

# SAFETY MANAGEMENT SYSTEM



Policy document December 2022

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## INTRODUCTION

This document is important for group leaders. It details NST's commitment to the management of safety on educational visits. Importantly, it specifies the external auditing and verification of the suitability and implementation of this Safety Management System.

The DfE and Education Scotland guidelines relating to health and safety on educational visits state that the LEA, Local Authority or governing body should advise schools to ask tour operators for a copy of their Safety Management System and details of the external verification.

Whilst the DfE and Education Scotland guidelines only technically cover state schools, the advice they contain and the information regarding the Safety Management System will undoubtedly be of interest to any institute in the United Kingdom which undertakes educational visits, in the interests of establishing and following best practice with regard to the selection of NST as a reputable tour operator.

# 1 HEALTH & SAFETY POLICY STATEMENT

**The directors, management and staff of NST are committed to ensuring that all reasonable measures are taken so that our clients are assured of a high level of safety throughout their tour.**

**We shall achieve this by:-**

- 1.1 Establishing and maintaining a written health and safety policy document which is consistent with the advice contained within the HSE publication Successful Health and Safety Management and incorporates the requirements of the School Travel Forum Code of Practice and the Learning Outside the Classroom Quality Badge.
- 1.2 Facilitating and promoting a positive health and safety culture throughout our own, our clients' and our suppliers' organisations worldwide.
- 1.3 Planning and setting standards which meet the needs of our clients and are measurable, achievable and realistic.
- 1.4 Measuring and reviewing performance of our compliance with the terms of this standard and our own Safety Management System, including a formal annual verification by a suitably qualified external expert.
- 1.5 The Company agreeing to make available to clients details of audits and a copy of the annual external verification.

The improvement and monitoring of safety standards is the responsibility of all employees. Staff are encouraged to bring any matters of concern to the immediate attention of their line manager.



Paul Kenwright  
PGL Group Director of  
Safety and Compliance

December 2022

## 2 DIRECTION, MANAGEMENT, IMPLEMENTATION & REVIEW OF THE SAFETY MANAGEMENT SYSTEM (SMS)

### 2.1 Identification of responsibilities

**Policy making** will be the responsibility of the Board of Directors who will ensure that:

- 2.1.1 Safety management systems are developed for the implementation of the Safety Management System Policy.
- 2.1.2 Competent persons are appointed to implement the requirements of the SMS.
- 2.1.3 Additionally, NST will prepare and train suitable internal members of staff to implement the requirements of the SMS. Adequate resources will be provided to implement the requirements of the SMS.

**Planning** will be the responsibility of the Head of Safety who will:

- 2.1.4 Ensure the participation of appropriate personnel in the development and implementation of the SMS procedures.
- 2.1.5 Ensure personnel are trained and competent in the requirements of the SMS.
- 2.1.6 Monitor the performance of the SMS and staff in its implementation, providing feedback to the Board of Directors, both on areas of success and also any areas where there is a need for improvement.
- 2.1.7 Examine the trends identified by the monitoring activities contained within the SMS.
- 2.1.8 Keep up to date with safety requirements and best practices applicable to the provision of tours.

**Implementation** will be the responsibility of the Head of Safety, who will ensure that:

- 2.1.9 All staff are made formally aware of the basic remit of the SMS.

2.1.10 All staff are made aware of the need to report any weakness or failures in the SMS to their manager.

2.1.11 All staff are made formally aware of their personal responsibilities to the SMS and given sufficient training and resources to undertake these successfully.

### 2.2 Review of the Safety Management System (SMS)

The Head of Safety will ensure that:

- 2.2.1 NST will maintain regular contact with suitable organisations to ascertain whether there are any developments in safety of which it needs to be aware to further improve the Safety Management System.
- 2.2.2 NST shall invite a suitably qualified external organisation approved by the STF to conduct its own audit of the paperwork and processes of the SMS on an annual basis to ensure that the Company continues to meet the standards stipulated therein.
- 2.2.3 Any accidents, incidents or near misses brought to our attention will be logged.
- 2.2.4 The Board of Directors holds a formal review and update of the SMS on at least an annual basis.

