

Safety Management System Manual

NST, Esto & StudyLink Tours

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Glossary of Terms

Term	Meaning
Agent	Intermediary through whom accommodation and/or other services are sourced and contracted for PGL Beyond
Coach Company standard checklist	Checklist for coach suppliers reviewed by trained auditors in compliance with STF requirements
HSG65	Managing Health and Safety Guidance document published by the Health and Safety Executive
LOtC	Learning Outside the Classroom
On-site Accommodation Audit	On-site safety audit for accommodation, undertaken and assessed by trained auditors in compliance with STF requirements
PGL Beyond	A network of educational travel brands – PGL Travel Ltd, NST, Esto and StudyLink Tours
Regular Use List	A list of coach operators who have been inspected to the standards established in the Coach Company Audit
Safety Management Committee	Committee that ensures the effectiveness of the SMS policy, provides constructive challenge and scrutiny of safety measures across NST, Esto and StudyLink Tours
SMS	Safety Management System for NST, Esto, and StudyLink brands
Standard Accommodation Checklist	Self-audit safety system for accommodation specified by the STF and assessed and scored by STF trained auditors
STF	School Travel Forum

General Policy Statement

All brands with the PGL Beyond network are committed to being best-in-class operators to ensure the highest possible safety standards are maintained on behalf of our travelling guests.

We go above and beyond to ensure the physical and emotional safety of every young person is a top priority across all of our brands.



Our In Safe Hands framework is built on five pillars:

Safe people

For our tours overseas, we work with a network of partners to provide local support and in-depth destination knowledge to provide additional peace of mind whilst you're away.

Safe places

We have safety management systems in place for all our brands that meet the Government's recommendations for educational safety. For NST, Esto, and StudyLink Tours, all external accommodation and excursions are carefully audited to ensure the highest standards can be met.

Safe spaces

We work hard to accommodate SEND and accessibility requirements and we request an open and flexible approach to help us meet the needs of our guests. We will ensure a fair assessment of service provision can be made and appropriate resources are identified. A code of conduct is required for all our experiences for everyone's safety.

Safeguarding

Each of our brands is committed to being a best-in-class operator to ensure the safety and protection of everyone under our care. We take responsibility for promoting the welfare of children, young people and adults at risk to protect them from harm.

Safe travels

Every travel partner we work with is vetted to ensure they have effective safety management systems in place, specifically focused on travelling with young people. We aim to ensure travel provision is adaptable to meet the needs of our guests. All of our travel brands offer insurance included as standard unless otherwise stated, with 24-hour emergency cover support for all tours.

As part of our commitment to promoting best practice in educational travel, NST, Esto, and StudyLink Tours are Full Members of the School Travel Forum (STF) and Learning Outside the Classroom Quality (LOtC) Badge holders. Health and Safety is a key part of our overall business strategy and will seek opportunities for continuous improvement on an ongoing basis.

This policy applies to all colleagues and everyone working on behalf of PGL Beyond's brands – NST, Esto and StudyLink Tours.

We are committed to fulfilling our obligations under the Health and Safety at Work Act 1974 and will:

- Ensure that guests are not placed in unsafe conditions as far as is reasonably practicable
- Take all reasonable precautions to reduce the risk of accident
- Require suppliers to ensure all components of each tour fully comply with EU legislation (where directly applicable), national or local government regulation in regard to food hygiene, fire, and other safety standards
- Ensure that our in-house colleagues receive suitable training in the requirements of this SMS and how to respond in the event of an emergency
- Provide adequate resources to ensure continued improvement in health and safety management and performance
- Develop a positive health and safety culture throughout the organisation by increasing awareness and engagement to promote a positive and proactive 'safety first' culture
- Identify risks and opportunities and implement controls to effectively manage them
- Provide suitable information, training and supervision to maintain required competency levels
- Ensure that appropriate information and guidance is provided to all colleagues and guests in respect of safe practices and that they are aware of their health and safety responsibilities
- Regularly review performance of the Safety Management System

A handwritten signature in black ink, appearing to read 'Alex Alfred', with a stylized, cursive script.

