



*Member of the World Cat Congress*

# **New Zealand Cat Fancy Inc.**

## **Health, Safety, & Wellness System**

### **for NZCF Inc. & Affiliate Clubs**

# Amendment Summary

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**07 Dec 2020**

Document          Entire document reissued with updated content and format. (Ref: 19-024.)

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## Amendment Process

- 0.1          Suggestions for minor amendments (minor errors or omissions which do not affect the intent) are welcome and may be submitted to the Secretary. These will usually be incorporated the next time the page is reissued.
- 0.2          Proposals for significant amendments should also be submitted to the Secretary but will require a process of assessment and approval prior to incorporation.

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# 1. Health and Safety Policy

- 1.1 New Zealand Cat Fancy Inc. is committed to promoting all aspects of health and safety in order to protect the wellbeing of its affiliated clubs, judges, members, show workers, contractors, and the public at NZCF sanctioned shows and activities.
- 1.2 We will take responsibility for our health and safety procedures; however, affiliated clubs, members, and judges need to be aware of their own responsibilities and fully comply with health and safety policies and guidelines.
- 1.3 This is to be achieved through commitments to the following:
  - a. Ongoing consultation between our affiliated clubs and members regarding the way health and safety is managed and practiced sanctioned shows, meetings, and activities.
  - b. Ensuring all our affiliated clubs and members are committed to health and safety and are aware of their own responsibilities in contributing to provide a safe environment for themselves, each other, and the public.
  - c. Providing the appropriate information or training for our club members in health and safety awareness, understanding, management, and responsibilities.
  - d. Meeting our statutory obligations set out in the relevant health and safety laws, regulations, and standards.
  - e. Take all practicable steps to eliminate, isolate or minimize the risks/hazards before, during, and after shows, activities, or meetings.
  - f. Accurate reporting and recording of all incidents, injuries, and near misses; as well as identifying the appropriate follow-up to avoid reoccurrence.
- 1.4 An annual self-assessment of the NZCF health and safety system by our management team and each club's representatives to set objectives and plan performance measures with targets. These will ensure compliance and continuous improvements.

New Zealand Cat Fancy Inc.  
Executive Council

Date: 25 November 2020

## 2. Health, Safety, & Wellness

### Commitment

- 2.1 The New Zealand Cat Fancy Incorporated (referred to as NZCF for the purposes of this document), is an employer of paid and unpaid (volunteer) workers who have a common interest in cat breeding, showing, and welfare. Cat shows, meetings, and training activities are held in different areas of the country throughout the year. The NZCF and affiliate clubs utilise many workplaces, which may include many visitors, so the management system and emergency procedures must reflect this.
- 2.2 It is the NZCF's intention that all matters relating to their workers' health, safety, and wellbeing will be established and maintained at the highest level possible, at every site used for NZCF's sanctioned activity.
- 2.3 The NZCF will maintain and review a workplace safety management system that aims to prevent harm to any individual in the NZCF workplaces.
- 2.4 Every individual who works at NZCF's sanctioned activities will have their own responsibilities to ensure that their actions or inaction does not cause harm to any other person or damage to property.

### Purpose & Definitions

- 2.5 The NZCF is the governing body, and all affiliated clubs will be responsible for managing their own health and safety programmes and reporting back to the NZCF.
- 2.6 The NZCF is responsible for ensuring that all facilities used for the purpose of NZCF sanctioned activities have appropriate policies, programmes, and adequate resources in place to provide a healthy and safe site.
- 2.7 The NZCF and all affiliate clubs will comply with all legislation regarding matters of health and safety. Currently these include the *Health and Safety at Work Act 2015* (also known as the *HSWA 2015*), the *ACC Act 2001*, any future amendments of those Acts, and any other legislation relevant to health, safety, and wellness in at NZCF sanctioned activities and meetings.
- 2.8 The NZCF Inc will set general guidelines which must be followed by all workers (paid and unpaid, or volunteers) and members of the NZCF Inc, Affiliate Clubs and anyone involved in their activities.
- 2.9 A **worker** is considered by this policy as being any NZCF member, NZCF affiliated club member, individuals or groups assisting clubs, and show workers (including judges, stewards, club officials, and members) at NZCF sanctioned shows and activities.
- 2.10 **Affiliate clubs** are all clubs who are governed by the NZCF.

