



Europe's Leading
Educational & Group
Travel Company

Safety Management System



Policy Document



Members of the British Safety Council
Members of the Royal Society for the Prevention of Accidents



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

The DfES and Scottish Executive 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 DfES & Scottish Executive's 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.

A current copy of this document will enable leaders to evidence they are following current best practice with regard to the selection of a reputable tour operator.

GLOSSARY OF TERMS

NST/The Company	'NST' (or 'The Company') refers to the NST Travel Group plc which is a specialist educational and group travel company.
Agent	Intermediary through whom accommodation and/or other services are sourced and contracted for NST.
Audit	A detailed report examining Health and Safety to be completed by NST staff who have undertaken the appropriate training, using the audit forms detailed in the appendices.
Brochure	A printed booklet or web site produced by NST, which contains enough information about the travel arrangements offered by NST to allow a client to reliably book those travel arrangements without obtaining additional information from NST.
Brochured Unit	Hotel/centre which is specifically named in the relevant brochure.
Non-brochured Unit	Any unit of accommodation used by NST other than those specifically featured in our brochures.
Regular Use List	A list of Coach Operators who have been inspected to the standards established in the Coach Company Audit.
RoSPA	Royal Society for the Prevention of Accidents.
SMS	Safety Management System.
STF	School Travel Forum.
Overcoat	The Health and Safety expert organisation contracted to advise the STF and its members.



CERTIFICATE OF COMPLIANCE

This is to certify

That

Overcoat Ltd. have inspected the
Safety Management System

of

NST Travel Group Plc.
and

confirm that it complies to the requirements of
the

School Travel Forum Code of Practice.

Signed:

A handwritten signature in blue ink, appearing to read "Terry Auld".

Terry Auld M. I. Fire E
Managing Director

Original on display at NST Head Office

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1. Health and 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 (HSG65).
- 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.
- 1.6** Ensuring that the STF minimum standards for Health and Safety are incorporated within our Safety Management System.

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.



JM Craven
Director & Company Secretary
1 October 2005

2. Direction, Management, Implementation and Review of the Safety Management System

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. Additionally, NST will prepare and train suitable existing members of staff to implement the requirements of the SMS.
- 2.1.3 Adequate resources are provided to implement the requirements of the SMS.

Planning will be the responsibility of the Company Secretary 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 Supplier Relation Director or Safety Manager, as appropriate, 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 SMS

The Company Secretary 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** NST will invite a suitably qualified external Health and Safety consultant for up to 3 days per annum, to carry out spot checks of constituent elements of its SMS in operation in the field. At the same time, the consultant will use such visits to verify and confirm the standard of audits carried out by NST staff.
- 2.2.4** Any accidents, incidents or near misses brought to our attention will be logged. 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 all incidents considered to be serious shall be reported to the Company Secretary as outlined in our Accident, Incident and Near Miss Procedure. Additionally, the Board of Directors of NST will hold an annual review of any such accidents, incidents or near misses.
- 2.2.5** The Board of Directors holds a formal review and update of the SMS on at least an annual basis.

3. Accommodation Contracted Directly (or owned by the Company)

Our Contracts Managers will ensure that:

- 3.1** An Accommodation Contract is signed confirming (as a minimum) that the accommodation conforms to local and national fire, safety and hygiene standards and additionally a set of specific safety standards aimed at further improving clients' safety.
- 3.2** We obtain a copy of the current fire certificate or equivalent local documentation.
- 3.3** We obtain a copy of the current liability insurance policy.
- 3.4** Where possible we will obtain a copy of the current hygiene certificate or local equivalent.

Additionally, for all accommodation **featured in NST brochures:**

- 3.5** The Company will inspect all accommodation featured in brochures prior to using it for the first time and thereafter at least every 3 years. The inspection will be to the standards established in the Accommodation Audit Form. (See appendices).

