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# **CONSOLIDATED SAFETY CODE**

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Revision: 1.3

Adopted by the Committee 14/10/23  
To be re-issued no later than 14/10/26

**REVISION HISTORY**

Revision Number	Nature of Revision	Date of Adoption
1.0	First release.	04/10/18
1.1	Reworking of 3.5.3 to underline value of mobile phones. Max wave height included in 5.1.6. Additions to Generic Risk Assessment and new sections 7 and 8.6 to cover new club rowing machines.	29/11/18
1.2	Includes provisions for Covid-19	14/10/20
1.3	2023 Review which includes updating URL's and removal of provision for Covid-19. Risk Assessment	23/10/23

## North Berwick Rowing Club

### ACRONYMS

COLREGs	Collision Regulations; also known as IRPCS
DSC	Digital Selective Calling
EU	European Union
IRPCS	International Regulations for Preventing Collisions at Sea, also known as COLREGs
ITU	International Telecommunication Union
MAIB	Marine Accident Investigation Branch
MMSI	Marine Mobile Service Identity
NB	North Berwick
NBHTA	North Berwick Harbour Trust Association
NBRC	North Berwick Rowing Club
Ofcom	The Office of Communications
PPE	Personal Protective Equipment
RNLI	Royal National Lifeboat Institution
SCRA	Scottish Coastal Rowing Association
SOLAS	The International Convention for the Safety of Life at Sea
UK	United Kingdom
VHF	Very High Frequency

**TABLE OF CONTENTS**

**Contents**

<b>1 GENERAL POLICY</b>	<b>5</b>
1.1 Statement of Intent .....	5
1.2 Aims.....	5
1.3 NBRC Approach to Safety Management .....	5
1.4 Applicability .....	5
1.5 Document Control.....	6
1.6 Basis.....	6
1.7 Contacts .....	7
<b>2 RISK ASSESSMENTS</b>	<b>8</b>
2.1 General.....	8
2.2 General Risk Assessment.....	8
2.3 Bespoke Risk Assessments .....	8
<b>3 RESPONSIBILITIES</b>	<b>10</b>
3.1 All Members .....	10
3.2 Committee Members.....	10
3.3 Competent Coxes .....	11
3.4 Event/Activity Organisers.....	11
3.5 Marine VHF Owners/Users.....	11
3.6 Drivers (Boat Towing).....	11
3.7 Non-Members .....	12
<b>4 COMPETENT COX SYSTEM</b>	<b>13</b>
4.1 General.....	13
4.2 Powers and Responsibilities.....	13
<b>5 RULES FOR USE OF CLUB BOATS</b>	<b>15</b>
5.1 General.....	15
5.2 Planning: Rows within Local Waters .....	16
5.3 Planning: Rows Outside Local Waters.....	16
5.4 Planning: NBRC Events.....	16
5.5 Exemptions .....	16
5.6 Covid – 19.....	18
<b>6 1819</b>	
6.1 1819	
6.2 180	
6.3 180	
<b>7 191</b>	
7.1 191	
7.2 191	

North Berwick Rowing Club

<b>8</b>	202	
8.1	202	
8.2	202	
8.3	213	
8.4	213	
8.5	213	
8.6	224	
8.7	235	
<b>9</b>	236	
9.1	236	
9.2	236	
9.3	246	
9.4	247	
<b>10</b>	268	
10.1	.....	268
10.2	.....	268
10.3	.....	268
<b>SAFETY CODE APPENDIX: GENERAL RISK ASSESSMENT</b>		<b>29</b>

1.1.1

**ANNEXES**

- Annex 1: Incident Reporting Form
- Annex 2: Non-Member Form
- Annex 3: Passage Planning Template
- Annex 4: Risk Assessment Template
- Annex 5: Lifejacket Service Log
- Annex 6: Safety Equipment Service Log

# 1 GENERAL POLICY

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## 1.1 Statement of Intent

*North Berwick Rowing Club (NBRC) recognises that it owes a duty of care to protect the safety and welfare of its members and others who may be affected by its activities. To this end, NBRC is committed to ensuring that activities carried out by its members in relation to club activities are managed in such a way as to avoid, control or reduce to an acceptable level all foreseeable risks to health, safety and welfare.*

## 1.2 Aims

- 1.1.2 This policy aims to provide members with the means to undertake club activities in a manner that champions the highest levels of safety and competence, in accordance with Rule 2 of the Club Constitution.
- 1.1.3 This policy aims to uphold NBRC's duty of care to members, other water users and the general public by assessing and, so far as reasonably practicable, minimising the risks to people, property and the environment.

## 1.3 NBRC Approach to Safety Management

- 1.1.4 NBRC will assess the risks associated with club activities by means of formal risk assessments.
- 1.1.5 NBRC will write, promote and enforce appropriate club rules to safeguard people, property and the environment, and encourage best practice amongst its members.
- 1.1.6 Water-based activities will be undertaken under a 'Competent Cox' system, whereby a named person will accept overall responsibility for the safety of each boat in any given outing. Notwithstanding this, NBRC will promote a community approach to safety in which all members are empowered to act in the interests of their own safety and that of others.
- 1.1.7 NBRC will provide appropriate and adequate safety equipment necessary for members and non-members to undertake club activities safely. Boats and equipment will be maintained to a safe standard.
- 1.1.8 NBRC will investigate accidents and near-misses, learn from them where possible, and report them to a suitable authority where appropriate.

## 1.4 Applicability

- 1.1.9 This policy and the rules herein in will apply to all members and non-members using club boats and equipment, taking part in club activities, or otherwise representing the club at events.

