





## TRIPS AND VISITS POLICY

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## Policy for the Management of Educational Visits

### VISION AND ETHOS

Chichester Free School will:

- **Nurture** children in a safe, happy and caring environment where every child will be known, positive behaviour is rewarded and there will be a strong sense of community between child, home, school and community.
- **Challenge** children to recognise and respect one another so we all may learn and grow together. Our curriculum, including the extended day provision, will stimulate and challenge every individual, inspiring a passion for learning. Such challenge requires courage on the part of all members of our community.
- **Inspire** children towards the highest standards of behaviour as the foundation for individual success and a culture of well-being, warmth and exciting futures. We will inspire confident, happy, creative and articulate young people who will emerge with a clear vision for their future.

Chichester Free School's pastoral care is based on the four Cardinal Virtues of Wisdom, Temperance, Justice and Courage:

- **Wisdom** – The wisdom to recognise the importance of context, history, circumstance and intention in every act. We wish to create a culture where the contexts and circumstances of everyday life enable all members of our community to intend excellence in behaviour and achievement. The wisdom to praise effort as much as achievement and to choose well now, even when this is the harder path.
- **Temperance** – To seek self-control so all members of the community act thoughtfully, internalising self-regulation, rather than giving in to impulse or always relying on others to set boundaries. We will be modest in asserting our own rights, prudent in exercising our energies, resilient when faced with difficulty, demonstrating humility and forgiveness in our dealings with others.
- **Justice** – To act fairly, finding evidence first, not fault. To recognise that behaviour is an act carried out by a person. Whether rewarding or punishing, we seek to build the character of the individual and the school through the just actions we take in response. We will listen proactively to all members of the community to form the just culture of the school. To demonstrate justice every day in the respect we show for all members of the community and beyond, and for the material fabric of the school.
- **Courage** – The courage to do what is right when doing what is right is hard, to challenge poor behaviour, speak up for minority groups, or those who are being mistreated and the courage to seize opportunities despite what others might think.

Chichester Free School has a strong commitment to the added value of learning outside the classroom and beyond the school premises. We will seek to provide a broad and balanced range of learning outside the classroom opportunities for all students.

Each year the school will arrange a number of activities that take place off the school site, during the school day (both the main curriculum day and during the extended day provision), and out of school hours, which support the aims of the school.

The range of activities which the Governing Body has given its approval includes (but is not limited to):

- Extended day clubs (music, drama, art, science, sport, homework etc.);
- School sports practice and team fixtures;
- Regular local visits (forest school, swimming, other local amenities);
- Day visits for particular groups;

- Residential visits;
- Overseas visits and exchanges;
- Adventurous Activities.

## 1. Provision of Employer Guidance

Chichester Free School (CFS) has formally adopted “*National Guidance*” as “*Chichester Free School Employer Guidance*”. This Educational visits guidance can be found on the following web site: [www.oeapng.info](http://www.oeapng.info) The DfE Guidance for Health and Safety in Schools is here: [DfE advice on Health and Safety](#)

It is a legal expectation that CFS employees **must** work within the requirements of their employer’s guidance.

CFS employees should also follow National Guidance (NG) recommendations.

Where there is any variance of policy between the national guidance and CFS policy the CFS policy requirements take precedence over any guidance.

Where a CFS employee commissions a **Learning Outside the Classroom** (LOtC) activity, they must ensure that such commissioned agent has either:

1. adopted CFS or OEAP National Guidance  
**or**
2. has systems and procedures in place where the standards are not less than those required by OEAP National Guidance.

## 2. Scope and Remit

The NG document “[Basic Essentials MUST Read - Status and Remit](#)” clarifies the range of employees whose work requires them to use the guidance. In summary, it applies to employees whose work involves any one of the following:

- direct supervision of young people undertaking experiences beyond the boundary of their normal operational base
- direct supervision of young people undertaking experiences that fall within the remit of Educational visits and Learning Outside the Classroom;
- facilitating experiences for young people undertaking experiences beyond the boundary of their normal operational base
- deploying staff who will supervise or facilitate experiences of or for young people undertaking experiences beyond the boundary of their normal operational base

This applies regardless of whether or not the activities take place within or outside of normal working hours, including weekends and holiday periods.