Additionally, for all NST Owned Accommodation:

- 3.6** Where NST owns its own accommodation the property will be audited to the same standard as non-owned accommodation. These audits will be carried out annually by an appropriately qualified auditor. In addition, each Property Manager will report monthly on a range of safety, training and quality issues.

Additionally, for all accommodation that is **not featured in NST brochures:**

- 3.7** It is not possible to carry out Accommodation Audits on all these properties, due to the enormous number involved, many used on a one-off basis and often at the request of one particular group. However, if a non-brochured property is used for 5 groups or 12 nights in one year (whichever is the lesser), and it is evident that this property will be used a similar amount in subsequent years, an audit will be carried out within 12 months of it becoming evident to the standards established in the Accommodation Audit Form.

3. Accommodation Contracted Directly (or owned by the Company)

3.8 Monitoring of Accommodation Audits

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

3.8.1 Conforms (SMS Status 1)

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

3.8.2 Minor non-conformities (SMS Status 2)

Whilst confirming to local standards, 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 and a copy of the audit including a schedule of remedial action will be sent to the hotelier within 14 days of the audit. The hotelier will be given 4 weeks to reply after which NST will pursue this with them. If no satisfactory reply is received from the hotelier within 3 months of the date of the audit the Contracts Manager responsible will review the use of the unit in consultation with the Supplier Relations Director.

3.8.3 Unsafe (SMS Status 3)

The accommodation is considered unsafe, even if it conforms to local standards. In this case, NST will remove the accommodation from its programme and will not consider its re-instatement until the defects have been rectified and the establishment has been re-audited to a standard that either conforms or has minor non-conformities.

A schedule of all units of accommodation indicating the current audit status will be maintained by the appropriate Contracts Manager and a copy of the relevant audit will be available to any group considering travelling to the accommodation concerned.

4. Transportation Contracted Directly

Our Contracts Managers will ensure that:

4.1 UK Coach Companies

- 4.1.1** All companies shall complete a Coach Contract in which they confirm 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 and vehicle age to which the coach company must agree prior to their usage by NST.
- 4.1.2** We obtain and keep on record prior to first use and thereafter on an annual basis copies of motor and liability insurance and the operator's licence.
- 4.1.3** We will endeavour to select coach operators who belong to recognised industry bodies such as the Confederation of Passenger Transport (CPT), Guild of British Coach Operators 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** NST will only contract with coach companies that will confirm that their tour drivers have received appropriate clearance from the Criminal Records Bureau or Scottish Criminal Records Office.
- 4.1.6** All itineraries for NST tours by coach are prepared taking into account current legislation on drivers' hours.
- 4.1.7** 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.

Additionally for regularly used UK Coach Companies:

- 4.1.8** We will establish and maintain a list of regularly used UK coach operators, the "Regular Use List". This will include all companies that we anticipate using for more than 5 groups in any calendar year.
- 4.1.9** All companies on the Regular Use List will be inspected prior to first use and thereafter at least every 3 years. The inspection will be in accordance with the NST Coach Company Audit Form (see appendices).
- 4.1.10** We will maintain a schedule of the audit status of UK coach companies on the Regular Use List and review it annually.

For infrequently used UK Coach Companies:

4.1.11 It is the intention of NST to use coach companies from the Regular Use List 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 on our Regular Use List

4. Transportation Contracted Directly

For Coach Companies requested by clients:

- 4.1.12** When the client requests a specific company that is not on our Regular Use List, we will attempt to secure their services and will obtain the documentation outlined in 4.1.1 and 4.1.2. 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.

In the event of unforeseen circumstances:

- 4.1.13** 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.

4.2 Non UK Coaches

For non-UK Coaches booked direct:

- 4.2.1** All companies will complete a Coach Contract for non-UK operators in which they confirm 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 and vehicle age to which the coach company must agree prior to their usage by NST.
- 4.2.2** We will obtain on an annual basis and keep on record, copies of motor and liability insurance and the operator's licence.