- 1.1.10 Members are expected to uphold these rules (insofar as they apply) whenever representing NBRC in privately-owned boats; for example:
- a) when using the club name in application or entry documentation
  - b) when rowing in club branded clothing or otherwise “flying club colours”.

## 1.5 Document Control

- 1.1.11 This document forms the primary reference for all matters pertaining to safety. Wherever there is any disagreement or ambiguity between this document and any subsequent direction, instruction or communication, the standards set out in this policy shall take precedent. This document supersedes previous instruction.
- 1.1.12 Changes to the core standards laid out in this document may be made only through a formal update and re-issuing with Committee approval. A description of changes must be recorded and retained in the Revision History table.
- 1.1.13 This policy and associated safety documentation must be made freely available to all members and non-members on a publically-accessible area of the club website. This includes the following:
- a) Vulnerable Groups Protection Policy
  - b) Code of Conduct
  - c) Club Constitution
- 1.1.14 This document must be monitored and reviewed
- d) in accordance with changes in legislation or guidance
  - e) following any accident or near-miss which caused, or had the potential to cause, severe injury
  - f) in all other circumstances, at least every three years
- 1.1.15 The document owner shall be the incumbent Health & Safety Officer, who will be responsible for leading all reviews under the direction of the Committee.
- 1.1.16 The Revision History table at the front of this document is to be updated whenever a review is conducted. Details of changes are to be summarised; if there are none, the nature of revision should be recorded as ‘*Reviewed. No changes required.*’

## 1.6 Basis

- 1.1.17 The rules laid out in this document are not standalone, and are aligned with the requirements summarised below:
- a) International and national statute, including:
    - **MGN 610 (M+F) SOLAS chapter V: Guidance on the merchant shipping (safety of navigation) regulations 2020**  
which can be viewed at [MGN 610 \(M+F\) SOLAS chapter V: Guidance on the merchant shipping \(safety of navigation\) regulations 2020 - GOV.UK](#)

## North Berwick Rowing Club

*These are implemented into UK law under The Merchant Shipping (Safety of Navigation) Regulations 2002, which can be viewed at [The Merchant Shipping \(Safety of Navigation\) Regulations 2002](#)*

- **COLREGS/IRPCS**, which are outlined in Merchant Shipping Notice 1781 (M+F) at [The Merchant Shipping \(Distress Signals and Prevention of Collisions\) Regulations 1996](#)

*These are implemented into UK law under the Merchant Shipping (Distress Signals & Prevention of Collisions) Regulations 1996, which can be viewed at [The Merchant Shipping \(Distress Signals and Prevention of Collisions\) Regulations 1996](#)*

- **ITU Radio Regulations**
- b) Local harbour regulations and byelaws, including:
- **Management Rules for North Berwick Harbour**, which is provided at <https://www.nbharbour.org.uk/using-the-harbour/bylaws/>
  - **NBHTA Safety Management System Manual**, which is provided at <https://www.nbharbour.org.uk/using-the-harbour/safety-management-plan/>
- c) SCRA requirements, including:
- **SCRA Constitution**
  - **SCRA Rules of Racing**
- d) The **NBRC General Risk Assessment**, which is detailed in Section 2 and the Appendix

## 1.7 Contacts

1.1.18 Any matter pertaining to safety can be directed to the club's Health & Safety Officer, who is a member of the Committee and can be contacted as follows:

- a) The name of the current Health & Safety Officer can be found on the club website here: <http://j3.nbrowingclub.com/index.php/committee-members>
- b) Direct contact details, including phone number, can be found on the club website here: <http://j3.nbrowingclub.com/index.php/members-directory>
- c) The Health & Safety Officer can be contacted by e-mail using the address below; however, urgent matters should be communicated by phone or in person.  
[committee@nbrowingclub.com](mailto:committee@nbrowingclub.com)

1.1.19 The coastguard may be contacted as follows:

- d) By phone:
- **999** (emergencies)
  - **01224 592334** (Aberdeen station)
  - **020 3817 2001** (Aberdeen Marine Office)
- e) By VHF radio on **Channel 16**.



## 2 RISK ASSESSMENTS

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### 2.1 General

- 1.1.20 The purpose of club risk assessments is to identify hazards and evaluate any associated risks arising from NBRC activities, enabling informed decisions to be taken to eliminate or minimise any risk of harm to those who may be affected.
- 1.1.21 All NBRC activities with significant associated risks should be conducted under the auspices of an appropriate risk assessment, which will ensure that suitable mitigations are applied. The only exception is activities conducted under the control of a professional external body (e.g. a gym), in which that body's rules simply need to be followed.
- 1.1.22 NBRC's approach to risk mitigation is generally governed by a 4-tiered approach, as follows:
- a) **Prevention**: These mitigations aim to prevent an incident from taking place and as such should be given the highest priority  
(e.g. *environmental limits, Competent Cox system, carriage of anchors and drogues*)
  - b) **Communication** (for water-based activities): The nature of the Mk II St Ayles Skiff (see 8.1.2) means that reliance has to be placed on outside help in case of swamping or inversion; these mitigations aim to ensure rapid communication with an external party able to provide assistance  
(e.g. *carriage of radios, distress flares*)
  - c) **Preservation**: These mitigations aim to limit the harm caused when an incident occurs  
(e.g. *lifejackets to extend survival time in the water, provision of first aid kits*)
  - d) **Investigation**: In cases where prevention fails, post-incident investigation will allow NBRC to learn from experience and prevent recurrences in future.

