

Policy for the management of Health & Safety in Education Travel Group Ltd.

ISSUE CONTROL

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AUTHORISATION

This document is approved and authorised by the Board of Education Travel Group Ltd (hereinafter referred to as the 'Board') and must be implemented without amendment and applies to the whole of the business including:

- Kingswood Learning and Leisure Group Ltd;
- Britannia Learning and Leisure Group Ltd; and
- School Travel Group Ltd.

The Board has appointed the Chief Executive Officer to be responsible, on its behalf, for championing Health & Safety throughout the business and is authorised (following appropriate consultation with employee representatives and/or the appointed 'competent person', as necessary) to review, update and amend this document.



Paul Gilbert
Chief Executive Officer (Health & Safety Champion)

Date: 23 November 2010

Notes:

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Appendix A Terms applicable to Health & Safety at work

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1 PURPOSE AND SCOPE OF THIS DOCUMENT

1.01 Education Travel Group Ltd is committed to excellence in all aspects of its undertaking, including its management of Health & Safety. This commitment is represented by one of the 'Group Strategic Objectives':

'Building and maintaining a best in class safety management system that ensures the highest standards of Health & Safety for our customers, staff and partners in the Groups operations'.

1.02 In order to fulfil that intent, this document:

- satisfies the requirement of Section 2(3) of the Health and Safety at Work etc. Act 1974 (the 'HSW Act') by setting out the business's general policy for Health & Safety;
- specifies the managerial and operational requirements that will be implemented in the business to achieve compliance with the general duties placed on an employer under Sections 2(1) and 3(1) of the HSW Act;
- specifies the managerial and operational requirements that will be implemented to achieve compliance with the duties placed on an employer under the Management of Health and Safety Regulations 1999 (particularly Regulation 5: 'Health and safety arrangements');
- reflects the principles of Health & Safety management outlined in Health and Safety Executive publication HS(G)65: 'Successful health and safety management' and OHSAS¹ 18001:2007: 'Occupational health and safety management systems - Requirements'.

1.03 In addition, it sets out the arrangements that the business will implement in order to demonstrate its ongoing and determined commitment to continuously improve its Health & Safety performance.

1.04 In determining its policies for and commitment to Health & Safety, the requirements set out in this document represent the standards that will apply throughout the business.

1.05 To support the delivery of Health & Safety, the business has adopted a colour-coding approach for Health & Safety documentation in order to identify Health & Safety policy, management arrangements and implementation requirements:

Health & Safety policy
(Strategic, i.e. why we do it)

Sets out a Health & Safety policy requirement of the business by providing the strategic intent to fulfil its Health & Safety obligations, comply with relevant Health & Safety legislation and to continually improve its Health & Safety performance.

Management requirements
(Tactical, i.e. who will do it)

Sets out the management requirements that will be implemented to ensure its Health & Safety policy is put into effect in order to achieve its strategic objective.

Note: Such requirements are set out, at an operational level, in detail in each business's Health & Safety management document.

¹ Occupational Health and Safety Assessment Series

Implementation overview
(Operational delivery, i.e. how we will do it)

Provides the operational requirements that will be implemented to support the delivery of Health & Safety within the business (such as operational Health & Safety procedures, technical standards, guidance, etc).

Note: Such requirements are set out, at an operational level, in detail in each business's Health & Safety management document.

- 1.06 To facilitate the management of Health & Safety:
- this document sets out the overall policy for Health & Safety and the detailed policy requirements that will apply throughout the business (i.e. the planning for and organisation of Health & Safety); and
 - each business to which this document applies will develop and implement a documented Health & Safety management system which will put into effect the policy requirements (i.e. the management, control, monitoring and review of Health & Safety).
- 1.07 To that end, the Board recognises its overall responsibilities for Health & Safety and will ensure adequate resources, facilities and arrangements are in place to comply with the requirements of relevant Health & Safety legislation and to implement effectively this document.
- 1.08 The business will appoint such 'competent persons' (including, as necessary, persons external to the business) as are necessary to provide the business with appropriate Health & Safety assistance.
- 1.09 In relation to any other business activities where Education Travel Group Ltd holds either a prevailing managerial influence or otherwise considers it appropriate, this document either applies or can be used as guidance for determining compliance by that business activity with Health & Safety requirements.
- 1.10 This document will be made readily available and communicated to all employees and, as necessary, any other interested parties.

