



BSS Advisory Committee – Confirmed Notes

BSSAC #99, 5 JUNE 2018, CANAL & RIVER TRUST OFFICES, HATTON

Present:

Chair
BSS Manager & Secretariat
BSS Technical Committee (BSSTC) Chair
BSS Business and Technical Manager

NABO
TBA

Examiner Body reps:

YDSA
IIMS
NABSE
ABSE

Navigation Authority reps:

Canal & River Trust
Broads Authority
EA
AINA

Boat User Group reps:

RBOA
IWA
RYA Executive Interests
AWCC

Marine Trade reps:

BM1 – BM Executive Interests

Apologies:

BM2 – BM Hire Boats
BM3 - BM Boatbuilding

99.1 Apologies and introductions

99.1.1 Apologies were listed as above. The Chair welcomed ***** from AINA and welcomed back ***** of ABSE and who had stepped in to replace *****. ***** was thanked for his contributions.

99.2 Notes of last meeting

99.2.1 98.5.1- An additional paragraph is to be added after the 2nd paragraph – ‘*The RBOA Rep undertook to ask her Chairman if he could provide information on the current situation in London regarding various aspects of tenanted boats*’

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99.2.2 98.5.1 - The Chair said he wished to clarify the debate at the last meeting when the question was asked as to whether the composition of this committee remained representative. The debate was about tenanted boats and the Chair clarified that members should to take the question back to their bodies for any views about tenant safety generally.

He reported that RYA considered that i) tenant safety issue was not one for BSS to resolve, ii) tenancy safety issues ought to be better regulated but RYA asked how could the Navigation Authorities’ provide remedy if cruising tenancies are not authorised? iii) RYA recognise that BSS Examiners operate within a confusing framework, which put examiners in a difficult position.

The BM Executive Interests Rep saw it as purely a matter of classifying boats as either ‘private’ or ‘non-private’, for BSS examination purposes.

The Chair thanked the RBOA rep for delivering a report in the response to the action at 99.2.1 above. This report is attached to these notes as Appendix A and is intended that it be shared more widely, to help achieve the organisational views sought.

The AINA and EA Reps identified that the issues were wider than the BSS requirements and that a multi-agency group was looking at the whole matter including involving different government departments. At present the Navigation Authorities were not seeking to take on responsibilities in this respect and that other agencies probably should step up more. The EA Rep said that if similar circumstances existed on the shore and not water, they would be well covered by existing provisions.

The BSS Manager commented that the issue was about the changing use of waterways, away from pure leisure use and towards boats being used as affordable accommodation. No one knows exactly how big the issue is because it was largely hidden. The matter was planned to be on the BSS/AINA meeting agenda later in the year. The BSS was ready to help with any solutions it was asked to deliver.

The BSSTC Chair reported that the Trust had stopped their Navigation Advisory Group on licensing, meaning users no longer had a forum. He went on to say that BSSTC would look at specific issues and solutions if/when requested.

Further questions and views were recorded as follows:

- Whether boat tenant risks were first or third-party issues? Whether consideration of this subject matter was challenging the fundamentals of what the BSS did, and outside the current remit of the Scheme.
- Warnings and education being as important as enforcement.
- The fact that landlord owners don't always admit that their boat is tenanted and therefore are wrongly applying for and getting private boat licences. The feasibility for underground tenancies to be eliminated and the difficulty for Navigation Authorities to identify boats being rented out. Tenants being coerced by landlords not to admit the boat is rented. The difficulty this presents BSS Examiners being presented with false information about the class of BSS examination needed.
- The perception that the increase of tenanted boats is due to the housing crisis and relevant authorities being overwhelmed with other priorities and avoiding managing the issue.
- Dividing big boats into small multi-occupancy dwellings – and associated dangers – was recognised as a separate but compelling issue.
- The changing use of the waterways ought to prompt a broadening of Navigation Authorities' risk controls rather than rigidity. The need to make it easy for people to be law-abiding and this may take a re-think by the Navigation Authorities. The alternative question is the resources it would take to enforce the current rules that are being openly flouted.
- The need for a clear steer from the Navigation Authorities on the subject of licensing category for tenanted boats, the BSS examination class and what risks need to be better managed and how.

99.2.3 Minutes from the last meeting were accepted as accurate, subject to the amendment at 99.2.1

99.2.4 **Matters arising**

Hire Boat Code (HBC) Development – The draft code is now being readied for public consultation.