For a more expansive explanation of legal expectations, all users of the guidance are strongly recommended to read the NG document: “[Underpinning Legal Framework](#)”

This Policy relates to the following Chichester Free School policies (Health and Safety Policy and Critical Incident Policy)

### 3. Ensuring Understanding of Basic Requirements

As an employer, CFS is required to ensure that its employees are provided with

- appropriate guidance relating to visits and LOtC activity;
- employer-led training courses to support the guidance to ensure that it is understood;
- suitable systems and processes to ensure that those trained are kept updated;
- access to advice, support and further training from an appointed Adviser that has proven expertise and professional understanding of the guidance, the training and expectations set by current good practice.

The appropriate guidance for the management of outdoor learning and LOtC at CFS is the Employer Guidance web site [OEAPNG](#)

The relevant training courses for Chichester Free School are:

1. Educational Visit Coordinator (EVC) Training – Chichester Free School is required to have a current, trained EVC in post for the Senior and Junior/Infant schools.
2. Chichester Free School Educational Visit Coordinator (EVC) Revalidation - all Chichester Free School EVCs are required to undertake a formal revalidation from time to time (3-5 years suggested)
3. Visit Leader Training – all visit leaders have training and support from the EVC and an ‘apprenticeship’ system is operated with experienced staff mentoring staff with less trip experience. All new staff have ‘visit leader training’ as part of their induction programme.

Where an employee experiences problems with finding the material they are looking for, or require clarification or further help and guidance, they should consult the EVC.

### 4. Approval and Notification of Activities and Visits

Employer guidance **must** provide clarity on issues where responsibilities and functions are delegated. This is particularly critical in establishing requirements regarding formal notification and formal approval of activities.

When a visit is approved cover, diary, finance, catering, selected member of SLT and Pastoral Heads must be informed.

#### *Approval*

All visits are approved at Principal and EVC Level. Governor approval is required for all residential visits and all adventure activities. New ventures for the School that do not fit into these categories can be put to Governors at the discretion of the EVC.

The approval process and procedures for day, adventurous and residential visits (eg. consent forms, emergency cards, trip letters etc.) will be made available to those organising trips.

Sport fixtures and trips as part of the weekday extended day programme are approved by the Lead teacher of Sport and the teacher with responsibility for the extended day programme.

The competence of the visit leader is the key component in ensuring the safety of the participants. Assessment, training and support of visit leaders is a priority of the EVC.

All School trips have a named leader who must be a serving teacher at CFS. The approval paperwork is to be completed by the Trip Leader

## 5. Risk Management

Refer to NG document: [“Risk Management”](#)

As an employer, CFS has a legal duty to ensure that risks are managed - requiring them to be reduced to an “acceptable” or “tolerable” level - and not to eliminate risks, as would be a reasonable expectation when risk assessing a piece of machinery, work shop or manufacturing process. This requires that proportional (suitable and sufficient) risk management systems are in place, requiring CFS to provide such support, training and resources to its employees as is necessary to implement this policy.

The risk management of an activity should be informed by the benefits to be gained from participating. CFS promotes a “Risk-Benefit Assessment” approach, whereby the starting point for any risk assessment should be a consideration of the targeted benefits and learning outcomes. This appreciation of the benefits to be gained through participating provides objectivity to a decision that any residual risk (i.e. the risk remaining after control measures have been put in place) is “acceptable”. HSE endorse this approach through their [“Principles of Sensible Risk Management”](#) and advocate that it is important that young people are exposed to well-managed risks so that they learn how to manage risk for themselves. DfE also make clear that they support this approach through their guidance here [DfE assessing and managing risk](#).

There is no legal or CFS requirement to produce a risk assessment in a particular format; but there is a legal requirement for the process to be recorded and for suitable and sufficient control measures to be identified for any significant risks i.e. those that may cause serious harm to an individual, or harm several people. HSE case study examples of sensible school trip risk management are available here: [HSE case-studies](#)

Generic CFS risk management plans exist for a wide range of trips and components of trips – accommodation, transport, theatre trips etc.