## 3 ACCOMMODATION CONTRACTED BY NST

For all contracted accommodation used or featured by NST, our Contracting and Destination Services Team will ensure that:

### 3.1

An accommodation contract or agency agreement is signed confirming (as a minimum) that the accommodation conforms to local and national fire, safety and hygiene standards and will have current liability insurance cover for the duration of the contract. Wherever possible, copies of the relevant documents will be obtained. Where accommodation is being used on an ad-hoc basis, by virtue of a hotelier or agent accepting our booking, they are accepting our stated terms and conditions.

### 3.2

Confirmation is obtained every three years that contract conditions are being met.

In addition, our Safety Team will ensure that:

### 3.3 Standard accommodation checklist

- 3.3.1 All accommodation (used or featured) will be subject to a standard accommodation checklist prior to first use and thereafter when a significant change occurs, such as major structural alterations, or change of owner, or at a maximum of 3-year intervals. A standard accommodation checklist will not be required if an on-site accommodation audit has been carried out in the last 3 years.
- 3.3.2 The standard accommodation checklist may be completed by a School Travel Forum member, hotelier or agent.
- 3.3.3 The standard accommodation checklist result will be assessed by an auditor trained in accordance with 10.1. Where the standard accommodation checklist results indicate

areas for concern, the auditor should instigate appropriate additional action, which may include the use of an on-site accommodation audit, before use.

- 3.3.4 Based on the results of the checklist analysis and any subsequent investigation, the result will be recorded as one of the categories defined in 3.5.
- 3.3.5 We endeavour to inspect at random a selection of accommodation units to verify both the safety of the accommodation and the integrity of our audits/risk assessments.

### 3.4 On-site accommodation audit for frequent use accommodation

- 3.4.1 In addition to the above standard accommodation checklist, if it is clear that an accommodation unit will be used for 5 or more groups in any one year, it will be listed as 'frequent use' and, within a maximum of 12 months of the frequent use criteria being established, will receive a Supplementary Audit.
- 3.4.2 A on-site accommodation audit can only be carried out on-site by an auditor trained in accordance with 10.1.
- 3.4.3 A frequent use property will be re-audited to on-site accommodation audit standard every 3 years.
- 3.4.4 Based on the results of an audit analysis, the result will be recorded as one of the categories defined in 3.5.

## 3 ACCOMMODATION CONTRACTED BY NST

### 3.5 Monitoring of accommodation audits

Following the completion of an Accommodation Audit, we will record audits as per the following categories:-

#### 3.5.1 High Conformity

Minor or no areas of improvement have been identified. The management will be commended and encouraged to maintain their standards.

#### 3.5.2 Acceptable Conformity

Room for improvement has been identified, but the defects do not render the building unsafe. The defects will be brought to the immediate attention of the management at the time of auditing, or at the time of the audit assessment, and followed up in writing within fourteen days. The deficiencies will be evaluated, and a schedule or remedial action will be agreed and monitored.

#### 3.5.3 Unacceptable

Room for improvement has been identified which renders the accommodation unsafe for use. The defects will be brought to the immediate attention of the management at the time of auditing, or at the time of the audit assessment, and followed up in writing within fourteen days. The accommodation will be removed from our programme and will not be reinstated until evidence is obtained that the defects have been rectified and the accommodation is reclassified to either high or acceptable conformity.

### 3.6

A schedule of all accommodation indicating the current audit status will be maintained

# 4 TRANSPORTATION

## 4.1 Coaches - booked direct

For all coach operators used and booked we will ensure that:

- 4.1.1 A coach contract is signed, or where use of a supplier is fewer than five times per calendar year, or two hundred and fifty clients, whichever is greater, a purchase order is issued, in which it stipulates they comply with all applicable national, local, trade and other laws, regulations, rules and codes of practice. This contract also stipulates a set of safety standards regarding drivers' hours, driver vetting, insurance cover, subcontracting and vehicle age.
- 4.1.2 Confirmation is obtained every three years that contract conditions are being met.
- 4.1.3 We will endeavour to select coach operators who belong to recognised industry bodies such as the Confederation of Passenger Transport (CPT), or are Coach Marque accredited.
- 4.1.4 Each coach company contracted to NST is required to take responsibility to establish that their drivers do not have a material criminal record or detrimental employment history.
- 4.1.5 In certain unforeseen circumstances such as coach breakdown or driver illness etc it may not be possible to comply with the terms outlined above and NST reserves the right to find the best available alternative.

