

ANNUAL REPORT

Year ended 31 March 2024



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Executive Overview

Welsh Water is the sixth largest of the eleven regulated water and sewerage companies in England and Wales. Responsible for providing over three million people with a continuous, high-quality supply of drinking water and for taking away, treating and properly disposing of the wastewater that is produced we are fully committed to delivering best quality service at least possible cost. We look after 91 reservoirs and supply 850 million litres of water every day through a network of 26,500km of water mains. We also collect wastewater through a network of over 30,000km of sewers, which is treated at over 800 wastewater treatment works located next to rivers and along the coast of Wales. We operate, maintain, and upgrade these assets and their associated pumping stations. These essential public health and customer services are delivered by over 5,500 people who work either for Welsh Water or for one of our contract partners.

Ensuring the health, safety and wellbeing of all our employees, contractors and our communities is a key priority and a big responsibility.

The financial year ended 31 March 2024 (2023-24) saw us further improve our health and safety management systems and processes. It was the fourth year of our regulatory period ('AMP7') and we continued to implement our Health, Safety and Wellbeing Strategy – our Journey to Zero for 2020-2025. The strategy outlines five key areas for focus – Health and Safety Leadership, STEP and Colleague Engagement, Risk Management, Health and Wellbeing and Contractor Management. It identifies what we are aiming to achieve and how we will work with colleagues to get there. Each business function has developed their own health and safety improvement plan which is aligned to the strategy and is influenced by their previous health and safety survey responses and function specific risks.

SAFETY PERFORMANCE

In 2023-24 our overall safety performance has further improved on its existing high standard. We have continued to focus on preventing incidents and injuries and providing appropriate health and wellbeing support for our employees. This has resulted in a second year with our lowest ever number of HSE RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) reportable injuries. Of special note is the Water business that has achieved over 8 years without a RIDDOR reportable employee injury and also had no lost time injuries in the last year. The overall number of Lost Time Injuries (LTIs) has further reduced, and we are seeing low numbers of working days lost from injuries, with over half of these incidents resulting in 3 or fewer days off work.

We have continued to encourage our employees and contractors to make 'Positive Interventions' and take action where unsafe acts or conditions are identified. We place emphasis on these leading indicators as one precursor of a positive safety culture. We have continued to see a high number of near misses and positive interventions reported during the year.

It was good to see that there were no incidents in the last two years that met the criteria for reporting to the HSE as a Dangerous Occurrence under RIDDOR. There were some significant incidents and near misses reported. All these incidents were thoroughly investigated, and process changes/additional controls implemented, as appropriate. We will continue to encourage the reporting of significant incidents and will treat them seriously to ensure we are learning from them to effectively manage risks and prevent more serious events.

We have also continued to report and review any incidents involving customers and members of the public that have occurred during the year. We have seen an increase in visitors in the last few years alongside the increased number of Visitor Attraction sites and activities that we offer. We have also continued our education and communications programmes to highlight the risks from cold and deep water. Where our colleagues or contractors have been working in or near customer properties, we remain focussed on providing high standards of health and safety as part of our customer service.

While our safety performance has continued to show improvements, we cannot be complacent. We will continue to ensure that we are making positive interventions to prevent injuries and that all employees and contractors are actively involved in identifying improvements, as Safety Takes Every Person.

HEALTH AND WELLBEING PERFORMANCE

We have good support services in place with an occupational health service provider, an Employee Assistance Programme and our Wellbeing Champions to help managers and colleagues maintain health and wellbeing. We also provide I-ACT mental health and wellbeing training for managers. Along with support from Human Resources, these services enable managers to obtain information and advice to support employees with long and short term health conditions.

Post the Coronavirus pandemic, we have seen an increase in employee sickness absence. While there have been fewer individuals reporting mental ill health, some have more complex issues, and these are resulting in longer absences from work. Many of these issues are not work-related, but they impact on individuals' ability to work and/or be productive when in work. We have also seen an increase in other causes of sickness, such as colds, flu and other infections, as employees are being exposed again to viruses following a two-year period of reduced social interactions.

We are continuing to promote good health and wellbeing with both our employees and contract partners. We have used information from external bodies such as the HSE, Public Health Wales and IOSH to support this. Occupational health specialists, including ergonomists and occupational hygienists, have also been engaged where needed, to help review our risks and improve our controls.

OUR PROACTIVE APPROACH TO MANAGING HEALTH, SAFETY AND WELLBEING

The last annual review of our health and safety performance was held with Board members in June 2023. We were able to demonstrate good improvements against all the identified areas in our strategy and business plans. We have continued to report progress through our quarterly health and safety performance reports to the Quality and Safety Committee (QSC).

Some highlights during the last year have been:

Platinum and Gold Corporate Health Standard Revalidations

Our successful assessment by Healthy Working Wales and retention of these standards is a reflection of the focus we place on both colleague health and wellbeing and our contribution to wider society. It is unfortunate that Public Health Wales have discontinued this process and we will be looking to find an alternative scheme to help us benchmark and further improve.

Employee Engagement

Our last employee survey in November 2023 showed that colleagues value the emphasis we place on health, safety and wellbeing, and understand their role within this. We encourage managers to actively engage with their teams and colleagues to support each other and contribute to business improvements.

H&S Culture Surveys

Teams have used the findings from the HSL health and safety culture surveys to develop their local improvement action plans. During the year we have carried out many cross-business focus groups to obtain additional feedback and identify any areas for local or companywide focus.

2023 Health and Safety Conference and Awards

It was great to get 300 employees and contract partners together for this event to focus on health, safety and wellbeing. We had 59 entries for our annual health, safety and wellbeing awards and we were able to recognise the winners as part of this event.

Working with our Capital Contract Partners

We have continued to work closely with our contract partners. During 2023 activities included joint site visits, inspections, audits and H&S forums. 6 capital site safety days were held where Directors and senior managers visited a range of construction projects to review health and safety controls. There were focussed campaigns including work at height, hand injuries and avoiding service strikes and we have developed a new joint guidance note on service avoidance. We also hosted 4 capital contract partner H&S forums, and 528 construction site inspections took place during the year. This all helped to ensure the safe delivery of our construction and maintenance activities.

External Training and Continuous Professional Development

To ensure that we continue to maintain and develop our management systems, the health and safety team participated in an Eversheds led workshop focussed on effective incident investigations. The Process Safety Steering Group spent a full day with a consultant from Hastam looking at their role, individually and collectively in active process safety leadership.

SAFETY TAKES EVERY PERSON (STEP) — OUR HEALTH AND SAFETY CULTURE

In previous annual health and safety reports we have highlighted that we believe that we experience too many avoidable injuries. We recognise the importance of human factors as contributors to incidents and have continued to focus on improving our culture and behaviours. This is part of our Company Values and Code of Conduct.