- 2.11 A **contractor** is a person or group of people used to assist with setting up, pulling down, or running of a show, or repairman, or any other person assisting the NZCF or an affiliate club in their business of cat breeding, showing, or meetings. Sub-contractors may be used by contractors to fulfil duties required of them.
- 2.12 A **visitor** is any person who is not an NZCF or NZCF affiliate club member, a contractor, or sub-contractor.
- 2.13 **Serious harm** is considered as causing a fatality, injury, or illness which results in a person(s) receiving attention from a general practitioner, A & E, or hospital admission, or any injury serious enough to temporarily or permanently disable the person(s) and prevent them from carrying out normal work duties.
- 2.14 A **near miss** is an incident that did not result in injury but has the potential to cause harm in the future.
- 2.15 A **PCBU** is a person conducting a business or undertaking. It will usually be a business entity rather than an individual. The business will have a primary duty of care under the new Act to ensure the health and safety of workers, contractors, sub-contractors, and visitors affected by NZCF sanctioned activities and meetings.
- 2.16 The *HSWA 2015* shifts the focus from monitoring and recording health and safety incidents to proactively identifying and managing risks.

## The NZCF & Affiliate Clubs

- 2.17 The NZCF and all affiliate clubs will meet the following requirements:
- a. Provide health, safety, & wellness guidelines and general hazard registers at all activities and sites.
  - b. Identify, develop, and maintain systems to identify, assess, control, and monitor hazards and risks in the NZCF sanctioned activities and meetings. Control measures are by preferably elimination or where a hazard cannot be controlled by eliminating the hazard, by minimisation of the effects from the hazard.
  - c. Ensure health and safety officers (known as H&S officers for the purposes of this document) are suitably trained and have easy access to sufficient information to enable them to perform their functions effectively.
  - d. Develop procedures for dealing with emergencies that may arise while workers are at NZCF sanctioned activities and meetings, i.e., medical emergencies, earthquake, civil defence etc
  - e. Include everyone where possible– members, visitors, volunteers, contractors, and anyone else involved in the organisation.
  - f. Ensure reporting is carried out in a timely manner.

## Responsibilities of the NZCF

2.18 The NZCF is responsible for the following:

- a. Ensuring the consultation process is completed and, in an effort towards continual improvement, review the effectiveness of the policies and procedures annually. Keeping records of hazards, accidents and incidents, and all training completed by workers.
- b. Setting goals and objectives for health, safety, and wellness, then reviewing and reporting to the membership via Executive Council minutes.
- c. Ensuring hazards are identified, then eliminated or minimised.
- d. Ensuring that 'serious harm' accidents are investigated, recorded, and controls are put in place to reduce the chances of the accident occurring again.
- e. Ensuring that all information is communicated to affiliate clubs and their members.
- f. Leading health and safety from the top management down. Ensure everyone feels valued and are given an opportunity to be involved in their own wellbeing.
- g. Encourage a positive workplace culture where everyone feels important and knows their needs are met.

## Responsibilities of Affiliate Clubs

2.19 Affiliate clubs are responsible for the following:

- a. Acquiring and distributing information regarding changes for the health, safety, and wellness of members.
- b. Assigning an H&S officer, qualified first aiders, and floor wardens at shows, meetings, seminars, or training events.
- c. Ensure instruction is provided so that everyone knows who to report to if there are any concerns, where to find first aid kits or any other items required, and egress methods at facilities.
- d. Ensure that accidents are reported, investigated, and any follow-up or outcomes are completed. Make sure a copy of the paperwork is sent to the NZCF Health & Safety Officer.
- e. Ensure that identified hazards are eliminated or minimised as promptly as possible.
- f. Ensure that the emergency procedures are appropriate for their own circumstances, i.e., volcanic eruption would be more likely in some areas in New Zealand than in others.

- g. Including the health and safety policies and procedures in club rules and constitutions, and ensuring that all relevant alterations are made to the rules and constitutions as directed by NZCF.
- h. Ensuring that all facilities used for NZCF sanctioned activities meet with the policies and procedures of the NZCF.
- i. Ensuring that the emergency procedures documents are filled out correctly prior to shows, events and activities.
- j. Ensuring that any contractors and their sub-contractors are aware of health and safety obligations.
- k. Carry out a physical inspection of a building used for the activity prior to using it and completing a list of hazards. (Some buildings may already have suitable registers already in place, use these, but still do a walk around check once equipment has been put in place.)

