



Gníomhaireacht Bainistíochta an Chisteáin Náisiúnta
National Treasury Management Agency

An Gníomhaireacht um Éilimh ar an Stát
State Claims Agency

National Parks and Wildlife Service, Killarney National Park

[Killarney National Park- Risk Management System Audit]

[Final Audit Report]

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Introduction

The State Claims Agency (SCA) conducted a Risk Management System (RMS) audit in Killarney National Park on the 11th October 2023. This document sets out the findings and recommendations arising from this.

Note - this audit was completed using sampling techniques intended to be representative of the whole. Not all aspects of the RMS were audited.

Objective of audits

- To determine whether the Risk Management System (RMS):
 - Addresses planned arrangements for risk management including elements or clauses of the appropriate standard or specification e.g. ISO 45001, Visitor Safety Group Principles;
 - Complies with regulatory and common law requirements e.g. Safety, Health and Welfare at Work Act, 2005 and applicable regulations;
 - Complies with internal requirements in alignment with best practice standards.
- To improve the efficiency and effectiveness of the arrangements by:
 - Identifying gaps in the existing system and processes;
 - Making recommendations for improvements.
- To target risk management activities to prevent incidents which could lead to claims.

Scope and methodology of audit

The scope and format of the audit is consistent with that agreed by prior meetings with NPWS.

The audit consisted of a review of relevant documentation relating to the RMS including policies and procedures, interviews with relevant staff and a walk-through of selected areas.

Report structure

1.0 Summary of compliance

This section provides a summary of the positive findings from arrangements observed and sampled during the audit.

2.0 Findings and Recommendations

This section outlines any gaps identified in the existing systems, processes and practices and includes recommendations for improvement.

- Findings are of three priority levels as denoted in the 'priority level' column.
 - Priority Level 1 indicates that the area audited did not have a key element of the RMS in place.
 - Priority Level 2 indicates the area audited had the key element of the RMS in place however it was not being implemented completely or there were deficiencies in its implementation. * Note: a significant number of Priority Level 2 findings in one or more key elements may also result in a failure to comply with the system.
 - Priority Level 3 indicates areas where the auditor/s has made recommendations "for consideration only"; to further improve upon the RMS.
- The findings are outlined in the 'finding' column.
- The recommendations are set out in the 'recommendation' column.

1.0 Summary of compliance

Killarney National Park is part of the National Parks and Wildlife Service (NPWS) which is part of the Dept of Housing, Local Government and Heritage (DHLGH). Killarney National Park has a total area of over 10, 000 hectares, and comprises the former Bourne Vincent and Kenmare Estates. It is comprised of gardens, parkland, forestry and open mountain. The National Park includes Killarney House and grounds and lands surrounding, but excluding, Muckcross House, which is operated by a Trust. Killarney National Park is readily accessible from Killarney town and includes numerous paths and roads which are used by jaunting cars, walkers and cyclists. It is the 2nd largest of the National Parks by area and is one of the largest properties covered under State indemnity.

The SCA would like to thank the staff of Killarney National Park who participated in the audit. Documentation forwarded to SCA in advance of the audit was of a very high standard. Throughout the audit there was a high level of knowledge demonstrated and the focus on health and safety was apparent in most areas. The following was noted during the audit that demonstrated conformance with a proactive RMS:

Positive comments & findings

- DHLGH have a Dept level Safety Statement in place which incorporates an Occupational Health and Safety Policy, dated 4 May 2023 and signed by the current Secretary General;
- NPWS also have a Safety Statement in place:
- 5.3 Leadership. Safety Statements outline responsibilities for:
 - Secretary General, DHLGH;
 - Assistant Secretary Heritage Division;
 - Dept H&S Manager;
 - Dept H&S Specialist;
 - Dept H&S Committee;
 - NPWS Line Managers;
 - Safety (Divisional) Managers;
 - Safety Regional Managers;
 - Asst Safety District Conservation Officers;
 - Safety Representatives;
 - Staff.
- 5.4 Consultation and Participation arrangements are as follows:
 - Dept H&S Committee, minutes were provided;
 - NPWS Central Safety Committee;
 - There are Senior management meetings which are attended by Safety Officer;
 - Safety Statement provides for each Division and large National Park to have local safety committees.
- 6. Planning:
 - NPWS SOPs were shared with audit team covering general operative, office and field work;
 - DHLGH have a central Hive for accessing documentation and SOPs;
 - Risk Assessments were shared for Rangers, GOs, general and office staff;
 - A comprehensive set of Certification of Lifting Equipment and machinery checks were shared with the Audit team;
 - Procedures are in place for:
 - Personal Locator Beacon (PLB) Usage in Emergency Situations;
 - Tetra Procedure in Emergency Activations;
 - Methodology for risk assessment is outlined in Part 8, NPWS Safety Statement;
 - Job Safety Plans are prepared as a final check to ensure identified controls for a specific work activity are in place before work commences.
- 7.2 Training is covered in:
 - Chapter 10 in NPWS Safety Statement;
 - 10.1, Competence, Training, Awareness and Induction in Dept Safety Statement;