For a clear justification for the Risk/Benefit approach to risk management see the article by Professor David Ball here: [the-future-of-risk-assessment](#)

## 6. Emergency Planning and Critical Incident Support

A critical incident is an incident where any member of a group undertaking an off-site activity has:

- either suffered a life threatening injury or fatality;
- is at serious risk;
- or has gone missing for a significant and unacceptable period.

As an employer, CFS is committed to providing emergency planning procedures to support establishments in the event of a critical incident.

Refer to NG document: [“Critical Incident Management for Visits”](#) and the CFS Critical Incident Policy  
All CFS trip leaders are provided with a Critical Incident card detailing our emergency procedures and contact details for the CFS Critical Incident team.

All residential trips have a nominated Critical Incident base contact who has trip details and is ‘on call’ at all times.

## 7. Monitoring

As an employer, CFS ensures that there is monitoring of the visits and LOtC activities undertaken by its staff. Such monitoring should be in keeping with the recommendations of Employer Guidance. There is a clear expectation that the monitoring function is a delegated task put in place by the EVC and principally carried out by experienced staff acting as mentors/advisors for colleagues.

Refer to NG document: [“Monitoring”](#)

## 8. Assessment of Leader Competence

Employer Guidance provides clear advice regarding the assessment of leader competence. It is an expectation of the CFS Policy that all leaders and assistants have been assessed as competent to undertake such responsibilities as they have been assigned in line with national guidance.

All staff involved in off-site activities complete a ‘Certification of Competence’ form where experienced staff comment on their role in previous trips and based on their experience the EVC decides which of four levels (assist, lead day, lead residential, lead residential overseas) the member of staff can operate at.

To be ‘competent’ also includes completing specific CFS School Trip First Aid and Minibus driving qualifications.

*Adventurous Activities – see appendix A for list*

CFS acknowledges the immense educational benefits that adventurous activities can potentially bring to young people, and fully supports and encourages adventurous activities that are correctly planned, managed, and conducted. Competences to lead outdoor activities should be demonstrated by holding the relevant National Governing Body (NGB) award where it exists. Where there are queries regarding the competencies/experience required the EVC will contact outdoor professionals for advice. All centres and providers used by the school for the provision of adventure activities will hold a current AALS licence.

*Other Areas*

Staff competence in first aid, minibus driving, life saving etc may also be needed, depending on the activity. Volunteers will also require induction training prior to a specific visit. Training requirements in these areas should be identified as part of the risk assessment process.

Refer to NG document: [“Assessment of Competence”](#)

## 9. Role-specific Requirements and Recommendations

Employer Guidance sets out clear and detailed responsibilities and functions of specific roles that relate to roles to be found within CFS management structures. These are:

[Governing Body \(Employers\)](#)

[Principal](#)

[EVC](#)

Refer to individual NG documents headed as above.

Employer Guidance sets out clear and detailed responsibilities and functions of specific roles that relate to roles to be found at the establishment. These are:

1. [Member of Board of Governors or Management Board](#)
2. [Principal](#)
3. [EVC](#)
4. [Visit or Activity Leader](#)
5. [Assistant Visit leader](#)
6. [Volunteer Adult Helper](#)
7. [Parents](#)

Refer to individual NG documents headed as above.

## 10. Charges for Off-site Activities and Visits

Chichester Free School may invite, but not require, parents / carers to make voluntary contributions for educational activities in order to enhance what is otherwise provided. There is no obligation to contribute and students will not be treated any differently according to whether or not their parents / carers have made a contribution.

The level of contribution will be calculated for each activity and may include, for example, an element to cover the participation by young people from low-income families or the cost of travel for accompanying teachers. Some activities may not take place if parents / carers are reluctant to support it.

The School will comply with the law in relation to charges that may be made for the cost of activities provided outside school hours, within school hours and for board and lodging on residential courses, where those laws apply to Free Schools.