The good news for the Scheme is that a reference to Crew Areas and the requirement for a Crew Limit and Crew Area Sign, will remain in the HBC (subject to consultation) and this outcome aligns with the BSS hire boat requirements for slip-resistant surfaces, handholds and tiller swing arc labels where hire-operators identifying designated Crew Areas are already specified

It remains unclear when public consultation will commence, but it is likely to be within the next 2-3 months, will last for 3 months and the intention is for most Navigation

Authorities to implement it from April 2019 except EA who will implement it from April 2020.

The BM Executive Interests Rep noted that it had been 15 years in the making and thanked relevant parties for their hard work, hoping the public consultation would go well.

99.2.5 **BSS hire boat requirements and shared ownership boats** - There remains a number of actions necessary before ratification of the BSS Hire Boat Requirements ECPs can be achieved. Covered in BSSTC Chair's report [See Doc C1, BSSAC #99].

It is possible a further course for to convert BSS Examiners to the BSS Hire Boat Requirements will be run this year. Currently around 80 are qualified.

Concerning third-party managed shared ownership boats being considered by the BSS as hire boats and the associated British Marine challenge the BSS Manager reported that there has been no further activity since the last meeting and the more recent BSSMC meeting.

It was reported that BSS legal advice commissioned had now been received and that there was some further investigative work to complete before the position can be clarified. Three factors influencing the delayed conclusion to this subject include:

- i. the legal adviser used has now left the Trust,
- ii. the review of the alignment of BSS boat classifications with Navigation Authority licensing categories will be aired at the planned BSS/AINA later in the year. BSS input to be developed through the BSSAC Chair, supported by the BSS Manager and the Examiner Body rep on BSSMC.
- iii. there remains an easy route for third-party management companies to have the boats viewed by the Scheme as private boats – namely to inform the owners of the maintenance schedule.

The BM Executive Interests Rep expressed frustration at the length of time the matter was taking to resolve. He said complaints received from operators had initiated the BM letter.

The BSS Manager asked the BM Executive Interests Rep to be inform him of any current and future complaints from operators, as he felt the matter was controlled pending final solution.

The Chair preferred a solution where risk was shared with owners so that the boat remained private as far as the class of BSS examination was concerned.

The BSSTC Chair said he would object to any 'fudge' and stood by the risk assessment done that applied to shared boats where owners were not involved with the maintenance. The Chair committed to finding a solution.

99.2.6 **Examiner 'Trusted Messenger' project update** – Little activity to report. Two factors influence no activity, these are:

- i. The JIGSAW BSS Examiner/boat user eLearning course material needs further refinement and is scheduled to be completed by the end of the year.
- ii. Notwithstanding that most examiners already engage with customers; the planned BSS Examiner survey will likely be used to test examiner attitudes and provide further facts in support of the planned initiative.

The Chair noted initial reluctance from examiner body reps to support the Trusted Messenger initiative and concluded that the product had to be agreed by examiner reps and then could be released. He said that it seemed appropriate to await any introduction of the BSS requirement for CO alarms for boats to finish the Trusted Messenger product.

99.2.7 **Reviewing BSS requirements for the non-private classes of boats that are not hire boats** - No actions to report, preliminary work done indicating very few incidents

on work boats, floating cafes and shops and hotel boats, etc. Project parked with the agreement of BSSMC.

The pressure to deliver on this project is based upon the increasing use of boats as rented accommodation (sometimes hidden) and the need to adequately protect tenants. One issue is that the navigation authorities licensing classifications do not generally take account of the changing use of boats.

From the BSS Examiner perspective, it is imperative to have processes in place that can ensure examiners are not exposed to litigation, Coroner criticism and/or internal disciplinary actions.

There is a need to better scope the project and that task need close engagement with the navigation authorities. There planned joint BSS/AINA meeting later in the year is proposed to be the vehicle used to move the subject forward.

99.2.8 **BSS Hazardous Boat Notification procedure review** - The joint BSS/AINA forum referred to earlier will also help ensure that the review of the BSS Hazardous Boat Notification procedure can commence. This is because Navigation Authority staff are a key part of the process.

99.2.9 **BSS Examiner - Environment Monitoring Project** - The update is largely covered by the CO alarm RRAP and the BSSTC Chairs report.