- Training needs are identified in PMDS process;
 - Courses are organised centrally by NPWS.
- 8. Support:
 - Processes are outlined in SOPS, e.g. Lone Working, Pesticides, etc.;
 - Management of Change is outlined in Section 2.1 DHLGH Safety Statement;
 - The safety management system takes account of the Hierarchy of Controls; outlined on Page 21 of Dept Safety Statement;
 - 8.1.4 Re Outsourced processes, the following relevant documents were shared with the Audit Team:
 - Conditions attaching to the Granting of Permission to hold an Event within Killarney National Park;
 - Application to hold organised event within Killarney National Park;
 - Aide Memoire for Commercial Boating Permit within Killarney National Park;
 - Boating Permit application;
 - Commercial boating renewal application;
 - Jaunting car permit application;
 - Dinis Cottage Tea Room Concession License Agreement;
 - Rhododendron Clearance.
 - 8.1.5 A Tree Management Contractor was retained by Killarney National Parks, to undertake a hazard evaluation and condition assessment on the mature significant trees in proximity to public areas. where there may be potential works required.
 - 8.1.6 Contractor Management Procedures are outlined in:
 - Part 13 NPWS Safety Statement;
 - Requirements for Contractors Page 14 Dept Safety Statement.
 - 8.2 Fire and Emergency Planning is outlined as follows:
 - Part 5 Emergency Arrangements, Dept Safety Statement;
 - Part 12 Emergency Evacuation Procedures, NPWS Safety Statement;
 - KNP Fire Management Strategy 2023;
 - Wildfire Response Plan 2023.
 - During the visit to Killarney House, the Audit Team noted:
 - Good first aid and fire safety arrangements;
 - Good PAT testing procedures;
 - Didn't have a daily inspection sheet but in good condition and doing as part of work.
- 9.1.1 Monitoring and Review procedures were outlined in:
 - Part 14 Monitoring and Review NPWS Safety Statement;
 - Part 2 Performance Measurement and Monitoring Dept Safety Statement.
- 10.2 Procedures for Improvement were outlined in:
 - Dept Safety Statement Part 7, Dept Incident Reporting and Investigation;
 - NPWS Accident and Incident Procedure on Page 11.

2.0 Findings and recommendations

* Corporate level finding

Rec. No	Priority Level	Finding	Recommendation
4. Context of the organisation			
1	2	<p>While VSG methodology is outlined in the NPWS Safety Statement, no Visitor Risk Assessments were completed. NPWS stated that these were planned to be completed next year.</p> <p>Although this is a large site with wide variety in the level of visitor usage, there was no evidence that breaking the site into zones has been considered.</p>	<p>4.1 Visitor risk assessments should be developed for the principal visitor amenities.</p> <p>Consideration should be given to zoning the site in accordance with VSG guidance in order to prioritise resources.</p>
5. Leadership			
2	2	5.2 While the NPWS Safety Statement includes the NPWS National Parks and Nature Reserves Directorate Health and Safety Policy Statement, this is currently not signed. Neither this nor the Dept Safety Policy is on display at any of the locations visited.	5.2 A copy of the safety policy, signed by the Secretary General, should be displayed in a prominent location at visitor and staff facilities in all locations, to communicate the organisation's commitment to safety and health to staff, contractors, visitors, and other interested parties.
3	2	<p>Notwithstanding that there are Safety Committees at Dept and NPWS levels, there is no Safety Committee at Killarney National Park level.</p> <p>There is no evidence that any of the employees interviewed had seen or known about the NPWS and Dept Safety Statements.</p> <p>It is acknowledged that safety is discussed at team meetings. It should be formalised and minutes /actions documented.</p>	<p>A health and safety committee should be established that meets periodically to discuss and to review all matters as they relate to health and safety. It is an opportunity to review KPI performance of agreed objectives and to ensure continuous improvements of the safety management system.</p> <p>Records of meetings e.g. minutes should be taken and distributed to all members. There should be a structure put in place by NPWS to facilitate actions from such meetings being addressed and closed out.</p>
6. Planning			
4*	2	6.1.3 The Safety Statement does not include a documented procedure for identifying and accessing legal and other OH&S requirements and recording these in a legal register.	6.1.3 NPWS should have a structured approach to ensure that legal and other requirements can be identified and communicated accordingly. This should include processes for seeking out relevant applicable OH&S legislative or other requirements. This can be achieved using knowledge within the organisation and/or through external sources such as the Health and Safety Authority's (HSA) website. This could be made available through the NPWS Intranet.