### 2.2 General Risk Assessment

- 1.1.23 NBRC operates primarily under the *NBRC General Risk Assessment*, which is contained in the Appendix of this document. The necessary risk mitigations are incorporated in general club rules within this document.
- 1.1.24 The scope of the *NBRC General Risk Assessment* is limited to the following:
- a) training, pleasure, social and expedition rowing in North Berwick and elsewhere
  - b) attendance at externally-organised events, regattas and navigations
  - c) routine maintenance of boats and equipment

### 2.3 Bespoke Risk Assessments

- 1.1.25 The following is outwith the scope of the *NBRC General Risk Assessment* and will require the creation of a bespoke risk assessment on a case-by-case basis:
- a) organisation of competitive events hosted by NBRC
  - b) any activity, on or off the water, that introduces significant new risks or increases existing ones beyond the scope considered in Section 2.2.2

1.1.26 A bespoke risk assessment may take any generally accepted form; the template in Annex 4 provides guidance on an acceptable approach.

## 3 RESPONSIBILITIES

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### 3.1 All Members

- 1.1.27 Each member has a Duty of Care to ensure that their actions both on and off the water do not compromise the welfare of others. Furthermore:
- a) It is the responsibility of every member to act in accordance with the rules laid out in this document.
  - b) Nothing in this policy removes the normal requirements on all members to act in a safe manner, and to take care that their actions do not endanger others.
- 1.1.28 Members shall promptly report any damage or defects found in any club boat or item of safety equipment; this includes the deployment (intentionally or accidentally) of club lifejackets.
- 1.1.29 Members are individually responsible for any personal safety equipment they choose to use in lieu of club-owned equipment, and shall ensure that they are maintained to a safe standard.
- 1.1.30 Members shall equip themselves appropriately for club activities, giving consideration to the possibility that they may last longer than planned. Consideration should be given to clothing, water, food and medication.
- 1.1.31 Members shall be responsible for informing the Competent Cox any special requirements or medical conditions of which he/she should be aware in the interests of the safety of that individual and/or the boat and crew.
- 1.1.32 Whilst on any water-based club outing, Members shall:
- c) obey the orders of the appointed Competent Cox; however they are also expected to:
  - d) challenge any decisions they perceive may be unsafe or ill-judged.
- 1.1.33 Members are expected to look after their own health and avoid subjecting themselves to physical exertions that are likely to be harmful. All rowers should be encouraged to row on both sides of club boats to encourage even development.

### 3.2 Committee Members

- 1.1.34 The Committee shall be responsible for ensuring that the club's above-mentioned duty of care is upheld. This will include, in part, the promotion and enforcement of the rules listed herein.
- 1.1.35 The Committee shall promote a safety culture.
- 1.1.36 The Committee shall actively encourage the development of skills necessary to navigate a small boat safely.

1.1.37 The following Committee members shall uphold specific additional duties; in the event that any of these Committee positions are unfilled, the Committee shall ensure that the duties are appropriately delegated:

- a) The Committee shall be responsible for ensuring that the club's boats, rowing and steering apparatus are maintained to a safe standard.
- b) The Committee shall be responsible for ensuring that all other items of club safety equipment are maintained to a safe standard; this will include club lifejackets, anchors, drogues and the contents of the safety boxes.

### **3.3 Competent Coxes**

1.1.38 Competent Cox responsibilities are detailed in Section 4.1.

### **3.4 Event/Activity Organisers**

1.1.39 Members organising club activities shall be responsible for consulting with the Committee to ensure that an appropriate risk assessment is in place, if required (see Section 2.3).

### **3.5 Marine VHF Owners/Users**

1.1.40 All owners of portable handheld VHF or VHF DSC radios shall be responsible for ensuring that the device is legally registered through Ofcom by obtaining a Ship Portable Radio License and MMSI number.

1.1.41 All users of VHF or VHF DSC radios must either:

- a) hold an appropriate radio qualification (e.g. Short Range Certificate), or
- b) act under the direct supervision of a qualified operator.

1.1.42 Any person relying on a VHF or VHF DSC radio for safety purposes should be aware of the limitations of this equipment. The nearest coastguard relay masts to North Berwick are at Fife Ness and Craiggelly and beyond the design range of handheld sets; over these ranges, signals can be temperamental – especially in the shadow of Craigleith. Mobile phones can provide useful backup to contact the Emergency Service or to make direct contact with the Coastguard (see Section 1.7.2a).

### **3.6 Drivers (Boat Towing)**

1.1.43 Whenever a club trailer/boat is towed, the driver shall be responsible for ensuring that the trailer, the skiff and its contents are appropriately secured.

1.1.44 The driver shall be responsible for ensuring that he/she and the towing vehicle are appropriately licensed/certified, and that lights and registration plates are appropriately displayed.

### **3.7 Non-Members**

1.1.45 Non-members participating in NBRC activities are expected to cooperate with members and obey all safety instructions and to complete a non-members form.

## 4 COMPETENT COX SYSTEM

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### 4.1 General

- 1.1.46 When on the water, every club skiff requires a named person who is ultimately responsible for that boat and its crew. In NBRC, this is controlled using the Competent Cox system.
- 1.1.47 Competent Cox requirements are driven by the following:
- a) The need to uphold legislative requirements (in particular SOLAS V and COLREGS/IRPCS), and identify the individual(s) responsible for doing so. The position of Competent Cox is to be considered synonymous with Master, Skipper or Captain.
  - b) The North Berwick Harbour Trust's *Management Rules for North Berwick Harbour 2017*. (The Competent Cox is the 'Master', as defined in Section 1.3.1 of that document).
  - c) The *NBRC General Risk Assessment*, which considers a Competent Cox to be a suitably able person to mitigate against risks resulting from improper navigation.
- 1.1.48 Any member of NBRC who is aged 16 years or over may become registered as a Competent Cox by requesting that their name be added to the club list of Competent Coxes. In doing so, they:
- d) declare that they are sufficiently capable to take on the duties of a Competent Cox (as described within this document)
  - e) agree to accept the responsibilities described within this document
  - f) commit to retaining, improving and passing on coxing skills
- 1.1.49 The inclusion of a member as a Competent Cox is neither assessed nor approved, but is based on self-assessment of ability and agreement to accept the responsibilities of the role. Notwithstanding this, the Committee reserves the right to require a Member to step down as a Competent Cox and gain further experience in the event it becomes apparent that there are significant gaps in his/her competencies.