Alex Alfred

Head of Operational Services

Responsibilities

Chief Executive Officer

The CEO is responsible for all health and safety matters across the PGL Beyond network and will:

- Provide direction on communication of the health and safety policy at all levels and across all areas of the business
- Provide leadership and set a personal example to promote a positive health and safety culture
- Provide adequate resources and funds to support effective implementation of the health and safety policy and the Safety Management System
- Appoint a Director responsible for the provision of strategic health and safety advice to the Board
- Consider and approve recommendations from the Director responsible for health and safety regarding changes to policy, procedure and the Safety Management System
- Require the Director responsible for health and safety to regularly report to the Board on health and safety implementation and performance of the Safety Management System
- Provide ongoing commitment to continuous improvement in health and safety performance and develop the collective vision and direction necessary to comply with and exceed where possible the relevant statutory provisions
- Ensure that PGL Beyond consults with colleagues on matters relating to health and safety at work and that proposals from colleagues on such matters receive proper consideration
- Obtain and share advice with the Board on the interpretation and compliance with relevant health and safety legislation, guidance and good industry practice
- Through the Director responsible for health and safety, take reasonable steps to ensure the performance of the Safety Management System is reviewed at regular intervals

Board of Directors

The Board, in line with current legislation and best management practice, are responsible for health and safety matters within their control and will:

- Ensure that the health and safety policy is effectively implemented within the areas under their control together with arrangements necessary to maintain compliance with statutory requirements
- Assign responsibilities for day-to-day management and monitoring of health and safety issues within all the functions under their control
- Communicate and promote the use of the health and safety policy and procedures within all functions under their control
- Provide leadership and set a personal example to promote a positive health and safety culture
- Effectively communicate to all colleagues within all functions under their control on matters of health and safety
- Ensure that suitable risk assessments and safe systems of working are developed and implemented within functions under their control
- Ensure that colleagues within functions under their control undertake health and safety training appropriate to their role and responsibilities as directed
- Advise the Director responsible for health and safety of any significant health and safety issues that may affect the corporate body
- Include health and safety as an agenda item at all meetings and forums within all functions under their control

Director of Health & Safety and Operational Services

The Director of Health & Safety and Operational Services is responsible for ensuring that standards of health and safety across PGL meets or exceeds legal and industry standards and will:

- Recommend, monitor and track health and safety objectives and improvement targets and provide periodic feedback on progress to the PGL Beyond Board through regular reports
- Report to the PGL Beyond Board on matters of health and safety performance
- Provide health and safety advice to the PGL Beyond Board and business groups as necessary to ensure the effective planning and delivery of an effective health and safety management system
- Ensure that the PGL Beyond health and safety policy, general arrangements and procedures are kept under review and formally reviewed at regular intervals
- Ensure that the safety management system is updated as required to reflect changes in legislation, guidance or best practice
- Ensure a suitable and robust health, safety and compliance audit programme is delivered
- Oversee and provide feedback on the success of auditing and inspection programmes
- Ensure that all accidents, incidents, near misses and dangerous occurrences are reported and investigated thoroughly and where necessary reported promptly to the enforcing authority
- Ensure that accident statistics are collated and where necessary corrective action is taken
- Ensure that new legislative requirements which will have an impact on the business are identified and reviewed after consultation with stakeholders prior to implementation
- Undertake a formal review of the effectiveness of the safety management system and make recommendations for continuous improvement
- Obtain technical advice where necessary

Arrangements

1. Risk Assessment

- 1.1 We have a Risk Assessment Policy which sets out the process for undertaking risk assessments.
- 1.2 We have a suite of risk assessment guides which are made available to Group Leaders.
- 1.3 We have a suite of subject and country specific risk assessment guides that are made available to Group Leaders to assist them in planning their tour.
- 1.4 Risk assessment guides are reviewed at regular intervals or following a serious event to ensure they remain suitable and sufficient.

