



School Travel Group Health & Safety Management System - Part 2

Notes:

1. This document is the property of School Travel Group Ltd, 1 Jubilee Street, Brighton, West Sussex, BN1 1GE and must not be copied, reproduced or distributed in whole or in part without prior consent.

This document, our Health & Safety management system, has been compiled with the purpose of defining the Health & Safety management system which is in place within School Travel Group Ltd. Its purpose is to enable employees and representatives to pro-actively provide products and services with due care and diligence towards all aspects of Health & Safety.

To meet individual business needs, this document may be shortened and/or its content extracted into a brand specific Health & Safety management system document, providing:

- the content extracted from this document is not altered and/or amended in any way whatsoever;
- a brand specific document (whether as a shortened version and/or containing content extracted from this document) makes reference to this document; and
- a brand specific document is signed and/or approved by the relevant member of the senior management team, as defined on page **Error! Bookmark not defined..**

However, for all such brand specific documents, this document will continue to apply in full.

School Travel Group Ltd is a member of ABTA and, consequently, is subject to its 'Code of Conduct'. Our air holidays and flights are ATOL protected by the Civil Aviation Authority and we also hold an IATA License.

The following table lists the various registrations and/or licences held by the business:

Business	ABTA No.	ATOL No.	IATA licence
School Travel Group Ltd	V5376		9127495-6
STS Pavilion Travel Ltd	W0798	5259	

School Travel Group Ltd has public liability insurance of up to £15,000,000 arranged with QBE Insurance (Europe) Limited.

School Travel Forum



School Travel Group Ltd is a full member of the School Travel Forum, the group of leading school tour operators who promote good practice and Health & Safety in school travel.

All members of the forum adhere to a rigorous 'Code of Practice' and Health & Safety management standards which meet the requirements of DCSF (Department for Children, School and Families) guidelines. Members are externally verified each year by suitably qualified independent Health & Safety professionals.

During the course of developing the 'Code of Practice', and in addition liaising with the DCSF, advice has been sought from all leading Educational Unions and Associations.

The School Travel Forum initiative has the support of the SHA, NAHT, ATL and PAT, and is welcomed by the Outdoor Education Advisors' Panel. The principles on which it is based have the support of the NUT

and the NASUWT who advise their members wishing to organise school trips to use companies that have this type of scheme.

Details of the forum's 'Code of Practice' are available online at: www.schooltravelforum.com



Learning Outside the Classroom

The Learning Outside the Classroom (LOtC) Quality Badge provides for the first time a national accreditation combining the essential elements of provision (learning and safety) into one easily recognisable and trusted Quality Badge for all types of Learning Outside the Classroom provider organisations.

STS Pavilion Travel Service are proud to have been awarded with a 'Quality Badge' issued by the Council for Learning Outside the Classroom (Certificate Ref: R2QB100665), a reflection of our support for providing high-quality experiences for all young people.

Details of the 'LOtC Quality Badge' are available online at: www.lotcqualitybadge.org.uk



(All STS Pavilion brands covered with the exception of Adventure (e.g. Watersports))

School Travel Group Safety Policy Mission Statement

The safety of our groups is the single most important responsibility of School Travel Group. School Travel Group Ltd is committed to ensuring that all precautions are taken and all regulations are complied with as far as reasonably possible to provide our customers with the highest possible safety standards throughout our product and at all times.

- School Travel Group will provide the resources both financial and human to implement the safety policy.
- School Travel Group will proactively undertake all possible measures to minimise the risk of an accident occurring.
- School Travel Group will ensure our products and services (in relation to hotels, coach companies and activities) comply where applicable with the current local/national standards as a minimum requirement and maintain this in the relevant School Travel Group supplier files
- School Travel Group personnel training (in-house and by professional bodies) will be sufficient to enable them to carry out appropriate supplier audits
- School Travel Group personnel training will enable staff to competently apply the safety policy
- School Travel Group personnel will be trained effectively to respond quickly and efficiently in the event of any emergency
- School Travel Group will establish and maintain effective systems of communication with our clients
- School Travel Group will keep up to date with safety requirements and practices applicable to the provision of educational tours
- School Travel Group will regularly review and update the safety policy as and when appropriate
Safety improvements and monitoring is everyone at School Travel Group responsibility and management will assist to ensure that the safety aspects of all our tours are of the highest importance.