### 4.2 Powers and Responsibilities

- 1.1.50 The appointed Competent Cox shall accept responsibility as Master of the Vessel including all aspects pertaining to planning, navigation and safety. His/her safety responsibilities will take priority over all other concerns, including those pertaining to racing.
- 1.1.51 The exact demands placed on a Competent Cox will depend on the nature of a given outing, but may include the following:
- a) steering and navigation, including manoeuvring in confined spaces and in close proximity to other water-users (kayaks, sailing dinghies, leisure craft, commercial vessels, etc.)
  - b) assessing local conditions (tide, wind, haar, swell) and planning outings

## North Berwick Rowing Club

- c) directing use of safety equipment, including lifejackets, anchors, drogues, towlines, flare, compass, VHF radio, etc.
- 1.1.52 The Competent Cox will have absolute discretion to take decisions in the interests of safety, and nothing shall absolve him/her of that right. His/her decision to cancel, postpone or end an outing for which he/she has accepted responsibility may be taken at any time and must be respected.<sup>1</sup>
- 1.1.53 The Competent Cox shall obey and enforce (as required) all relevant international/national laws, local byelaws and SCRA/NBRC rules; this will include the following<sup>2</sup>:
- d) SOLAS V (including lifesaving signals, danger messages, distress messages, passage planning and misuse of distress signals)
  - e) COLREGS/IRPCS (steering and sailing rules, sound and light signals)
  - f) ITU Radio Regulations (if a VHF radio is carried aboard)
  - g) Any other such rules or laws as are applicable, including any local byelaws.
  - h) SCRA Rules of Racing, or any other racing rules that may apply at a competitive event
- 1.1.54 The Competent Cox shall be responsible for ensuring that outings are planned and conducted in accordance with these rules, and instructing any Non-Members in their responsibilities.
- 1.1.55 All Competent Coxes who expect to be coxing at an event for which a formal coxes' briefing is provided shall be obliged to attend.

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<sup>1</sup> This rule has its basis in SOLAS Regulation 34-1

<sup>2</sup> Competent Coxes are not expected to know all rules and regulations by heart, but should know how and when they apply and have a sufficient working knowledge to be able to follow them if circumstances require.

## 5 RULES FOR USE OF CLUB BOATS

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### 5.1 General

- 1.1.56 Responsibility for any given outing must be taken by one of NBRC's listed Competent Coxes. There must be one Competent Cox for each club boat on the water.
- 1.1.57 To allow for the training of new coxes<sup>3</sup>, the Competent Cox may sit outside the cox's seat on the condition that:
- he/she is aboard the same skiff,
  - the skiff is not engaged in racing, and
  - he/she is in such a position as to manage all of his/her responsibilities with due regard to the conditions and circumstances; this will usually be stroke position.
- 1.1.58 One of the following emergency communication methods must be adopted for every outing:
- a licensed, operational VHF radio and qualified operator is aboard
  - a 'shorewatch' is used – a person ashore maintains visual contact with the skiff and has the means to communicate with the crew (e.g. by mobile phone)
  - in the case of multiple-skiff outings or rows under escort, at least one vessel has a licensed, operational VHF radio and qualified operator aboard AND the vessels stay within hailing distance of each other.
- 1.1.59 All crew members and passengers must wear appropriate personal buoyancy, properly fitted, and know how to use it. (See Section 8.4 for details of approved lifejackets and buoyancy aids.)
- 1.1.60 The following safety equipment is to be carried at all times (see 8.2.1 for full details):
- 2x bailers
  - safety box
  - towline
  - anchor and line (except during certain races<sup>4</sup>)
- 1.1.61 Skiffs must not be taken out in the following conditions:
- above Beaufort Force 5 (21 knots)<sup>5</sup>, except where localised shelter brings windspeed and sea conditions down to an acceptable level
  - visibility of less than 1000 metres<sup>6</sup>, except within the limits of North Berwick Bay at the Competent Cox's discretion

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<sup>3</sup> The purpose of Rule 5.1.2 is to allow the development of coxing skills, and trainee coxes should be offered reasonable experience and coaching from the designated Competent Cox. They are not there simply to steer the boat.

<sup>4</sup> The anchor is required under the Measurement Rules, but may be removed for races if the organiser gives explicit permission.

<sup>5</sup> The Beaufort Scale uses mean windspeeds, usually measured over a 10 minute period. Gusts may exceed stated values.

<sup>6</sup> This is approximately the distance from North Berwick Harbour to Craigleith.



- m) breaking swell, under any circumstances
- n) wave heights greater than 1 metre
- o) between the times of sunset and sunrise

1.1.62 Within North Berwick, all skiffs are to observe a 3-skiff-length exclusion zone around the High Pier, in accordance with harbour byelaws. Entry into the inner harbour should be attempted only in an emergency.

1.1.63 Boats are to avoid directly approaching seals, dolphins, porpoises and other such wildlife. No landings on Fidra are to be conducted during nesting season.

