

## Memo

**To:**

From: Ian Pearson, General Manager, School Travel Forum

Date: August 2011

Re: Proposed replacement for the licensing regime for adventure activities consultation.

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### 1. Executive Summary

The School Travel Forum (STF) welcomes the HSE's review of the AALA licensing scheme. In this submission the STF would like to highlight the benefits of self-regulatory schemes, which feature wider, comprehensive risk management. We believe that the existing schemes which form the Council for Learning Outside the Classroom Quality Badge scheme offer excellent case studies on which to base future sound practice.

In this submission we have used our experience to highlight the following areas:

- The limitations of 'activity only' schemes and the benefits of comprehensive risk management.
- The role of independent, external verification in developing user confidence and better standards.
- The need to reduce the confusion amongst users caused by a plethora of approval schemes and the benefits of uniting them behind a single user facing umbrella body.

### 2. About The School Travel Forum

Founded in 2003, the School Travel Forum (STF) is a democratic, not for profit organisation of leading school tour operators that promotes good practice and safety in school travel. Since its inception STF has won widespread recognition and support for the way it simplifies and provides essential reassurance for leaders looking to organise study, sports and ski trips. The STF, which includes the major companies in the school travel business, has estimated that around 15,000 school visits are organised through our members annually.

Our members are required to adhere to a rigorous Code of Practice and Safety Management Standards, which covers all the component parts of a school trip, including activities, accommodation, transport, emergency and accident management and training, and be externally verified each year by a leading Health and Safety Consultancy.

Our Objectives include:

- Promoting best practice in educational school travel and support the principles established by the Learning Outside the Classroom Manifesto

- Designing and promoting sector-specific standards that will be periodically reviewed and adapted to reflect changes in education, health and safety legislation and any other relevant influence.
- Ensuring the needs of schools and teachers are understood and adopted into our standards by regularly meeting bodies such as the Learning Outside of the Classroom Council (LOtC), the Department for Education (DfE), the Outdoor Education Advisors Panel (OEAP), Head Teacher Associations and Teacher Unions.
- Ensuring that independent assessment of travel companies offering educational travel in line with the requirements of the LOtC Quality Badge and the STF Code of Practice.
- Providing a forum for members to discuss non-competitive issues of common interest and concern.

In conjunction with a wide range of stakeholders in LOtC, the STF has recently developed an Annex to its wider Safety Management System that specifically looks at the safe management of Outdoor and Adventurous Activities, which are outside the scope of any existing scheme.

### **3 Question Responses**

#### **Q1 Scope of the Code of Practice**

It can be practically demonstrated that excellent detailed risk management for all activities has been developed, both within and without the AALA scope; thereby illustrating that effective micro-management exists without the need for detail at the higher Code of Practice level. For example, the 6 parameters used by the LOtC Quality Badge, that are in turn interpreted in the various ways necessary by the separate Awarding Bodies to actively meet the needs of their own scope of operations.

We believe adventurous activities require dynamic, active risk management and too much detail in an overarching Code of Practice will hinder this. We suggest a Code which address sound general principles is most appropriate.

We also believe the it is important that those principles should not confine the Code's effectiveness to simply the activities themselves. Risk is no respecter of being on or off an adventurous activity; it exists in the additional services which support activities, for example transport, accommodation, food and hygiene management. Very few providers simply offer activities on their own without a surrounding of ancillary services, sometimes outside the UK.

Additionally, an important principle to be included in the Code is the need for an independent, expert verification process (see Q4 later). Numerous organisations, including the STF, BAHA and EPA have successful examples of such schemes.

#### **Q2 Role of voluntary schemes**

The role of self-regulatory schemes has been exemplary and fundamental in leading to the opportunity and confidence to de-regulate. They cover a much wider scope than regulation

and have proven to be flexible, robust and effective. Most schemes are self-financing by providing their members with two key benefits:

- Good corporate governance by identifying current good practice.
- Marketing opportunities by providing reassurance to users.

Whilst some schemes, particularly NGBs, concentrate on the delivery of the activity only, others such as the STF, BAHA & EPA are much more comprehensive. However it is common practice for any NGB rules to be incorporated into and a requirement of the wider schemes, thereby ensuring a practical and effective integration of ideals and practice.

In some sectors, particularly adventurous activities users have complained of confusion with the plethora of schemes and the possible limitations of the specialist coverage of NGBs. The LOtC Quality Badge has been successful at providing a simple, easily accessed single portal which combines the strengths of existing schemes.

We recommend that the Code should require membership of schemes that provide independent external verification of entire provision and specifically endorses the LOtC QB as the simplest means by which this can be achieved.

We would also like to see a recommendation by the consultation to Government to invest some of the savings into the LOtC Council and QB scheme.

### **Q3 Assurance for other activities.**

Providing the Code is based on sound general principles the existence of or development of activities that do not have a specific individual code is not an issue.

For example, the STF in developing its own Adventurous Activities Code recognised that there is no definitive list, or comprehensive description of what constitutes 'Adventurous Activities'. Instead this code, consistent with responsibilities under law, guides providers to assess the risks associated with an activity to identify if further expert inspection is necessary; such an assessment is required to cover:

- The activity provider's safety management system and safety record
- Suitability of the activity for planned users, by reference to their age and likely level of ability
- Location
- Equipment
- Staffing ratios
- Staff competence, recruitment and monitoring
- First aid and emergency provision
- Communications
- Insurance
- Existence and effects of local regulations, safety standards and/or disclaimers.

Therefore it is possible to write a Code which matches the responsibilities that already exist under law and is not restrictive..

#### **Q4 Reassurance of Users**

All the existing examples of Codes which hold the greatest levels of confidence amongst users and stakeholders feature independent, external verification at the core of their principles. This contrasts with a lack of confidence amongst stakeholders for self-accreditation.

Additionally the LOtC QB and STF schemes are both examples whereby continuing dialog between users and providers is facilitated. This is an important means by which confidence and understanding is developed.

We recommend that any future code recognises both these important factors which create reassurance and promulgate good practice.

#### **Q5 Monitoring**

All the existing voluntary schemes have effective monitoring schemes in place and there is a strong natural inclination to protect standards.

Self-monitoring does not provide the same assurance of rigour.

Additionally the LOtC QB provides for a forum to assess schemes, moderate and share good practice.

#### **Q6 Industry Sector Action**

See Q5 above. The LOtC provides an ideal platform to share and develop good practice. In developing our own Adventurous Activity Annex the stakeholder contacts generated through the LOtC network, were immensely valuable.

#### **Q7 Continuing Reassurance**

See Q5 & 6. Additionally, the existence of a central, independent organisation provides both a channel for concerns to be addressed, fairly and independently and for good practice to be disseminated.

#### **Q8 Cost impact**

Other than we believe that the costs associated with the development of public confidence and sound business practice are a sound and pragmatic investment, we have no further comments.

### **5 Contact Details**

If you require any further information, please contact Ian Pearson, School Travel Forum, [ianpearson@schooltravelforum.com](mailto:ianpearson@schooltravelforum.com)