



STUDY EXPERIENCES & SPORT EXPERIENCES' SAFETY MANAGEMENT POLICY AND PROCEDURE

Study Experiences is the school and college educational travel division of the Newmarket Group. Sport Experiences is the student sport travel division of the Newmarket Group. The tours provided by Study Experiences and Sport Experiences are operated by Newmarket Promotions Ltd and Newmarket Air Holidays Ltd.

Study Experiences and Sport Experiences are Assured Members of the School Travel Forum (STF) whose general membership rules dictate that:

All members are required to adhere to the Regulations laid down by the EU Package Holiday Regulations 1992.

All members must maintain adequate insurance protection in the form of Tour Operators' liability insurance cover with a minimum indemnity of £5 million per claim, and in the aggregate, each year.

All STF members must be bonded with ABTA, AITO or the CAA via the ATOL Scheme (as appropriate), so that in the event of the failure of the tour operator, all customer payments can be refunded and any customers on tour can be repatriated. Members must contract with their customers as principal. Split contract and ATOL agency arrangements are not acceptable.

All Assured Members are required at all times to comply fully with the Association's Safety Management Standards as minimum standards in relation to the safety of their clients.

PUBLIC & PRODUCT LIABILITY INSURANCE

Newmarket Promotions Ltd, Newmarket Air Holidays Ltd, Newmarket Study Experiences & Newmarket Sport Experiences are insured with Lloyds of London. Policy No. 52113A06 with limit of indemnity of £5,000,000. Renewal date 6th February 2011



STUDY EXPERIENCES & SPORT EXPERIENCES SAFETY MANAGEMENT SYSTEM (SMS)

This is a formal policy document setting out how Study Experiences and Sport Experiences ensure that the company's safety objectives for its clients are met, managed and reviewed.

POLICY

The Directors and Management of the Newmarket Group recognise that they have a responsibility to clients to ensure that all reasonable precautions are taken to provide and maintain high levels of safety. Study Experiences and Sport Experiences' standards comply with the School Travel Forum's (STF) safety management standards.

The company will so far as is reasonably practicable, pay particular attention to:-

1. Recognising that health and safety issues are paramount and ensuring such issues always take a priority.
2. Ensuring suppliers provide safe transport and accommodation and comply with current local and national standards.
3. Ensuring general competency to respond efficiently in the event of an emergency.
4. Regularly reviewing and as appropriate up-dating our formal Safety Management System and Standards. This process is audited by external Health and Safety experts to ensure we follow best practices.

Identification of responsibilities & processes

Policy making will be the responsibility of the *Managing Director* who will ensure that:

- Systems are developed for implementation of the safety management system policy.
- Competent persons are appointed to implement the requirements of the Safety Management System (SMS).
- Adequate resources are provided to implement the requirements of the Safety Management System (SMS).
- Regular auditing monitors the effectiveness of the Safety Management System (SMS).

Planning will be the responsibility of the *Operations Director* who will ensure that:

- The Safety Management System (SMS) is reviewed and updated.
- All employees participate in the development and implementation of the Safety Management System (SMS) procedures.
- Employees are trained and competent in the requirements of the Safety Management System (SMS).
- The Safety Management System's (SMS) performance is monitored by staff in its implementation, providing feedback to executive management on success and areas where there is a need for improvement.
- The trends are examined and identified by monitoring activities.
- He/she keeps up to date with safety requirements and practices applicable to the provision of educational and sport tours.

Implementation

Departmental Managers are to provide leadership and to promote responsible attitude towards health and safety. Each manager will:

- a. Ensure that each new employee is given induction training; including precautions procedures appropriate to their specific jobs.
- b. Ensure that all staff are made aware of any procedures in place if clients face any serious or imminent danger, and the name of the competent person(s) designated to implement those procedures.
- c. Ensure all staff for whom they are responsible are aware of the Safety Management System (SMS).
- d. Keep up to date with health and safety matters applicable to the operations of the company.
- e. Investigate all accidents, with the assistance of the Operations Director, with a view to prevention in the future.
- f. Ensure good housekeeping standards are applied and regular safety checks and audits carried out.

