To connect people with dragon boating across Australia.



Dragon Boating WA

HEALTH AND SAFETY MANUAL

Revised June 2023

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Amendment Record Register

Issue #: 4

Issue Date: June 2023

Rev.	Date	Details	Description of Changes	Approved By
1	10/07/2020	Manual reviewed and amended SK	Following areas added scope, purpose, alcohol, on water procedures and conditions, safety clothing and equipment, Incident and hazard reporting and risk. Removed sweep specific responsibilities and substituted on water procedures and conditions.	Barbara Clarkson
2	15/02/2021	Manual reviewed and amended SK	Amended to align the Australian Standards for health and safety management, added risk management criteria and Risk Management Policy.	Barbara Clarkson
3	10/02/2022	Section added	8.14 Sweep PFD Safety Requirements added and Safe365 to section 10.	Sheryl Kelly
4	Jun 2023	Manual reviewed and amended BB	8.14 Sweep & U18 PFD Safety Requirements updated and minor changes.	Brad Brooksby
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1 Introduction

Dragon Boating Western Australia (DBWA) is committed to providing, promoting and maintaining a healthy and safe sporting environment.

DBWA believes a Health and Safety Management System (HSMS) is good practice and vital for profitable and sustainable growth. We strive for safe sporting environment, and we will not risk causing harm to athletes, sweeps, drummers, volunteers or the community. Refer to DBWA Safety and Health Policy – Appendix A.

Health and Safety (HS) policies, plans and procedures have been developed with the aim of providing and maintaining a safe environment for all our athletes, volunteers, visitors and stakeholders. Proactive health and safety require active involvement, commitment and co-operation of all parties cooperating together to create a safe and healthy sporting environment.

The Health and Safety Management Plan (HSMP) has been compiled:

- as a general guideline.
- in consultation with board members and other key stakeholders.
- to comply with relevant legislative requirements.
- with reference to relevant Australian Standards, Australian Dragon Boating Federation (AusDBF) and guidance material.
- with the intention of conducting regular reviews to ensure continuous improvement.

Copies of the plan are available for all athletes, volunteers and stakeholders on the DBWA website.

This HSMP will be reviewed by current board members, in consultation with stakeholders, at least annually, to determine if it remains relevant, appropriate and with the philosophy of continuous improvement. Where significant legislative change occurs, a review will be undertaken immediately.

When a review is completed, any changes and improvements will be communicated to all relevant stakeholders in a timely manner.

DBWA has endorsed the National Integrity Framework and the AusDBF Safety Manual.

2 Scope

This Health and Safety Management Plan defines the safety requirements and standards required to be demonstrated and implemented by DBWA registered clubs, athletes, officials and volunteers.

This manual focuses on specific safety information as it pertains to Dragon Boating in Western Australia (WA). The full AusDBF Safety Handbook is available on their website https://www.ausdbf.com.au/home/

3 Purpose

The purpose of this plan is to describe the scope of health and safety management, define accountabilities of all persons involved and to provide guidance for all activities that impact the sport. The HS plan is also used to inform club members and external parties who require information about DBWA safety requirements.

This plan will include essential information for persons and responsibilities of club members and guidance for hazard identification, risk assessment and controls, managing incidents, emergency response and review/monitoring processes.

To understand the external issues, the DBWA Board will monitor and consider issues coming from:

- Legal and legislative requirements.
- Sporting regulations and rules.
- Technology changes.
- Club and member requirements.
- Cultural and social expectations on an international, national, regional and local level.

To understand the internal issues affecting our safety policies, the DBWA Board will monitor and consider issues coming from:

- Australian Standards.
- Australian Dragon Boating Federation (AusDBF).
- International Dragon Boating Federation (IDBF).
- The ongoing safety performance of dragon boating in WA against this plan.

4 References

- DBWA Health and Safety Policy.
- DBWA Risk Management Policy.
- AusDBF Safety Handbook.
- AusDBF Sweep Guidelines and Safety Procedures.
- DBWA Risk Register.
- DBWA Risk Assessment.
- DBWA Incident Reporting and Investigation Procedure.

5 Risk Management, Legal and Other Obligations

Using a risk management system approach allows DBWA to identify HS aspects and impacts, and to determine appropriate risk control measures.

The risk management framework is embedded within DBWA operational policies and practices.

DBWA has systems in place to identify relevant legislation, standards, specific approvals, licenses and/or registration for its sporting events and operations.