1 Issue control

This document is issue controlled and, as such, printed copies may not be up to date. To check its validity and/or to obtain an up-to-date copy, please check on the Intranet website or contact the Health & Safety Manager.

This document replaces the existing 'School Travel Group Ltd Safety Management System' and the 'STS Pavilion Travel' Safety Management System', and has immediate effect.

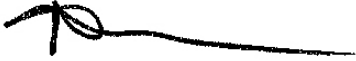
2 Authorisation

This document is approved and authorised by the Chief Executive Officer, Education Travel Group Ltd, and the Managing Director of Tours & Ski, School Travel Group Ltd, and applies to the whole of School Travel Group Ltd (hereinafter referred to as 'STG'),

The CEO and Managing Director of Tours & Ski are responsible, on behalf of Education Travel Group Ltd, for Health & Safety throughout STG and are authorised (following appropriate consultation with employee representatives and the appointed 'competent person') to, as necessary, review, update and amend this document, including its supporting documents.



Paul Gilbert
Chief Executive Officer
Education Travel Group Ltd



Nigel Wright
Managing Director of Tours & Ski
School Travel Group

Part 2: OPERATIONAL CONTROLS AND IMPLEMENTATION REQUIREMENTS

This part of our Health & Safety management system sets out the operational controls and processes that will be adopted in order to effectively deliver the requirements of the 'Education Travel Group Ltd Health & Safety policy' statement and Part 1, 'Management organisation', of this document.

6.1 Communication and consultation

6.1.1	Implementation overview	<u>Tour reports.</u> All clients are provided with 'Tour Report' forms which we request are completed and returned by the group leader. All forms are reviewed by a member of the senior management team. If clients highlight areas of concern regarding Health & Safety, these are investigated immediately and appropriate action taken. Tour report trends are reviewed, as a minimum, on an annual basis.
6.1.2		<u>Pre-tour information.</u> The group leader also has a part to play in heightening participants' awareness of Health & Safety issues before the start of the tour. We produce a pre-tour guide, which provides an outline of the key Health & Safety points that should be brought to participants' attention.
6.1.3		<u>Emergency information.</u> We provide group leaders with a 24 hour emergency contact number (for use during the tour) which is stated in our information sheet 'Group Leader Important Notes' and appears on the cover sheet of each itinerary.
6.1.4		The 24 hour emergency contact number reaches an operator who will contact our 'duty officer' by radio pager. A member of the senior management team is also available on a 24 hour basis to assist the 'duty officer'.
6.1.5		<u>General Health & Safety communication.</u> We will implement processes to ensure: <ul style="list-style-type: none">• there is active and open dialogue with employees on matters affecting their Health & Safety (including emergency and fire evacuation arrangements);• any person visiting our offices either undergoes an appropriate Health & Safety induction and/or receives adequate information to ensure their Health & Safety;• there is active and two-way communication with others, as necessary, to ensure Health & Safety in the delivery of our products;• where an employee works in another workplace, whether in the UK or abroad, they receive a suitable Health & Safety induction and/or receive adequate information to ensure their Health & Safety.

6.2 Incident investigation

6.2.1	Implementation overview	To ensure that we deal with any serious incidents in the most efficient and professional manner possible, we have formalised our emergency arrangements into a manual for internal use which sets out clearly all
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		actions to be taken in the event of such a serious incident.
6.2.2		The manual defines the key roles and responsibilities of staff members should an incident occur.
6.2.3		Incidents are investigated immediately and appropriate action is taken. Records are kept of all serious incidents and their investigation.
6.2.4		We will implement a procedure to ensure that major incidents, as defined, are communicated internally to nominated management.
6.2.5		We will implement processes to ensure that: <ul style="list-style-type: none"> • accidents and incidents are reported, recorded and investigated; • if necessary, incidents are reported to an enforcing authority to comply with legal requirements; • any corrective actions identified by an investigation are communicated and implemented in a timely manner to prevent a recurrence.
6.2.6		We will maintain records of relevant incidents in order to help analyse incident data to identify significant Health & Safety issues and/or trends, and monitor our Health & Safety performance.