We need to ensure we are identifying and addressing the root causes of incidents. Manual handling and slips, trips, falls are the causes of many injuries. In addition, situational awareness is important, with injuries being caused by contact with fixed and moving objects and vehicles. We are seeing some improvements. During 2023-24 a total of 108 injuries were linked to manual handling and slips, trips and falls; compared to 190 injuries in 2013-14.

We continue to develop and deliver our AMP7 STEP safety culture programme, including holding effective safety conversations and adopting a fair and just culture model. We also focus on those functions and activities where we are seeing injuries and ill health as part of our regular awareness campaigns and safety days.

GOVERNANCE

Our health and safety performance is detailed in reports which are reviewed by the Board and QSC. QSC also reviews and when appropriate, briefs the Board on significant incidents, near-miss reports and matters arising from the updates they receive. Within our management system, each tier of management (including the Board, Executive Directors, steering groups and consultative committees) has a responsibility to encourage a positive health and safety culture. We have used the Institute of Directors and HSE 'Leading Health & Safety at Work' guidance as a benchmark for Board engagement.

One area that we have particularly focussed on in the last two years has been our Visitor Attractions function. Following a long period of significant disruption due to the pandemic and several site and staffing changes these teams have been subject to a series of internal audits. These audits identified several areas for improvement, including a need to update and harmonise some of the site health and safety arrangements. A lot of work has been carried out by the teams to review and improve their procedures, with additional support from external expertise in the health and safety management of recreation activities.



We continue to place great emphasis on monitoring contract partner performance and ensuring we promote and share good practice across the business. This is reflected in this report which includes the performance of our main contract partners along with data from our wider contractor base. We encourage continuous improvement in the performance of all partners via regular meetings and sharing of information. Through these arrangements we aim to ensure a consistently high health and safety standard across all activities undertaken by or on behalf of Welsh Water.

PRIORITIES FOR 2024-25

The priorities for the next year are to continue to manage and monitor our health and safety risks while delivering further business improvements. We will focus on health, safety and wellbeing, supporting both colleagues and contract partners. This is especially important as we see more extreme weather events and also move from AMP7 to AMP8. We recognise the operational pressures of delivering our performance improvement plans alongside developing our arrangements for the next 5 years. This can have both a physical and psychological impact on individuals resulting in distractions and fatigue that can lead to incidents and injuries.

In addition, we will be reviewing our health and safety arrangements to support the next 5-year investment programme (AMP8). We need to engage suitable contractors to deliver our business improvement plans and will be increasing many of our activities and investments to address customer and regulator expectations.

We will continue with our STEP safety culture programme throughout 2024, reinforcing our approach of a fair and just culture, with effective health and safety engagement and conversations. This will include workshops, health and safety conversation masterclasses and employee focus groups. We will be launching a new e-learning package and materials for managers and STEP Champions to use with teams. We will also be carrying out our 4th HSL Climate survey to gain additional feedback that will help us to develop our AMP8 improvement plans.

We will be holding our 17th health and safety conference in Llandudno in June 2024 and will be recognising colleagues and contractors through our health and safety awards.

We will also continue to work with the HSE in Wales as our regulator. We actively support the HSE Strategy 'Protecting People and Places' and their campaigns such as their 'Working Minds' mental health campaign and 'Your Health, Your Future' construction campaign. We will be presenting on how employers can improve mental health and wellbeing in the workplace at the South Wales Safety Groups Alliance Annual Conference & Exhibition on the 17th April 2024 in Swansea. This event will be chaired by HSE and recognises the 50-year anniversary of the Health and Safety at Work Etc. Act 1974.

CONCLUSION

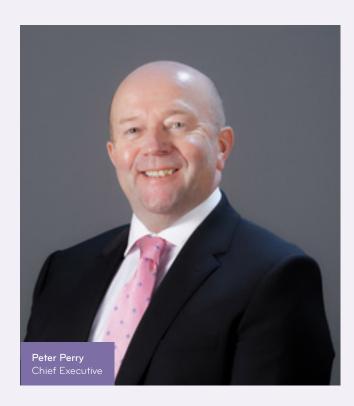
Our health and safety performance has continued to improve, and we have effectively managed our occupational health and safety risks to protect employees, contractors and members of the public. It has been particularly encouraging to see this during a year where we have continued to see operational challenges due to the impact of climate change and an increase in workload as we developed future performance improvement plans.

We have continued to focus on colleague health and wellbeing and this is a key driver of employee engagement within the company. This has been especially important as we have moved to hybrid-working mode post pandemic. There have been changed working patterns for many colleagues, who now spend part of their week working from home. While this has been welcomed by employees, it is important to ensure they don't feel isolated and have sufficient support to continue to perform effectively in their roles.

We are committed to delivering our AMP7 health and safety strategy, learning from others and working with the Health and Safety Executive and other regulators and the wider water industry. We have increased our focus on process safety alongside occupational health and safety as we recognise the need to also closely manage and monitor our high hazard sites and activities. We will continue to work with others in the industry to ensure that learning from any incidents is shared, lessons are learned, and we continually improve our controls.

47% of all our injuries last year were due to slips, trips and falls or manual handling and these risks still remain. We will continue to use the HSE climate survey tool, supported by focus groups, to seek feedback from colleagues and will work with teams to implement local health and safety improvement plans. By ensuring that all colleagues are actively engaged in making a difference we can continue to reduce the number of lost time injuries and to further improve our employees' health and wellbeing.

We maintain our value that Safety
Takes Every Person and our aspiration for 'Everyone, Safe, Healthy and Happy, Every Day'.



Review of performance 2023-24

This report details the occupational health and safety performance of Welsh Water, its contract partners and their main subcontractors in the twelve-month period that ended on 31 March 2024.

The report covers the following activities:

Asset Operation and Maintenance (all reservoirs, sewage/water treatment works and pumping stations, water and sewerage network systems including mechanical/electrical/instrumentation work/CCTV surveys)

Asset Investment (ownership/design/construction/refurbishment)

Sampling and Laboratory Services (water and sewage)

Customer Services (billing and income, credit management, call centre management and meter reading)

Meter Installations; and Provision and Maintenance of IT Systems

Commercial business functions and Visitor Attraction sites and activities

PERFORMANCE DATA

During 2023-24 we saw further improvements in our occupational health and safety performance.

The number of RIDDOR injuries reported to HSE during 2023-24 was 5. This was the same as last year, even though there were more people and hours worked in the year, and is the lowest it has ever been.

The total number of reported injuries was 229 (including 6 injuries due to road traffic incidents). There was a reduction in all injuries during 2 years of changed/ceased activities due to the pandemic. We are now back working in offices, visiting customer properties, and have reopened (and expanded) our Visitor Attraction sites, resulting in a rise in the number of minor injuries being reported. Overall, the numbers of incidents are lower than pre-pandemic, which is an improving trend over the long term.