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2		<u>GENERAL STATEMENT OF HEALTH & SAFETY POLICY</u>
2.01	Health & Safety policy	Education Travel Group Ltd is committed to excellence in all aspects of its undertaking, including its management of Health & Safety.
2.02		In addition to its statutory obligations, the Board acknowledges the special responsibilities it holds for the Health & Safety, and the well-being and welfare, of the young people and others who participate in its sporting, leisure, activity and learning and development programmes.
2.03		Our general policy is to ensure, so far as is reasonably practicable, the Health & Safety at work of our employees and the Health & Safety of any other persons who may be affected by our undertaking.
2.04		We will comply with the requirements of relevant national Health & Safety legislation and, if applicable, approved codes of practice, and, as appropriate, published guidance, such as in the UK that issued by the Health and Safety Executive and/or recognised industry or national governing bodies.
2.05		We will seek to continually improve our Health & Safety performance in order to raise standards and reduce the potential for occupational injuries and/or cases of ill-health.
2.06		Our objective is to achieve a business culture and management framework in which Health & Safety hazards and risks are identified, assessed and adequately controlled to ensure the Health & Safety of our employees and others, thereby reducing the incidence of accidents, incidents and/or cases of occupational ill-health.
2.07		In addition, we acknowledge the benefit and value to young people’s learning of exposure to managed risk and, as such, we will ensure residual risk is maintained only to the minimum level necessary to contribute to their learning.
2.08		We will seek to ensure that Health & Safety actively contributes to the success of the business, and will be supported by ensuring the real engagement of our employees and, as necessary, others in delivering good Health & Safety.
2.09		Our employees and, as appropriate, others will be made aware of this policy and our commitment to its effective implementation; and, as necessary, their responsibility to support us in its effective implementation.
2.10	Management requirements	The Chief Executive Officer is responsible for ensuring the ‘General statement of Health & Safety policy’ is signed and communicated to employees and, as necessary, any other interested party.
2.11	Implementation overview	A signed and dated copy of our ‘General statement of Health & Safety policy’ will be displayed in all our UK-based premises and, as necessary, a copy will be made available to employees and/or any other interested party, such as via the business’s Intranet and Internet websites.

3

ROLES AND RESPONSIBILITIES FOR HEALTH & SAFETY

3.01

Health & Safety policy

The Board of Education Travel Group Ltd has overall responsibility for ensuring that adequate management arrangements and resources are in place to comply with relevant Health & Safety legislation and to effectively deliver our Health & Safety policy.

3.02

The Chief Executive Officer, on behalf of the Board, is appointed with responsibility for championing Health & Safety throughout the business, including ensuring that:

- appropriate documented Health & Safety management systems are in place (including defining Health & Safety roles and responsibilities); and
- suitable 'competent persons' are appointed, in writing, to provide the business with Health & Safety assistance, including that of Health & Safety management and organisation.

3.03

All employees and, as necessary, others will be expected to actively support the business in fulfilling its Health & Safety obligations and commitments by fulfilling their Health & Safety responsibilities.

3.04

Management requirements

Although the Board maintains overall and final responsibility for Health & Safety, the Chief Executive Officer, on its behalf, has day-to-day operational responsibility for ensuring that the business fulfils all its Health & Safety obligations.

3.05

The Chief Executive Officer is responsible for championing Health & Safety throughout the business and ensuring the minimum requirements of this document are effectively implemented, monitored and reviewed, including:

- producing an annual Health & Safety improvement plan; and
- promoting and maintaining commitment to and management leadership of Health & Safety.