## Responsibilities of Members

2.20 Members of either NZCF or affiliate clubs are responsible for the following:

- a. Carrying out their work in a safe manner and encouraging others to do the same.
- b. Assisting with any health and safety assessments or investigations.
- c. Reporting any accidents or near misses, reporting and/or rectifying unsafe conditions.
- d. Complying with all policies and procedures adopted by the NZCF or the affiliate club they are members of.
- e. Following systems for responding to and managing identified hazards, i.e., identified; assess, then eliminate / minimise as required.
- f. Ensuring any behaviour that causes any other person (or property) to feel threatened, including being the target of emotional, verbal, or physical abuse is stopped immediately. No person in NZCF sanctioned activities and meetings should feel threatened or be harmed physically, emotionally, or verbally. Social media should never be used in any way to isolate, threaten, or abuse any other person.

## Responsibilities of Judges

2.21 Judges are responsible for the following:

- a. Ensuring they are fully aware of the NZCF health and safety policies and procedures.
- b. Completing any health and safety training request of them by the NZCF.

- c. Complying with all health and safety procedures including reporting any incidents, hazards, and risks at any NZCF sanctioned event.
- d. Contributing to any health and safety procedures that may affect them.

## **Responsibilities of Exhibitors**

2.22 Exhibitors are responsible for the following:

- a. Making sure exhibits are healthy and temperament is suitable for showing.
- b. Clipping their exhibits nails prior to the show.
- c. Reporting any incidents, hazards, and risks.

# **3. Hazards – Identify, Assess, & Control**

## **Hazards**

- 3.1 A hazard can be an activity, arrangement, circumstance, event, occurrence, phenomenon, process, situation, or substance (whether arising or caused within or outside a place of NZCF sanctioned activities and meetings) that is an actual or potential cause or source of harm. It includes:
- a. a situation where a person's behaviour may be an actual or potential cause or source of harm to themselves or another person, or
  - b. without limitation a situation resulting from a. above, resulting from physical or mental fatigue, drugs, alcohol, traumatic shock, or any other temporary condition that affects a person's behaviour.

## **Hazard Identification**

- 3.2 Hazard identification involves recording all hazards in the NZCF sanctioned activities and meetings. Along with hazards which occur at a national level there will be hazards peculiar to some areas or buildings used by clubs. These must be reported to the NZCF Health & Safety Officer who will decide if they are relevant for other clubs. Each affiliate club will have its own hazard register.
- 3.3 Hazards can be identified by accident and incident reporting, by work task, or by inspection of a work area.
- 3.4 The NZCF will hold a register of all possible hazards and affiliate clubs should assist the NZCF with this process. H&S officers in affiliate clubs will need to assess if the identified hazards advised to them are applicable or not, and place those which are in the club's hazard register.

## Hazard Assessment

- 3.5 Once a hazard is identified it needs to be assessed for risk. The simplest way is asking how often the task is done, how likely is it the harm may occur, and how severe the harm is likely to be. Clubs also need to assess the cost and feasibility of 'doing' against the consequences of 'not doing'. Clubs then need to assign a control for the hazard, by preferably eliminating the hazard completely, or by minimising the risk of it happening and harm being caused.

## Hazard Control

- 3.6 Elimination is always the preferred option for hazard management. Where elimination is **not possible** the hazard effects must then be minimised.

### Example 1:

A slippery patch on the floor can be eliminated by cleaning it up. This hazard probably could not be minimised as placing a towel over the spill and leaving it there to stop slipping could cause another hazard.

### Example 2:

Loud speakers could be eliminated by not using them so loudly or staying well away from them, or minimised by handing out hearing protection devices. However, when protective devices are used, employers need to check that the devices are having the required effect, in this case, workers would need auditory testing regularly to ensure no harm is being done.

## Hazard Reporting

- 3.7 If you find a hazard or have a hazard reported to you it is your responsibility to manage it. Many accidents can be prevented if someone does something about a hazard after a near miss, or a minor accident. Everyone must make sure that their actions or inaction does not cause harm.

### Example 3:

If you ignore the spill in Example 1, above, and 10 minutes later someone is injured badly slipping on it, you could find yourself held responsible for it.