## **5.2 Planning: Rows within Local Waters**

1.1.64 Local rows are those that take place within Local Waters; these are considered to be bounded by Fidra to the west and the Bass Rock or St Baldred's Cross to the east, and also encompassing Craigleith and all waters within 100m of these islands (to allow for circumnavigations).

1.1.65 The Competent Cox is not required to submit a written passage plan for local rows, but must conduct an assessment of the conditions and their impact on the proposed outing prior to heading out; this will include:

- a) tide times
- b) windspeed and direction
- c) visibility
- d) sea state and swell
- e) Alternative landing sites along the route

## **5.3 Planning: Rows Outside Local Waters**

1.1.66 Any non-competitive row wholly or partially outside Local Waters is considered to be a non-local row and is governed by this section.

1.1.67 Non-local rows are to be governed in one of two ways:

- a) in the case of regattas and organised expedition or pleasure rowing events with independent rescue cover, by whatever rules and requirements are imposed by the hosting club;
- b) in all other cases, by means of a written passage plan.

1.1.68 The template in Annex 3 may be used to assist in the creation of a passage plan. Passage plans are to be submitted to the Committee for reference.

## **5.4 Planning: NBRC Events**

1.1.69 Any event in which an NBRC member has taken an organisational lead on behalf of the club is considered to be an NBRC Event. The following requirements apply in addition to the General rules in 5.1.

1.1.70 All NBRC Events in which non-members (including rowers who are members of visiting clubs) are to be engaged in any form of water-based competition must be risk assessed.

1.1.71 A passage plan must be produced for any non-competitive expedition or pleasure rowing events taking place wholly or partially outwith Local Waters.

## **5.5 Exemptions**

1.1.72 In exceptional cases, exemptions to Section 5 rules may be granted by the Committee, subject to the terms of this section. This is intended to allow sufficient flexibility to prevent rows outwith the anticipated scope of this section from being blocked by unnecessarily strict adherence to these rules.

1.1.73 For an exemption to be considered, the following must all be satisfied:

- a) it is impossible or impracticable for the proposed outing to take place without the granting of the exemption
- b) a bespoke risk assessment has been carried out and appropriate mitigations applied if appropriate

1.1.74 Exemption requests will be assessed on a case-by-case basis, and explicit approval granted in writing by the Committee.

## **6 WORKSHOP ACTIVITIES**

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### **6.1 Scope**

- 6.1.1 The rules in this section are intended to govern activities associated with the maintenance of NBRC boats and ancillary equipment, including:
  - 6.1.1.1 removal and renewal of surface coatings
  - 6.1.1.2 removal, repair, replacement, fabrication and installation of boat equipment (pins, seats, footrests, rudders, tillers, oars, etc)
  - 6.1.1.3 rectification of damage in way of hull planking and primary structure
- 6.1.2 The scope will include the use of the following tools and equipment:
  - 6.1.2.1 hand tools (saws, planes, spokeshaves, chisels, hammers, screwdrivers, etc)
  - 6.1.2.2 handheld power tools (drills, sanders, planers, electric screwdrivers, etc)
  - 6.1.2.3 hand abrasives (sandpaper)
  - 6.1.2.4 solvents and chemicals (varnish, paint, primer, spirits, resins, etc)
- 6.1.3 Work that is outwith the scope above, or will involve use of substantially different equipment (including fixed power tools) must be risk assessed.

### **6.2 Workshop Rules**

- 6.2.1 Work shall be undertaken under the direction and supervision of a competent member of the Boat Maintenance Group or another suitably experienced member.
- 6.2.2 A first aid kit shall be kept readily available.
- 6.2.3 Appropriate face/respiratory protection must be worn for all sanding activities.
- 6.2.4 Power tools must only be operated by suitably experienced individuals, and appropriate personal protective equipment (PPE) is to be worn (e.g. eye protection).
- 6.2.5 Solvents must only be used in appropriately ventilated spaces.

### **6.3 Use of Chemicals and Solvents**

- 6.3.1 Where practicable, non-harmful substances should be used in lieu of harmful ones. However, it is recognised that this will not always be possible.
- 6.3.2 Harmful substances are to be stored appropriately and in accordance with the manufacturers' instructions.

## **7 INDOOR ROWING MACHINES**

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### **7.1 Scope**

7.1.1 The rules in this section are intended to govern activities associated with use of indoor rowing machines as part of an NBRC activity; for example:

7.1.1.1 use of NBRC-owned rowing machines

7.1.1.2 use of privately owned rowing machines by other members as part of a club activity (e.g. augmenting NBRC machines with privately owned ones to increase availability during a session)

7.1.2 Activities conducted under the jurisdiction of a professional external body using their own equipment (e.g. a gym), do not fall within this scope (see Section 2.1.2).

### **7.2 Rules**

7.2.1 Members are required to dress appropriately, bring adequate water, and carry any personal medication that may be necessary.

7.2.2 Members shall take individual responsibility for ensuring their own safety and wellbeing whilst using indoor rowing machines by conducting appropriate warm-ups and employing correct indoor rowing technique. New users must seek instruction from experienced Members.

7.2.3 All users should check that their machine is in good working order before use.

7.2.4 A first aid kit is to be kept readily available at all club indoor rowing sessions.

7.2.5 Any Member using a club rowing machine unaccompanied is required to:

7.2.5.1 notify a responsible person of their intentions and when they expect to return,

7.2.5.2 confirm with that person when they have finished, and

7.2.5.3 carry a mobile phone.

