



BRATHAY EXPLORATION GROUP

DETAILED RESPONSE TO ISSUES RAISED BY THE TRAGIC DEATH OF ANDREW LUCAS ON THE BEG EXPEDITION TO THE PICOS MOUNTAINS IN SUMMER 2009; BY THE SUBSEQUENT INDEPENDENT INQUIRY INTO THE INCIDENT; AND BY THE INQUEST INTO HIS DEATH

The Brathay Exploration Group has been committed for over sixty years to running safe and responsible expeditions. Nobody can remove all risk from life; the Group does not pretend to do so. It has sought to blend experience, learning from others and training to best advantage whilst navigating between the opposing dangers of providing its volunteer Leaders with too little guidance on the one hand and on the other hand defining responsibility to such a high degree that reasonable people will not accept the task, leaving the field to rash and incompetent practitioners and increasing risk for everyone.

There are now many more providers of youth expeditions than there were when BEG began in 1947. In line with the general development of ideas about how risk in all fields of endeavour should be assessed and recorded, BEG has participated fully in the evolution of public standards, culminating in BS8848 and independent assessment by The Young Explorers Trust of the plans for each of its expeditions. The BEG Board keeps standards under continuous review and is assisted in this by a group of its Leaders specially convened for that purpose.

All these precautions did not prevent the tragic death in 2009 of a young man who fell from a cliff after the evening meal in camp. That tragedy has prompted the BEG Board to make public in some detail its current debates and intentions with regard to all aspects of expedition planning, management and conduct. The schedule that follow are published for that purpose and comments or contributions from anyone are welcome.

Issues	Actions/proposals
Selection of expedition destination etc	<p>BEG has altered its administrative arrangements and is changing its procedure to emphasise the distinction it has always maintained between expedition origination, development/assessment and implementation. Specific action taken and in hand includes:</p> <ul style="list-style-type: none"> • separation of an Expedition Development Action Group and Expedition Management Action Group, previously established as one Expeditions Committee • encouraging expedition option suggestions to fit BEG project plans and only taking forward those put forward by enthusiastic Leaders if they are likely make a distinctive contribution to the Group’s aims and development • establishing more systematic Group involvement at the expedition selection and development stage to provide Leaders with greater support and protection.



<p>Advertising of expedition</p>	<p>Advertising is now to some extent seen as part of a contract between provider and participants. BEG expeditions will usually be subject to the Package Travel Regulations 1992, which establish particular requirements regarding advertising; and BS8848 makes provisions regarding accuracy and fairness in advertising. We will take special care to ensure wording in advertising is clear, comprehensive and consistent, matching as far as is reasonably possible the expedition experience involved while leaving scope for the inevitable flexibility required in practice to meet conditions. Procedures are being amended to cover this and will be applied to all future expeditions.</p>
<p>Handling of enquiries and bookings for the expedition</p>	<p>Procedures are being modified to ensure that we communicate properly, consistently and appropriately at all stages in the enquiry/booking process. Our general approach is to be transparent about numbers booked and about the stage reached in relation to any necessary approvals sought for an expedition.</p> <p>We are clarifying the terms and conditions on which bookings are made, accepted and confirmed. These will make it clear that all bookings are accepted subject to expeditions achieving requisite numbers of bookings, obtaining any necessary approvals etc; and that the organisation may make a cancellation due to commercial, safety and operational concerns at any stage.</p>
<p>Information provided to participants</p>	<p>We have already agreed to revise our basic information pack provided to participants. This is being done, with a model pack being produced to be calibrated to fit specific circumstances as required.</p>
<p>Preparation of the advance risk assessment</p>	<p>The quality of advance expedition risk assessment has always been recognised as a very significant safety factor. The Group has recently increased its requirement for Main Leaders at least, and in general as a many Leaders as possible, to be formally trained in risk assessment in an expedition context. This process will be continued, and also we will ensure that there are “top ups” as required for those who have previously undertaken the basic training. These “top ups” will be recorded in Leader training logs or similar.</p> <p>Additional procedures are being established to</p> <ul style="list-style-type: none"> • improve initial risk assessment • tighten up internal vetting at several stages of preparation • build on the BEG risk assessment template to generate variants suited to specific expedition circumstances as well as a master template • review and update as necessary checklists that assist with internal vetting of risk assessment • ensure that risk assessments for specific expeditions are used positively to improve the quality of future assessments. • ensure that feedback is sought from each expedition in the form of incident report forms and post expedition review of risk assessment and any lessons learned are used to update and continually improve our safety procedures and future risk assessment (including more explicit encouragement for Leaders to be sufficiently confident to report incidents and ideas for improvement)