3.06

In addition, the Chief Executive Officer is responsible for ensuring that:

- adequate management resources and arrangements are in place to fulfil legal obligations including defining and allocating managerial roles and responsibilities for Health & Safety;
- there is a structured framework in place for managing Health & Safety;
- there are documented Health & Safety management systems in place to effectively deliver the requirements of this document;
- as necessary, suitable internal and/or external audits are undertaken to establish compliance with relevant Health & Safety legislation; and
- there is pro-active measurement of Health & Safety performance.

3.07


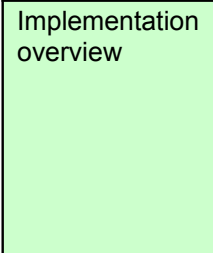
The Group Finance Director is responsible for ensuring sufficient finance resource is provided to enable the business to fulfil its Health & Safety obligations, comply with relevant Health & Safety legislation and deliver the requirements of this document.

3.08

All managers are responsible for ensuring Health & Safety within their area of control and/or responsibility and are accountable to the Chief Executive Officer for its effective implementation.

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- 3.09  All employees and, as necessary, others are responsible for co-operating with the business on Health & Safety and ensuring not only their own Health & Safety but also that of any other persons who may be affected by their acts or omissions.
- 3.10  Clearly identified roles and responsibilities are a key ingredient in ensuring that Health & Safety is effectively managed. Engaging staff in determining their Health & Safety role and the extent of their responsibilities will ensure appropriate competency levels are identified and maintained.
- 3.11 To achieve that end, the Chief Executive Officer will ensure Health & Safety roles and responsibilities are identified and defined within each of the business's documented Health & Safety management systems.

4 POLICIES FOR THE MANAGEMENT OF HEALTH & SAFETY

4(a) General requirements

4.01 **Health & Safety policy** Education Travel Group Ltd will develop and implement documented Health & Safety management arrangements to ensure it fulfils its Health & Safety obligations, delivers its policies and complies, as necessary, with Health & Safety legislation.

4.02 **Management requirements** To support the management and delivery of Health & Safety, we will implement a structured management framework is in place to:

- explain the organisation and arrangements needed to facilitate the management and delivery of Health & Safety (including in relation to those who partake in our activities and other non-employees);
- communicate our approach to Health & Safety, including our policy and objectives;
- as necessary, develop and implement business Health & Safety improvement plans;
- audit and review our Health & Safety performance; and
- support a process of continuous improvement in our Health & Safety performance.

4.03 **Implementation overview** To support the delivery of Health & Safety, we will review and amend this document, as necessary, to ensure it remains effective in fulfilling our expectations, supporting our management and delivering our operational requirements.

4.04 This document will be communicated to and/or made available to our employees and, as necessary, any other interested parties.

4.05 The managerial and operational requirements to deliver these polices will be contained within documented business Health & Safety management systems.

4(b) Communication and consultation


4.06 **Health & Safety policy** There will be active and open communication and consultation on Health & Safety between the business, its managers and employees and, as appropriate, others whose Health & Safety may be affected by the business’s undertaking.

4.07 Health & Safety will be integrated into business communications, wherever appropriate.


4.08 Where employees work in another organisation’s premises, suitable and sufficient information and/or induction will be provided to ensure their Health & Safety.

4(c) Incident investigation

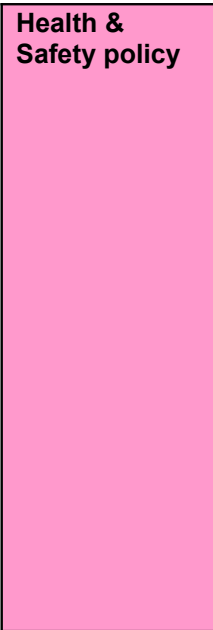
4.09 **Health & Safety policy** We will record and investigate, as necessary, all accidents, incidents and other significant near misses both in the workplace and during activities to identify any failings in our management of Health & Safety.

4.10  Any lessons learned from such investigations will be used to take corrective actions to prevent recurrences and improve our Health & Safety performance, including reviewing 'risk assessments'.