## 8 EQUIPMENT

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### 8.1 NBRC Boats

- 8.1.1 NBRC owns three Mk3 St Ayles Skiffs designed by Iain Oughtred and built by members using kits supplied by Alec Jordan:
- 8.1.1.1 St Baldred (05), launched May 2010
  - 8.1.1.2 Skiff John B (07), launched August 2010
  - 8.1.1.3 Blackadder (61), launched May 2014
- 8.1.2 The Mk3 St Ayles Skiff does not satisfy the reserve buoyancy requirements of the EU *Recreational Craft Directive*. Such buoyancy, if fitted, is intended to permit the crew to self-recover in the case of an inversion. Retrofitting of buoyancy has not been identified as a necessary mitigation in the *NBRC General Risk Assessment* for the following reasons:
- 8.1.2.1 the conditions in which an inversion is likely (breaking waves) make recovery without assistance impracticable; any such assistance should be concerned with rescuing the crew rather than the boat
  - 8.1.2.2 the locations in which an inversion is most likely (near shore and with assistance close at hand) make attempting self-recovery dangerous and unnecessary
- 8.1.3 Club boats are to be maintained to a safe standard under the direction of the Bosun and/or suitably experienced Members.
- 8.1.4 Club boats may be withdrawn from service without notice for safety reasons on the authority of the Bosun, Health & Safety Officer or Convenor, to whom any urgent concerns should be addressed.

### 8.2 NBRC Boats – Safety Outfit

- 8.2.1 The following items of safety equipment are to be considered permanent and should be carried for all outings:
- 8.2.1.1 8m of 14mm rope for towing, affixed in the bow
  - 8.2.1.2 2x hand bailers
  - 8.2.1.3 rudder-freeing tool (device similar to a boathook, designed for clearing a fouled rudder)
- 8.2.2 The following items of safety equipment must be carried where required by Section 5
- 8.2.2.1 anchor with chain and 30m line with a combined weight of at least 7 kilograms
  - 8.2.2.2 safety box, as detailed in 8.5
  - 8.2.2.3 drogue
- 8.2.3 SOLAS V Regulation 19 requires the carriage of a radar reflector “if practicable”. Owing to the St Ayles Skiff’s small size and lack of a mast, this is deemed impracticable. The *NBRC General Risk Assessment* has not identified a radar reflector as a necessary mitigation.

8.2.4 Safety hardware is to be checked and/or serviced annually in accordance with the *Safety Equipment Service Log* in Annex 6.

### 8.3 Club Lifejackets

8.3.1 NBRC should hold a stock of lifejackets for use in its boats. They are to be:

8.3.1.1 of the waistcoat-type

8.3.1.2 150 classification

8.3.1.3 manually inflatable (*not* automatic); this is to mitigate against entrapment risk in case of an inversion

This does not preclude the use of alternative items of personal buoyancy as outlined in 8.4 on an individual basis.

8.3.2 Lifejackets are to be serviced in accordance with the manufacturers' instructions. A template *Lifejacket Service Log* is contained in Annex 5. If a service date expires, the lifejacket must be withdrawn from use until the service is renewed.

### 8.4 Approved Personal Buoyancy

8.4.1 Although the club provides lifejackets, individuals may choose to use their own.

8.4.2 The following may be considered acceptable at the discretion of the Competent Cox:

8.4.2.1 Foam Buoyancy Aids:

- Level 50 for competent swimmers only
- Level 100

8.4.2.2 Manual Inflatable Lifejacket:

- Level 150 (club-owned lifejackets are of this type)
- Level 275

8.4.2.3 Use of automatic inflating models is allowed, but users must be aware that they can present an entrapment risk in an inversion.

8.4.2.4 Use of 'bum bag' style lifejackets is allowed, but users must be competent swimmers and confident with how to don them if they find themselves in the water.

### 8.5 Safety Boxes

8.5.1 A box of general safety equipment is to be made available for each boat (Figure 1). This is to be kept sealed when not in use, and should not be used to store any of the crew's personal effects.



**Figure 1: Safety Boxes**

8.5.2 When aboard a skiff, the safety box is to be secured in such a way as to ensure it will not be lost in case of an inversion.

8.5.3 The safety box shall contain the following items:

- 8.5.3.1 boatknife
- 8.5.3.2 small first aid kit
- 8.5.3.3 2 x red handheld flares, within date
- 8.5.3.4 2 x orange handsmokes, within date
- 8.5.3.5 gloves, to be worn when firing flares
- 8.5.3.6 compass
- 8.5.3.7 signalling torch with charged batteries
- 8.5.3.8 throwing line
- 8.5.3.9 survival bag
- 8.5.3.10 laminated cards showing pilotage sketch of North Berwick and an illustrated table of lifesaving signals<sup>7</sup>

8.5.4 The safety box should be appropriately marked to indicate that it contains pyrotechnics.

8.5.5 The safety box must be serviced annually in accordance with the *Safety Equipment Service Log* in Annex 6.

## **8.6 Indoor Rowing Machines**

8.6.1 NBRC owns four *Concept2* indoor rowing machines for use by its members.

8.6.2 Club rowing machines are to be maintained to a safe standard under the direction of an appropriate person appointed by the Committee, and must be withdrawn immediately from service if deemed to be unsafe.

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<sup>7</sup> In accordance with SOLAS V Regulation 29

## 8.7 Miscellaneous

- 8.7.1 In addition to 8.5.3b), the club should also retain at least one additional first aid kit suitable for general use on-shore at regattas, boat maintenance and other such activities.
- 8.7.2 NBRC should retain a supply of fenders that may be used at the discretion of rowers and when required at events. They should be checked annually in accordance with the *Safety Equipment Service Log* in Annex 6.
- 8.7.3 Small hand paddles should be made available for events that are liable to require manoeuvring in confined spaces. They should be checked annually in accordance with the *Safety Equipment Service Log* in Annex 6.