We are focussed on preventing all Lost Time Injuries (LTIs), not just those that meet the RIDDOR criteria. There were a total of 22 RIDDOR and LTIs last year compared to 23 in the previous year and 44 in 2016-17. There were also more FTEs and hours worked last year than in the previous 3 years.

The days lost due to injuries has also reduced significantly over time. Over 50% of all LTIs in the year resulted in 3 or fewer days off work. Only 12% of the injury days lost were due to Welsh Water employee injuries. Nearly 50% of the total days lost due to injuries was linked with one incident where a subcontractor broke several bones after a fall linked to the failure of their fall arrest equipment.

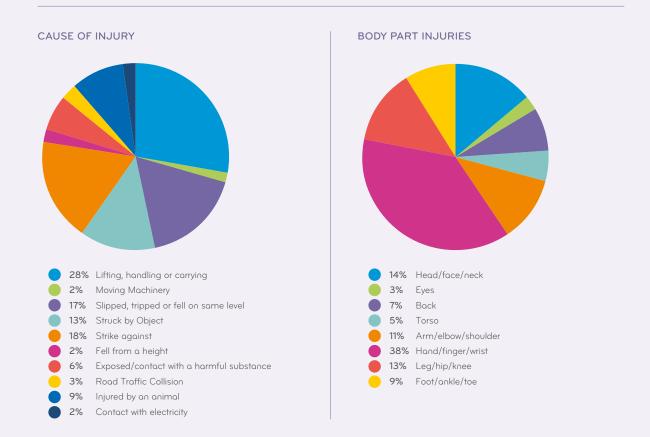
Incident category	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
RIDDOR Reportable injuries	20	19	12	14	8	8	6	9	5	5
Lost Time Injuries	N/A	N/A	32	28	27	28	15	22	18	17
Non-reportable injuries	275	207	238	236	261	262	177	171	203	218
RIDDOR Dangerous occurrences	1	2	3	1	2	1	1	1	0	0
Near misses	2,574	5,020	4,963	5,779	4,514	4,395	3,476	1,911	2,211	1,866
Positive Interventions	17,691	19,457	28,510	45,698	56,457	73,754	87,472	73,335	72,567	78,195
RIDDOR Reportable diseases	0	0	1	1	0	0	0	0	0	0
HSE Enforcement actions	0	0	0	0	0	0	0	0	0	0
Days lost to injuries*	872	1,007	730	925	548	826	446	350	398	379
Days lost due to illnesses**	25,114	28,416	26,240	29,922	30,836	30,930	23,102	27,224	34,091	30,593
Average no. employees (FTE)	5,324	4,860	5,275	5,765	6,390	6,081	5,723	5,473	5,594	5,790
Total hours worked in year	10,538,730	9,544,613	10,643,211	11,727,759	12,209,136	12,138,308	11,242,005	10,298,530	10,784,933	11,443,108

^{*}Days lost within the year, including any carry-over days from previous year **All illness, including non-work related absence

	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
RIDDOR reportable incidents (RIR)*	394	432	303	278	156	148	122	183	89	86
Non-reportable injuries (AIR)	5,165	4,259	4,512	4,094	4,085	4,309	3,093	3,124	3,629	3,765
Working days lost to injury per employee	0.16	0.21	0.14	0.16	0.09	0.14	0.08	0.06	0.07	0.07

^{*}Includes all RIDDOR Injuries, Diseases and Dangerous Occurrences

It is worth noting that these numbers do not take account of the hours worked by the many smaller companies who work for Welsh Water, while the performance data does include all incidents reported by them while working on our activities.



REPORTABLE INCIDENT RATE (RIR) PER 100,000 EMPLOYEES



NON-REPORTABLE INJURY RATE PER 100,000 EMPLOYEES



INJURY DAYS LOST PER EMPLOYEE



----- Actual figure •••••• Moving average

SPECIFIED INJURIES TO WORKERS

Specified injuries to workers that require reporting to the HSE are defined in RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) and are mainly concerned with work related accidents resulting in fractures, amputations, permanent loss/reduction of sight, serious burns, or loss of consciousness.

In 2023-24, only 2 out of the 5 reportable injuries to Welsh Water employees and contractors were classified as 'specified injuries' under RIDDOR. These were both injuries to contractors that resulted in broken bones.

One of the specified injuries reported was a fractured leg after a subcontractor repairing a burst water pipe was struck by a vacuum excavator pipe. The other was a subcontractor who sustained broken bones in both legs when they slipped off a ladder and their harness and line failed to fully arrest their fall.

The remaining 3 reportable injuries in the year were lost time injuries resulting in the individual being away from work, or unable to perform their normal work duties, for more than seven consecutive days as the result of their injury.

LOST TIME INJURIES

We saw a further reduction in the number of lost time injuries which continues our improving year on year trend. Our lowest recorded number to date was in 2020-21 as there was a significant reduction in the number of injuries during the Coronavirus pandemic. While it is hard to directly confirm the reasons for this, it is likely to have been the result of more people working from home, cessation of some work activities during lockdowns, and a heightened awareness of health and safety risks.

DANGEROUS OCCURRENCES

There were no RIDDOR dangerous occurrences reported during 2023-24.

REPORTABLE DISEASES

There were no RIDDOR diseases reported during 2023-24.

NEAR MISS REPORTING AND POSITIVE INTERVENTIONS

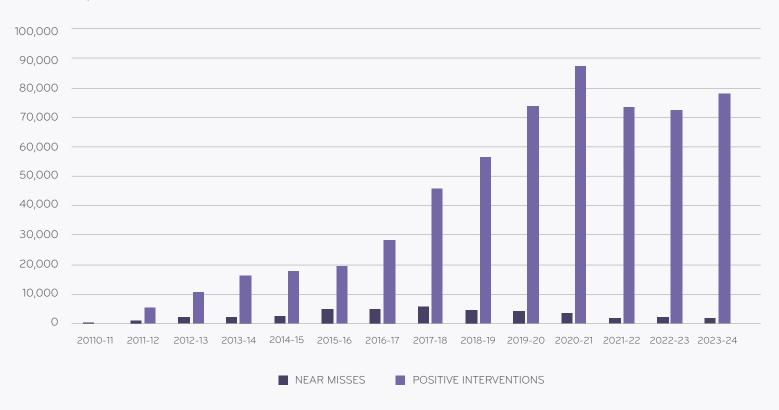
We have continued to focus on encouraging employees and partners to report near misses and have defined them as 'an event or incident that had the potential to cause harm'. Near misses are investigated by managers and the resulting information is used to notify others of potential risks and to review safe working processes and procedures.

During 2023-24, 1,866 near misses were reported. The number of these types of incidents being reported has reduced in the recent years. We have been reviewing our data capture processes and teams have been asked to ensure that these incidents are true near misses, rather than positive interventions.