Supervisors and Team Leaders have the responsibility to provide leadership and promote responsible leadership attitudes towards health and safety.

Supervisors and Team Leaders must ensure that all tasks carried out in their sections are performed with the utmost regard of the health and safety of all those involved. Accidents must be reported immediately to the line manager. Particular regard will be paid to:

- Ensuring that staff for whom they are responsible are aware of any procedures in place to deal with serious or imminent danger.

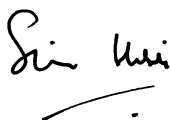
All employees have a responsibility to do everything they can to prevent injury by their actions or omissions at work. They are expected to follow company procedures in particular, to report any incidents which have or may have led to injury or damage.

Review

Departmental Managers will annually audit the quality and consistency of the implementation of Study Experiences and Sport Experiences Safety Management System (SMS) procedures and provide feedback on standards to the *Operations Director*.

In the event of any accident, a comprehensive accident report will be completed and a review of accident information carried out annually to identify trends and confirm that required remedial actions have been implemented.

As part of the School Travel Forum (STF) Assured membership status, Study Experiences and Sport Experiences also undertake an external audit with independent Health and Safety experts.



Signed: Simon Hibbs
Managing Director

Date: 28th January 2010

Safety Management Standards

1. ACCOMMODATION

1.1 For all accommodation, used or featured, members will ensure that:

- a) An accommodation contract or agent 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.
- b) Confirmation that the contract conditions are still being met will be obtained every three years.

1.2 **Standard Audit**

- a) All accommodation (used or featured) will be subject to a standard audit prior to first use and thereafter at a maximum of three year intervals. A standard audit will not be required if a supplementary audit has been carried out in the past three years.
- b) The standard audit may be completed by an STF member, hotelier or agent.
- c) The standard audit results will be assessed by a trained auditor. Where the standard audit results indicate areas for concern the auditor should instigate appropriate additional action, which may include the use of a supplementary audit, before use.
- d) Based on the results of the audit analysis and any subsequent investigation, the result will be recorded as one of the categories defined in 1.4.
- e) Members shall complete random sample spot checks of standard audits annually. The results will be analysed by a trained auditor and where significant discrepancies are identified suitable corrective action will be undertaken before accepting any further standard audits from that source. Records of these checks will be maintained.

1.3 **Supplementary Audit**

- a) Frequent Use: In addition to the above standard audit, if it is clear that the accommodation will be used for five or more groups in any one year it will be listed as 'frequent use' and, within a maximum of twelve months of the frequent use criteria being established, will receive a supplementary audit.
- b) A supplementary audit can only be carried out in situ by a trained auditor.
- c) The accommodation will be re-audited to supplementary audit standard at least every three years or as long as it remains 'frequent use'.
- d) Based on the results of an audit analysis, the result will be recorded as one of the categories defined in 1.4.

1.4 **Monitoring of Accommodation Audits**

Members will record audits in the following categories:

- a) **High Conformity**
No areas of improvement have been identified. The management will be commended and encouraged to maintain their standards.

- b) **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 and followed up in writing within 14 days. The deficiencies will be evaluated and a schedule of remedial action will be agreed and monitored.
- c) **Unacceptable**
Member will remove the accommodation from its programme and will not consider its reinstatement until the defects have been rectified and the establishment has been re-audited to a standard that either conforms or has minor non-conformities.

Defects – In the event of a defect/s the hotel will be notified in writing and a recommendation will be made. Deficiencies will be logged and evaluated and the hotel will be asked to confirm that remedial action will be taken.

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

2. TRANSPORT

2.1 UK Coaches

2.1.1 Members will:

- a) For all coach operators, prior to use for the first time, obtain a copy of their operating licence together with their motor vehicle and public liability insurance. Members 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 operators.
- b) Ensure all coach companies used sign a coach contract in which they confirm that they comply with all national, local, trade and other laws, regulations, rules and codes of practice. This contract should also stipulate a set of safety standards regarding drivers' hours, driver vetting, insurance cover and vehicle age.