# 9 SAFETY INCIDENTS

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## 9.1 Guiding Principles

- 9.1.1 NBRC aims to empower members to report adverse occurrences by fostering an environment in which events may be reviewed openly and without judgement. The sole aim will be the prevention of future accidents and, except so far as is necessary to achieve this, no attempt should be made to apportion blame.
- 9.1.2 The following definitions for reportable events shall be used:
- Accident: an unplanned occurrence that has caused injury to a person or damage to a boat or property.
  - Incident/near-miss: an unplanned occurrence that did not cause harm, but could have.
  - Undesired circumstance: a situation or set of circumstances that increases the risk of an accident or incident occurring.

## 9.2 Accident & Incident Reporting

- 9.2.1 All accidents, incidents and undesired circumstances should be immediately recorded using the form template in Annex 1, and reported to the Health & Safety Officer or another Committee member as soon as possible after the event. The onus does not lie on any one individual – all witnesses have a responsibility to ensure this is done.
- 9.2.2 In addition, the Harbour Master must be notified of any accidents or incidents that occur within the harbour area shown in Figure 2<sup>8</sup>.

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<sup>8</sup> In accordance with the NBHTA *Safety Management System Manual*



## 9.3 Rule Enforcement

9.3.1 The following (strictly non-disciplinary) action may be taken by a Committee Member to enforce the safety rules:

9.3.1.1 Club-Wide Reminder – sent to the whole membership

9.3.1.2 Individual Reminder – sent to those associated with a specific incident

9.3.2 Disciplinary action is to be considered the last resort for the most serious breaches of the rules laid out in this document. The Committee may take such action against infringements falling against any of the following criteria:

9.3.2.1 deliberate

9.3.2.2 reckless

9.3.2.3 repeated

9.3.3 The following disciplinary action may be taken by the Committee to enforce the safety rules:

9.3.3.1 Formal Notice – sent to those associated with a specific incident to highlight concern at Committee level

9.3.3.2 Initiation of Membership Termination Process – in accordance with Section 4 of the club constitution

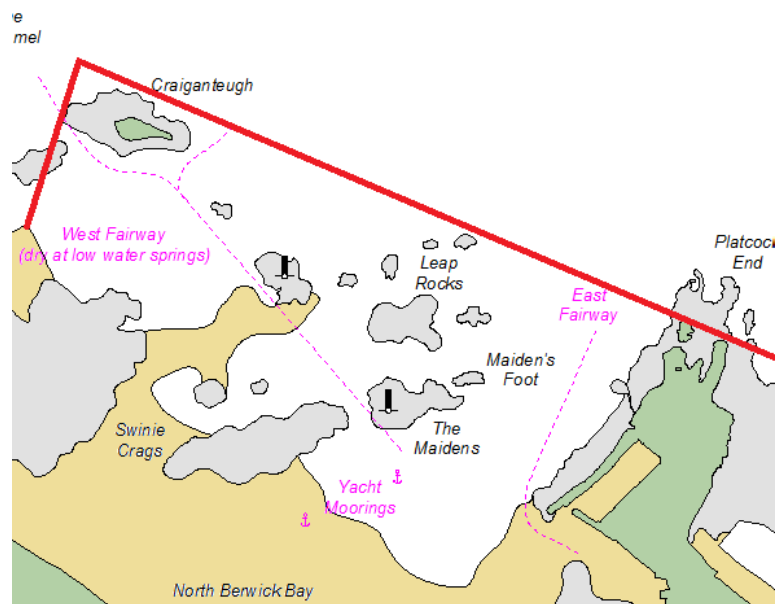


Figure 2: Harbour Area (South of Red Line)

## 9.4 Accident & Incident Investigation

9.4.1 The Committee shall make a judgement on the appropriate action to take following the report of any accident or incident. This may include instigating a more detailed investigation.

## North Berwick Rowing Club

9.4.2 The objectives of any such investigation will be to:

9.4.2.1 understand the circumstances of the incident

9.4.2.2 determine what lessons can be learned to prevent a recurrence

9.4.2.3 make a recommendation as to whether the SCRA should be notified

9.4.3 In the most severe cases, it may be appropriate to send an immediate notification to the SCRA and/or Marine Accident Investigation Branch (MAIB). This should be decided on a case-by-case basis by the Committee as soon as possible after the accident or incident has occurred.

## **10 HUMAN FACTORS**

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### **10.1 Minors and Child Protection**

- 10.1.1 No person under the age of 13 may row in a club boat, though they may travel as a passenger at the Competent Cox's discretion.
- 10.1.2 Parental consent must be obtained prior to the acceptance of membership from any person under the age of 18; an emergency contact is to be provided along with a summary of any medical conditions.
- 10.1.3 The Committee and all members shall operate under the terms of the club's Vulnerable Groups Protection Policy.

### **10.2 Non-Members**

- 10.2.1 Non-members must provide an emergency contact prior to any outing.
- 10.2.2 Parental consent must be obtained prior to any person below the age of 18 being taken out; an emergency contact is to be provided along with a summary of any medical conditions.
- 10.2.3 There is to be at least one experienced rower for each inexperienced rower in the boat.

### **10.3 Bullying & Harassment**

- 10.3.1 The Committee and all members shall operate under the terms of the club's *Code of Conduct*.



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**SAFETY CODE APPENDIX:**  
**GENERAL RISK ASSESSMENT**

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## North Berwick Rowing Club

The *NBRC General Risk Assessment* uses a risk matrix approach. A total of 55 health, safety and environmental risks have been identified, and each is assessed in terms of its likelihood and severity using a 1-5 rating system. Guideline metrics are summarised in the tables below.