14 BSS Examiners are involved in the BSS Examiner Environment Monitoring Project. This project will run for up to two years and is to monitor the environment presented to all Examiners to help assess whether it presents any exposure to gas hazards during site visits. Since mid-December 2017, the group has examined 850 boats and on 17 occasions since then a gas analyser device has activated providing a warning regarding CO being present at over 10ppm.

The highest recorded ppm has been 88ppm after the examiner arrived at the boat having just turned on instrument. The outboard motor was running and as he climbed in through canopy the alarm almost instantly sounded.

In total five activations have exceeded 30ppm, with a further four between 20-30ppm and the remaining eight between 10-20ppm.

The breakdown in the alarm activation causes from the 11 reports where a source has been (possibly) identified, are widely spread, including, cookers – 4, water heaters – 2, solid fuel – 2, engine fumes – 2, cigarette smoke – 1

Only 6 of the 14 Examiners who are equipped with instruments, have uploaded reports and therefore some have seen multiple events, whereas the other 8 have not seen any events.

99.3 To note actions from the last BSSMC meeting

99.3.1 The meeting was held on 16 March. At the Exec part of the meeting several wide-ranging issues were raised in principle:

- a) The perceived shift of use from boats from leisure to residential; tenanted boats and third-party protections, subletting boats, unscrupulous landlords with multiple boat ownerships. The role of BSS examiners, the different role of Navigation Authorities and any need for dialogue and understanding of how future interactions, including any whistle-blowing facility.
- b) From this debate the planned joint AINA/BSS meeting was agreed and that the subjects should include the shared-ownership private boat/hire boat issue and RCD II, etc.
- c) It was reported that BSS finances were exactly on track as per the plan.

At the main meeting the above items were summarised, and the following significant other items covered:

- d) It was concluded that the increase to BSS certification charges had been accepted largely without reaction due to a general perception that BSS was a necessary safeguard for users.
- e) Members considered the BSSAC question for BSSMC namely, whether or not to re-open discussions with HSE/Gas Safe Register about excluding the BSS Examiner gas testing activity from the gas regulations. The conclusion was that there was no appetite to make a formal approach and no agreement on an informal approach to GSR or HSE on this subject, indeed there was concern that an informal approach to the HSE was not possible.
- f) Canal & River Trust rep ***** long service to the BSS was recognised, as he is leaving the Trust at the end of June.
- g) It was agreed that the quarterly incident reports at BSSMC should change to better identify any trends and an analysis identifying the 'so what's'.
- h) Following the meeting a BSS Examiner case review was heard concerning an examiner who had resigned as soon as the allegations were made known to him. The outcome was to deny any re-application unless i) full re-training is undertaken, ii) presuming passing the course, undergoing a full BSS Examiner Field Assessment at his own expense after having completed ten BSS examinations, iii) before any application can be accepted, provide full and satisfactory responses to two additional complaints viewed at the case review.

Regarding point e) the IIMS Rep (who is also the Examiner Body Rep on BSSMC) added to the debate saying that examiner exposure could be reduced if they were all Gas Safe registered.

He further commented that there had been talk of a subcommittee to further discuss the matter, the BSS Manager promised to check the BSSMC meeting notes for that.

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99.4 Risk Review and Assessment Paper [RRAP] – BSS CO alarms for boats requirement

99.4.1 Referring to the Risk Review and Assessment Paper [Doc G1, BSSAC #99], the Chair clarified that this committee did not wish to repeat the work of the BSSTC but to look for unintended consequences or wider issues that were not of a technical nature. He recommended to adopt the recommendations within Doc G to introduce a mandatory BSS requirement for CO alarms on all classes of boat with accommodation spaces.

The paper was praised as being comprehensive and supportable. Discussion ensued around:

- CO alarm manufacturing and performance standards and the recommendation for the – 2 version of BS EN 50291. The effective promotion of the owner's selection of alarms made to the -2 standard is a challenge to overcome. Members' accepted that alarms made to the -1 version of the standard were acceptable.
- The AWCC rep questioned the 62% average CO alarm take-up figure.
- The critical and continuing part CO safety education and awareness plays was emphasised and accepted.
- CO alarm manufacturer's instructions versus the BSS wall mounted 150mm below ceiling height recommendation. The BSS Manager provided assurance that BSS CO alarm placement requirements were endorsed by all five main UK CO alarm manufacturers /suppliers. The Chair commented that it would be impractical for examiners to ask to be provided with the original manufacturer's instructions.
- Whether other incremental costs to the users should be written down, i.e. any increased examining costs added by BSS Examiners to compensate them for any

added time taken to complete the new checks.