2.1.2 In addition, members shall establish and maintain a list of UK coach operators that they use regularly or anticipate using more than 5 times in any one year (the "regular use list") and:

- a) Obtain on an annual basis and keep on record a copy of the operating licence, motor vehicle and liability insurance.
- b) Inspect the coach operator prior to using them for the first time and thereafter at least every 3 years.
- c) Maintain a schedule of the audit status of coach operators and review it on an annual basis.
- d) Ensure that their drivers have no material criminal record or detrimental employment record.

2.1.3 Members' policy documents must clearly state the circumstances in which they would not be able to provide a coach operator from their "regular use list" and what checks it would carry out in these circumstances.

2.2 Non-UK Coaches

2.2.1 Members will ensure that all coach companies used complete a coach contract for non-UK operators in which they will confirm that they 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 drivers' hours, driver vetting, insurance cover and vehicle age to which the coach company must agree prior to usage by the member.

2.2.2 Non-UK coach companies that are contracted directly by the member which will be used, or it is anticipated that they will be used, more than 5 times in any one year will:

- a) Be audited every 3 years.
- b) Obtain on an annual basis, and keep on record, a copy of the operating licence, motor vehicle and liability insurance.

2.3 Tour Managers/Resort Representatives

Study Experiences and Sport Experiences Tour Managers are contracted on a freelance basis and for the duration of the tour are responsible for the general wellbeing of the group and for highlighting any possible health and safety issues and/or reporting any incidents back to head office.

Tour Managers on all school and student group tours are CRB checked. Tour Managers are only added to our CRB database and recommended for schools and youth tours work, on presentation of the original copy of their CRB check confirming that they have been cleared and these are reviewed at regular intervals.

We provide each Tour Manager with a manual intended as a guide to company policy, conduct, hotel/coach standards, conditions of hire and how Study Experiences and Sport Experiences wish the Tour Managers to operate the tours. The manual sets out guidelines to be used in conjunction with their professional experience and liaison with the Duty Executive in order to decide the most appropriate action in any given situation. All Tour Managers are fully cognisant of the company procedures in respect of illness, injury, death, accident, breakdown, technical or weather delay or "problems" with suppliers or complaints from clients.

2.4 Airlines

Flights from Britain are regulated by the Department of Transport and the Civil Aviation Authority. Flights originating in other jurisdictions are governed by the laws and regulations of the country in question. It is not felt that members can take any further measures.

2.5 Rail Transportation

All rail transport is regulated nationally. It is not felt that members can take any further measures.

2.6 Ferry and Eurotunnel

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

2.7 Public Transport

All public transport is regulated nationally. It is not felt that members can take any further measures.

3. SERVICES SECURED BY AGENTS AND GROUND HANDLERS

3.1 Transportation

All agents providing foreign coach services 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 drivers' hours, driver vetting, insurance cover and vehicle age to which the coach company must agree prior to usage by the member.

3.2 Other Services

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

4. VISITS AND EXCURSIONS

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

- a) evidence that health and safety has been evaluated
- b) an outline of any potential remaining risks which the provider wishes to bring to the attention of school and youth groups

5. INSPECTION VISITS

Each Company shall provide a means for clients to inspect a destination in advance of travelling with their group. Terms and conditions for such visits will be at the discretion of each Company. Members shall provide evidence that such a facility is in place.

6. SAFETY INFORMATION BEFORE TRAVEL

Each member shall provide written practical safety information to their clients prior to their tour.

7. DUTY OFFICER AND EMERGENCY PROCEDURES

- a) Members will operate a duty officer system so that they can be contacted at all times when groups are traveling.
- b) Members will produce and maintain a fully documented emergency procedure that is available to all their clients and that is operational at all times.
- c) All group leaders on tour, drivers of British coaches and agents will be provided with details of how to contact the Duty Officer.

8. TRAINING POLICY

Members policies shall detail the training provided:

- a) to enable staff to be equipped to carry out the tasks assigned to them in their policy.
- b) to familiarise all staff with an outline of their safety policy.