Additionally for regularly used non-UK Coach Companies:

- 4.2.3** We will establish and maintain a list of regularly used non-UK coach operators, the "Regular Use List". This will include all companies that we anticipate using for more than 5 groups in any calendar year.
- 4.2.4** All companies on the Regular Use List will be inspected prior to first use and thereafter at least every 3 years. The inspection will be in accordance with the NST Coach Company Audit Form (see appendices).

4. Transportation Contracted Directly

4.3 Airlines

All air transport to and from the UK is regulated by the Department of Transport and the Civil Aviation Authority. This body operates 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 Transportation (including Eurostar)

All rail transport is regulated nationally by the countries through which trains travel. It is not felt that NST can take any additional measures.

4.5 Ferries and Eurotunnel

All ferries (and Eurotunnel) are regulated nationally. For major British ferry companies used, NST shall check on an annual basis that levels of on board safety are being maintained and a record of such discussions will be kept.

4.6 Cruise Ships

All cruise ships are regulated by national bodies. Cruise vessels are required to be constructed to the International Rules of Shipbuilding and must strictly comply with all the rules of the International Maritime Organisation and the SOLAS Regulations (Safety of Life at Sea). Prior to booking any group on a cruise ship involving overnight accommodation, NST will seek confirmation from the cruise company or their agent that the vessel to be booked complies with all current regulations.

4.7 Public Transport

The regulations concerning public transport are determined by the appropriate authorities in each country. It is not felt that NST can take any additional measures.

5. Services Secured by Agents and Ground Handlers

Our Contracts Managers will ensure that:

5.1 Accommodation

- 5.1.1 Agents complete an Agent Contract confirming that accommodation which they provide have a current fire certificate or the local equivalent, the appropriate insurance cover and have attempted to obtain a hygiene certificate or the local equivalent. Furthermore, such accommodation shall conform to a set of specific safety standards aimed at further improving clients' safety.
- 5.1.2 NST shall inspect annually sample establishments from a minimum of 10% of agents and ground handlers who provide such accommodation to them. This inspection shall be to the standards established in the Accommodation Audit Form (see appendices).
- 5.1.3 A record of such audits will be maintained and accommodation audited in this manner will be treated in the same way as if the accommodation had been contracted directly. In addition the agent will be appraised of the audit standard achieved.
- 5.1.4 If any establishment audited falls into the unsafe category, NST will hold a formal review with the agent concerned and provide remedial training for the agent's staff that secure accommodation on behalf of NST.

5.2 Non UK Coaches

All agents providing non UK Coaches will sign a contract in which they agree that the companies they select will comply with all applicable national, local, trade or other laws, regulations, rules and codes of practice. This contract should also stipulate a set of safety standards regarding driver's hours, driver vetting, insurance cover and vehicle age to which the coach company must agree prior to usage by NST.

5.3 Other Services

Where Agents or Ground Handlers provide other services that would be the subject of a safety review if booked direct by NST eg visits and excursions, they shall sign a contract agreeing to use the same standards as outlined in the appropriate paragraphs of this document.

6. Visits and Excursions

Our Contracts Manager will ensure that:

NST will use reasonable endeavours to obtain from providers of visits and excursions that are included in tours:

- 6.1** Evidence that health and safety has been evaluated.
- 6.2** An outline of any potential remaining risks which the provider wishes to bring to the attention of school and youth groups.

If we become aware that a visit or excursion is considered unsafe, even if it conforms to local standards, NST will remove the visit or excursion from its programme and will not consider its reinstatement until we have evidenced that the defects have been rectified.

7. Accidents, Incidents and Near Misses

Our Safety Manager will ensure that:

- 7.1** 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. To facilitate this, NST will provide an Accident and Incident Form to all group leaders prior to travel.
- 7.2** NST will keep a record of all incidents, accidents and near misses of which it becomes aware or which are brought to its 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 all incidents considered to be serious shall be reported to the Company Secretary as outlined in our Accident, Incident and Near Miss Procedure. Additionally, the Board of Directors of NST will hold an annual review of any such accidents, incidents and near misses.