6.3 Measuring performance

6.3.1	Implementation overview	We will implement Health & Safety improvements to ensure that: <ul style="list-style-type: none"> • there is a measured assessment of our Health & Safety performance to identify improvements in our Health & Safety management system; and • the delivery the planned improvements is monitored.
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6.4 Hazard identification

6.4.1	Implementation overview	We will implement processes to ensure that hazards, including occupational health hazards, are identified to comply with relevant legal requirements (including, as necessary, hazards associated with activities and/or products we provide).
6.4.2		Due consideration will be given to the additional hazards associated with work being undertaken by: <ul style="list-style-type: none"> • any temporary workers; • a new or expectant mother; and/or • a young person at work.

6.5 Risk assessment and management

6.5.1	Implementation overview	<u>Accommodation.</u>
6.5.1.1		<u>Accommodation contract and audit.</u> For each hotel/centre which is contracted directly (including those which are leased or owned properties), we will ensure an accommodation contract is signed confirming that the accommodation conforms to local

6.5.1.2	and national fire safety and hygiene standards and additionally a set of specific Health & Safety standards.
6.5.1.2	<p>In addition, we will endeavour to obtain a copy of the current:</p> <ul style="list-style-type: none"> • fire certificate or local equivalent; • current insurance; and • hygiene certificate or local equivalent.
6.5.1.3	<p>In destinations where hotel audits are not applicable, we will:</p> <ul style="list-style-type: none"> • carryout a risk assessment of the accommodation and, as necessary, activities supplied; • endeavour to obtain details of licenses and insurance from local providers; and • inform party leaders of any significant Health & Safety risks noted.
6.5.1.4	<p><u>Standard Accommodation Audit, a self-audit process.</u> The Standard Accommodation Audit process undertakes a thorough audit of an accommodation's fire safety, security, general hygiene and the Health & Safety standards.</p>
6.5.1.5	<p>All accommodation we use will be subject, as a minimum, to a Standard Accommodation Audit prior to first use and thereafter at a maximum interval of three years.</p>
6.5.1.6	<p>The Standard Accommodation Audit will be completed by a member of staff, the hotelier or an agent, as appropriate.</p>
6.5.1.7	<p>The results of the audit will be used to assess and score the hotel, and any areas of concern will initiate the appropriate action including, in some cases, the completion of a Supplementary Accommodation Audit, an independent and separate audit completed by a trained person.</p>
6.5.1.8	<p>To ensure appropriate practices are being followed, we shall complete, annually, random sample spot checks of hotels that have completed a Standard Accommodation Audit. The results of this will be analysed by a trained auditor and where significant discrepancies are identified suitable corrective action will be undertaken before accepting any further audits from source. Records of these checks will be maintained.</p>
6.5.1.9	<p><u>Supplementary Accommodation Audit.</u> In addition to the Standard Accommodation Audit, we will carry out a Supplementary Accommodation Audit on all accommodation used for five groups or more in any one year, i.e. frequent use. This audit will be completed within 12 months of the frequent use criteria being established.</p>
6.5.1.10	<p>Results of the Supplementary Accommodation Audits will be recorded and recommendations will be made with hotel management where we feel improvements could be made.</p>
6.5.1.11	<p>The accommodation will be re-audited at least every three years. A valid Supplementary Accommodation Audit will be completed, and in place, as long as the accommodation remains in frequent use.</p>