- The BSSTC Chair repeated his position that when a new ECP was introduced, another was dropped. He urged member's organisational representatives on BSSTC to support this.
- Any change in effectiveness of CO alarms relevant to alarm location was suggested as a future BRE research topic.
- To ensure clarity in public facing communications concerning the definition of 'accommodation space', in terms of cabins, overnight, and canopies.
- The critical nature of promotional communications leading up to implementation, including making it easy for boat owners to choose the right CO alarm and fit it in the right place.

The IWA Rep did not understand the last paragraph on page 12, 5B, under 'BSS office/TC commentary', 'would first need to change to the NAA'. The BSS Manager said that at present only the risk to third parties can result in a mandatory BSS Requirement, a change in the Navigation Authority Agreement (NAA) would be required to change this position. The Chair added that previously there had been resistance to a mandatory requirement to install CO alarms because all fatalities had arisen from equipment misuse, now the focus is on CO entering a boat from an outside source.

There was a need to guide the owners of large petrol-engined boats as to how best to protect themselves from CO from their boat's own engine exhaust. Specifically, in the event the alarm is in the cabin and the cabin door is shut. This should be covered in the consultation and in the pre-implementation communications.

The AINA Rep brought up the very recent incident involving four people hospitalised on a large petrol-engined boat on the Broads due to a CO incident. The Broads Authority Rep noted that there had been no wind and that environmental conditions were a factor. The IWA Rep asked about petrol engines and it was agreed that there was a big difference in the level of CO risk between petrol and diesel engine emissions.

The BM Executive Interests Rep asked about the requirement for a public consultation and the BSS Manager responded that as a brand-new requirement, a consultation process was necessary, would likely last three months and begin in early August.

The BM Executive Interests Rep noted that the way ECPs were set, the private boat requirements apply as 'core' requirements to hire boats. The BSS Manager responded that the plan was to facilitate the change within BSS Examiner and boat owner documentation and on through recording on Salesforce as a core requirement.

The BSS Manager received confirmation from members that there was full support and consensus to move forward, having agreed all sections within the RRAP, namely:

- Pressures for change
- Existing risk controls
- Identification and Scale of the risk
- The detailed Specific Considerations listed in the index
- The Summary Impact Assessment
- The Recommendations

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The BSS Manager said that he had recorded the questions and that through BSSTC the consultation draft of the ECP would be further developed.

This paper would be sent to the Management Committee for endorsement and ratification, so the BSS could move forward with planned consultation, and

implementation. He noted that this was no longer a confidential paper.

99.5 Revised BSS Risk Management Process

99.5.1 The Chair summarised that the revised BSS Risk Management Process document [*Doc D1, BSSAC #99*] had the advantage of an external viewpoint, and that it described the role of this committee and the BSS Technical and Management Committees. He asked for any comments including about any unintended or unforeseen outcomes.

The YDSA Rep pointed out a typo, 'BSS Management Committee sign-of' it should be 'sign-off', page 3, paragraph 2, line 5. BSS
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The NABSE rep considered the document not to stand up well against other comparable organisation's risk management procedures and asked how this committee gets to see the Risk Register and perhaps to provide oversight. The BSSTC Chair said that the procedure did not include BSSAC oversight or BSSAC access to the risk register. He said BSSAC would see outputs from BSSTC concerning risk management activity. He went on to explain that all risks which came to the BSS office were accepted-in and logged as reported, and that a decision was made by BSSTC Chair about if the risk was already known, decided upon, and if it should be acted upon. If there was no reason to act, it was logged and nothing happened. Any new risks went to the BSSTC, and any decisions, including decisions to do nothing, were ratified by BSSTC. The BSSAC only saw risks the BSSTC decided to bring that required action; BSSAC looked at recommendations from the perspective of the wider stakeholder community and to ensure the impact of any decision could be taken into account.

The YDSA Rep asked who would be identified by the BSS Office to be involved throughout the process. The Chair responded that it would be a named person, but not necessarily the same person each time, and the BSS Manager commented that it was usually him, albeit that will change over time.