8. Provision of Pre-Tour Information including Inspection Visits

The Company Secretary will ensure that:

8.1 Pre-tour Safety Guide

NST's Pre-Tour Safety Guide, written in conjunction with RoSPA, will be provided to all groups prior to travel. This guide provides safety information and is intended to draw attention to key safety points and promote increased awareness.

8.2 Group Leaders' Inspection Visits

NST will undertake to offer a minimum of 4 group leader inspection visits per annum to the most popular destinations. Each of these inspection visits will offer a minimum of 40 places free of charge to enable group leaders, who have not previously visited the area, to familiarise themselves with all aspects of the tour.

Where no inspection visit has been arranged to a destination, 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.

These offers apply to group leaders who have confirmed a booking to a specific destination.

9. Emergency Procedures

The Company Secretary will ensure that:

- 9.1 NST will maintain and update the Emergency Procedure Practical Guide which clearly defines the roles that all staff could carry out in the event of a serious incident involving NST clients on tour. This document will be made available to clients on request.
- 9.2 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.
- 9.3 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 DfES and LEA guidelines.
- 9.4 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.

10. Training

The Company Secretary 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 annual refresher training. A record of all training undertaken will be maintained.

The Company Secretary will ensure that:

10.1 Accommodation Audit Training

One or more senior members of NST's management team will undertake a training course with a suitably qualified external organisation which will enable them to present initial accommodation audit training to newly designated Auditors. This internal Auditor training module has been formally documented and approved by a qualified external organisation.

In addition, a suitably qualified external body will be invited once a year to deliver update training to employees who have been identified to carry out Accommodation Audits. If established auditors are unable to attend their update through exceptional circumstances, they will be briefed on the content of the course by one of the senior members of staff who is qualified to deliver training (see above). If they are unable to attend the following year they will be required to complete the New Auditor Training Course.

New auditors will be accompanied by an auditor with a minimum of 2 years' experience whilst undertaking their first 3 audits.

A record of all the training undertaken will be maintained.

10.2 Transport Audit Training

Training will be provided for those staff members identified to carry out Transport Audits. Additionally, on the first 2 audits carried out by the trainee auditor, they will be accompanied by an auditor with a minimum of 2 years' experience of auditing transport suppliers.

10.3 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. Training

10.4 Emergency Procedure Training

All staff employed by NST will receive training in the Company's emergency procedures within 6 months of joining the Company.

10.5 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.

10.6 Emergency Procedure and Duty Officer Refresher Training

All staff will receive refresher training on an annual basis covering emergency procedures and, if appropriate, the Duty Officer role.

11. Outdoor and Adventurous Activities

NST owns and manages 2 adventure centres, Winmarleigh Hall in the UK and Lou Valagran in France. The Safety Management System covers all the component parts of a visit to these centres. In addition, each centre has its own separate safety policy which is sent to all groups booking a course. In addition, where National Governing Bodies (NGBs) exist, we adopt their guidelines as our minimum safety standard.

Neither of these adventure centres falls within the remit of the Adventure Activity Licensing Authority (AALA). Lou Valagran is not covered because it is not in the UK and Winmarleigh Hall, although in the UK, offers a level of activity that does not require AALA approval. However, we do follow AALA guidelines in conjunction with NGB guidelines.

Lou Valagran and Winmarleigh Hall are British Canoe Union (BCU) approved centres. The centres are inspected annually by the BCU as part of their approval scheme.

British Activity Holiday Association (BAHA) guidelines are adopted at both Winmarleigh Hall and Lou Valagran. In addition, Winmarleigh Hall is inspected annually by BAHA and is an approved centre.

Where AALA, NGB or BAHA guidelines do not exist for an activity, NST's Activities and Training Manager will ensure that our own operating procedure is developed, documented and adopted.

All SMS standards in this document apply to outdoor and adventurous courses in addition to any specific terms required by the authorities mentioned above.

NST

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