We have continued to encourage our employees and contractors to make Positive Interventions and take action where unsafe acts or conditions are observed. Over 78,000 interventions have been reported in the last year. The number of positive interventions peaked in 2020-21 due to a significant number of safety conversations related to reinforcing Covid-19 controls during the pandemic.

We believe that taking action to address these hazards and the prevention of some near miss incidents has also prevented accidents and injuries.

NEAR MISSES/POSITIVE INTERVENTIONS



MONITORING DAYS LOST DUE TO ILL HEALTH

In 2023-24, 30,593 working days were lost as a result of ill health amongst the 5,790 Welsh Water and Partner employees giving an average number of days lost per employee of 5, which is a reduction from 6 last year. While the majority of this absence is not caused by work, it has an impact on individuals and the business. We need to ensure we are effectively managing sickness absence and supporting employees and contractors to be able to return to health and to work.

ENFORCEMENT ACTIONS AND REGULATOR ENGAGEMENT

There were no health and safety improvement, prohibition notices or HSE prosecutions against Welsh Water during 2023-24.

The HSE carried out a proactive inspection at Cardiff Organic Energy anaerobic digestion plant on 6th March 2024. This was a review of the controls in place to manage DSEAR (Dangerous Substances and Explosive Atmospheres Regulations). No legal actions were identified and HSE were complementary over the site design and operations.

HEALTH AND SAFETY EXECUTIVE (HSE) COMAH PLANNED INTERVENTIONS

We are subject to Health and Safety Executive (HSE) audits of our management controls at one of our Water Treatment Works which is a Lower Tier COMAH (Control of Major Accident Hazards) site. These audits have included reviews of the Process Safety Performance Indicators (PSPIs) we use to monitor that this site is operating safely, along with plant maintenance, operational competence and management arrangements.

As part of a planned HSE intervention programme, HSE and Natural Resources Wales (NRW) representatives visited our site in July 2023. The main focus of this intervention was to review the team competency management plans and they also reviewed progress of automating the sodium thiosulphate dosing system. No legal actions were identified, and a detailed report was issued in January 2024 which included some recommendations for further improvements to our systems.

In February 2024 NRW attended site to review the secondary and tertiary containment and site flooding arrangements in place. No legal actions were identified, or concerns raised from this review.

CONCLUSION — PERFORMANCE DATA AND FUTURE CHALLENGES

The performance detailed in this report shows that we have continued to prevent harm and reduce the amount of injuries and ill health associated with our activities. We have successfully come through two challenging years that were impacted by the pandemic (2020-22), resulting in significant changes to our working practices. We have also seen increasing impacts on our operations from climate change leading to more severe weather events. Despite this, we have continued to maintain our health, safety and wellbeing standards and make improvements.

Our goal for 2024-25 is to continue to drive down the number of avoidable incidents as we complete the last year of AMP7 and prepare for AMP8. Climate change predictions suggest that extreme weather events will become more severe and more frequent. We need to ensure that our assets are resilient and that our colleagues and contractors do not become fatigued, creating an increased risk of injury as a result of responding to these challenges. Ensuring we build a proactive, fair, and just safety culture and hold effective health and safety conversations will continue to be the main focus of our improvement activities.

We will also continue to undertake best practice benchmarking of our health, safety, and wellbeing programmes, working with other water companies and external bodies to ensure continuous improvement.



Occupational health and wellbeing

As part of our management of occupational health within Welsh Water, we have a contract with Insight Workplace Health. This contract provides a proactive and comprehensive occupational health service to all our employees.

The aim of the service is to:

Implement occupational health programmes that, as a minimum, meet the requirements of legislation and recognised best practice.

Ensure that employees are fit for their roles and assist managers to help employees return to work following sickness absence due to illness or injuries.

Increase employee awareness of general health issues, which in turn will support them to make informed choices about their lifestyles and working practices.

Welsh Water receives no confidential information from Insight in respect of individuals. Where, as the employer, we are requested to make adjustments in the workplace to accommodate the circumstances of an individual employee, and the individual expressly consents, certain information may be shared.

Regular reports are produced by Insights on their services and reviews are held with them to identify trends and ensure that effective support is in place. 446 management referrals for advice on employees were made to Insights during the last financial year along with 262 review appointments. Most referrals were for either mental health issues or musculoskeletal disorders (42% and 21% of cases respectively).

Our annual programme of operational health surveillance commenced in September 2023 for eligible employees who were subject to a range of tests, relevant to their role. These appointments were held at Insights' 4 regional clinics, with 5 Welsh Water operational sites being used for those working in more remote areas. Out of a population of 946 employees that were seen, 72 individuals were referred for further advice. This process enables us to effectively support employees and to identify and manage potential health risks before they result in employee ill health.

Insights have worked with us during the year to support managers and employees to identify health risks arising from work activities and any health conditions that may affect employee wellbeing and performance at work. They provide confidential and objective occupational health advice. This allows the business to make timely and effective interventions to both support employees and enable managers to manage risks and prevent sickness absence.

We have also worked closely with Insights to implement our attendance management policy and procedures and to support employees who have longer term health conditions identify reasonable adjustments. We have task analysis tools and phased return processes in place to support colleagues to remain in and return to work. In addition, Insights can provide specialist psychiatric assessments and support for more complex mental health needs and learning difficulties.

There is an Employee Assistance Programme (EAP) that is available to all employees and their families. As well as providing information via a website, app and telephone service, it includes free access to counselling sessions to support individuals to effectively manage their mental health and wellbeing. We have promoted this service as part of our mental health awareness campaigns and have also provided colleagues with free access to the Headspace app which provides relaxation techniques.

We have 37 trained 'Wellbeing Champions' across the business to support colleagues and managers to maintain positive mental health and wellbeing. They have visited several sites during the year to meet with colleagues and promote good mental health and they have also delivered team talks and hosted a stand at the December 2023 Members meeting.

We are signatories of the Time to Change Wales pledge and support the HSE's Working Minds campaign. In 2023 we hosted a Time to Change Wales network event at our Tŷ Awen office as part of our Resilient Restart mental health and wellbeing campaign.

We have a package of wellbeing initiatives to help support employee fitness to work. This includes tailored health and wellbeing awareness campaigns, gym membership benefits, a cycle to work scheme and an employee healthcare provision to support employees to get back to work more quickly. To support healthy hybrid and mobile working we have an online DSE training and risk assessment system.

We provided advice and events throughout the last year including personal and financial resilience, menopause awareness, maintaining health, fitness and good posture, and managing uncertainty. We have also hosted smoking cessation support classes. A specific focus of our health awareness over the last year has been mental health and wellbeing. Our 'Resilient Restart' campaigns have encouraged colleagues to take positive actions to maintain good health and wellbeing. We have reviewed and updated our mental health and stress at work policy and guidance for managers and employees. We also have a dedicated intranet page bringing together all our wellbeing information and resources.