The EA Rep wondered if within the 'Definitions' on the last page, all customer groups should be listed at the top rather than spread down the list. He also suggested AINA's definition of Navigation Authorities could be used. The Chair asked him to email this definition. [*Post meeting note – both amendments made prior to paper moving on to BSSMC*]

There was a question on whether Examiners should be mentioned within the procedural document but the BSSTC Chair felt all stakeholders had been represented fairly. He characterised the document as refining out the waffle and jargon from the previous document. He noted that he needed the Risk Register to fulfil his duties and wanted it endorsed today with a 12-monthly review.

The YDSA Rep felt it ignored the wealth of inputs from BSS Examiners. The BSS Manager noted the examiners' huge part to play, including informing them of risks they were seeing more frequently. BSS
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The paper was endorsed and will now proceed to BSSMC for ratification.

99.6 Examiner CoR guidance change proposal

99.6.1 The BSS Manager explained that this item continued the actions from the previous meeting a) to achieve the view of the third 'block policy' insurer and then b) achieve agreement to the draft guidance for publication.

The BSS Manager reported that full agreement between the BSS office and the BSSAC examiner body reps could not be achieved in advance of the meeting. The Chair explained that the third insurer had agreed that they would expect examiners to co-operate with a complaint unless told otherwise.

There was discussion around examiners consulting their insurers in the case of an incident and it was noted that advice to say nothing would have to be communicated. The Chair felt that unless significant exceptional circumstances exist, the BSS should expect examiner co-operation with investigations.

The guidance was accepted, subject to review of previous text suggested by the IIMS rep, and the revised guidance will be made known to all Examiners.

[Post meeting note – the revised guidance was made known to all examiners in early July -

Examiners are expected to co-operate with BSS investigations.

Any circumstances that may delay the prompt provision of information and responses must be agreed in advance with the BSS Manager.

It is recognised that if the Examiner is suffering a serious medical incapacity or is away on holiday or has pressing personal issues to deal with, the provision of information and responses could be delayed.]

99.7 Report from BSSTC Chair

99.7.1 Referring to *Doc C1, BSSAC #99* the BSSTC Chair said that the report can largely be taken as read, however covered in brief the following items

The BSSTC Chair referred to the work to update BSS LPG tightness testing procedures. He reported that the project is nearing completion and that consultants are being employed to validate the work done in house.

Concerning the BSS Hire Boat Requirement checking procedures introduced in April 2017, it was noted on handholds on hire boats with sliding canopies was holding up the ratification of the Examination Checking Procedures (ECPs) that was hoped to be achieved within one year.

It was noted that BSSTC members had been kept abreast of developments to European gas regulations and Gas Safe procedures. The NABSE Rep noted that there would be a 10-year certification period and shared the view that most manufacturers would not go to the trouble of resubmitting, and would rather make another model, which could have negative consequences for the boat sector.

The BSSTC Chair noted a date set in July for the next meeting, which would cover the BSS LPG tightness testing procedures, some appeals and some work to update the 2015 ECPs.

99.8 Quarterly BSS Quality Management Activity Report

99.8.1 Doc F1, BSSAC #99

The EA Rep asked about BSS office training for Navigation Authority field staff, hazardous boat training, and investigation of boat related incident training. The BSS Manager explained that they were trying to agree dates.

99.8.2 The BSS Business and Technical Manager gave a verbal update on the proposed BSS Examiner Survey. He summarised that they had contracted an independent company and in seeking small examiner group to inform the development, had been oversubscribed by examiners who wanted to take part. Development was now nearly complete.

The ABSE Rep asked about age range of those helping development and the BSS Business and Technical Manager hoped this factor would be dealt with at analysis stage. There had been a positive response to the examiner survey and there is a commitment to share the results. Regarding timescale, the initiative was on track for a survey launch on 18 June.

99.9 Report from the BSS Manager

99.9.1 The BSS Manager referred to the *Quarterly report of incidents and accidents recorded, and inferences drawn [Doc H1, BSSAC #99]*. He noted a negative new trend of boaters using solid fuel appliances succumbing to boat fires in the first 5 months of the year.

The BSS Manager stated that solid fuel stove safety would be covered in YouTube style videos which would be impactful. There had been recent incidents of sinking through wet gas lockers, ending in a person drowning, and there had been a spike of incidents.