Risk Likelihood	Metric
1 Very Low	Not likely to occur anywhere in the rowing community within a 5-year period
2 Low	Not likely to occur in the club in a 5-year period, though may happen in the rowing community
3 Medium	Likely to occur at least once in the club in a 5-year period
4 High	Likely to occur in the club at least once a year
5 Very High	Regular occurrence, likely to happen multiple times a year

Risk Severity	Example Metrics				
	Physical Harm to Person(s)	Physical Damage to Vessel(s)	Harm to the Environment	Harm to Reputation	Assistance Required
1 Very Low	Nothing worse than minor knocks, bumps and bruises	No damage beyond normal cosmetic wear-and-tear	None	None	None
2 Low	Incidental injuries requiring, at most, minor first aid	Damage requiring repair, though not requiring immediate removal from service	Incidental environmental failure with minimal impact	Not discussed beyond involved parties and committee if appropriate	
3 Medium	Injury requiring first aid and medical attention/check-over once ashore	No immediate threat to crew, but requiring boat to be taken out of commission for repair	Breach of environmental regulations or byelaws; agitation of wildlife	Becomes common knowledge circulated within club and harbour communities	Request for general assistance, including Pan-Pan
4 High	Injury requiring hospital treatment	Damage affecting seaworthiness and causing concern for the safety of the crew	Significant distress to wildlife; release of harmful substances	Discussed across wide rowing community; possible interest by external agencies	Urgent call for help, including Mayday
5 Very High	Injury liable to be life-threatening or life-changing in nature	Loss or major damage requiring an insurance claim against the vessel		Reporting in local and possibly national press; likely interest by external agencies	

The total risk for each hazard is quantified by multiplying the Severity and Likelihood values together. A ‘traffic light’ system helps identify whether or not a given risk level can be tolerated, as shown.

		Severity				
		1	2	3	4	5
Likelihood	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5

	Tolerable
	Tolerable if risk cannot reasonably be lowered further
	Intolerable

Each risk is first assessed prior to the application of any mitigations (control measures). In instances where the risk level is not tolerable, appropriate control measures are applied to reduce likelihood, severity or both. The residual risk is then assessed to verify that the control measures bring the risk down to a level that can be accepted. In no circumstance will a risk of 12 or above be deemed acceptable.

### [General Risk Assessment](#)

A summary of the numbered mitigations is provided below. These have been elaborated upon where it was impracticable to record full details within the confines of the risk assessment table.

1. Competent Cox to be aboard for all outings; this will be a person of sufficient ability to mitigate against risks resulting from improper navigation, instruction or planning
2. VHF to be carried or a shore watch in place at all times
3. boats not to go out above Beaufort Force 5
4. lifejackets to be worn
5. club lifejackets to be non-automatic
6. bailers to be carried
7. boats not to go out in building or breaking swell in the fairway
8. drogue to be carried
9. first aid kit to be carried
10. lookout to be made in accordance with SOLAS regulations
11. adherence to COLREGS
12. adherence to racing rules set by SCRA, where applicable
13. tool for freeing rudder carried
14. knife to be carried
15. boats not to go out in visibility of less than 1 kilometre (approximate distance to Craighleith)
16. compass & signal torch to be carried
17. no night rowing (between sunset and sunrise)
18. anchor and appropriate rope to be carried
19. Competent Cox to be in cox's seat in races
20. race organiser's rules to be followed
21. coxes required to attend briefings at rowing events, if provided
22. written passage plans to be conducted for non-local rows
23. throwing line to be carried
24. crew responsible for carriage of personal medication, as required
25. crew responsible for disclosing any pertinent medical conditions to Competent Cox
26. no under-13s to row
27. members encouraged to row on both sides
28. survival bag to be carried
29. crew to carry adequate water for all outings
30. crew to be properly dressed/equipped for all outings
31. in-date flares to be carried
32. flare instructions to be legible
33. gloves providing hand protection during firing of flares to be carried
34. safety boxes to carry explosives marking
35. Bosun responsible for boat maintenance
36. skiffs to be taken out of service if deemed unsafe
37. annual servicing regime for club lifejackets
38. members responsible for servicing their own lifejackets, should they choose to have them
39. safety equipment defects to be reported
40. annual servicing regime for boat safety hardware
41. annual servicing regime for safety boxes and contents
42. responsible person to direct work during workshop activities
43. first aid kit to be available for shore-based activities with injury potential
44. only suitably experienced persons to operate power tools
45. non-harmful substances to be used where practicable

## North Berwick Rowing Club

46. hazardous substances to be stored in appropriate containers
47. appropriate protective equipment to be worn when using tools (e.g. eye protection)
48. respiratory protective equipment to be worn when sanding
49. tower (driver) responsible for checking towing arrangements
50. tower (driver) to be appropriately licensed
51. vehicle to be appropriate for towing
52. rules of professional external bodies (e.g. gyms) to be followed
53. require risk assessments where applicable
54. bullying and harassment policy; this is contained within the club's *Code of Conduct*
55. Vulnerable Groups Protection Policy
56. named person / health & safety officer to action concerns
57. directly approaching seals, dolphins & porpoises forbidden
58. no Fidora landings during nesting season
59. new rowing machine users to seek instruction from experienced members
60. appropriate warm-ups to be conducted
61. any lone (unaccompanied) users of indoor rowing equipment to notify responsible person of intentions and carry mobile phone
62. correct functioning of rowing machines to be checked prior to each use
63. rowing machines to be maintained by designated person
64. rowing machines to be taken out of service if deemed unsafe

The mitigations identified as part of the risk assessment process have been incorporated into the appropriate sections of this *Safety Code* document. Alterations may be made only in accordance with Section 1.5.

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