### 4.1.6 Standard Coach Audit

- All coach suppliers booked direct will be subject to a standard coach audit prior to first use and thereafter, where a significant change occurs, such as major fleet changes, or change of owner, or at a maximum of three year intervals, whichever is sooner. A standard coach audit will not be required if an on-site coach audit has been carried out in the past three years.
- The Coach Standard Audit may be completed by a School Travel Forum member, supplier or agent.
- The Standard Coach Audit will be assessed by an auditor trained in accordance with 10.1.

### 4.1.7 On-site Coach Audit

- In addition to the standard coach audit, if it becomes evident that the supplier will be used for five or more groups in any one year, or more than two hundred and fifty clients, whichever is reached first, it will be listed as 'frequent use' and, within a maximum of twelve months of the 'frequent use' criteria being established, will receive an on-site coach audit.
- The on-site coach audit may only be completed by an auditor trained in accordance with 10.1.

## 4 TRANSPORTATION

### 4.1 Coaches - booked direct (continued)

#### 4.1.8 Additionally for UK Coach Suppliers booked direct:

- We will check that suppliers are in possession of valid and current liability insurance, motor insurance and other necessary local certification and licences to operate legally.
- NST will only contract coach companies that will confirm that their tour drivers have received appropriate clearance from the Disclosure and Barring Service or Disclosure Scotland.
- All itineraries for NST tours by coach are prepared taking into account current legislation on drivers' hours.
- All UK coaches will be fitted with seat belts. In the event of a vehicle breakdown, if it is necessary to provide a replacement vehicle the coach will be fitted with seat belts if it is a UK coach. However, due to the different legislation in countries outside the UK, this may not be possible if a non-UK coach is supplied.
- It is the intention of NST to use our regular use coach companies whenever practical. The following are the circumstances in which we may select an infrequently used company:
  - ▶ In peak periods when availability is strictly limited.
  - ▶ Where the location of departure would be best served by an infrequently used company.
  - ▶ When a last-minute breakdown or other unforeseen event from a regular use company necessitates a subcontracted company.
  - ▶ When a coach breaks down on tour and has to be replaced by another vehicle.
  - ▶ Where a client specifically requests a company not used by NST.

#### 4.1.9 For coach companies requested by clients:

- When the client requests a specific company that is not used by NST, we will attempt to secure their services and will obtain the Standard Coach Audit outlined in 4.1.6. In addition, the client will be advised that NST will not be able to carry out an inspection of the operator in question, and they must accept the operator on this understanding.

### 4.2 Coaches - agent supplied

For all agents supplying coach services, we will ensure that:

- 4.2.1 A contract is signed in which it stipulates that they comply with all applicable national, local, trade and other laws, regulations, rules and codes of practice. This contract also stipulates a set of safety standards regarding drivers' hours, driver vetting, insurance cover, subcontracting and vehicle age.
- 4.2.2 Confirmation is obtained every three years that contract conditions are being met.
- 4.2.3 **Standard Coach Audit**
  - All coach suppliers used by the agent will be subject to a coach audit prior to first use and thereafter at a maximum of three year intervals.
  - The coach audit may be completed by a School Travel Forum member, supplier or agent.
  - The coach audit will be assessed by an auditor trained in accordance with 10.1.

## 4 TRANSPORTATION

### 4.3 Airlines

All air transport to and from the UK is regulated by the Department of Transport and the Civil Aviation Authority. These bodies operate to very strict safety criteria and no additional practical measures can be undertaken by NST. Flights originating in other jurisdictions are governed by the laws and regulations of the country in question.

### 4.4 Rail (inc. Eurotunnel), ocean-going cruise liners & public transport

All rail, ferry, ocean-going cruise liners and public transport is regulated nationally by the countries through which they travel. It is not felt that NST can take any additional measures.

### 4.5 Services secured by agents & ground handlers

Where agents or ground handlers provide services that would be the subject of a safety review if booked direct (e.g. visits and excursions), they will sign a contract agreeing to use the appropriate STF standards as a minimum.