	<p>In accordance with BS8848 and YET guidance on risk assessment, procedures include informing participants (and where appropriate parents) of the risk assessment and providing documentation on this as appropriate.</p>
Internal vetting of expedition quality and safety	<p>We are detailing our existing procedures, making clear what is expected of people at various stages in the internal vetting process. Procedures will include vetting by an Expedition Quality Panel including an expert person not part of BEG.</p>
External vetting via YET - procedures	<p>In the short term, we intend to get the Adventure Activities Licensing Service to audit our system of internal procedures. Formal Adventure Activities Licensing Authority accreditation only applies to bodies acting on a commercial basis (not membership organisations) in the UK with under 18's, where it is statutory requirement; but their professional experience of carrying out both statutory and voluntary inspections will be a firm foundation from which to develop and seek other appropriate forms of accreditation. Following an initial AALS audit, we will have a review/resubmission if needed in the light of any recommendations, and subsequently as seems appropriate but in any case approximately every three years.</p> <p>Our procedures continue to include a process of external assessment and accreditation of individual expeditions. However, this will be in relation to the BS8848 standard from now on. For the moment this accreditation will continue to be provided by YET, but our intention ultimately is to become accredited in our own right.</p> <p>In any case, our internal procedures will incorporate a late stage expert review which will look at all the relevant factors, including the process and outcome of any external assessment. This review, which will include a "safety audit", will have a final say in whether or not an expedition is cleared to proceed. Previously external approval was <i>sufficient</i> for the expedition to proceed; in future approval will be <i>necessary</i> but may not be sufficient.</p> <p>BEG will work closely with YET in the development and application of high standards of external, independent vetting of expeditions.</p>
Qualifications of Leaders	<p>Formal qualification, alongside training and experience, has increasingly been expected of expedition Leaders. BEG is fully committed to requiring appropriate qualification of its Leaders and has responded to that at present in the following ways:</p> <ul style="list-style-type: none"> • Summer ML is now the normal requirement for Main Leaders of all BEG UK- based expeditions • IML or equivalent is now the normal requirement for Main Leaders of BEG overseas expeditions but only where it is relevant to the sort of expedition and territory concerned. BEG is still looking at the precise suitability of the IML and exploring other options suited, for example, to expeditions not located in mountainous areas



	<ul style="list-style-type: none"> • Main Leaders require accredited training in risk assessment and expedition first aid as well as familiarity with BEG procedures; all Leaders will be required to undertake internal BEG training with independent accreditation as to quality (achieved by the use of external audit and external technical advisors/trainers) • a subsidised training programme has been established to help BEG Leaders acquire formal qualifications • increasing significantly and systematising its internal training in leadership, procedures, risk assessment and planning <p>To accredit and endorse the continuing professional development (CPD) of its leaders BEG is also looking at supporting leaders through to becoming registered/Accredited Practitioners of the Institute of Outdoor Learning.</p> <p>BEG has accepted the principle that highly trained, qualified and experienced Leaders of overseas expeditions may if necessary be paid an appropriate fee, a major break with BEG tradition.</p> <p>There is a lively debate amongst expedition providers about the role of qualifications and standards. BEG will continue to participate in it and respond appropriately to its conclusions.</p>
Experience of Leaders	<p>We already specify experience requirements for our Leaders. Revised procedures will detail these more precisely, with specific provisions relating to experience of particular activities, locations, skills etc.</p> <p>To assess the experience of leaders we will use the following:</p> <ul style="list-style-type: none"> • reference from technical advisors and other suitably qualified individuals • reference and reports from other BEG expeditions • reference from other expedition providers and other relevant bodies (eg outdoor pursuits providers, field studies organisations).
Training of Leaders	<p>BEG has expanded its provision of training for its leaders and aspiring Leaders as detailed above. It is also supporting this provision financially to the best of its ability.</p>