- 3.8 Clubs should look over their registers at a set period to check controls are effective and being followed. The main reason for this is to identify how frequently harm from a particular hazard is occurring. It may seem a minor incident each time it happens, but if it is a regular incident, then more action is required, and costs for injured parties will accrue. It may be that previous control is not effective or suitable, or that the person requires further training (i.e., a handler being injured at shows repeatedly).

## Public Liability Insurance

- 3.9 Public liability insurance is held by the NZCF for affiliated clubs who comply with all requirements of these policies and procedures. Failure to comply will result in cover not being granted by the NZCF or the insurer, at the discretion of either party. Currently insurance companies are legally not allowed to cover any fines or infringement fees charged to any party.

## 4. Incidents

- 4.1 All incidents, accidents, injuries, and near misses that could have caused harm to people, damage to property, or damage to the environment must be reported to the floor wardens, show manager, or H&S officer immediately.

### Response

- 4.2 An outline of an incident response is as follows:
- a. Respond to the incident or near miss promptly and positively.
  - b. Place controls on hazard. Assess and treat injured parties.
  - c. Call 111 for emergency services or arrange transport to a medical facility. Depending on the incident, consider advising police.
  - d. Preserve the scene in case of serious harm.
  - e. Collect relevant information, develop and take remedial actions.

### Reporting

- 4.3 Club H&S officers or their delegate(s) will carry out the following reporting requirements:
- a. Record any incident using the Incident Report & Investigation form.
  - b. Drive the investigation of the incident using the Incident Report & Investigation form.
  - c. Report all incidents to the NZCF Health & Safety Officer within 21 days except for serious harm incidents which should be reported as soon as practicable and must be reported within 24 hours.
  - d. Ensure that any hazards or risks identified in the investigation process are then added to the hazard register and be responsible for the implementation of the necessary corrective actions.
    - i. These will be signed, dated, and implemented within the set time frame.

- ii. The hazard register will then be updated again to show that the corrective actions have been implemented.
  - e. Upon completion of the incident being recorded and investigated, shall forward all documentation together with the Incident Report & Investigation form to the NZCF Health and Safety Officer and retain a copy for their club's records
- 4.4 The NZCF Health & Safety Officer will carry out the follow reporting requirements:
- a. Report serious harm incidents to the Shows PM as soon as possible.
  - b. Assist with insurance claim forms and reports as required.
  - c. Retain any Incident Report & Investigation forms, the WorkSafe Notification of Accident or Serious Harm form, and a master hazard register for a period of 5 years.

## Serious Harm

- 4.5 In cases of serious harm, the following apply:
- a. Refer below for explanation of serious harm.
  - b. The clubs' H&S officer must report the incident to the NZCF Health & Safety Officer, the NZCF Secretary, or the NZCF Executive Council member in charge of Health & Safety at the earliest possible moment, **after** the victim has been treated and suitable medical personnel have arrived.
  - c. The local WorkSafe New Zealand office may need to be contacted by phone or email and, if needed, they will start their own investigation. If this happens, we are legally obliged to comply with their instructions. This will include any paperwork / reports, witness names, and collection of statements.
  - d. The scene must be protected by the club H&S officer unless the person's life is at risk, or they are at risk of further suffering, or property is at risk of serious further damage. In some cases, particularly rural areas, or small towns, police may be called in place of inspectors to report on and preserve the scene until the arrival of an inspector. Photographs and/or samples may be taken by inspectors or police. Make sure public access is restricted unless absolutely necessary, i.e., access to an essential service or utility.
  - e. Advise the owner of the building (or their agent) of the incident within a reasonable time frame.

### Definition of Serious Harm

- 4.6 Serious harm is defined legislatively as any one of the following conditions that amounts to or results in permanent loss of bodily function or temporary severe loss of bodily function:
- a. Respiratory disease.

- b. Noise induced hearing loss.
- c. Neurological disease.
- d. Cancer.
- e. Dermatological disease.
- f. Communicable disease.
- g. Illness caused by exposure to infected material.
- h. Decompression sickness.
- i. Poisoning.
- j. Vision impairment.
- k. Chemical or hot metal burn of eye.
- l. Penetrating wound of eye.
- m. Bone fracture.
- n. Laceration.
- o. Crushing.
- p. Amputation of body part.
- q. Burns requiring referral to a specialist registered medical practitioner or specialist outpatient clinic.
- r. Loss of consciousness from lack of oxygen.
- s. Loss of consciousness, or acute illness requiring treatment by a registered medical practitioner, from absorption, inhalation, or ingestion of any substance.
- t. Any harm that causes the person harmed to be hospitalised for a period of 48 hours or more commencing within 7 days of the harm's occurrence.

