

25 October 06

Mrs Gloria Birchall
Health & Safety Executive
Rose Court
2 Southwark Bridge
London
SE1 9HS

Dear Madam,

CONSULTATION ON THE WORK AT HEIGHT (AMENDMENT) REGULATIONS

I refer to your letter of 1 August 2006, enclosing the above consultative document and in particular, Annex B. You will be aware that my organisation is a member of the AAIAC Working Group, as shown on page 42 within appendix 2, represented by myself.

In consequence, we fully support the response sent in by John Cousins of Mountain Leader Training UK, AS Chair of the Adventure Activity Industry Advisory Committee, Working Group.

We would emphasise the answer to Q2.1 “Adventure Activity workers are in general experienced and well trained and consequently exercise good judgement in the application of any chosen safety procedure. The sector therefore values terms such as 'equivalent level of safety' and 'suitable and sufficient' and wishes to avoid legislation which prescribes specific techniques, which do not fit all industry or which uses a numerical approach to safety e.g. two ropes, two anchors etc.”

We look forward to the next and hopefully final step in this process.

However, we believe that this Institute (IOL) should have been included within Question 12.

Yours faithfully

Brian Lamb
Vice Chair and member of the AAIAC WG

We would also draw your attention to the following:

‘The Institute 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.

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.’