the plan will be made based on the severity of the warning and prevailing conditions within the Board's District

Specific actions – Environment Agency Warnings

Flood Alert Flooding possible – issued 2 hours to 2 days in advance of flooding	All staff & operatives made aware & ensure everything in order ready for response if needed Consider implementing Emergency Plan	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Flood Warning Flooding expected, immediate action required – issued half and hour to 1 day in advance of flooding	Implement Emergency Plan The ER Plan will be invoked if the water level at Black Hole Drove PS reaches 2.30m ODN. Inspect specific critical infrastructure sites	<input type="checkbox"/> <input type="checkbox"/>
Severe Flood Warning Flooding has occurred and there is a danger to life	As above plus constant monitoring by duty officer Establish central control. Liaise with IDB representative in County Emergency Centre Silver Control and/or other local responders Assist with emergency evacuation and response dependent on resources	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

APPENDIX SIX – Environment Agency Procedures for the Black Sluice Complex

<p>Fluvial Event: Environment Agency Procedures Black Sluice Complex</p> <p><i>Normal Operation</i></p>	<p>Flood Incident Duty Officer (FIDO) and Flood Warning Duty Officer (FWDO) monitor river levels on a weekly roster (with support from a wider Duty Team). During a high rainfall event, this will move to a 3-shift pattern on a 24-hour roster.</p> <p>The SFF Drain levels are managed based on several factors:</p> <ul style="list-style-type: none"> • Flood risk management (no set levels) • Navigation (legal duty – length of navigable SFF) minimum 1.2m draught (minimum of 24 hr needed for boat passage) • Abstraction licences (taken at Black Sluice) 0m to -0.1m • Environmental considerations (no level set) – note need for fish passage in summer <p>Retention Level = Summer: 0 mODN, Winter: -0.6 mODN (at Black Sluice) <i>Historic Level Oct-19 (mODN): 2.369</i> <i>Historic Level Jan-13 (mODN): 2.2</i> <i>Historic Level Apr-98 (mODN): 2.36</i> <i>Historic Level Feb-77 (mODN): 2.41</i></p> <p>Catchment lag: ~40 hours</p> <p>During normal operation, only the gravity sluice is needed to manage the SFF levels.</p> <p>In the event of rainfall/raised river levels, the lock can currently be operated in <u>two</u> modes (if required):</p> <ol style="list-style-type: none"> 1. For small/short events, the lock remains in 'NAVIGATION MODE' and is operated manually to discharge at low tides by the Duty Team. 2. For more extreme/longer events the lock can be put into 'FREE FLOAT MODE' by disconnecting rams from pointing doors, setting sector gates to open and guillotine gate on 'auto'. <i>Navigation is not possible in this mode. To meet the EA's legal duty for navigable watercourses, this mode can only be used during a prolonged/extreme event in the summer period.</i> <p>For both modes, a minimum 50mm difference is required between the fluvial and tidal side before the sluice will begin to discharge (as the tide drops).</p> <p><i>For guidance on emergency response to asset failure, see the Operational Contingency Plan for Black Sluice Outfall and Navigation Lock.</i></p>
--	---

Prior to a high rainfall event

The lock will not be operated for every rainfall event.

The decision on how to operate both the sluice and lock is dependent on the event itself. The Duty Team will make an informed decision on the benefit of reducing levels prior to the event (as well as operation of the lock during an event) based on several factors.

This includes:

- **The gravity sluice as an effective way of managing levels:** this asset is the primary means to manage levels in the SFF Drain, including lowering levels (if required) ahead of rainfall. For most rainfall events, the lock will not be used ahead of the event as it is not necessary.
- **The likelihood of the event** (including widespread or localised): the risk of reducing the levels and there being no subsequent heavy rain, resulting in low levels affecting abstraction, oxygen levels and wildlife impacts etc.
- **Aggressive water level management:** When the lock and sluice are operated concurrently, the high discharge rate and sudden draw-down can impact the integrity of the banks immediately upstream of Boston.
- **Summer and winter seasonal risks:** for example, the risk of drought and water resource needs
- **Catchment conditions:** For example, if the rain is falling on already saturated ground
- **Neap tides and head difference**
- **The forecast for prolonged/repeat events:** i.e. the risk and likelihood of further rain or prolonged rain before normal retention levels have been reached.

Broad scenarios are set out below to direct the decision-making of the Duty team, but these are not hard and fast rules.