DBWA Board, in conjunction with relevant experienced and qualified individuals, shall ensure that:

- applicable legislation, licenses or registration is determined.
- copies of all applicable legislation, AusDBF guidance materials, standards etc. are readily available in electronic format.
- a mechanism is in place to update any changes in a timely manner.
- legal responsibilities are documented and communicated to all relevant individuals.

As with any water sport, and because of the environment itself, there is always an element of risk in dragon boating.

It is the duty of all who participate in the sport to be aware of the potential risks inherent in the sport. Be safety conscious and ensure that dragon boat racing is conducted in a healthy, safe and responsible manner.

Managing the identified hazards is the responsibility of all associated with dragon boating. This includes, but is not limited to, people managing and administering the sport, sweeps, athletes, drummers, regatta staff (including volunteers), contractors, service providers and officials. Managing hazards is a collective effort and focuses on making dragon boating a safe sport and environment.

6 Leadership and Accountability

Board Directors, Club Presidents, Club Committee Members, Coaches, Officials, Athletes and Volunteers shall know, understand and apply their respective responsibilities and accountabilities in relation to health and safety.

6.1 DBWA Board

DBWA Board is responsible for setting the vision and goals for DBWA in relation to health and safety.

The Board is specifically responsible for:

- setting goals and targets in relation to HS.
- reviewing HS performance.
- regularly reviewing risks which may impact on Dragon Boating events and operations.

- review the HS policies, plans and procedures on a regular basis to ensure that they comply with legislative requirements, AusDBF and whenever there is a significant change to the sporting environment or practices.
- provision of adequate resources for developing, implementing and reviewing the HSMS.

6.2 Club Presidents and Club Committees

Club Presidents and Club Committees are responsible for the implementation and compliance with the HS systems for their Clubs. Their responsibilities include (but are not limited to):

- demonstrating leadership and proactive commitment to HS by personal example.
- review and development of club specific health and safety policies, plans and procedures to ensure
 that they comply with DBWA and AusDBF requirements and whenever there is a significant change to
 the sporting or club environment or practices.
- ensuring provision of adequate resources for the implementation and maintenance of HS.
- assisting with the coordination and continual improvement of the HS.
- ensuring that relevant club members are trained and competent to undertake the accredited positions within the Club.
- ensure all equipment is adequate and suitable for use, at all times.
- counsel any Club members for failing to satisfactorily discharge the duties and responsibilities allocated to them.
- recognise and celebrate positive contribution to health and safety within the Club.

6.3 Coaches, Team Managers and Sweeps

Coaches, Team Managers and Sweeps are responsible for club athletes and guest paddlers under their control. Their roles and responsibilities in relation to health and safety include (but are not limited to):

- provide information on health and safety for the sport.
- ensure that all new athletes and where necessary visitors are aware of the hazards involved in the sport and are fit to participate.
- facilitate safety briefing at the start of a training session.
- ensure all athletes are provided with instruction and direction to undertake the paddling safely.
- ensure all safety equipment is in good working order.
- monitor sporting activities to ensure compliance with health and safety requirements.
- demonstrate commitment to HS by personal example.
- ensure all incidents and hazards are reported by completing an incident report and forwarding to DBWA.
- gather emergency contact details of all members and visitors.

6.4 Athletes

Specific roles and responsibilities of athletes include (but are not limited to):

- look after their own health and safety and the health of safety of other individuals during training and events.
- comply with health and safety procedures.
- monitor and encourage team mates to follow safe practices.
- report any unsafe act, hazard or incident immediately.
- participate in safety briefings.
- wear appropriate clothing and footwear at all times.
- correctly use safety equipment and sporting equipment supplied.
- inform the Coach or Sweep if they are unwell or have an existing injury that may restrict their participating in an event or training.
- participate and contribute to maintaining training and sporting events in a safe manner.

6.5 Officials

Officials' responsibilities will be to:

- provide support and assistance in the implementation of health and safety procedures.
- report any unsafe act, hazard or incident immediately.
- provide health and safety information at events.
- liaise with DBWA, AusDBF and Senior Officials relating to health and safety.
- promote and lead by example good health and safety practices.
- keep up to date on dragon boating rules and regulations.