6.5.1.12	The Supplementary Accommodation Audit is similar to that of the Standard Accommodation Audit except it can only be undertaken by a suitably trained auditor.
6.5.1.13	Supplementary Accommodation Audits will be rated by a trained auditor as follows:
6.5.1.14	Rating 3: Conforms and exceeds all local and national requirements and Health & Safety is excellent. No improvements are presently required at all.
	Rating 2: Conforms with all local and/or national requirements and Health & Safety is good. Health & Safety levels could only be improved slightly and we will advise the accommodation accordingly.
	Rating 1: Minor non-conformances with local and/o national requirements and Health & Safety is adequate. Health & Safety levels could be improved and we will advise the accommodation accordingly.
	Rating 0: Unsafe regardless of its conformance with all local and/or national requirements, we deem the accommodation falls below the required Health & Safety standards and would strongly recommend clients not to use it.
6.5.1.15	Where a Supplementary Accommodation Audit is deemed unsatisfactory, i.e. a Rating of 0 or 'Unsafe', contact with the manager or acting agent will be made for immediate discussion. If no immediate action is taken to improve the standard prior to the party's visit the accommodation will automatically be withdrawn from the programme.
6.5.1.16	Following the completion of a Supplementary Accommodation Audit, observations will be recorded and recommendations made (even where the accommodation is deemed satisfactory) where further improvements concerning the level of Health & Safety could and should be made.
6.5.1.17	If there were any structural changes to any accommodation within the three-year audit inspection period, the supplier is asked to inform us immediately. If required, a subsequent audit would be carried out.
6.5.1.18	If a complaint is received via a client concerning a given accommodation's Health & Safety aspects, we would undertake to contact the agent or supplier direct within 14 days of receiving the correspondence and respond to the client within 28 days.
6.5.1.19	The audit process will apply equally to owned and/or leased accommodation.
6.5.1.20	<p><u>Accommodation booked through an agent.</u></p> <p>We will ensure we have an agent contract confirming that hotels which our agents have provided have a current fire certificate or local equivalent, appropriate insurance cover and endeavour to obtain a hygiene certificate or local equivalent and furthermore that they conform to a set of specific Health & Safety standards.</p>
	We have been and will continue to pro-actively advise and educate our agents of the high importance of Health & Safety in all the accommodation

		they provide for us. This is communicated via face-to-face meetings during visits, telephone, letter, facsimile and e-mail.
6.5.1.21		<u>Accommodation requested directly by a client.</u>
		No accommodation will be provided if it has been audited by us and has a Rating of 0 or 'Unsafe'. If the requested accommodation has never been used before, we would undertake to obtain a fire certificate and other such Health & Safety and security information via the agent or ourselves to enable all concerned to make an informed decision.
6.5.1.22		The latest available accommodation audit, whether a Standard or Supplementary Audit, of a given unit will, if requested, be made available to anyone who should confirm a booking with us.
6.5.1.23		<u>Coaches.</u>
		<u>British coaches.</u>
6.5.2		We or our appointed agent will hire British coaches from well established reliable companies. We will endeavour to select coach operators who belong to recognised industry bodies, such as the Confederation of Passenger Transport, the Guild of British Coach Operators or who are Coach Marque accredited operators.
6.5.2.1		All coach companies used will sign a contract in which they confirm that they comply with all national, local, trade and other laws. The contract will also stipulate a set of Health & Safety standards regarding driver's providing a Health & Safety pre-departure talk, driver's hours, driver vetting (i.e. ensuring drivers have no criminal or detrimental employment record), insurance cover and vehicle age.
6.5.2.2		<u>British coach Health & Safety audit.</u>
		Our audit of British coach companies requires them to supply information under the following headings:
6.5.2.3		<ul style="list-style-type: none"> • operating license; • maintenance regimes and records; • enforcement records; • records of drivers qualifications; • systems for monitoring drivers competence and licence; • vetting of drivers for suitability of working with children, such as Criminal Records Bureau (CRB) checks; • system for ensuring drivers are fully aware of drivers' hours regulations; • drivers' health check records; • contingency plans in the event of a coach breakdown.
		<u>Frequency of British coach Health & Safety audits.</u>
		For British coach companies on our main operator list (i.e. used more than five times in a year) an audit will take place at least once every three years. The company or our agent will hold on record a copy of their operating license, motor vehicle and public liability insurances.
6.5.2.4		We will maintain a schedule of the audit status of coach operators which will be reviewed on an annual basis.