The BM Executive Interests Rep commented that MAIB released a new regulation update regarding who must report what incidents, when, and to whom. The BSS Manager noted that it was the responsibility of the relevant Navigation Authority to report reportable items to MAIB.

The BSS Manager drew attention to the BSS media release in early May regarding large petrol engines and the associated CO risk, and an incident on the Broads 6-7 weeks' later. [See also the AINA Reps report at 99.4.1, 5th paragraph].

The NABSE Rep enquired if any legal action was taken against the landlord boat owner in 3.1.6. The BM Executive Interests Rep suggested advertising any enforcement action would help protect tenants. The BSS Manager said he would endeavour to find out what if anything happened.

The NABSE Rep noted that in Table A6, 'stove' should read 'chimney'.

There was discussion on sealing ropes, their ability to seal properly and the need to select precisely the correct diameter of rope.

The BSSTC Chair noted 11 incidents out of 25 of unknown causes, which was frustrating for the BSSTC.

The BSS Manager highlighted that there have been 3 fire fatalities this year to date, all involving liveaboard boaters. One from coal or ember rolling from a solid fuel stove, where the boat owner was intoxicated, the others unknown. As soon as confirmation was available as to precise causes, there would be a BSS press release advising liveaboard boaters to take extra care, with a 10-point safety check list. .

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99.10 Items for BSSMC

99.10.1 To raise the tenanted boat issue, in the context of the position of the BSSAC that *Committee members do not believe that the risks we are seeing from unlawfully tenanted boats are being managed effectively.*

The Risk Management Process, the RRAP recommending CO alarms on boats with accommodation spaces, the change in the guidance to examiners concerning co-operating with BSS office investigations.

99.11 Confirmed dates of the remaining BSSAC meetings for 2018

99.11.1 Meeting #100 – Tuesday 13 November.

99.12 Any other business [AOB]

99.12.1 [Raised at agenda item 2] The NABO Rep reported 3 different users who had been told by 3 different examiners that they could not complete the BSS examination due to Gas Safe regulations, part way through the examination. The YSDA Rep corroborated anecdotes from owners being told to fit gas bubble testers when there was no requirement.

The BSS Manager requested details in order that complaints could be investigated, adding that Examiner newsletters and website text, made the proper procedure clear. The Chair noted that this was an issue of monitoring examiner performance.

99.12.2 The NABSE Rep, acknowledging that the next meeting is the 100th, suggested

members commemorate the work of the committee and acknowledge impact of the Committee by perhaps identifying the measures of success.

The Chair asked members to think about one thing in the Scheme they were proud of and email it to the BSS Manager in advance of the next meeting, for a cumulative discussion. All

Appendix A

Residential Boat Owners' Association (RBOA)

Notes on Craft Rented Out on Inland Waterways for Residential Use

RBOA does not support the renting out of craft for residential use on inland navigations, a view that we have previously made known to Canal & River Trust. The practice risks legitimising the concept that waterways exist, in part at least, to provide cheap housing. Safe and successful living afloat requires greater understanding and commitment than that.

Should commercially rented out boats be safety inspected on a more frequent basis than the present 4-year cycle?

Some concerns raised by floating tenants, not all BSS issues but included here to illustrate the wide-ranging issues that should be addressed if this practice is to continue:

- Safety from eviction – is the rental legitimate, i.e. approved by the appropriate Navigation Authority
- Mooring safety and personal security
- Legality of the boat – is it insured, safe and properly licensed
- Guidance as regards operating and managing on board service systems and/or navigation if necessary
- Safety for habitation – fears around dampness and harmful mould?
- Hull condition – is it watertight, sound and not likely to fail – fear of sinking
- Safety of utilities – shore lines - 12volt/240volt electrical systems (fear of break down and potential electrocution - water and electricity don't mix) – gas safety (fear of fire/explosions through bad maintenance or lack of knowledge) – easy access to isolation taps and switches
- Reliability of on board systems generally - are the boat's services reliable, not prone to failure (possibly through neglect)
- On board tap water – fears over possible contaminated water – legionella - safe to drink?
- Where there is a solid fuel stove – is it safe to use – how to use and look after it
- Safety provisions – e.g. fire and CO alarms, floatation devices, understanding combustibility
- Clear procedures as regards who to contact if/when things go wrong
- Clear guidance as to who is responsible for putting things right, if/when they go wrong
- Who and how to contact in times of emergency

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