Occupational health and safety (OHS) management system and risk

OHSAS 18001:2007 AND ISO 45001

The Welsh Water health and safety management system has been based on and accredited to a series of external standards. The system was assessed against the Occupational Health and Safety Assessment Series (OHSAS) 18001:2007 in 2009. OHSAS 18001:2007 was a British Standard that was replaced by the International Standard for Occupational Health and Safety Management Systems ISO 45001:2018. We successfully attained ISO 45001 status in 2019.

As with ISO 9001 and ISO 14001, the ISO 45001 system is built on a cycle of plan, do, check, review and improve. ISO 45001 specifically encourages the incorporation of health and safety into the broader management system of an organisation. Senior management are expected to take a stronger top-down leadership role, driving performance improvements into action and taking responsibility for the protection of their employees. Health and safety responsibility and engagement should be embedded as widely as possible with all employees understanding how they can support and contribute to a culture of health and safety. Health and safety should be seamlessly part of 'business as usual', with everyone being aware of the objectives and advantages of a safe and efficient workplace and empowered to contribute to it. The standard is also intended to encourage increased 'risk-based thinking' with a more proactive, flexible and preventative approach based on remedying a broader range of risks before they materialise.

The last internal audit of our health and safety management system against the ISO 45001 standard was completed in March 2024 and was graded as Full Assurance. The last external assessment against 9001,14001 and 45001 was completed in October 2023 with 21 site audits completed across a range of water, waste and support functions. There were no major non-conformances found. Only 4 minor non-conformances were identified, and all actions are being tracked to completion.

This independent certification process, and the regular compliance audits, ensure that we continue to take effective measures and implement rigorous controls to identify and manage the health and safety risks associated with our business activities. We also hold internal annual reviews of the effectiveness of our OHS management system and use these as an opportunity to identify and drive continual improvement.

HOW WE MONITOR AND MANAGE OHS RISK

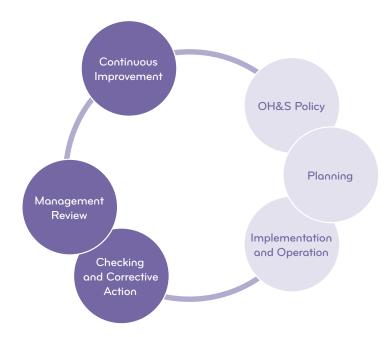
Underpinning our health and safety management system we have internet-based tools for recording and reporting injuries, incidents, and illnesses along with near misses and positive interventions.

Our IT health and safety management system, Assure, was launched in 2015 and we have worked closely with the business to effectively embed and utilise this tool. It provides a facility for action tracking and local management of incident reports and allows managers to develop tailored health and safety performance dashboards to suit their needs.

All incidents must be immediately reported and investigated by relevant line managers. Main contractor partner organisations are also required to provide monthly OHS performance reports.

Illness and sickness absence records are maintained by Welsh Water and contract partner Human Resources departments. These records allow us to identify the causes and monitor the rates of sickness absence.

We have developed and improved the quality of our internal performance reports over time to ensure that meaningful data is presented and areas for improvement are clearly identified. We are continually looking to see how we can further enhance the use of the dashboards and reports to help managers to monitor and manage their performance locally.



OCCUPATIONAL HEALTH & SAFETY TRAINING AND COMPETENCE

The key health and safety knowledge and experience needed for all roles has been mapped out and any mandatory training is identified against individuals in our HR systems. Training and development needs are reviewed annually. Courses are practical with face-to-face training and assessments where required. We monitor the completion of key health and safety training as a leading indicator in our management and quarterly Board reports.

We deliver bespoke corporate induction health and safety sessions for new employees, apprentices, and graduates. Competence checks are carried out on key activities and employees are 'signed off' as fit to carry out tasks as part of Personal Work Plans. In addition, there is a passport scheme in place for contactors working on our potable supply pipes which has been extended into other Capital contracts, where appropriate.

During the Coronavirus pandemic, we continued to develop and deliver a range of bespoke training courses, however many of these were delivered virtually using a combination of e-learning and online training sessions. Those courses that required an essential practical element, such as confined spaces training, were altered to be Covid-secure by limiting the numbers attending sessions and redesigning elements to ensure good hygiene and social distancing were maintained.

Post-pandemic we have reviewed all training courses and identified those that are more effective delivered in a classroom or site environment and those that will remain as e-learning or online sessions. We will continue to monitor the effectiveness of these to ensure that they are achieving the desired aims.

PROMOTING GOOD PRACTICE

The following illustrates some actions taken in 2023-24 to mitigate OHS risk and raise awareness:

Welsh Water health and safety days

Over the last 12 months we have held several company-wide health and safety days and awareness campaigns. Information, presentations, webinars and films have been produced and shared with all managers to review with their teams. Directors and managers have met physically and virtually with teams across the business to discuss health, safety and wellbeing.

In the last year we have focussed on our STEP just safety culture, lone working, legionella management, manual handling, DSE and back care, mental and physical health and wellbeing, and winter preparations (including health and hygiene and slips, trips and falls).

Many teams have also carried out targeted health and safety events during the year to focus on specific topics relevant to their activities. These have included reminders about how to 'Take 5' and have effective health and safety conversations, how to look after health and wellbeing, good contractor management practices and sharing learning from incidents.

We also publish a monthly H&S E-Newsletter 'Safety Net' summarising all key performance information and items for action in one communication for managers and teams to review.

TRACA coach programme

To support our manual handling training programme and ensure that colleagues continue to use safe handling techniques we have 232 trained 'Traca' coaches. The coaches carry out manual handling observations and support employees and managers to identify any areas of concern. They will also support employees returning to work after injuries to ensure they are able to safely carry out their role. Completion of these observations is one of our leading indicators. The Traca Coaches have an online group for sharing queries and improvement ideas and 79 coaches participated in 4 sharing workshops during 2023. There is also a Welsh Water guide to the different types of manhole covers and lifting tools that colleagues may need to use.

STEP (Safety Takes Every Person) safety culture programme

We actively encourage all employees to have regular health and safety conversations. Executive directors and senior managers have quarterly objectives to conduct site and team health and safety visits and report back on their conversations. This is one of our lead indicators in our Board quarterly health and safety performance reports.

For the last 10 years we have developed and delivered STEP safety culture training and awareness programmes. These have been aimed at managers and supervisors and have been supported with workshops and briefing materials that they can use with their teams. Alongside this teams have appointed STEP Champions. Each year, new materials are developed for them to deliver which incorporate health and wellbeing messages. A short case study on this STEP programme was included on the HSE website to support their H&S Strategy, enabling us to share ideas and improvements with others.

Tribe Culture Change have been working with us in AMP7 to further develop our STEP programme. Due to the pandemic, much of this programme has been delivered online, starting in 2020 with a series of webinars for over 650 managers and supervisors. These covered a range of safety culture aspects including Mindset, Trust and Just Culture, Engagement and Team Resilience. Workshops were held for over 200 STEP Champions introducing them to a bespoke safety conversation book for use with their teams.