More information is available in the CFS Charging and Remissions Policy.

## 11. Vetting and DBS Checks - see also CFS Child Protection Policy

CFS employees who work *frequently* or *intensively* with, or have *regular access to* young people or vulnerable adults, must undergo an enhanced DBS check as part of their recruitment process.

For the purposes of this guidance:

- *frequently* is defined as "once a week or more";
- *intensively* is defined as 4 days or more in a month or overnight.

Those accompanying a trip on an overnight stay should have a DBS check completed. The key criterion for a DBS check on a volunteer is whether they are having regular, unsupervised contact with children.

However, it must be clearly understood that a DBS check (or other vetting procedure) in itself, is no guarantee as to the suitability of an adult to work with any given group of young or vulnerable people.

The placement of an adult within a situation of professional trust (where young people could be vulnerable to physical or mental exploitation or grooming) should always be on the understanding that an overview based on a common sense risk-benefit assessment process has been considered.

Refer to NG document: [“Vetting and CRB Checks”](#)

## 12. Requirement to Ensure Effective Supervision

In general terms, the Law does not prescribe activity-specific staffing ratios; but it does require that the level of supervision and group management is “effective”.

Effective supervision should be determined by proper consideration of:

- Staff Competence
- Activity - nature and location of the activity (including the type of activity, duration, skill levels involved)
- Group - age (including the developmental age) of the group; ability of the group (including special learning needs, behavioural, medical and vulnerability characteristics etc);
- Environment - nature and location of the activity (including the type of activity, duration, skill levels involved, as well as the time of year and prevailing conditions,
- Distance away from the base

However, as an exception to the above, Ofsted and DfE guidance prescribe ratios for Early Years.

See link here: “[Early Years Foundation Stage](#)”

Refer to NG document: “[Ratios and Effective Supervision](#)”

Refer to NG document: “[Group management and Supervision](#)”

Guidance for CFS staff contains examples of typical ‘CFS’ staffing ratios for trips.

## 13. Preliminary Visits and Provider Assurances

All visits should be thoroughly researched to establish the suitability of the venue and to check that facilities and third party provision will meet group expectations. Such information gathering is essential in assessing the requirements for effective supervision of young people. It is a vital dimension of risk management.

Wherever reasonably practicable, it is good practice to carry out a preliminary visit. The EVC will advise on this in each specific case. A pre-visit is usually required for visits where there is a high complexity factor and the visit has not happened previously, or when the visit is adventurous and led by CFS staff. A new D of E day walk for example.

Residential, visits abroad, exchange visits, adventure led by school staff all have aspects of complexity. If the visit is led and managed by a provider, then a variety of approaches can reduce the need to pre visit.

It is good practice for Visit Leaders to take full advantage of the nationally accredited, provider assurance schemes that are now available, thus reducing bureaucracy.

Examples of such schemes include:

[The LOtC Quality Badge](#)

[AALS licensing](#)

[Adventuremark](#)

[School travel forum](#)

NGB centre approval schemes (applicable where the provision is a single, specialist activity).

CFS takes the view that where a provider holds such one of the above accreditations, there should be no need to seek further assurances.

Refer to: NG document “[Preliminary Visits and provider Assurances](#)”



#### 14. Insurance for Off-site Activities and Visits

Insurance is held through the Risk Protection Agreement (RPA) with the Education Funding Agency and covers Employer Liability Insurance, a statutory requirement (unlimited) and unlimited Third Party insurance. This covers all staff pupils and volunteers whilst they are on CFS business within the UK. All such persons are indemnified against claims for any third party claim. The insurance also covers off-site activities (such as Forest School and swimming) and outside visits organised by departments or class teachers etc as deemed responsible by the SLT of CFS. Trips outside of the UK are covered by trip specific insurance with the trip organisers/providers (ie: ski trip). Details of these insurance policies are provided with initial correspondence to parents. The full policy membership rules are as attached. Loss or damage to school property is also covered within the UK.