### 4.6 Services obtained through third-party approved verification schemes

Where services are obtained through the approved schemes, the quality of the third-party verification had been assessed and, other than confirmation of the supplier's current membership of the scheme, the STF's safety management system requirements can be considered as met and further substantiation is not required. Approved schemes are:

- LOtC Quality Badge;
- CPT Coach Marque;
- Guild of British coach operators membership



## 5 VISITS, EXCURSIONS & ACTIVITIES

### 5.1

Where visits, excursions or activities are included in a final itinerary, except where the itinerary specifically states the event is not being arranged or facilitated by

NST, we will take reasonable steps to ensure risks have been evaluated and monitored.

### 5.2

Where appropriate, information is brought to the attention of our group leaders that we consider is necessary to help them make informed decisions and

manage their own responsibilities for the safety of their group.

### 5.3

We may not arrange or recommend excursions or activities which carry an inherent risk such as, for example, bungee jumping or tobogganing, white

water rafting etc. However, group leaders are advised that almost any activity carries some inherent risk, particularly where children and young persons are involved. Group leaders should ensure that any visits or activities, which they select, are appropriate to the age, abilities and size of the group. Group leaders will be responsible for ensuring that students are fully supervised at all times, and that any instruction or safety briefings are followed. Where any safety equipment is provided, this must be worn at all times.

## 6 ACCIDENTS, INCIDENTS & NEAR MISSES

### 6.1

NST will encourage clients to report any safety related issues immediately. This will enable the Company to investigate their concerns and to ensure that any

necessary action is taken straight away.

### 6.2

A record will be kept of all incidents, accidents and near misses which we become aware of or which are brought to our attention. All reports will be reviewed

and, where the situation merits, an investigation will be held. An automatic investigation will be held where there is a fatality, or hospitalisation for 24 hours or more. Where relevant, all reasonable steps will be taken to reduce the likelihood of a similar incident occurring in the future. All major accidents and incidents are reported to the Board of Directors on a monthly basis.

## 7 PROVISION OF PRE-TOUR INFORMATION

### 7.1 Pre-tour safety information

NST's pre-tour safety information will provide all groups with information which is intended to draw attention to key safety points, promote increased awareness and assist them with their responsibilities.

### 7.2 Group leaders' preview visits

NST undertakes to offer, free of charge, 2 nights' bed and breakfast for 2 persons at, or near their booked accommodation.

This will enable group leaders to carry out their Risk Assessments of their hotel, excursions, visits etc. This offer applies to group leaders who have confirmed a booking to a specific destination.

## 8 EMERGENCY PROCEDURES

8.1

NST have procedures in place for a major serious incident.

8.2

A roster of Duty Officers shall be established to ensure that a member of NST staff is contactable 24 hours per day via a call centre service.