The programme progressed in 2021 and 2022 with half day workshops for line managers utilising bespoke films and a series of shorter webinars tailored specifically for Directors and senior managers. This was supported with Talking STEP podcasts, newsletters and an annual STEP safety standdown session for all colleagues. During the last year 98% of employees participated in a STEP standdown session.

Major risk reviews

We have identified the 'Top 10' health and safety risks associated with our activities. These are those risks that have a low probability, but a high severity, should they arise. A rolling programme of major risk assurance reviews has been built into our health and safety improvement plans. During 2023-24 the Health and Safety Team have reviewed the management controls in place for work on or near deep water and driving at work.

Process safety and best practice benchmarking

There is an active Process Safety Steering Group that co-ordinates all our process safety improvement activities. It is Chaired by a Managing Director and oversees several specialist working groups covering digester safety, fire and explosion risk management, toxic gas risk management and electrical safety. The working groups monitor our management processes and identify improvements along with reviewing learning from audits and incidents and sharing ideas and innovations from our external contacts. A key of focus has been to review the controls in place to manage the process safety risks within our Advanced Anaerobic Digester sites. This has included a series of internal and external site audits utilising process safety expertise to identify further enhancements to sites, where appropriate. We have also worked with other water companies to share industry best practice in the management of Dangerous Substances and Explosive Atmospheres.

Driver safety

In January 2024 the Welsh Water Fleet Management Team launched a new driver safety programme to 1,500 commercial drivers. This programme is aimed at improving safety and reducing risk and the associated costs of personal harm, vehicle damage and insurance. It involves online driver risk assessments to develop a tailored schedule of quarterly e-learning modules. There is also a specific winter driving module that all drivers are asked to complete.

Water Networks Alliance (WNA)

We have taken the learning from working closely with our capital partners over many years to also establish a strong health, safety and wellbeing focus within our WNA. Operatives have been actively engaged in trialling new plant and equipment and have participated in regular site stand downs and over 170 CTRD audits. CDM awareness training has been delivered to over 85 WNA team members. The alliance has also developed their own safety culture training programme and increased their focus on customer safety and occupational health and wellbeing.

Employee Engagement and Climate Surveys

The results of our last employee engagement survey in November 2023 showed that 98% of employees understand their role and responsibilities in creating a safe work environment. 94% feel comfortable in reporting any safety concern and 94% believe Welsh Water is committed to employee safety.

We have used the HSE Climate Survey tool every 2-3 years to provide more detailed feedback on areas for improvement. Our last survey was in 2022 and 61% of all employees responded. We scored above the HSE average scores for all the different aspects of health and safety management. Each team used this information to identify areas for further improvement and put in place local action plans. Our fourth survey will be launched in June 2024.

During 2023, our safety culture provider also held 16 online focus groups with a total of 158 employees across all business areas. These were used to identify any areas of good practice and where we could further improve. This information has been used to help develop our STEP programme for 2024-25.

H&S CLIMATE SURVEY - OVERALL SCORES



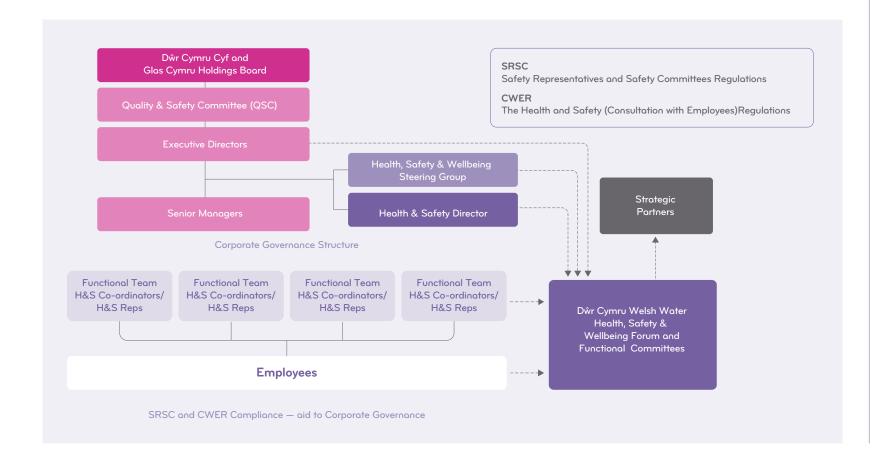
Governance

Welsh Water has in place a health and safety management system that is accredited to the ISO 45001 Occupational Health and Safety Management standard. We have defined policies and procedures and established systems to manage all aspects of our operations. The standard provides a framework that supports continuous improvement to prevent injuries and ill health.

The management system is subject to regular audits by an external accreditation body. In addition, Welsh Water has established a programme of internal audits, which are designed to identify any opportunities for improvement.

MONITORING PERFORMANCE

Our arrangements to monitor and review our health, safety and wellbeing performance are described in this Organisational Structure chart.



Board and Executive review of performance

'The Health and Safety Director is a direct report to the Chief Executive Officer and a member of the executive team. They produce a health and safety Monthly Management Report (MMR) for the Executive and Board. Alongside this, more in-depth quarterly reports are presented to the Board Quality and Safety Committee (QSC) meetings for their review. In addition to performance, this report addresses key issues of health, safety and wellbeing policies and procedures, training and regulatory engagement and communication. Board and QSC members also review the health and safety policy statement and the annual health and safety report before they are published. This report is shared with our Members and published on the Welsh Water website. Health and safety performance updates are included in the biannual Members meetings.

The Board and Executive undertake bespoke health and safety training at 3 yearly intervals. Board and Executive team members have previously completed the National Examination Board in Occupational Safety and Health (NEBOSH) HSE Certificate in Health and Safety Leadership Excellence. This enabled them to reflect on and further develop their personal health and safety competence and leadership. During 2022-23 they participated in workshops, hosted by a Principal Consultant at Eversheds Sutherland. These looked at how effective Boards and Executive teams can ensure that health, safety and wellbeing remain integral to company activities.

Health, safety and wellbeing steering group

Monitoring and review of overall health and safety performance and progress against improvement initiatives has been undertaken during quarterly meetings chaired by the Managing Director leading on health and safety. This group involving several Directors and Heads of Service was established in 2011 and has ensured that business focus is maintained on improving health, safety and wellbeing. They review performance, learning from incidents, and analyse the outputs of sub-groups including improvement projects and internal reviews. This has included the findings from internal and external audits and emergency exercises.

Health, safety and wellbeing consultation forum

This Trade Union consultation group meets quarterly to review policies, procedures and performance and to consider opportunities for further improvements to our management arrangements. Chaired by the Managing Director leading on health and safety, the forum is aligned to the Health, Safety and Wellbeing Steering Group, which approves priorities and, where required, resources. This group also carries out site and team visits engaging with colleagues and reviewing learning from injury and near miss investigations to better understand how health and safety arrangements are working in practice and identify future improvements.