2. Pre-Tour Safety Information

- 2.1 Pre-tour safety information is provided to all groups and is intended to draw attention to key safety points, promote increased awareness and assist guests with their responsibilities.
- 2.2 Guidance and templates for undertaking risk assessments are made available to Group Leaders within their pre-travel safety information.
- 2.3 Group Leaders are provided with the following safety information:
 - Emergency contact telephone number (Duty Officer)
 - Accident, incident and unsafe condition reporting
- 2.4 Group Leaders are provided with the opportunity to undertake a 2-night bed and breakfast stay (for 2 persons) at or near their booked accommodation to enable them to carry out their own risk assessment of their hotel and planned excursions or visits. This offer applies to Group Leaders who have confirmed a booking to a specific destination.

3. Accommodation

3.1 Accommodation Contract and Certification

- 3.1..1 An accommodation contract or agency agreement is signed confirming that the accommodation to be used when arranging tours for guests conforms to local and national fire, safety and hygiene standards and will have current liability insurance cover for the duration of the contract.
- 3.1..2 Wherever possible, copies of the relevant documents will be obtained.
- 3.1..3 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.
- 3.1..4 Confirmation is obtained every three years that contract conditions are being met.

3.2 Standard Accommodation Audit

- 3.2..1 All accommodation (used or featured) will be subject to a standard accommodation audit 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.
- 3.2..2 The standard accommodation audit may be carried out by a trained auditor, hotelier or agent. The results of the audit will then be reviewed by a qualified auditor, who will determine whether they meet STF standards and assess the accommodation's suitability for use.

- 3.2..3 If the results of the standard accommodation audit highlight any concerns, these will be addressed accordingly. The auditor will initiate any necessary follow-up actions, which may include conducting an on-site accommodation audit prior to use.
- 3.2..4 NST, Esto and StudyLink Tours will, where practicable, inspect a sample of accommodation audits to verify both the safety of the accommodation and the integrity of our audits/risk assessments.
- 3.2..5 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 **On-site Accommodation Audits**

- 3.3..1 In addition to the standard accommodation audits, a trained auditor would visit the accommodation to undertake an on-site audit should it meet the necessary STF usage criteria.
- 3.3..2 On-site accommodation audits are undertaken by trained auditors.
- 3.3..3 Frequent use accommodation will be re-audited to on-site accommodation audit standard every 3 years.

3.4 **Accommodation Conformity**

- 3.4..1 Based on the results of an audit analysis, accommodation will be categorised as either high, acceptable or unacceptable conformity as per the STF standards.
- 3.4..2 Acceptable conformity may include recommendations for improvement identified during the audit; however, these do not render the accommodation unsafe for use.
- 3.4..3 Accommodation that receives a conformity level of Unacceptable (Unsafe for use) following an audit **will not be considered for use**.
- 3.4..4 A schedule of all accommodation indicating the current audit status will be maintained on our system.

4. **Transport**

4.1 **Direct Coach Bookings**

For all coach operators used and booked directly by NST, Esto or StudyLink Tours, the Contracting and Transport teams 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 when the supplier is re-audited.
- 4.1..3 Where possible, coach operators who belong to recognised industry bodies such as the Confederation of Passenger Transport (CPT), or are Coach Marque accredited will be selected for use on tours.
- 4.1..4 Coach companies contracted by NST, Esto or StudyLink Tours are required to establish that their drivers do not have a material criminal record or detrimental employment history.
- 4.1..5 Checks to ensure that coach suppliers are in possession of valid and current liability insurance, motor insurance and other necessary local certification and licences to operate legally will be undertaken with records retained.

- 4.1..6 For UK coaches we will only use companies that confirm that their tour drivers have received appropriate clearance from the Disclosure and Barring Service or Disclosure Scotland.
- 4.1..7 All itineraries for tours by coach are prepared taking into account current legislation on drivers' hours.
- 4.1..8 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 PGL Beyond reserves the right to find the best available alternative to minimise impact on our guests.