Refer to NG document: [\*“Insurance”\*](#)

#### 15. Inclusion

Every effort should be made to ensure that outdoor learning activities and visits are available and accessible to all, irrespective of special educational or medical needs, ethnic origin, gender or religion. If a visit needs to cater for young people with special needs, every *reasonable* effort should be made to find a venue that is both suitable and accessible and that enables the whole group to participate fully and be actively involved.

Establishments should take all *reasonably practicable* measures to include all young people. The principles of inclusion should be promoted and addressed for all visits and reflected in establishment policy, thus ensuring an aspiration towards:

- an entitlement to participate
- accessibility through direct or realistic adaptation or modification
- integration through participation with peers

Employers, Heads/Managers, Curriculum Planners, EVCs and Visit Leaders should be aware of the extent to which Inclusion is or is not a Legal issue.

Under the Disability Discrimination Act 1995, it is unlawful to:

- treat a disabled young person less favourably;
- fail to take reasonable steps to ensure that disabled persons are not placed at a substantial disadvantage without justification.

Refer to NG document: [\*“Inclusion”\*](#)

#### 16. Good practice requirements

To be deemed competent, a CFS Visit / Activity Leader, or Assistant Leader must be able to demonstrate *the ability to operate to the current standards of recognized good practice for that role.*

All staff and helpers must be competent to carry out their defined roles and responsibilities.

Employer Guidance sets a clear standard to which CFS leaders must work. The guidance states:

*“a competent Visit / Activity Leader (or an Assistant Leader where they may take sole responsibility for a sub-group) requires:*

- Knowledge and understanding of their employer’s guidance supported by establishment-led training.
- Knowledge and understanding of establishment procedures supported by a structured induction process specified by the establishment.
- Knowledge and understanding of the staff, the activity, the group and the venue.
- Appropriate experience
- In some circumstances (e.g. first aid, adventurous activities) a formally accredited qualification.”

Staff participating in off-site activities and visits must be aware of the extent of their duty of care and should only be given such responsibilities as are in keeping with the above guidance. It is particularly important that careful consideration of competence issues is applied to both newly qualified and newly appointed staff. The School should view the original documents and certificates when verifying leader’s qualifications, and not rely on photocopies.

Where a Volunteer Helper is a parent (or otherwise in a close relationship to of a young person taking part in the visit) they should be made aware of the potential for their relationship to compromise the Visit Leader’s plans for group management. The Visit Leader should directly address this issue as part of the Risk-Benefit assessment.

Refer to NG document: [“Good Practice Basics”](#)

## **17. Medical**

Medical details for students and staff taking part in trips are collected by the trip leader either through a specific medical consent form for residential trips, or by reference to the school database for day visits. The School medical database or professional is also consulted for residential trips. Any specific student medical issues are to be included in the trip risk management planning.

It is desirable that all staff supervising students on a school trip have knowledge of appropriate first aid.

## **18. Transport**

Careful thought must be given to planning transport to support off-site activities and visits. Statistics demonstrate that it is much more dangerous to travel to an activity than to engage in it. All national and local regulatory requirements **must** be followed.

### *Minibuses*

It is a requirement of CFS Policy that all staff must hold category D1 entitlement on their driving licence and have completed appropriate training, for those vehicles where such requirements are necessary. No staff under the age of 25 are able to drive a school vehicle. Separate fully comprehensive minibus insurance is held through ERS as damage to vehicles is not covered under the RPA insurance policy.

The level of supervision necessary should be considered as part of the risk management process when planning the journey, giving proper consideration to issues of driver-distraction when considering what supervision is required for the specific group of passengers being transported in a minibus.

The Visit Leader should ensure that coaches and buses are hired from a CFS-approved company.

Also see NG document: [“Transport in Minibuses”](#)

Transporting young people in private cars requires careful consideration. Staff cars should only be used to transport students in ‘unplanned’ or ‘emergency’ situations. For example, journeys to hospital, to prevent students being stranded at Failand etc.