6.6 Visitors and Volunteers

All visitors and volunteers attending a dragon boating event or club will be required to comply with the requirements of the health and safety and shall:

- participate in a safety briefing outlining hazards and associated risks they may be exposed to
- inform Coach or Sweep if they are unwell or have an existing injury that may restrict their participation.
- wear appropriate clothing and footwear at all times.
- comply will all safety instructions given by the nominate DBWA or club representative.
- follow any direction given by DBWA designated officials or Club representative in the event of an emergency at an event or training session.
- report any hazard, near miss or personal injury while at an event or participating in Club training.

7 Communication and Consultation

Consultation is integral to good health and safety management. A team approach has proved successful in communicating health and safety requirements, improving standards, commitment, morale and giving a sense of ownership at all levels. Having a shared vision and common goals can improve health and safety. This creates an environment where all persons involved feel they have some ownership of the development process to ensure that health and safety is implemented and successful.

7.1 Safety Briefings

DBWA encourages all Clubs, athletes, officials, volunteers and visitors to hold and actively participate in safety briefings at Club training and DBWA events.

7.2 Safety Alerts or Safety Communication

DBWA or Clubs will prepare and distribute health and safety related information on incidents, identified hazards and to keep members up to date with issues relevant to dragon boating. The information may be distributed via email to club presidents or the nominated DBWA contact Club, or posted on the DBWA website as appropriate.

The content of the information should be discussed during Club committee meetings or safety briefings as appropriate.

8 Hazard Management

Hazard management refers to the overall process of identification, assessment/evaluation and control of potential injury, harm or other adverse and unwanted effects from exposure to hazards. Risk is recognised as precisely what it implies – a possibility.

Commencing from planning, DBWA and WA Clubs shall use risk management principles and methodologies to identify hazards, analyse (assess and evaluate) and manage the associated risks.

8.1 Hazard Identification and Reporting

WA Clubs are to encourage their members to identify and report hazards that may be present at Club venues, training and regatta events, to enable the assessment of the risk associated with the hazard, resolve the hazard where able or implement suitable controls to reduce the exposure or eliminate the hazard, to as low as reasonably practicable. Hazard Reporting is to be done via the Safe365 Safety Management Program app, which can be accessed by the nominated club representative.

WA Clubs are responsible for reporting and recording the hazards relevant to their Club and activities. Hazards which have been identified are to be included on the Clubs specific risk register and assessment.

DBWA is responsible for identifying and managing hazards relevant to DBWA events and will include these in the DBWA risk register and assessment. Safety Handbook, Risk Assessments and information is available from the DBWA website.

https://www.dragonboatingwa.asn.au/documents/health-and-safety/

8.2 Risk Assessment and Evaluation

WA Clubs are required to have completed and submitted to DBWA a risk assessment in relation to their sporting activities, including training, corporate events, attendance at sporting events and transport of boats.

A risk assessment is the process of identifying hazards associated with dragon boating, determining the likelihood and consequence of that hazard, and implementing suitable controls to eliminate and or mitigate the risk of an incident occurring.

The risk assessment and evaluation process will incorporate:

- Consequences if the incident should occur.
- Likelihood of the incident happening, combined with exposure criteria.
- Risk level (likelihood and consequence combined).

8.3 Consequences

When considering consequences, it is important to consider more than just people, other potential outcomes may have a greater effect such as property and environment. When determining the consequences, the highest score of columns 2, 3 and 4 on the matrix should be utilised. The consequences are ranked from negligible to fatality.

Classifications		Categori		
		Health and Safety	Environmental	Financial
Negligible	Negligible risk – Minor compromised safety in unimportant areas.	Results in first or no injury. (e.g. band aid).	No risk of Environmental Damage.	Damage - Less than \$100
Minor	Minor risk — Partly compromised safety in less important areas of event.	May result in a minor injury (e.g. strained muscles).	No environmental damage.	Damage - Less than \$1000
Medium	Moderate – Partly compromised safety in key areas of event.	May result in moderate injury (e.g., broken bone).	Environmental Damage within notifiable limits.	Damage - More than \$1000 Less than \$5000
Major	Major – Mostly compromised safety of event.	May result in serious injury.	Environmental Damage requiring extensive correction.	Damage - More than \$5000 Less than \$50,000
Severe	Severe – Completely compromised safety of event.	May result in loss of life.	Environmental Damage requiring extensive correction.	Damage - More than \$50, 000

Likelihood

Determine the probability from rare to almost certain. Using the likelihood chart establish the probability of the consequence severity occurring. Not the probability of the incident / event occurring.