4.2 **Agency Supplied Coaches**

- 4.2..1 For all agents supplying coach services, the PGL Beyond Transport Department will ensure that a contract is signed which stipulates that they comply with all applicable national, local, trade and other laws, regulations, rules and codes of practice.
- 4.2..2 This contract also stipulates a set of safety standards regarding drivers' hours, driver vetting, insurance cover, subcontracting and vehicle age.
- 4.2..3 Confirmation is obtained every three years that contract conditions are being met.
- 4.2..4 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.
- 4.2..5 The coach audit will be assessed by a suitably trained auditor.

4.3 **Standard Coach Audit**

- 4.3..1 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.
- 4.3..2 Evidence of standard coach audits undertaken are held on our system.
- 4.3..3 A standard coach audit will not be required if an on-site coach audit has been carried out in the past three years.
- 4.3..4 The standard coach audit may be completed by a School Travel Forum member, supplier or agent.

4.4 **On-site Coach Audit**

- 4.4..1 In addition to the standard coach audit, if a supplier is expected to be used frequently and meets STF usage criteria, an on-site coach audit will be conducted.
- 4.4..2 On-site coach audits will be undertaken by auditors trained to STF standards.
- 4.4..3 The on-site coach audit will be assessed by an auditor trained to STF standard

4.5 **Seat belts**

- 4.5..1 Seat belts will be available for all passengers on UK coaches in line with UK legislation.
- 4.5..2 Where non-UK coaches are booked, every effort will be made to ensure that seat belts are fitted.

4.6 **Snowsport Tours**

- 4.6..1 Coaches for snowsport tours will be equipped for winter conditions, such as the provision of winter tyres, snow chains and appropriate driver training.

4.7 **Coach breakdowns**

4.7..1 It is the intention of NST, Esto or StudyLink Tours to use our regular use coach companies whenever practical in the event of a breakdown. In the event of a vehicle breakdown in the countries outside the UK and where it is necessary to provide a replacement vehicle, best efforts will be made but it may not always be possible to always provide a coach fitted with seatbelts.

4.7..2 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, Esto or StudyLink Tours

4.8 **Air Travel**

4.8..1 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, Esto or StudyLink Tours

4.8..2 Flights originating in other jurisdictions are governed by the laws and regulations of the country in question

4.9 **Ferries and Eurotunnel**

4.9..1 All ferries and Eurotunnel are regulated nationally. Therefore, it is not necessary for NST, Esto or StudyLink Tours to take any further measures.

4.10 **Eurostar**

4.10..1 Eurostar is regulated by a number of governmental bodies on both sides of the Channel. Therefore, it is not necessary for NST, Esto or StudyLink Tours to take any further measures.

4.11 **Rail Transportation**

4.11..1 All rail transport is regulated nationally. Therefore, it is not necessary for NST, Esto or StudyLink Tours to take any further measures.

4.12 **Public Transport**

4.12..1 All public transport is regulated nationally. Therefore, it is not necessary for NST, Esto or StudyLink Tours to take any further measures.

4.13 **Services secured by agents & ground handlers**

4.13..1 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.

4.14 **Services obtained through third-party approved verification schemes**

4.14..1 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.

4.14..2 Approved schemes are:

- LOTC Quality Badge

- CPT Coach Marque
- Guild of British Coach Operators membership
- Earned Recognition (DVSA)

5. Attractions, visits and excursions

Where visits, excursions or activities are arranged directly by NST, Esto and StudyLink Tours:

- 5.1 Where visits, excursions or activities are included in a final itinerary, we will take reasonable steps to ensure risks have been evaluated and monitored.
- 5.2 Group Leaders should satisfy themselves that any attractions, excursions, or visits are appropriate to the age, abilities and size of their group.
- 5.3 Group Leaders are responsible for ensuring that students are fully supervised at all times, and that any instruction or safety briefings are followed.
- 5.4 Where any safety equipment is provided by venue operators, this must be worn at all times.

Where visits, excursions or activities are arranged directly by the group and where the itinerary specifically states the event is not being arranged or facilitated by us:

- 5.5 The Group Leader is responsible for ensuring that risks have been appropriately assessed.