Local management information

A monthly health and safety performance dashboard is produced for use by teams and can be displayed on site notice boards. Managers have direct access to their team's incident reports and can also track progress on safety conversations, positive interventions and inspections via electronic dashboards. There are also operational leadership team specific reports that are cascaded through line management to support performance monitoring and management locally.



CONTRACTOR HEALTH AND SAFETY MANAGEMENT

Selection of contractors

Before any contractor is appointed to work for Welsh Water, the company will be required to provide evidence of a current SSIP (Safety Schemes in Procurement) registration as a minimum. This is one part of the full procurement process for contractor assessment.

During 2021 the health and safety team supported our Capital teams to evaluate the tender submissions for our new framework partners for major and minor civil works and our mechanical and electrical frameworks. These companies started working with us in 2022 and we are monitoring their performance to ensure that we maintain expected standards. Following a review of our anticipated capital programme for AMP8, we will be recruiting additional contractors to support with both design and build of assets during 2024, so that we can adequately prepare for a safe and successful programme delivery.

Setting performance targets

As part of the appointment process for main contractors and partners, Welsh Water managers supported by the Health and Safety team will meet organisations and discuss their health and safety management arrangements. This will include any company specific health and safety improvements and objectives, delivery of which will form part of their contracts.

Monitoring contractor performance

Our performance monitoring includes both pro-active and re-active monitoring arrangements. During 2023 Welsh Water teams completed 528 capital partner and 170 water networks construction site inspections. Health and safety performance is discussed at routine contract review meetings. Any recommended improvements identified during contract performance reviews are based upon a joint assessment of the risks and can include both quantitative and qualitative targets. Any partner improvement action plans are reviewed and updated on a regular basis.

In addition, we have held workshops with key operational and capital contractors looking at how we can work together to prevent injuries and ill health, with a specific focus on smaller companies including their suppliers and subcontractors.

Contract partner health and safety forums

Monitoring and review of contractor health and safety performance is also undertaken during regular meetings between Welsh Water's Health and Safety Managers and the managers of our main partner organisations. These groups review progress against improvement action plans, together with details of any reactive events such as accidents and incidents. Audit reports are discussed, and checks made to ensure that any corrective actions have been closed out within agreed timescales. Best practice and lessons learned are identified and, where appropriate, disseminated further.

The Capital Partner Alliance has also used these forums to develop joint standards and has held seminars, workshops, and construction site visits targeting key areas of risk. Key topics in the last year have included working at height, hand injuries, and prevention of utility service strikes.

In addition, over 400 Capital alliance partners have participated in bespoke online STEP sessions looking at safety culture and how they can display safety leadership behaviours.

AUDITING PERFORMANCE

Internal and cross partner audits

Welsh Water has arranged programmes of cross partner safety management system reviews, where contract partners are 'audited' by their peers. These reviews can be used to demonstrate conformance with policy and procedures. They also provide a long-term view of the health and safety competence of our contract partners and give them a view of health and safety procedures and processes in other organisations. This facilitates considerable sharing of good practice and cross fertilisation of ideas.

In 2019 the Capital Alliance developed a new contract partner health and safety control framework identifying key areas of risk. Partners have self-reported against the standards and it has also been used to drive a series of targeted site audits – identifying conformances, non-conformances and best practice. The learning from these reviews has been shared across all participants.

Insurer reviews and risk management support

We have close working relationships with our contract partners and have extended this good practice to encompass other service providers, including the companies that provide insurance for the business and our capital programme. Our insurers have attended H&S forums and events and visited Capital Alliance site projects. This working relationship has benefits for both parties. Their risk management support can be used to help us to clearly understand any risks and we benefit from their work with other clients who might have different procedures for preventing incidents, injuries and ill health.

ADR (Carriage of Dangerous Goods by Road) Inspections

We are externally audited on our compliance with the ADR legislation. In April 2023 we had a series of formal inspections by the Department for Transport focussed on transport security. We were found to be compliant in all aspects inspected.

CONTINUOUS IMPROVEMENT ACTION PLANS

There is a team specific 'unit assessment' process in place for 2022-25. This identifies the main health and safety risks and management controls that should be in place for each team. These unit assessments cover a 3-year period and are used to ensure that team procedural briefings are delivered and that risk controls are in place. Progress against unit assessments is monitored by line management. We regularly review the effectiveness of this process and work with users to further develop our health and safety monitoring and improvement tools.

Since 2017 we have also carried out HSE climate surveys with all employees invited to complete these. They have been undertaken every 2-3 years and provide reports for teams to discuss and develop local improvement action plans.

We have continued to see how we can use new technology and IT systems such as Apps to produce dashboards and enable access to forms, reducing the use of paper and streamlining processes for mobile workers. We have also rolled out a gas monitor function to many of our lone worker devices, reducing the need for colleagues to carry two different items.

Each year we carry out a series of emergency exercises to help us to review and improve our management arrangements. In 2022 we undertook an internal emergency exercise to test our response to a major health and safety incident. This included a simulated explosion on one of our sites resulting in serious injuries. In 2023, exercise Houdini simulated a missing lone worker and allowed us to test our systems to find employees who may need assistance. Both exercises worked well, and we identified some suggestions for further improvements for our guidance and training materials.

INDUSTRY REPORTING

Good governance includes proactive, open and transparent reporting relationships with key stakeholders. In this respect, key stakeholders include the community we serve, Welsh Water's regulators, supply chain partners, and Government, as well as all employees across the business. This annual report is shared with our Members and published on our website for all stakeholders to access.

Welsh Water participates in a water industry cross-company performance benchmarking system that is supported by the Water UK Occupational Health and Safety Group. We continue to share performance and best practice with others including the Water UK Board and the Health and Safety Executive.



Recognising excellence and achievements

HEALTH & SAFETY CONFERENCE

We have held an annual health and safety conference for many years. These events are one of the highlights of the year, involving over 300 individuals, including executive and non-executive directors, senior managers, safety representatives, contractors, and colleagues from across the business.

In June 2023 we held our sixteenth annual health and safety conference. Delegates were able to meet up at Parc Y Scarlets Stadium in Llanelli, listen to presentations, participate in workshops, and build their health and safety knowledge and contacts. The conference theme was 'STEP Ahead'. This was to recognise the importance of preventing injuries and ill health, rather than just learning from incidents, i.e. being one step ahead.

The keynote presentation was from Chris Lemons, a professional saturation diver, who shared his experience of being stranded 300 feet below the surface of the North Sea, with no light, heat or breathing gas for 35 minutes. He shared the importance of planning, preparation and teamwork, especially when things don't go as intended.

Delegates were also able to participate in a series of workshops highlighting key aspects of our health and safety management system.