Likelihood		
Rare	Very unlikely but not impossible, unlikely over a 10-year period	
Unlikely	Plausible, could occur over a 5-10-year period	
Possible	Reasonable likelihood that it may arise over a 5- year period	
Likely	High probability, likely to arise once per year	
Almost certain	Could occur several times a year	

Risk Level

After determining the likelihood and consequence, the next step is to calculate the risk. The agreed outcome from consequences table and likelihood table should then be applied to the risk assessment matrix to determine the level of risk.

Likelihood	Consequence				
Likelinood	Rare	Unlikely	Possible	Likely	Almost Certain
Fatality	Medium	High	High	Severe	Severe
Serious	Medium	Medium	High	High	Severe
Moderate	Low	Low	Medium	High	High
Minor	Low	Low	Low	Medium	Medium
Negligible	Low	Low	Low	Low	Medium

The criteria for determining the acceptability / unacceptability of the risk will be identified or sought in consultation with the club committee and club members.

DBWA's Risk Register and Assessment is available on the DBWA website for reference https://www.dragonboatingwa.asn.au/documents/health-and-safety/

Risk Control

All individuals are actively encouraged to correct hazards, if safely possible, as and when identified.

If this is not safely possible or it is outside an individual's ability to deal with or rectify the hazard immediately, that individual must make sure that there is no risk of another being exposed to the hazard.

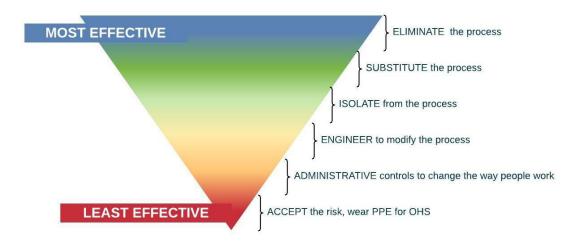
This can be done by informing a club committee member, coach, team manager or sweep. Where available a tag or warning information is to be included.

The hazard must be reported as soon as possible, and the club shall initiate the appropriate corrective action. All hazards should be documented using the appropriate form and forwarded to the club and DBWA where appropriate. A formal investigation will be initiated as required.

Reporting of hazards or near miss incidents is seen as proactive (positive) reporting as no injury, damage or loss has occurred. It therefore provides an opportunity to prevent either an accident or recurrence.

Having identified potential hazards, risk controls shall be identified to control/mitigate those hazards. The recognised hierarchy of control for developing risk management solutions shall be followed. The hierarchy (preferred order) is:

- Elimination: Eliminating task or processes that are not necessary for safe operations.
- Substitution: Where materials/equipment have been identified as a high risk then the preferred options it to replace the material/equipment with a less hazardous one.
- Isolation: The hazard is separated from the environment or individuals to reduce the risk of exposure.
- Engineering: The removal of potential hazards by modification (re-engineering). This, for example, may involve such actions as re-designing equipment.
- Administrative Controls: The application of administrative controls may include such actions as limiting the time exposure, training/re-training, provision of standards etc.
- Personal Protective Equipment: The provision of personal protective equipment does not eliminate the hazard, but only shields the individual from it.



8.4 Swimming Test

Dragon boating is a water sport. incidents on the water can lead to people drowning. To mitigate the risk of drowning all athletes (sweep, drummer, paddler, coach) in a dragon boat must be able to swim confidently 50 m in clothing (with a shirt, shorts, sandshoes as a minimum) and tread water in the same clothes for 10-15 minutes without support.

Juniors (under the age of 18 years) are required to wear a Personal Floating Device (PFD) when within 3 m of the water (training as well as racing). AusDBF Rues of racing CR 7.10 Crew Safety.

From 01 July 2023 it is mandatory for any person in a dragon boat not paddling to wear a PFD during training sessions (e.g., club, corporate, come & try etc.) or regattas. AusDBF Safety Manul.

Any person who cannot satisfy these requirements must wear a lifejacket or a PFD. All paddlers are required to undertake a swim test annually and to be recorded by Clubs. This test is to be conducted under the supervision of a nominated club member and competent swimmer or members for verification.

8.5 Alcohol

At no time should an athlete, sweep or coach participate in training or regatta events in a dragon boat whilst under the influence of alcohol and or illegal drugs (or drugs that may affect their ability to respond in an emergency situation or participate safely in a dragon boat).