6.5.2.5		If a coach company is used on an occasional basis, i.e. less than five times a year, where possible an audit will be completed. If this is not possible to complete a full audit, we or our agent will request the company to complete an audit on a self-declaration basis and forward copies of their operating license, motor vehicle and public liability insurances.
6.5.2.6		
6.5.2.7		The senior management team will be responsible for ensuring that coach operators are audited. The audit will be completed for the company and not for all the vehicles within their fleet. Regular spot checks to be made on these audits.
6.5.2.8		<p><u>Seat belts.</u> Seat belts will be available for all pupils on British coaches. The requirement regarding seat belts does not apply to foreign coaches although efforts are made to ensure European coaches are fitted with seat belts.</p>
6.5.2.9		<p><u>Driver's hours regulations.</u> All itineraries are completed taking into consideration EU drivers' hours regulations.</p>
6.5.2.10		<p><u>Breakdown.</u> In the event of a mechanical breakdown the priority will be to move clients to a place of safety. Coach operators have agreements with overseas repair services who will be called to diagnose and complete the repair.</p>
6.5.2.11		<p>If a delay is to be protracted then an alternative vehicle will be supplied and, where necessary, we will provide assistance. Please note it is possible this vehicle will not be supplied from an audited company in view of the extenuating circumstances. Where a continental vehicle is used it may not have seat belts as the regulation regarding seat belts is a British regulation.</p>
6.5.2.12		<p><u>Sub-contracting.</u> It is part of the contractual agreement with our coach companies that they do not sub contract to other companies unless there has been a signed agreement in advance to this arrangement.</p>
6.5.2.13		<p><u>Health & Safety information talk.</u> We will instruct all coach companies with whom we work to request that all drivers give a Health & Safety talk indicating emergency exits and giving general information prior to departure.</p>
6.5.2.14		<p><u>Coach company requested by a client.</u> If a client requests a specific coach company this can only be provided if the coach company provides us or our agent with information of an acceptable standard, i.e. completes a self-declaration audit and provides copies of documents of their operating license and public liability insurances.</p>
6.5.2.15		<p><u>Overseas coach companies.</u> We will hire overseas coaches from established reliable companies many of whom we have worked with for many years.</p> <p>A contract will be signed with the operator in which they confirm that the company complies with all applicable national, local, trade or other laws, regulations, rules and codes of practice.</p>

6.5.2.16		Overseas coach companies that are contracted directly which will be used more than 10 times in any one year will:
6.5.2.17		<ul style="list-style-type: none"> • be audited every three years; and • we will obtain on an annual basis and keep on record a copy of the operating license, motor vehicle and public liability insurance.
		It must be noted that seat belts are not necessarily a legal requirement for foreign coaches.
		Itineraries are prepared by tour co-ordinators who all have a basic understanding of drivers' hours regulations. All itineraries will be checked by our staff.
6.5.2.18		A system is in place to ensure itineraries are sent to clients in good time.
6.2.5.19		If there are any queries relating to drivers' hours, itineraries are submitted to the coach company for checking prior to dispatch to clients.
6.2.5.20		<u>Public transport.</u>
6.2.5.21		Public transport is, in the main, regulated by an appropriate national and/or regional authority in each country.
6.5.3		<u>Ferries and Eurotunnel.</u>
6.5.3.1		The cross channel operators we work with comply with independently set safety standards, which, because of their technical nature, it is not possible for us to audit.
6.5.3.2		We do, however, liaise very closely with all our operators to try to improve our clients safety during their channel crossing. Our pre-tour guide gives information on how to minimise risks as well as a transcript of specimen safety announcement.
6.5.3.3		<u>Airlines.</u>
6.5.3.4		Airlines comply with independently set safety standards which, because of their technical nature, it is not possible for us to audit.
6.5.3.4		<u>Rail transportation (including Euro Star).</u>
6.5.3.4		Rail transport complies with the independently set Health & Safety standards of the countries through which the train travels. It is, therefore, not possible for us to audit rail transport.
6.5.3.5		<u>Itinerary/excursion risk assessment.</u>
6.5.4		We have commenced a programme of establishing risk assessment forms for the main itinerary venues featured in our brochure.
6.5.4.1		These forms will be completed either by members of our staff or by a group leader who have already completed a visit with their party.
6.5.4.2		Risk assessments are available on request (and will incur an administrative charge).