These included sessions covering:

Coping with Uncertainty

Hosted by Willis Towers Watson

Managing Conflict

Hosted by Safety Solutions Training Ltd

Visible Street Works

Hosted by Morrisons Water Services

The Domino Effect

Hosted by Mid and West Wales Fire and Rescue Service

Taking Flight

Hosted by Welsh Water Statutory Maintenance Drone Team

EXCELLENCE AWARDS

In 2023 we held our 17th Welsh Water Occupational Health and Safety Excellence Awards. These awards recognise both our employees and contract partners. Each year there are awards for health and safety excellence and awards for individuals and teams to recognise their outstanding contributions to health and safety. These awards have been a highlight of the annual health and safety conference and the finalists in each category have been showcased and the winners formally recognised at these events.

We had our highest number of entries with 59 submissions for the 2023 awards. These came from a wide range of teams across the business and our contractors, all showcasing their hard work from the previous 12 months. They were reviewed by a judging panel and the finalists in each category were invited to attend the health and safety conference event where a short film was shown of their submissions. The winners were recognised with trophies that were presented on the day.

The Winners:

Welsh Water Team Health and Safety Award

The Dam Safety, Water Research and Innovation and Aerial Services teams

In recognition of their innovative approach to inspecting the condition of mortar on dam spillways, reducing the need for people to work at height or enter confined spaces.

Capital Projects and Contractors Health and Safety Award

Morgan Sindall for the Craig Goch reservoir improvement scheme.

This was a very complex scheme including working on a valve 36m below the water. By using offshore oil and gas industry type equipment that was remotely operated from the surface, they avoided the need for manned diving operations.

Operational Contractor Health and Safety Award

Marches Biogas for their work at Five Fords to remove and clean the digester mixer lances.

They identified a safe system of work to inspect and clean the mixer nozzles that included work at height and managed the risks of potentially flammable atmospheres.

Health and Wellbeing Award

Alun Griffiths Contractors Ltd.

In recognition of their mental health initiative 'Take 10 at 10' that was rolled out across all their repair and maintenance contract teams. As members of 'Mates in Mind' they also trained all their managers and supervisors in mental health awareness to support the effective roll out of this programme.

Outstanding Contribution Award

Julian Jones, a Wastewater Treatment Process Operator

Julian was recognised by his colleagues for his personal leadership in health and safety and his proactive approach to identifying and addressing safety hazards.

EXTERNAL RECOGNITION

Welsh Water has been recognised by Welsh Government for our work on health and wellbeing. We achieved the Healthy Working Wales Bronze Corporate Health Standard in 2015, the Gold Standard in 2016 and successfully completed the Platinum Standard in 2018.

The Gold and Platinum awards have successfully achieved revalidation status checks to confirm that we have maintained these standards. This included providing information to an external assessor and being interviewed online. Karen Rogers, H&S Manager, led these successful reviews with support from colleagues across the business. The assessor report from the last Platinum review in January 2023 noted 'I was really impressed, as I so often have been by Dŵr Cymru over recent years! I had the pleasure of speaking to the lead persons for each of the 6 Platinum criteria. I had the impression that despite the enormous challenges of the pandemic years, it was very much 'business as usual' in all the Platinum areas, with significant progress being made even since the last Platinum level status check in 2021.'

In 2023 we were also successful in securing a Gold RoSPA Health and Safety Medal Award in recognition of seven consecutive years of Gold Awards. To achieve this, we submitted 5 years of H&S performance data for our employees and contract partners and provided a range of evidence-based case studies on our health and safety management arrangements.



Some of our contract partners also received external recognition in the last 12 months for their achievements in occupational health and safety.

These include:

RoSPA Order of Distinction 2023Knights Brown Construction Ltd

RoSPA President's Occupational Health & Safety Award 2023 Bridges Ltd, Morgan Sindall

RoSPA Gold Medal Award 2023

Envolve Infrastructure

RoSPA Gold Award 2023 Morrison Water Service RoSPA Gold Fleet Safety Award 2023

O'Connor Utilities

FORS Silver Award 2023
TDW Distribution

FORS Bronze Award 2023
Envolve Infrastructure

Investors in People: Gold Standard Accreditation for Wellbeing Morgan Sindall

EXTERNAL REPRESENTATION

The Health and Safety Director has been an active member of the Water UK Occupational Health and Safety Group (WUKOHSG) for 24 years. This group works to share learning and improve performance collectively across the water industry through monthly online meetings and quarterly face to face sessions, along with a range of topic specific subgroups.

Welsh Water H&S Managers are represented on the Water UK process safety and construction subgroups and Karen Rogers chairs the water industry Occupational Health and Wellbeing subgroup. Members of our health and safety and statutory maintenance teams have contributed to the development of an industry information document on DSEAR (Dangerous Substances and Explosive Atmospheres Regulations), identifying how these risks can be effectively managed. During 2023, the Occupational Health group led a project to benchmark water industry performance against the UK Government Thriving at Work recommendations for supporting mental health. They are also working collectively to develop new industry guidance on occupational health surveillance standards.

The Health and Safety Director is a Chartered Safety and Health Professional and has been a member of the Institution of Occupational Safety and Health (IOSH) for 30 years, including a 6-year period as an IOSH Council Member. Within the wider health and safety team, there are colleagues who are also Chartered Members of IOSH and several who are progressing through their professional qualifications. The Institution holds regular branch and sector meetings and events and provides training and information to allow health and safety professionals to engage across industries and share knowledge and experience. Welsh Water actively supports IOSH, and colleagues have chaired and presented at national and local conferences and events and hosted site visits.

We welcome opportunities to share our approach to health, safety and wellbeing and to learn from others. In recent years we have held meetings and delivered presentations to a range of companies. Some of these events have been focussed on particular areas, such as our approach to contactor management, our health and wellbeing initiatives, and our journey to attain the Wales Platinum Corporate Health Standard.

During 2023, we participated in local and regional H&S groups and the South Wales CIA Responsible Care Cell. We have hosted meetings and site visits with other water companies and have shared information and ideas with fellow health and safety professionals in National Resources Wales, Public Health Wales, Pembrokeshire County Council and the Port of Milford Haven.

We encourage customers to enjoy the scenery at our reservoirs and offer a range of recreational activities at our Visitor Attraction sites. The sites hold a range of relevant accreditations to ensure this is a safe experience.

We have also worked closely over many years with the emergency services and other external stakeholders to promote our 'One Last Breath' reservoir safety campaign. This focusses on educating members of the public about the dangers of unauthorised swimming in reservoirs. It has included presentations at educational establishments alongside some hard-hitting films that have been shared on social media and with other water companies.

Our rangers will visit sites during busy periods, such as school holidays, to raise awareness of the risks and advise the public to use designated water sports facilities, where appropriate.

We also continue to deliver water safety educational materials to schools using a mix of online and virtual technology and classroom and site visits throughout the year.