4(d) Measuring performance

4.11  We will actively review and report on our Health & Safety performance against published objectives and targets.

4(e) Hazard identification, risk assessment and management


4.12  We will identify our Health & Safety hazards and assess and record the significant Health & Safety risks associated with such hazards present in our workplaces and activities (including occupational health hazards and risks) and inform our employees and, as appropriate, others of any significant hazards and risks that have the potential to impact on them.

4.13 We will take action to eliminate and reduce risks (including occupational health risks) or, where this is not reasonably practicable, controlling them to an acceptable level and, by doing so, reduce the potential for accidents, incidents or cases of work-related ill-health.


4.14 We will review risk assessments, as appropriate, to ensure they remain suitable and sufficient to our activities, including following:

- any significant changes in relevant Health & Safety legislation;
- any lessons learned from incidents and accidents; and
- the introduction of new or changes to existing activities, facilities, work equipment, hazardous substances, other processes, etc.

4(f) Competence and training

4.15  All employees will be adequately instructed and trained on the Health & Safety requirements that affect them, including awareness of our Health & Safety policy, their responsibilities for Health & Safety, and the safe practices that should be followed.

4(g) Culture and behaviour

4.16  We will strive to achieve a business culture with a positive approach to Health & Safety which is underpinned by a 'zero tolerance' attitude to unnecessary Health & Safety hazards and risks.

4.17 Management will demonstrate leadership in Health & Safety and will undertake centre visits to ensure that Health & Safety is being effectively managed and the Board's expectations implemented.

4.18 We will empower employees and, as appropriate, others to raise any Health & Safety concerns or imminent dangerous situations with management.

4(h)

4.19

Health & Safety policy

Health & Safety documentation

The business will maintain a documented Health & Safety management system to ensure:

- compliance with relevant Health & Safety legislation;
- the maintenance of Health & Safety records;
- fulfilment of the requirements of HS(G)65: ‘Successful health and safety management’; and
- continual improvement of Health & Safety performance.

4(i)

4.20

Health & Safety policy

Management of contractors

We will ensure that contractors engaged by the business are made aware of our Health & Safety policy, our commitment to its effective implementation and their responsibilities for Health & Safety.

4.21

We will ensure the Health & Safety hazards and risks associated with work being undertaken or provided by contractors, whether on projects or the provision of services, are effectively controlled including:

- the Health & Safety competence of contractors is assessed and reviewed to ensure Health & Safety during operational work;
- pre-start consultation is undertaken in order to ensure active exchange of relevant Health & Safety information;
- where necessary, formal appointments are made of competent persons; and
- hazards and risks associated with the contractor’s work, whether created by the business or the contractor, are identified, assessed and adequate controls implemented to manage any risks.

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5 MANAGEMENT AUDIT AND REVIEW

5.01	Health & Safety policy	Our compliance with the requirements of Health & Safety legislation and our overall Health & Safety performance will be continuously monitored and audited throughout the business at appropriate intervals and, at least, annually.
5.02	Management requirements	The Board will continually review the Health & Safety performance of the business in order to monitor the management of Health & Safety and ensure compliance with relevant Health & Safety legislation.
5.03		To that end, the Chief Executive Officer will set a programme of audits (including, as necessary, both internal and external third-party audits) to verify that Health & Safety is being effectively managed.
5.04	Implementation overview	Board reviews of Health & Safety performance will include technical and/or legal issues, managerial requirements and behavioural attributes that have the potential to significantly impact on Health & Safety.
5.05		<p>Examples of the types of information that will be used to support such reviews will include:</p> <ul style="list-style-type: none"> • delivery of any annual Health & Safety improvement plan(s); • the outcomes of any investigations into significant accidents and/or incidents, accident and/or incident frequency rates² and, as appropriate, 'industry benchmarking'; • any significant business and/or management changes that have the potential to impact on Health & Safety; • enforcement action by inspectors from an enforcing authority; • non-conformances identified by Health & Safety audits; • reports from management on the effectiveness and/or performance of the overall Health & Safety management system.
5.06		To support continuous improvement, this document will be updated and amended, as necessary, to reflect the outcome of Board reviews and to take into account any significant changes in Health & Safety legislation to ensure it remains relevant to the managerial and operational requirements of the business.
5.07		Any significant changes to this document will be discussed as necessary, by the Board, employee representatives and/or the appointed 'competent person', as necessary, prior to implementation.
5.08		The Chief Executive Officer will be responsible for ensuring that any significant changes to this document with the potential to impact on the delivery of Health & Safety are effectively communicated to those affected and are, subsequently, implemented.
5.09	The period of time between formal reviews of the entire documented Health & Safety management system will not exceed two years.	

