

**Institute for Outdoor Learning – Plumpton Old Hall – Plumpton – Penrith –  
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30<sup>th</sup> October 2006

Dear Sirs

**Response To BS8848 Draft**

The Institute for Outdoor Learning (IOL) is a registered charity and was formed in 2001 by the convergence of six organisations and has over 1400 members (both individuals and organisations) from throughout the UK, who are committed to outdoor learning and work with children, young people and adults in the private, voluntary, charitable and public sectors. Our members are those responsible for the delivery of a huge range of activities within the outdoor environment.

The Institute provides opportunities for continuous professional development, networking and sharing of good practice, represents the views and the wider interests of the outdoor learning sector, and seeks to form and maintain partnerships with other key organizations to ensure the continued development of the outdoor learning sector.

The Institute welcomes the opportunity to respond to the consultation at this time.

Whilst understanding the underlying rationale for the creation of the standard, the Institute would like to highlight the following issues which we were unable to adequately state in the rather restrictive template for comment:

- √ We assume that there will be no legal obligation to comply with this standard, this would therefore reduce the standard to that of a voluntary scheme. However, there needs to be clarification surrounding a situation where an ‘incident’ comes to court: would prosecutors use this ‘voluntary’ code as a means of attacking a defendant’s position if they had not adopted the code. This has happened previously where a local code of practice was used as evidence in a case against a private school, who had not adopted the code, (and were not obliged to do so). The code was held up by the court as ‘best practice’ and the judge commented that if the code had been adopted, the death would probably not have occurred.
- √ The scope of the standard appears to be over-ambitious and is not adequately defined
- √ What is the link between this standard and that being discussed and proposed by the Expedition Providers Association – we believe that dialogue should be opened between BSI and EPA
- √ There is no mention of the cost of implementation of the guidelines and certification to the standard – and certainly no mention of the management and administration of the standard by those tasked with inspecting participating organisations – including the ‘technical’ competence of those inspectors
- √ With reference to qualifications – there is very little detail/consideration given to technical qualifications required other than specific references to First Aid; additionally no thought has been given to those qualifications that are UK specific and their ‘currency’ when used overseas. We believe that there should be greater emphasis in the document for defining required qualifications as there could be a vast difference in standard – for example, many Local Authorities

- overseas expeditions, whereas providers adopting the code could choose their own qualifications
- √ There appears to be little distinction between the scale of a venture to be undertaken – this has serious implications for very small operators in respect of the paperwork/record keeping and associated staffing required in order to comply
  - √ A representative from BSI was interviewed (Radio 5 live 26<sup>th</sup> October); the item was introduced as being about safety of visits in the UK, and overseas issues were mentioned only as a single passing reference. The specific examples given were about a field trip to Malham, and a school group staying near Kings Cross, London. Additionally, the BSI representative seemed confident that this would be the principles and standard for all off site visits, no matter wherever and whatever they may be. If this is the case and the standard is to be used in the UK as well as overseas, then it must be completely revised.
  - √ There is also no mention of the impact on the environment in this document and it is our firm belief that consideration should be given to this by both venture providers and participants as part of the management of any venture – particularly in relation to air travel.

IOL could not support this document in its present form and urges that you set up a more broader based working group to consider its objectives, detail and application. We would welcome the opportunity to play a part in these discussions.

Yours sincerely

**Karen Brush**  
**Managing Director**

**Institute for Outdoor Learning**

[www.outdoor-learning.org](http://www.outdoor-learning.org)