	<p>In its current review of Leader qualifications options, BEG will consider the possibility of specialist training programmes even though they do not result in formal qualifications. This could be an important part of a qualification framework where people go beyond a Summer ML.</p> <p>Options include:</p> <ul style="list-style-type: none"> • specific modules within advanced qualification programmes, which are assessed even though they do not in themselves provide a qualification • advanced training provided by and/or accredited by respected bodies or qualified/competent persons without the award of a formal qualification • internal BEG training with some degree of independent accreditation as to quality • assessment of skills and competences of Assistant and Trainee Leaders being recorded by the Main Leader as part of the on-going leadership development programme • assessment of skills and competences of Main Leaders being recorded by technically qualified or experience individuals both internally and externally as part of the on-going leadership development programme.
<p>Experience in the locality of the expedition</p>	<p>Exploration Groups characteristically want to explore beyond the bounds of what is known to them already. Circumstances can also change radically in areas with which BEG was very familiar some years ago.</p> <p>Reconnaissance expeditions have been used in the past to check new locations and reassess old ones and will continue to do so. When nobody in a leadership team has recent experience of the expedition locality, route etc and no satisfactory local substitute is available, familiarisation expeditions will not include minors as members.</p>
<p>Maps</p>	<p>BEG accepted the recommendation of the independent investigation of Andrew Lucas' death that we will always use the best maps available. Where there are several possibilities, they inevitably have pros and cons (scale, clarity, accuracy, comprehensiveness, contour interval, level of detail, the way they present relevant information, age of survey/revision, purpose etc). The same is true of Guide Books.</p> <p>Our own procedures and risk assessment are being modified to cover the choice of maps and guidebooks more thoroughly. In most circumstances we will take several different types of map (and also several Guidebooks). Certainly the cost of doing this is not an obstacle.</p>



<p>The training weekend</p>	<p>Our procedures and general ethos already emphasise the significance of the preliminary training session for overseas expeditions, which usually takes place over a weekend in the Lake District. The most important elements of this are: Leaders getting to know members; starting to build a team; briefing members on what is expected of them (including Health and Safety and Risk assessment) and what they should expect.</p> <p>The preliminary training session is and will remain a compulsory component of participation in an overseas expedition, with exemptions from it clearly justified only in most exceptional cases (usually because the person concerned has undertaken something comparable and has been extensively briefed by BEG on expectation, itinerary and the extent of the undertaking).</p> <p>This is being clarified in our revised procedures, which also build in a very clear separation between safety assessment and commercial assessment of expeditions.</p> <p>We are also specifying more closely the purposes, content and structure of a pre expedition training session. The Picos incident has emphasised its critical significance as part of our safety and quality standards.</p>
<p>Organisation/logistics of the expedition generally</p>	<p>BEG has extensive experience of expedition logistics. Most of our procedures in this respect, while being reviewed, extended and restructured somewhat (especially to relate to the provisions of BS8848), are well tried and tested.</p>
<p>Risk assessment during the expedition (dynamic risk assessment)</p>	<p>We have arranged accredited training in risk assessment and a number of Leaders have taken part in this already. This will be a continuing feature of BEG operation and all Main Leaders will have to undertake this training before leading an expedition in future.</p> <p>The training covers explicitly techniques of dynamic risk assessment.</p> <p>Procedures are being revised to specify the detail and extent of risk assessment necessary. These procedures will be based on best practice guidance and consultation with experts in the field.</p>
<p>Briefing during the expedition/on arrival at the Refugio</p>	<p>Ongoing briefings on expeditions are already established practice, covering especially safety issues. These include important briefings on arrival at camp sites and similar. Procedures relating to briefings are being modified in the light of current best practice and official guidance relating to health and safety on expeditions.</p> <p>Briefings will continue to be based on what is reasonable, recognising that it is impossible to anticipate every conceivable hazard or threat. Precise requirements in any given situation must involve considerable flexibility to reflect especially site conditions and the nature of the group concerned. Further training and guidance in a workable format is being developed and implemented; this covers mechanisms for reinforcing messages in briefings and for feedback from participants to improve understanding.</p>