Rec. No	Priority Level	Finding	Recommendation
5	2	6.2.1 While the NPWS Safety Statement does set high level objectives for the organisation, and places responsibility on Senior Managers to ensure that the safety, health & welfare policy and related objectives are established for their business unit which are compatible with the strategic direction of the NPWS, there were no health and safety objectives set out for this site.	6.1 Quantifiable and measurable OH&S objectives approved by senior management should be set annually and reviewed periodically to continually improve OH&S within Killarney National Park Examples include objectives to increase or reduce something that specify a numerical figure e.g., to achieve X% compliance on X training; X% of incidents to be investigated on NIMS; complete X% of risk assessments; fire drills completed, etc.
6	2	While Risk Assessments for Wildlife Rangers do consider livestock, the audit team could not locate any risk assessment for the farming activities on site, which include cattle management, cattle accommodation, management of farm buildings including slurry tank, etc. The proximity of cattle to visitors also needs to be risk assessed.	Risk assessment for farming activities, particularly in relation to management of cattle, need to be developed for the site.
7	2	A local Risk Register was not available on site and there was no clear process for raising items.	A local Risk Register should be developed for the site.
8	1	The Dinis Loop cycling route, which is a popular cycling route on the site is based on a one-way system; the last portion of the Loop takes cyclists on to the main Killarney-Kenmare Road, also part of the Ring of Kerry which is a very busy road. Many cyclists, in particular family groups decline to cycle on the main road and instead turn back against the recommended direction at this point; this has resulted in a number of bike accidents and subsequent claims.	This has been a long-standing issue and needs to be addressed by KNP and NPWS management. It will be difficult for the SCA to defend any future claims on this cycling loop without suitable remediation action. This should be included in the local Risk Register for the site.
Rec. No	Priority Level	Finding	Recommendation
7. Support			
9	2	7.2 While NPWS Safety Statement outlines required training competencies, interviews with staff members indicate that there is poor awareness of who holds these competencies, when qualifications have expired, etc. While individual courses are organised through the PMDS, this system does not provide the local manager with the means of checking currency of training and expiry dates of qualifications, in particular, mandatory qualifications which include: Safe Pass, Manual Handling, Fire Warden, plant operators, chainsaw, pesticide qualifications.	Training should be co-ordinated by a designated training co-ordinator with training records accessible by the local manager. A training needs analysis is required to ensure training is adequate for addressing current, new and refresher training requirements within the organisation, including a method of flagging when training is nearly due and overdue at a glance. This will support the training needs assessment process and further assist managers in determining the health and safety training requirements of their employees. Compliance with training should be reviewed on an on-going basis.

		Staff members interviewed stated that they were not aware of, nor had seen, current Dept and NPWS Safety Statement.	Staff members should be made aware of current Safety Statements and other relevant safety and health policies and procedures.
8. Operation			
10	2	<p>While KNP have a Wildfire Management Strategy and a Wildfire Response Plan, the Audit Team did not see Fire Registers nor any record of Fire Drills for Killarney National Park and the Ranger Base.</p> <p>The Audit Team did not see a bespoke Business Continuity Plan nor an emergency plan for weather related events.</p> <p>It was not clear how many fire wardens had been appointed or trained</p>	<p>A Fire Risk assessment should be conducted which should lead to the development for Fire Registers on all buildings and facilities under the control of Killarney National Park.</p> <p>This should also identify the requirement for Fire Wardens.</p> <p>Where NPWS personnel are working in Muckross House, responsibilities for fire safety should be agreed with the Muckross House Trust.</p> <p>Fire and evacuation drills should be held with the objectives of familiarising staff with their roles and identifying shortcomings in the procedures. Fire drills should be completed at least twice annually and a record of such maintained in the Fire Register.</p>
9. Performance Evaluation			
11*	1	9.1.1 There is no evidence of Internal Audits, regular monitoring, analysis, and evaluation of processes etc.	9.1.1 Management should determine what processes need to be monitored, analysed, and evaluated through an internal audit programme, regular monitoring, analysis, and evaluation of processes. The outcome of the monitoring and evaluation process should be discussed at health and safety meetings.

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