

Procedure

Subject	Testing of Emergency Preparedness and Response (SMP 4.9.1)
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1- Ammendment Record

Issue No.	Page No.	Amendment Details	Amended By	Issue Date

2- Purpose

The procedure identifies the specific arrangements in place for testing Emergency Preparedness and Response.

3- Scope

The scope of this procedure covers all testing against The Royal Mint Emergency Management Plan and not plans created by any external organisation.

4- References

The Control of Major Accident Hazard Regulations 1999 (COMAH) and subsequent amending legislation places duties on upper tier COMAH operators to: prepare an adequate internal emergency plan; review and test emergency plans.

5- Roles and Responsibilities

5.1 Head of Security.

The Head of Security will be responsible for putting in place a testing regime that covers the site fire alarms (fire alarm drills).

5.2 Environmental Manager

The Environmental Manager will be responsible for putting in place a testing regime that covers internal testing of The Royal Mint's on site emergency plans.

5.3 Process Safety Manager

The Process Safety Manager will be responsible for putting in place a testing regime that covers statutory testing of The Royal Mint's emergency plans.

5.4 SHE Team

The SHE team members will act as nominated observers to assess the testing, paying attention to the appropriateness of actions, the behaviour of employees and any problems which may arise during the exercise.

6- Procedure

For the purposes of this procedure there are 3 distinctive types of testing that take place.

6.1 Fire Drills

In order to fulfil its legal obligations and in accordance with all fire safety regulations, The Royal Mint should conduct at least one fire drill per year in each area of The Royal Mint but where possible there will be two in each area each year.

Throughout the drill, nominated observers should:

- Keep an eye out for any inappropriate behaviour, such as stopping to collect coats, bags and other personal belongings.
- Closely observe any difficulties experienced by people with disabilities, such as an inability to get out of an exit or get down stairs easily.

- Make sure employees are using the nearest fire escape route, rather than just the exit they are most familiar with.
- Pay attention to any difficulties experienced as a result of the chosen escape routes, such as doors being difficult to open or exits being blocked.

Following the drill, the results of each fire drill should be recorded in Q Pulse including such points as:

- A log of all details of the fire drill, including how the evacuation procedure went and any inappropriate actions or problems which were noted as a result.
- Any significant findings of the drill should be recorded.
- If identified a review of the Fire Risk Assessment.
- Remedial action deemed necessary, such as the installation of additional fire safety signs or fire alarms.

6.2 Testing on-site emergency plans

The purpose of the emergency plan testing is to give confidence in the accuracy, completeness and practicability of the plan.

The Royal Mint will endeavour to carry out a monthly test of an element of the Emergency Plan in various areas of the site covered by the Emergency Plan.

Testing of the emergency plan may consist of a live exercise or a table-top exercise including the communication arrangements. The testing of other components should demonstrate whether the plan can be put into effect successfully.

Following each test exercise, there will be a debrief to understand any if any changes are required to the emergency plan. The results of each test should be recorded in Q Pulse including such points as:

- A brief description of the scenario used, including how the exercise went and any problems which were noted.
- Any significant findings of the test should be recorded.
- If identified a review of the Emergency Plan to be undertaken.
- Any remedial action deemed necessary.

6.3 Statutory testing of emergency plans

COMAH 1999 Regulation 11 requires that a 3-year emergency plan testing cycle is in place.

The objective of testing the emergency plan should be to give confidence in the following elements of the plan:

- The completeness, consistency and accuracy of the emergency plan and other documentation used to respond to an emergency.
- The adequacy of the equipment and facilities, and their operability, especially under emergency conditions.
- The competence of staff to carry out the duties identified for them in the plan, and their use of the equipment and facilities.

The test should be such that it shows that people following the emergency plan could cope with the range of accidents that could occur. The testing should give an indication of the conditions that may exist on and off the establishment in the event of an emergency. It should also show that the plan would work as proposed: controlling and mitigating the effects of an accident; communicating the necessary information; and initiating the measures which should lead to the necessary restoration of the environment.

Testing should be based on an accident scenario identified in the safety report as being reasonably foreseeable. Tests should address the response during the initial emergency phase, which is usually the first few hours after the accident occurs.

Statutory testing will generally be via a live exercise of one of the major accidents identified in the safety report. The exercise chosen will be prepared jointly and agreed by all the agencies expected to participate. There is also the option to test on-site and off-site plans at the same time.

The aims and objectives of test should always be made clear at the outset (both at the planning stage and on the day). The lessons learned should be passed to all the stakeholders involved.

Following any exercise there should be a period of evaluation to enable all the organisations to get the most out of their participation. The period of evaluation will generate reports that are recorded in Q Pulse and can include the following:

- Evaluation of the lessons learned.
- Determine whether modifications are required to the emergency plan.
- Modification to any onsite arrangements.
- Dissemination of information to the relevant organisations who need to be kept informed of progress on any actions.