Refer NG document: [“Transport: General Considerations”](#)

## 19. Planning

Planning should reflect the consideration of Legal and good practice requirements, ensuring:

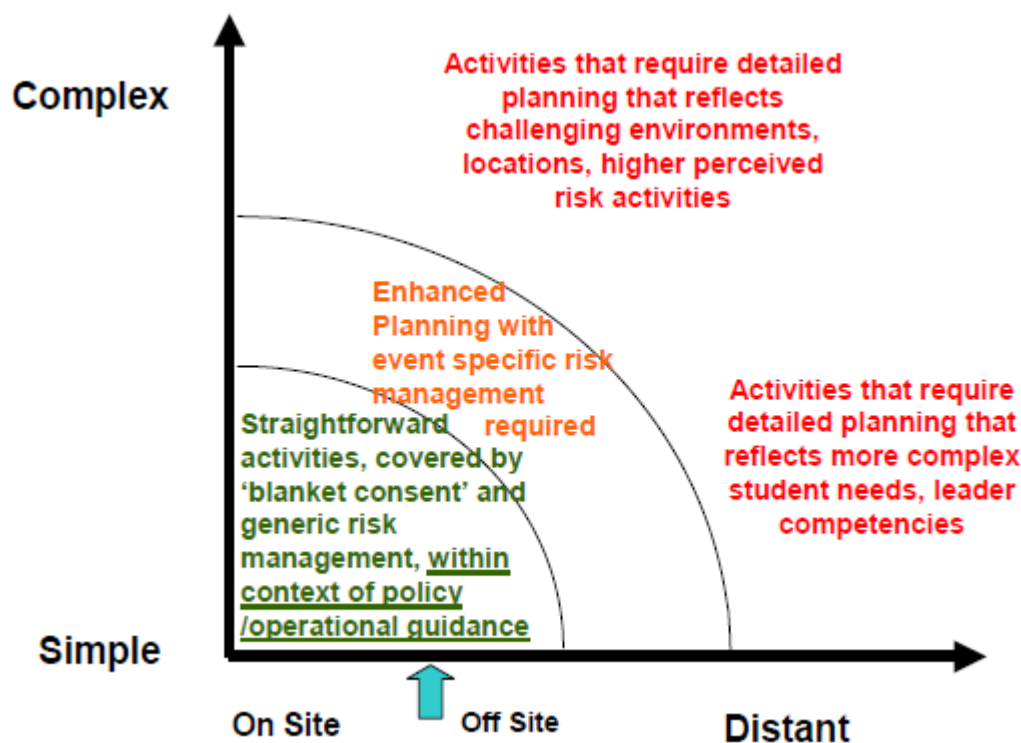
- The plan is based on CFS procedures and employer guidance.
- All staff (including any adult volunteer helpers) and the young people to be involved, have a clear understanding of their roles and responsibilities, including their role in the risk management process.
- Those in a position of parental authority have been fully informed and, where appropriate, formal consents have been obtained.
- Proportionate assurances have been obtained from any providers (making full use of national schemes that accredit that assurances have already been obtained by credible inspection regimes).
- Designated emergency contact(s) have been identified that will work on a 24/7 basis where required.
- All details of the activity provision are accessible to the emergency contact throughout the period of the activity.

It is strongly recommended that at a very early stage of the planning process, the provisional staffing team carry out a brain storming exercise in order to identify the benefits and learning outcomes that the activity (or range of activities) might achieve. If the outcomes are to be evaluated with any rigor, then it will be essential that these outcomes are prioritised, and appropriately targeted. A record of these outcomes will help keep the plan focussed and also be a vital part of the risk management process in providing some objectivity in a “Risk Benefit Analysis”. Once the targeted outcomes have been recorded, it will then be possible to identify appropriate on-going review and evaluation strategies, including indicators.

This supports the move towards developing activity-specific policies at establishment level for regular or routine activities. Such policies should be robust and equate to “*operational guidance*” that makes it clear how the activity should be planned and delivered, meeting all necessary recommendations and requirements, as well as assuring educational quality.

The degree of complexity of a particular plan or policy (along with its supporting procedures) will need to reflect the nature and complexity of several variables that can impact on any given activity. These variables can be remembered as “**SAGED**” as explained below.