6. Snowsports Equipment

- 6.1 We will have a signed contract in place with the suppliers of all hire equipment stating our minimum standards.
- 6.2 Helmets are included in our standard package.
- 6.3 All feedback from clients and staff is monitored, and all paperwork relating to the ski hire is recorded.
- 6.4 Should a ski hire shop have been contracted via an agent, then the agent will have signed a contract including the same detail.

7. Snowsport Instruction

- 7.1 We will ensure all ski schools will have signed a contract confirming that all instructors are qualified according to local and national regulations.
- 7.2 This contract will also state the minimum standards we expect of the instructors when working with young people as well as maximum class sizes of 12 students per ski class and 10 students per snowboarding class.
- 7.3 Our standard package includes 4 hours of tuition per day.
- 7.4 Should a ski school have been contracted via an agent, then the agent will have signed a contract including the same detail.

8. Standard of Up-lift and Runs

- 8.1 All ski lift systems used are licensed according to local regulations.
- 8.2 The resorts on the programme have been chosen with school party requirements in mind.

9. Accident, Incident & Unsafe Condition Reporting

9.1 Accidents

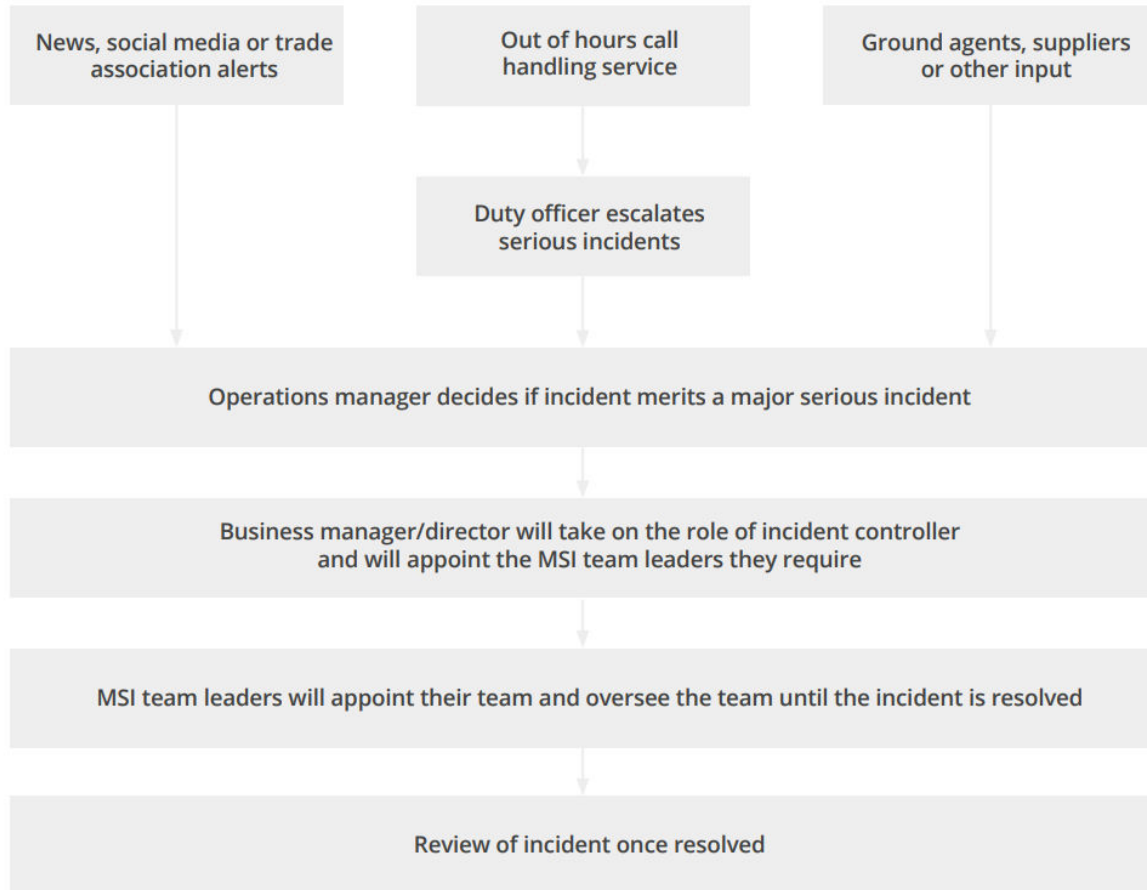
- 9.1..1 NST, Esto and StudyLink Tours provide Group Leaders with information and contact details to allow them to immediately report serious accidents in relation to hotel accommodation or excursion venues.
- 9.1..2 Any incidents or complaints whilst on tour are managed by the Operations Team or Duty Officer.
- 9.1..3 Where guests report serious accidents whilst on an organised tour, details will be recorded on our system and to the Safety Management Committee **within 24hrs (or next working day)** of being made aware.