² i.e. the number of 'RIDDOR' injuries/100,000 hours of exposure (an 'AFR') or /100,000 persons exposed (an 'AIR').

Appendix A: Terms applicable to Health & Safety at work

A.1 The following terms relate to the management of Health & Safety. As necessary, other terms applicable to Health & Safety will be defined within business management systems and their supporting documents, procedures and/or standards.

'Acceptable risk': a risk that has been reduced to a level that can be endured by the organisation having regard to its legal obligations and its Health & Safety policy.

'Accident': an undesired event giving rise to death, ill-health, injury, property damage or other such loss.

'Audit': the systematic examination to determine whether activities and related results conform to planned arrangements and whether these arrangements are implemented effectively and are suitable for achieving the organisation's policy and objectives.

'Competent person': a person (including an organisation) appointed under Regulation 7 of the Management of Health and Safety at Work Regulations 1998 to provide Health & Safety assistance who, by virtue of their qualifications and/or experience, has sufficient knowledge and ability, including communication skills, to advise on Health & Safety and is familiar with the requirements of relevant Health & Safety legislation, approved codes of practice, etc.

'Continual improvement': the process of enhancing the occupational Health & Safety management system to achieve improvements in overall performance, in line with the organisation's policy. The process need not take place in all areas of the business's activities simultaneously.

'Employee': a direct employee of the business or an agency employee who works under the immediate management control and/or instruction of an employee of the business.

'Employee representative': an employee of the business appointed under the Health & Safety (Consultation with Employees) Regulations 1996 for the purpose of representing employees in consultation on matters relating to Health & Safety.

'Hazard': a source or situation with a potential for harm in terms of human injury or ill-health, damage to property (such as damage or fire), damage to the workplace environment, or a combination of these.

'Hazard identification': the process of recognising that a hazard exists and defining its characteristics.

'Health': a state of well-being in both body, i.e. free of disease or other illness, and mind, i.e. free of stress or other mental illness.

'Health & Safety': the conditions and factors that affect the well-being of employees, temporary workers, contractor personnel, visitors and any other person in the workplace.

'Health & Safety management': part of the overall management of the business that facilitates the management of the occupational Health & Safety risks associated with the business including its organisational structure, planning activities, responsibilities, practices, procedures and resources for developing, implementing, achieving, reviewing and maintaining the organisation's Health & Safety policy.

'Health & Safety policy': a document that provides the overall intentions and direction of an organisation as expressed by top management.

'Incident': an event that gives rise to an accident or had the potential to lead to an accident. An incident where no ill-health, injury, damage, or other loss occurs is also referred to as a 'near miss'. Incidents include 'near misses'.

'Non-conformance': any deviation from work standards, practices, procedures, regulations, management system performance etc. that could either directly or indirectly lead to injury or illness, property damage, damage to the workplace environment, or a combination of these.

'Objectives': goals, in terms of performance, that an organisation sets itself to achieve. Objectives should be quantified wherever practicable.

'Organisation': a business, operation, firm, enterprise, institution or association, or part thereof, whether incorporated or not, public or private, that has its own functions and administration. For organisations with more than one operating unit, a single operating unit may be defined as an organisation.

'Performance': a measurable result of the management system, related to the organisation's control of risks, based on its policy and objectives. Performance measurement includes measurement of management activities and results.

'Risk': a combination of the likelihood and consequence(s) of a specified hazardous event occurring.

'Risk assessment': the overall process of estimating the magnitude of risk and deciding whether or not the risk is tolerable.

'Safety': a freedom from unacceptable risk of harm.

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