- **S**taffing requirements – trained? experienced? competent? ratios?
- **A**ctivity characteristics – specialist? insurance issues? licensable?
- **G**roup characteristics – prior experience? ability? behaviour? special and medical needs?
- **E**nvironmental conditions – like last time? impact of weather? water levels?
- **D**istance from support mechanisms in place at the home base – transport? residential?



Refer to NG document: *“Planning Basics”*

Example CFS trips

Straightforward – Sport, local theatre, local museum, House meal

Enhanced Planning – residential trip, Geography fieldwork

Challenging Environments – D of E or other complex outdoor residential

Complex student needs leader competencies – Water sports

## 20. Consent

In our current CFS Home School agreement parents’ consent to the following:

- 1 **School Trips:** A variety of school trips will be provided for your child while a pupil here. The cost of some school trips will be charged as a voluntary contribution or compulsory charge. **Parents' prior consent will be sought for a trip incurring a voluntary contribution or compulsory charge.** School trips abroad or those in the United Kingdom involving an overnight stay will be the subject of a separate agreement with parents. The cost of the trip will be payable in advance. The Pupil is subject to School discipline in all respects whilst engaged in a School trip. All additional costs of special measures (such as medical costs, taxis, air fares, or professional advice) necessary to protect the Pupil's safety and welfare, or to respond to breaches of discipline, will be added to the voluntary contribution or compulsory charge.
- 2 **School Trips & Transport:** We consent to my/our child taking part in school trips which do not involve an overnight stay or travel abroad and I/we consent to my/our child being carried by public transport or school transport driven in a responsible manner by an adult who is suitably qualified and insured.

When an activity is part of a planned curriculum in normal curriculum time and no parental contributions are requested, then additional formal consent is not necessary.



Almost all trips require communication with parents as specific information needs to be given on timings, equipment etc. and consent to payment gained. Example trip letters are available on request.

All residential trips and adventurous activities require specific parental consent.

## **21. The Value and Evaluation of LOtC**

The Ofsted report "[Learning Outside the Classroom – How Far Should You Go?](#)" (October 2008) makes statements in the strongest terms to support the value of LOtC, including the fact that it raises achievement. Refer to NG document: "[Ofsted and LOtC Summary](#)"

However, it also highlights the finding that *even where LOtC is highly valued and provided to a high standard, it is rarely evaluated with sufficient rigour* – i.e. in the way that classroom learning is evaluated – and a methodology to address this is provided within the National Guidance document:

5.1c "[Rigorous Evaluation of LOtC: Meeting Ofsted Expectations and Assuring Quality](#)".



## Appendix A

### ADVENTURE ACTIVITIES

Below is a list of 'Adventure Activities' as agreed by Local Authority outdoor education advisors.

Before our students take part in any of these we need to be sure that the relevant National Governing Body qualifications are held by the person/organisation running the activity or a technical advisor has provided a statement of competence.

- All activities in 'open country' such as D of E Expeditions.
- Swimming (all forms, excluding publicly life guarded pools)
- Camping where participants/leaders erect tents and/or self-cater.
- Canoeing / kayaking
- Sailing / windsurfing / kite surfing
- Rafting or improvised rafting
- Use of powered safety/rescue craft
- All other forms of boating (excluding commercial transport)
- Water skiing
- Paintball (including 'Laser Quest')
- Snorkel and aqualung activities
- Hill walking and Mountaineering
- Mountain biking
- Rock climbing (including indoor climbing walls)
- Abseiling
- River/gorge walking or scrambling
- Coasteering/coastal scrambling/sea level traversing
- Underground exploration (Except designated 'Show' caves)
- Shooting and archery
- Skiing, snowboarding, and related activities (including dry slope)
- Air activities (excluding commercial flights)
- Horse riding
- Motor sport – all forms
- High level ropes courses
- 'Extreme' sports (Parcours, Bungee, Zorbing, Mountain or ATB Boarding etc.)
- Other activities (e.g. initiative exercises) involving skills/risks inherent in any of the above

**GLM**

**November 2017**