6.5.4.3		We would, whenever possible, encourage group leaders to complete their own risk assessments, and inspection visits are offered to facilitate this process.
6.5.4.4		We request Health & Safety and insurance information to be provided by all suppliers of excursions/attractions featured in our brochure.
6.5.4.5		An Attraction Audit, a self-assessment process, and/or an appropriate EV form (as listed in Appendix A) are sent to the supplier for completion and return.
6.5.4.6		<u>Health & Safety for UK operations.</u>
6.5.4.6		We will ensure adequate and appropriate Health & Safety arrangements and systems are in place for our UK-based operations in order to comply with relevant Health & Safety legislation, including the conducting and recording of suitable and sufficient 'risk assessments'.
6.5.5.1		

6.6 Competence and training

6.6.1	Implementation overview	We will implement processes to ensure that the Health & Safety competence of our staff is identified and assessed against stated requirements and, as necessary, any Health & Safety training needs, including refresher training, are identified (and implemented).
6.6.2		Where necessary, training is supplied by an external independent consultancy nominated by the School Travel Forum.

6.7 Culture and behaviour

6.7.1	Implementation overview	We will implement processes to ensure that the senior management team review the Health & Safety performance of the business (including physical standards, management controls and behavioural attitudes) in order to establish that Health & Safety expectations are being fulfilled.
6.7.2		Our Health & Safety systems and procedures are audited and assessed by an external consultant in line with the membership requirements of the School Travel Forum.

6.8 Health & Safety documentation

6.8.1	Implementation overview	We will maintain a documented Health & Safety management system to ensure compliance with statutory requirements.
6.8.2		<p>We will implement processes to ensure:</p> <ul style="list-style-type: none"> • suitable and sufficient Health & Safety documentation is maintained; • reviews are conducted of relevant Health & Safety legislation that has the potential to impact on the business; and • the application of this document, as necessary, is explained to any interested parties.
6.8.3		We will implement processes to ensure identified records relating to our management of Health & Safety are retained, reviewed and, as

6.8.4 appropriate, correctly disposed of.
We will identify and review the impact of Health & Safety legislative which applies to the business.

6.9 Management of contractors

6.9.1 **Implementation overview**
Selection of overseas tour representatives.
Where tour representatives are available in resorts employed by us, the following criteria will be applied:

- the representative will be employed by our Recruitment Manager;
- we will hold on file a self-declaration form completed by the employee relating to criminal record and health matters;
- the representative will be given information about emergency arrangements and emergency contacts;
- the representative may be asked to complete risk assessments on our behalf and will receive training in this matter;
- the representative will report back to us regarding any areas of concern relating to Health & Safety issues.

6.9.2 Inspection visits.
Inspection visits are available to group leaders who have a confirmed booking with us.

6.9.3 There are two types of inspection visit:

- group inspection visits accompanied by a member of staff; and
- individual inspection visits.

6.9.4 For tour destinations not covered by group inspection visits, we offer group leaders with a confirmed booking an opportunity to visit their selected destinations, for which we will pay for one night's bed and breakfast accommodation for two people in a twin room.

6.9.5 Third party providers.
We will implement processes to ensure the Health & Safety hazards and risks associated with our products are effectively controlled, including:

- the Health & Safety competence of suppliers and agents is assessed (and, as necessary, monitored and reviewed) to ensure Health & Safety;
- pre-start consultation is undertaken to ensure there is an active exchange of relevant Health & Safety information; and
- the hazards and risks associated with the products and/or services are identified, assessed and adequate controls implemented by suppliers and agents to reduce, control or manage any unacceptable risks.

Appendix A: Documents supporting the delivery of Health & Safety.

A.1 The following table lists the various Health & Safety documents which support the delivery of Health & Safety in School Travel Group Ltd.

Reference number	Document title
6.2.5	Incident Report Form
6.5.1.4	Standard Accommodation Audit (available in various languages)
6.5.1.9	Supplementary Accommodation Audit
6.5.1.19	Agent Contract Form
6.5.2	Coach Inspection Form (available in various languages)
6.5.4	EV1: Visits Questionnaire EV2: Excursion Supplier Questionnaire EV3: Pool Safety Questionnaire Attraction Audit Ski Lift Company Audit Ski School Audit Ski Equipment Hire Audit

A.2 The senior management team, following appropriate consultation with employee representatives and/or the appointed competent person(s), is responsible for:

- revising, as necessary, existing Health & Safety documents; and
- as necessary, introducing new Health & Safety documents in order to support the business in its delivery of Health & Safety.