9.2 Incidents

- 9.2..1 NST, Esto and StudyLink Tours provide Group Leaders with information and contact details to allow them to immediately report serious incidents in relation to hotel accommodation or excursion venues.
- 9.2..2 Where guests report serious incidents whilst on an organised tour, details will be recorded on our system and reported to the Safety Management Committee **within 24hrs (or next working day)** of being made aware.

10. Emergency Procedures

- 10.1 NST, Esto and StudyLink Tours have developed an Emergency Procedures Manual to effectively manage serious/major crises should they occur.
- 10.2 A roster of Duty Officers has been established to ensure that a colleague from PGL Beyond is contactable 24 hours per day via a call centre service.
- 10.3 All Group Leaders, drivers of British coaches and agents are routinely provided with Duty Officer contact details.
- 10.4 An overview of emergency procedures escalation is provided here:



10.5 The Emergency Procedures Manual is subject to annual review.

11. Safeguarding

11.1 A separate Safeguarding Policy for NST, Esto and StudyLink Tours is available for Group Leaders.

12. Training

12.1 Internal Auditor (coaches & accommodation)

- 12.1.1 All accommodation and coach supply auditors complete a School Travel Forum (STF) approved auditor training course.
- 12.1.2 All auditors complete refresher training every two years.
- 12.1.3 Auditor training and refresher training is delivered by the STF or their appointed consultants.
- 12.1.4 Auditors who fail to complete refresher training after two years may attend refresher training if less than three years has elapsed since the date the refresher training was due.
- 12.1.5 Auditors must pass refresher training before continuing auditor duties.
- 12.1.6 Auditors who fail to complete refresher training after three years must attend a full STF auditor training course before continuing auditor duties.
- 12.1.7 A record of all auditor training undertaken will be available at all times.

12.1..8 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.

12.2 SMS Awareness

12.2..1 All colleagues within customer facing and supplier relations teams undergo Safety Management System awareness training to ensure that all colleagues are fully aware of the scope, principal commitments and arrangements contained within it.

12.2..2 All colleagues in these teams receive refresher training as and when significant amendments are made to the SMS.

12.2..3 A record of all auditor training undertaken will be available at all times.

12.3 Emergency Procedures

12.3..1 Irrespective of role, all colleagues receive training in the company's emergency procedures as required for their role.

12.3..2 A record of all Emergency Procedure training undertaken will be available at all times.

12.4 Duty Officer

12.4..1 All colleagues who are selected as Duty Officers will receive appropriate training prior to carrying out this role for the first time.

12.4..2 A record of all Duty Officer training undertaken will be available at all times.

12.5 Refresher Training

12.5..1 Refresher training will be provided at regular intervals as required by the role and as determined in the training matrix maintained by PGL Beyond's Learning and Development department.

13. Review

13.1 The Safety Management System for tours will be reviewed at regular intervals and at least annually by NST, Esto and StudyLink Tours' Safety Group to monitor performance and identify opportunities for improvement.

13.2 The PGL Beyond Safety Management Committee 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.

13.3 The PGL Beyond Safety Management Committee 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 we continue to meet the standards stipulated.