8.6 Fitness

Athletes fitness is primarily the responsibility of the athletes. It is important that qualified club coaches recognize that not all athletes may be fit for competition at the beginning of the season; club coaches are to cater for athletes of differing fitness levels, particularly at the beginning of the season, or when a new member joins the club. The intensity of training will increase commensurately.

Regular fitness tests undertaken periodically such as benchmark testing may indicate the level of fitness of athletes and allow coaches to assess their fitness for the rigors of dragon boat training and competition but are not mandatory.

Where a coach assesses that an athlete does not have the requisite fitness levels to compete, the paddler must be advised for their safety that they will not be placed into a race boat until they acquire the appropriate fitness levels.

8.7 Medical

Dragon boating is a physically intense sport. Any persons who have (or has had) heart disease or a family history of premature heart disease is recommended to seek clearance to paddle from a medical practitioner. Further to advise, as a minimum, an annual check-up from a medical practitioner.

It is recommended that any persons who possess two additional risk factors (from smoking, diabetes, hypertension, high blood fats, family history, inactivity) or a severe risk factor (including treatment for these) get clearance to paddle from a medical practitioner annually. They are also advised to have an exercise stress electrocardiogram (ECG).

Athletes who have a diagnosed medical condition that places them as risk due to the physical nature of the sport are requested to advise their Coach of their problem at the beginning of the season, or immediately after the condition is diagnosed. If a medical condition is exacerbated while undertaking a dragon boat activity, the athlete, sweep or drummer must notify the coach as soon as possible and cease the activity, until such time they have consulted with their medical practitioner or GP and medically cleared as fit to return to training.

- Privacy act provisions dictate that people do not have to divulge this information.
- If people chose not to surrender their medical information, they must fill out an indemnity form absolving the Club of all responsibility.

It is the responsibility of club members with a medical condition to equip themselves with the appropriate medication while involved in dragon boating – both on and off the water.

Athletes who are likely to suffer from an ailment or an illness while in a dragon boat must bring their medication with them on the boat.

A basic first aid kit must be carried in the dragon boat when on the water/training.

Members and visitor's emergency contacts must be available at all training sessions.

8.8 First aid precautions

Athletes are to:

- Take care to avoid infection if they have open wounds or a skin problem.
- Disinfect open wounds that might occur during training, as soon as possible.
- Try to avoid getting open wounds wet by either covering them with a waterproof dressing or not training until it has healed.
- Report any injury (particularly a head injury) to the coach or sweep immediately. The Sweep or Coach will assess the situation and take immediate action if the problem warrants it.

8.9 Impairment through Injury or Exhaustion

If an athlete is injured during a dragon boat activity the boat is to be stopped and the injury assessed by First Aider. If it is minor in nature the activity may recommence with an agreement between the sweep /

first aider and injured person on the best course of action, otherwise the injured person is to be taken to shore as quickly as possible and the appropriate first aid treatment given.

If an injury occurs during a regatta the athlete will do a self-assessment and alert the sweep / team if they are uncomfortable. If this occurs the boat is to be brought to a stop and the appropriate action taken.

If an athlete becomes exhausted during an activity, they must stop they can continue (self- assessment) with the activity. If the exhaustion continues the athlete must inform the sweep / coach who will decide on the best course of action (e.g., place the paddler in the safety boat if one is available, sit them in the back without paddling, return them to shore).

8.10 Concussion

Concussion is defined as a mild brain injury caused by trauma that results in temporary dysfunction of the brain. The trauma can be direct as from a blow to the head or indirect (whiplash). Concussion generally causes temporary loss of brain skills such as memory, thinking abilities and balance.

In dragon boating it can be caused by a fall and hitting your head on the boat as you get in or out of the boat, by a paddle accidently striking the head of an athlete during training or racing, or by another boat in the case of a collision.

Paramount in this situation is the welfare of the concussed person.

Coaches or those responsible for observing the welfare of the athletes, shall keenly observe the training session and be fully cognisant of any occurrence that appears to have rendered an athlete concussed.

Other than consciousness, signs to observe include loss of balance, irritability, pale complexion, poor concentration, slow or altered verbal skills, inappropriate behaviour, mental confusion and memory loss.

The athlete should be removed from the training session, first aid rendered and to attended to a medical facility immediately available. Once safely removed, the athlete's condition must be monitored to determine the extent of the injury. This shall be reported to the coach.