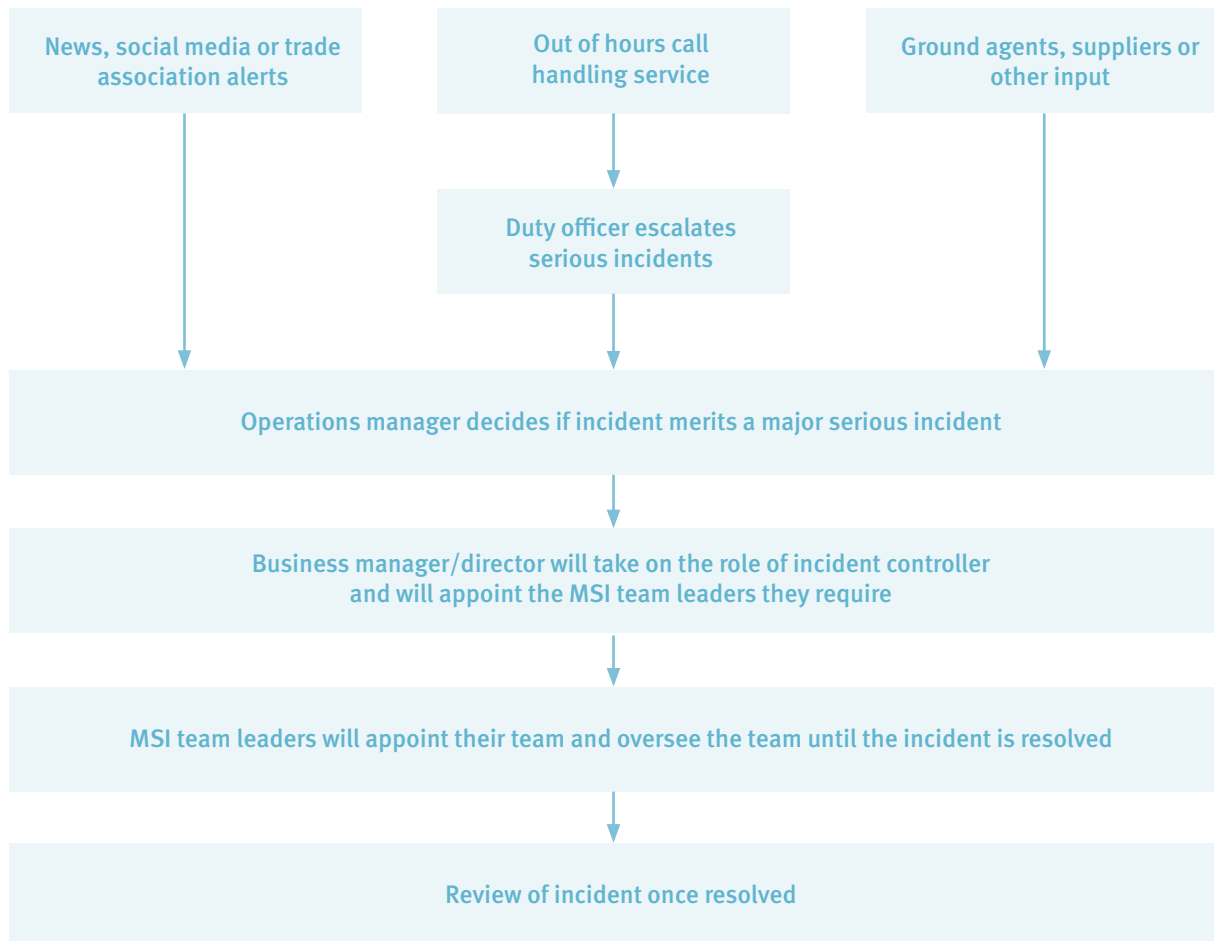
8.3

All group leaders, drivers of British coaches and agents will be provided with details of how to contact the Duty Officer should the need arise as suggested in Department for Education and Local Authority guidelines.

8.4

A Duty Kit will be provided to the Duty Officer, the content of which is monitored and updated weekly. This will include amongst other things outline details of the current groups on tour and emergency contact numbers for suppliers.

## 9 OVERVIEW OF EMERGENCY PROCEDURE



# 10 TRAINING

The Head of Safety will ensure that as part of NST's commitment to the safety of the tours it organises, all employees will be fully trained to enable them to meet the requirements of those areas of the Safety Management System for which they may be required to exercise responsibility. All employees will also receive appropriate refresher training. A record of all training undertaken will be maintained.

## 10.1 In-house audit training (coach & accommodation)

- 10.1.1** All in-house accommodation and coach supply auditors shall complete an initial training course, which is supplied, or approved by the School Travel Forum or the School Travel Forum's relevant consultants.
- 10.1.2** All in house auditors shall complete refresher training at least every two years, which is undertaken or approved by the School Travel Forum or relevant School Travel Forum consultants.
- 10.1.3** In-house auditors who fail to complete the refresher training:
- if less than three years has elapsed since the date the refresher training was due, they will attend and pass the refresher training before continuing auditor duties
  - if a period of three years or more has elapsed since the date the refresher training was due, they will attend and pass the new auditor training before continuing auditor duties.
- 10.1.4** A record of all the training undertaken will be maintained.
- 10.1.5** Holders of the CPC (Certificate of Professional Competence) for Transport Managers (Passenger Transport) Level 3 – 2012, or earlier equivalents, are exempt from the above coach auditor training requirement.

## 10.2 SMS awareness training

All employees of NST will undergo SMS awareness training. This training aims to ensure that all employees are fully aware of the scope and principal commitments we make in our SMS policy document. In addition all employees will be kept informed of the progress and latest developments of the Safety Management System.

## 10.3 Emergency procedure training

All staff employed by NST will receive training in the Company's emergency procedures as required for their role.

## 10.4 Duty Officer training

All staff who are selected as Duty Officers will receive appropriate training prior to their carrying out this role for the first time.