<p>Supervision levels during the expedition</p>	<p>The level of supervision on an expedition has to strike a difficult balance between obsessive mollycoddling and benign oversight. The nature of circumstances and of the group will have a bearing on the approach adopted. Clearly a higher degree of supervision is required with under 18s where an “in loco parentis” responsibility is involved.</p> <p>BS8848 sets out a number of rules and guidelines regarding supervision levels – “direct supervision”, “indirect supervision”, supervision in “personal time” and “downtime”. Procedures will be modified to relate specifically to these key provisions of BS8848. Risk assessments will take the provisions of BS8848 carefully into account in this respect when defining appropriate supervision levels to apply on an expedition.</p> <p>This is a critical matter where good practice needs to be established on a sector wide basis. BEG will work with others in the sector, initially via YET, to devise a practical code of conduct which can be adopted for Leaders to follow.</p>
<p>Emergency actions in the immediate aftermath of the accident</p>	<p>We are thoroughly revising our major incident and emergency procedures. We accepted the John Adams recommendation about relatives being informed via the police, and we have discussed with the police how this system operates, so this is being built into new procedures. Police involvement means the next of kin will be informed at once by a duty officer, whatever the time of day or night; this is automatically followed up by other services such as police community liaison etc, a welcome additional back up.</p> <p>Several other new features are being built into the new procedures, subject to consideration still taking place:</p> <ul style="list-style-type: none"> • a professionally staffed permanent hotline for the initial contact • an internal initial response team of BEG volunteers, organised much as at present • early and close liaison with insurance company emergency responses • early and continuing involvement of our liability insurers • early involvement of our own solicitors, and probably through them of any necessary media specialists and expert assessment • an early designated point of contact with the next of kin, with all information channelled through this person; the Leaders on site will not be put in direct contact



	<ul style="list-style-type: none"> • all appropriate assistance with the logistics of getting relatives to the site etc (in liaison with insurance companies) • early personal contact with relatives (this however will be subject to very clear legal limitations on any comments we can make about an incident). <p>In accordance with BS8848, our major incident and emergency procedures are also being extended to cover a range of situations mentioned. They will not be restricted to incidents of the sort encountered in the Picos expedition.</p>
<p>Actions on the expedition following the reporting of the incident</p>	<p>Procedures for handling major incidents and emergencies are being reviewed and are building in the lessons learned from this aspect of the Picos accident.</p>
<p>Press publicity after the event</p>	<p>Procedures for dealing with the publicity aspects are being incorporated into the revised major incident and emergency procedures.</p>
<p>The independent review of the incident.</p>	<p>The current provision whereby BEG commissions an “independent” report immediately following an incident is being retained, although the terms of reference and arrangements for this will reflect the specific circumstances. Where a fatality is involved or likely to be involved, BEG will from the outset acknowledge that legal proceedings of some sort are likely to be involved, and we will engage legal representation at an early stage in liaison with our insurance company.</p> <p>However, procedures will include provisions for appropriate levels of investigation – internal and/or external to BEG – in respect of incidents not involving fatalities, including “near miss” incidents. Procedures already include provisions for reporting such incidents. In future we will provide training for Leaders in how to deal with and report on such incidents, which are potentially a major means of learning from and benefiting from experience.</p>