Generally, physicians with expertise in concussion are not present when the concussion is sustained, and the initial assessment of an injured athlete is done by the coach, sweep or a member with first aid, however it is recommended that a person who has sustained a head injury is taken to Accident and Emergency to be assessed by a Doctor.

Any athlete assessed as concussed shall not return to training until a medical certificate by a registered medical practitioner is provided, clearly stating the athlete is fit to full participation.

8.11 Extreme Weather Conditions

Dragon boating is an outdoor sport, extreme weather conditions of heat or cold are to be assessed and the following measures to be considered to reduce the risk of injury or illness:

- Check weather conditions prior to leaving the shore.
- water sprays to reduce body temperatures during events or training in hot weather.
- a freshwater fountains or bottles of water for athletes.
- minimising the 'on water' time for athletes outside of the racing or training. This is to prevent crews from overheating or getting too cold.
- Suitable clothing for the weather conditions.

DBWA has a specific Weather Policy which should be referred to for all dragon boat activities and accessible via the DBWA website.

8.12 Emergency Communication

A list of vital/emergency telephone numbers should be available at all training sessions and inside every safety boat to include:

- Doctor / Ambulance /Police.
- Fire Department.
- Local hospital casualty department.

- The emergency service that can provide the quickest on-water response.
- The possible need for emergency communication from the water should be considered whether by two-way radio or by mobile phone.

Athletes and visitors next of kin information should be retained by club administration in case of an emergency event.

8.13 Safety Clothing and Equipment

Athletes should dress for the conditions. In the summer months – a paddlers wardrobe should include:

- Race shirt, long sleeve shirt or singlet top.
- Shorts, leggings or paddling shorts.
- Boat shoes or the like.
- Hat, sunglasses, sunscreen.
- Water bottle.

In the winter months, athletes should dress for the conditions remembering that hypothermia can kill. As such an athletes should dress accordingly in suitable warm clothing that will allow sufficient flexibility and movement for training.

Safety equipment in the dragon boat should include the following items:

- First Aid Kit.
- Bailers.
- Lights on both front and back of the dragon boat (night-time).
- Torch (held by sweep).
- Rope (in case of requirement to be towed).

8.14 Sweep and Drummer Safety Requirement

All Sweeps and Drummers are required to wear a Personal Flotation Device (PFD) at all times.

All Level 1 Sweeps must have a L3+ Sweep sitting in the back of the boat with them when sweeping.

DBWA highly recommends that L2 Sweeps are accompanied by a Level 3 Sweep (where possible) during regatta racing to allow for the L3 to give advice and to take over if necessary.

All Sweeps must maintain a current first aid qualification, Working with Children Clearance and maintain a minimum of 20 hours annually for reaccreditation.

9 Training and Competency

All clubs should ensure that there is an orientation provided to all new members, guest paddlers, volunteers and visitors. The information provided is dependent on the club environment and event. This may include but is not limited to:

This may need to change depending on the club activities:

- general club familiarity.
- Identification and introduction to club members.
- specific area orientation e.g., club launch area or pontoons.
- housekeeping and cleaning requirements.
- manual \ equipment \ boat handling.
- instruction and technique for paddling.
- safety equipment and handling.
- incident \ Hazard reporting.
- emergency response.
- injury or illness declaration and management.
- on or off water safety management.

Clubs will maintain training records and certification on all registered coaches and sweeps. This allows the club and DBWA to identify those individuals who have the necessary skills to perform the tasks assigned to them.

10 Incident Reporting

In the event that an incident occurs during training and or a regatta that results in a damage, injury/illness, environmental, near miss or involves the community or third party it is to be reported to DBWA on an Incident Report submitted within 24 hours of the incident to Safe365 incident reporting software. In the event that Safe365 is not accessible a written incident report form is available from the DBWA website and can be submitted to the DBWA Secretary.

Further information in relation to incident reporting can be obtained from the DBWA Incident and Investigation Procedure available on the DBWA website

https://www.dragonboatingwa.asn.au/documents/health-and-safety/

11 Document Control and Review

DBWA are the document owners of this plan and the DBWA Committee will review this plan in consultation with relevant stakeholders at regular intervals (annually), or sooner when deemed necessary.

12 APPENDIX A - DBWA SAFETY AND HEALTH POLICY

13 APPENDIX B - DBWA RISK MANAGEMENT POLICY