## First Aid Treatments

- 4.7 There must be a qualified first aider(s) present at any NZCF sanctioned shows and activities and they must be listed along with their contact number on the emergency information form.
- 4.8 All first aid treatment must be recorded on the first treatment form.
- 4.9 A first kit must be available – see below for a suggested list of contents.

Alcohol sanitiser (optional)		Triangular bandage	2
Crepe bandage, med	2	Crepe bandage, lge	1
Wound dressings	2	Combine dressing med	2
Combine dressing, lge	2	Sterile gauze, packs	2

Eye pads	2	Sticking plasters	12
CPR face shield	1	Saline, 30ml	2
Scissors	1	Tweezers	1
Micropore tape	1	Steristrips (optional)	2
Disposable gloves, pairs, assorted sizes	5	Alcohol wipes	4

## 5. Emergency Procedures

- 5.1 An emergency can strike at any time. It will be sudden and unexpected. It will disrupt your routine and it will demand immediate actions by persons within the building.
- 5.2 In the event of a fire or other emergency which requires the evacuation of the building; the prime consideration at all times shall be to protect judges, members, show workers, contractors, and the public at NZCF sanctioned shows and activities from any possibility of injury or death.
- 5.3 Everyone must know what to do in the event of an emergency or a Civil Defence evacuation.

### Emergency Planning

- 5.4 All affiliate clubs and the NZCF will have and maintain emergency procedure plans.
- 5.5 The following should be part of every plan:
- a. A list of emergency phone numbers (including area codes) and the address of the building activity is to be held at, filled out prior to show day.
  - b. Emergency check list, list of qualified first aiders, floor wardens, fire exits, evacuation assembly points, for the building or area you are in, cell phone numbers for everyone.
  - c. Fire checklist, including location of nearest phone.
  - d. Fire procedures.
  - e. Emergency CPR procedures.
  - f. Emergency first aid procedures.
  - g. Possible disaster procedures – earthquake, tsunami, flood, volcanic eruption, violence/bomb threat, chemical spill procedure, pandemic.

### Responsibilities

- 5.6 The H&S officer and floor wardens must fully understand how to reduce the risk of injury and the effects of an emergency and know how to carry out a prompt, safe and orderly

evacuation of the building.

- a. Know what to do in the event of an emergency or a Civil Defence evacuation.
- b. Know where the emergency assembly area is.
- c. Hold brief at the beginning of the event.
- d. Ensure exit doors are not locked, barred, blocked, or obstructed in any way so as to prevent occupants from safely exiting the building.
- e. Ensure escape routes are regularly checked and kept clear of obstacles at all times.
- f. Being aware of anyone attending an event who may have a disability and require assistance during an evacuation.
- g. Complete an incident report after the event.

5.7 The club must display an evacuation notice in the hall and an emergency information list of contacts.

## Communication

5.8 The following must be communicated to all attending NZCF sanctioned event:

- a. What to do in the event of an emergency or a Civil Defence evacuation.
- b. Civil defence warning signal.
- c. Where emergency exits are located.
- d. Where the emergency assembly area is.
- e. On-site first aiders.
- f. The importance of reporting any incidents or near misses.

## Evacuation & Civil Defence Procedures

5.9 In the event of an evacuation or a serious Civil Defence emergency where danger to people within the building is possible, the following procedure must be followed:

### Fire

5.10 If a fire is discovered:

- a. Ensure fire service is called using **111**. This may be done using a telephone in neighbouring premises, a cell phone outside or, if safe to do so, from within the building.

- b. Clearly state the **name and address** of the building and **nature of the emergency** (fire, bells ringing, etc.). It is vital you give the full address of the scene as many towns have similar named streets and most emergency communication centres are often based in elsewhere in New Zealand and they will not be familiar with locally well-known places.
- c. Firefighting should only be attempted if it is safe to do so.
- d. Potentially dangerous equipment should be turned off.
- e. Warn others in the immediate area to evacuate.
- f. Do not carry food, drink or bulky items when evacuating.
- g. Close doors and leave lights on.
- h. Leave immediately by the nearest safe exit route. Move quickly but **do not run**.
- i. Assist any person with disabilities.
- j. Report the location of the fire to the fire service.
- k. Stay outside the building until the 'all-clear' is given by the fire service.
- l. Follow all instruction from the fire service.