If between 0-30mm rain forecast in 24 hours on dry catchment:

- Levels will not be lowered ahead of event
- Lock may be used during the event on NAVIGATION MODE at each low tide (note consideration of neap tides)

If 30mm+ forecast in 24 hours on dry catchment:

- Duty Team will consider lowering levels by ahead of rain. *Consideration must be taken to the risk of low water levels during prolonged dry weather/drought and the confidence of the forecast. See above factors.*
- Lock may be operated on NAVIGATION MODE at each low tide (note effect of neap tides).
- If prolonged/recurrent rainfall events expected Duty Team to consider moving the lock to FREE FLOAT MODE.

	<p><u>If rain forecast to fall on wet catchment – single or short event:</u> The lock will remain in NAVIGATION MODE and operated at each low tide if required.</p> <p><u>If rain forecast to fall on wet catchment – prolonged/recurrent events (leading to Major Flood Incident):</u> The lock will be put into FLOOD RELIEF MODE ahead of rainfall, ready to be used if needed during the event. <i>Due consideration must be taken for this mode during summer period.</i></p> <p>Levels may be lowered in the SFF Drain by using the lock alongside the sluice if required – see previous factors considered.</p> <p>Lock and sluice will operate concurrently for as long as required. Strong Stream Advice will ensure navigation will not be possible (as the asset is operated by the EA).</p>
<p><i>During the event</i></p>	<p><i>The lock will not be operated for every rainfall event.</i></p> <p>For low rainfall forecast or short events, there may be no benefit in opening the lock due to effects on the head difference between the two sluices, and the effect of neap tides.</p> <p>As with the decision to reducing levels prior to the event, the Duty Team will consider:</p> <ul style="list-style-type: none"> • The gravity sluice as an effective way of managing levels • Aggressive water level management: When the lock and sluice are operated concurrently, the high discharge rate and sudden draw-down can impact the integrity of the banks immediately upstream of Boston. • Summer and winter seasonal risks: for example, the risk of drought and water resource needs after the event. • Catchment conditions: For example, if the rain is falling on already saturated ground. • Neap tides and head difference • The forecast for prolonged/repeat events: i.e. the risk and likelihood of further rain or prolonged rain before normal retention levels have returned. <p>The Duty Team will also consider the following guidance:</p> <ul style="list-style-type: none"> • If Dowsby 0.2m and 30mm+ rain forecast in 24 hrs, wet catchment, - open nav lock • If Dowsby 0.4m and 20mm+ rain forecast in 24 hrs, wet catchment, - open nav lock • If Dowsby 0.6m and 10mm+ forecast on a wet catchment - open nav lock • If Dowsby 0.6m and no rain forecast - don't open nav lock <p>FIDO and Black Sluice IDB Officers to liaise during the event to monitor the situation across the catchment.</p>

	<p>When in NAVIGATION MODE, Duty Officers to continue to open the lock on each low tide. If forecast changes, the Duty Team will consider moving to FLOOD RELIEF MODE.</p> <p>In FLOOD RELIEF MODE, lock discharges automatically with FIDO monitoring telemetry.</p> <p>During recurrent events, the Duty Team will continue to discharge until levels are at or below the normal retention.</p> <p>Flood Warning Thresholds:</p> <p>When at 2.6mODN at Dowsby:</p> <ul style="list-style-type: none"> • FWDO to consider issuing Flood Warnings for ‘Isolated properties and villages in the west of the SFF Drain and its tributaries’. • Patrols begin to monitor flood embankments and assets <p>When at 2.7mODN at Dowsby:</p> <ul style="list-style-type: none"> • FWDO to consider issuing Flood Warnings for ‘Isolated properties and villages in the east of the SFF Drain’ • IDB stop pumping and begin again at 2.3m – please refer to BS IDB ‘Emergency Response Plan’ for pumping regime. <p>When at 3mODN + at Dowsby: expect onset of property flooding for isolated properties and villages west of SFF Drain (3.13mODN for east of SFF Drain).</p>
<p><i>After the event</i></p>	<p>The lock may continue to be used after a high rainfall event if it is assessed as necessary to maintain flood resilience.</p> <ul style="list-style-type: none"> • If further significant rain is forecast in preceding days, leave in FREE FLOAT MODE • Until levels in the SFF Drain are at or near normal retention level (with no further heavy rain forecast)