## Civil Defence

5.11 In case of a Civil Defence emergency:

- a. Do not evacuate.
- b. Only on instruction from Civil Defence move outside to the emergency assembly point.

## Earthquake

5.12 Should an earthquake strike:

- a. Stay clear of loose items, cabinets, and high-rise storage.
- b. If outside, stay clear of buildings and overhead wires.
- c. Try to reach a position in a doorway or **stop, drop, and hold**.
- d. Stay well clear of windows or glass doors.
- e. Only evacuate outside after the shaking has stopped.
- f. Find an open space once outside. Remain well clear of buildings and overhead wires.

## Tsunami

5.13 Should you become aware of a tsunami threat:

- a. You need to be at least 35 m above sea level or at least 1 km inland and stay away from rivers, etc, which may act as a pathway for tsunami water flow.

- b. Do not go sightseeing.
- c. Listen to the radio for information and follow Civil Defence instructions.

### **Volcanic Eruption**

5.14 During a volcanic eruption:

- a. stay indoors as much as possible, and
- b. if you must go outside:
  - i. use protective clothing,
  - ii. cover your head,
  - iii. breath through a mask, and
  - iv. carry a torch.

### **Floods or Adverse Weather Events**

5.15 In case of floods or adverse weather events:

- a. Be prepared to go to high ground.
- b. Do not go into floodwaters alone.
- c. Do not go sightseeing.
- d. Do not drink flood water, stay away from outside drains / sewer systems.
- e. Be cautious if going outside and high winds are present.
- f. Be cautious at doorways if high winds are present.
- g. Consider any other adverse weather hazards (ice, cold, snow, heat) and treat any symptoms present.

## **6. Bullying, Threatening, or Violent Behaviour**

6.1 This will not be tolerated in any form at any workplace for an NZCF sanctioned activity. Every person has the right to not feel threatened, and not be subjected to emotional, verbal or physical abuse or violence. Social media should never be used in any way that would be harmful to a person or persons. The NZCF has a complaints procedure which should be followed in the event there is a problem.

- a. Emails and social media, along with any form of communication should not be used to start or continue any form of bullying, threatening, intimidating, or isolating behaviour. Isolating behaviour is where a person is subjected to public shame or made to feel any number of people are all against them. The behaviour makes the victim feel isolated and is a form of emotional harm.
- b. Incident reports need to be completed and sent off to the NZCF Health & Safety Officer as for any harmful incident.

6.2 In the event this occurs you can talk to the party or parties involved and advise them that the behaviour is not acceptable and ask that they stop. Hopefully this will be enough and things will settle quickly. However, if this does not work:

- a. Attempt to separate the parties to prevent any escalation of behaviour. Do not take sides. Officials should be made aware of the problem as soon as possible.
- b. Discuss what has happened to them separately. You can be understanding, but do not take sides or agree with anything that is said.
- c. Be aware of any party or parties that may be victims, these people need support. Sometimes all parties will feel like victims, do not make judgements, just support without taking sides.
- d. Allow all parties time to cool off. Hopefully things will settle quickly and everyone will return to what they were doing. All parties should be aware that further behaviour of this type will be taken seriously, they may be asked to remove their exhibits and leave the show, or police may be called if the behaviour continues or escalates.
- e. Shows are very busy with a limited number of officials available to deal with this type of problem. If this is the case all parties should be informed they need to 'cool off' before returning, and as in d. above may be asked to leave, or have the police called.

## 7. Planning & Review

7.1 Like any business practice we must plan and review to ensure we are continuously improving our health and safety performance. An annual review of our current health and safety plan is our opportunity to check on our performance and make improvements. The annual plan will be reviewed with the NZCF Executive Council, the NZCF Health & Safety Officer, and clubs' representatives.

7.2 At a minimum, the following questions should be answered:

- a. Have we achieved planned goals?
- b. Are hazard controls or recommendations from investigations still open?

- c. Has feedback been received from employees that hazard controls may not be working?
- d. Is there is strong evidence that hazard controls are not working?

