



Safety Advice for Coasteering Providers

nationalcoasteeringcharter.org.uk

Introduction

The third issue of this guidance, developed by members of the National Coasteering Charter has undergone some significant design and layout changes, intended to make the document easier to follow - we hope you like these. We have changed the structure of this advice – now split into two sections; key principles, and advice on practice.

The key principles cover approaches to risk assessment and management. The models and references we have used refer to common and accepted approaches within the industry, and those recognised by regulators and safety organisations.

The practice section is based upon our collective experience and interpretation. These may not fit every provider exactly, but we intend for there to be a useful basis for you to build upon.

What has not changed is that this information has been developed and led by active coasteering providers.

We hope that the following information is useful, and that you can use this when planning and developing your activities. As ever we would like to know what you think of this, and the work of the Coasteering Charter; you can make contact via your local regional representative and/or via the website.

Status of this guidance

This third issue builds upon technical input from members of the National Water Safety Forum, coasteering safety working group, of which members include: RNLI, RoSPA, MCA, RLSS UK, SLSGB, AALS, AAIAC, Coasteering Providers, governing bodies and associations. This issue has been updated by members of the National Coasteering Charter.

The following information should not be considered definitive, nor exhaustive. There is no compulsion to follow this guidance. However, following this will normally be enough to achieve the required standard laid out by the Adventure Activities Licensing Service (AALS). Much of the content is derived from AALS safety checklist for combined water/rock activities.¹

This information has been developed as industry led guidance. The guidelines within this document is intended for organised coasteering activity taking place on the coast, in the United Kingdom.

The information contained within this document is intended to be a useful aid to managing safety during a coasteering session, it is not a replacement for a providers own risk assessment and policies. Further, these guidelines have been created to compliment and align where possible with other relevant safety advice and practices that the provider may undertake in their range of activities.

The use of the terms; should, consider, good or best practice are the opinions of the authors only, and as such do not carry any legal compulsion. Where existing UK law, regulation or code exists we highlight these.

1. http://webcommunities.hse.gov.uk/gf2.ti/f/6594/492869.1/PDF//6.06_Combined_water_rock_activities.pdf

Part one Key principles



Developing a well-managed activity

Leading coasteering requires sound judgement of a dynamic environment. This judgement can be developed through a mix of qualifications, and, as with many outdoor environments, relevant and recent experience is a critical measure for managing risk.

In this section we highlight a few key principles and approaches that are common and accepted as good practice, used by NCC members.

Key principles

Activity risks are dynamic. Because the activity of coasteering takes place in a highly dynamic environment the assessment of risk is dependent on being able to assess a number of variables. The interaction between the participant and tidal water, weather and physical features could be seen as a very complex assessment.

Relevant and timely experience is critical. In a led activity, the key factor in being able to manage dynamic risks is the experience, competence, knowledge and judgement of the provider and guide. The duty of care bestowed upon the guide is executed by their ability to continually assess the environment and adapt to the experience, competence, knowledge and judgement of the individual participant.

Risk and benefits in context. It is not possible– nor desirable – to eliminate all risk in coasteering. It is however possible to reduce the risk to an acceptable level. RoSPA term this approach: As safe as necessary not as safe as possible.

Water as a resource for recreation and leisure purposes presents the attraction of challenge and of being at one with nature. All adventurous activity has an element of danger; adventure infers that there is an element of the unknown, and it is this that presents the biggest attraction.

The challenge is how best to balance the need to offer excitement and the feeling of potential danger with methods to judge the optimum balance between the benefits and the risks of the activities available.

Informed consent for both staff and clients. The reality is that sometimes the balance can be wrong. This can have real consequences that may be serious or even fatal. Participants and guides should have appropriate information to make an informed decision, acknowledge that these risks exist, or have the opportunity find a more benign activity.

This approach allows the participant to take responsibility with the provider for their own safety within a challenge environment.

Additional and careful thought needs to be given as to the extent of a child's ability to make these judgements, and how the information is given to the child and their parent.

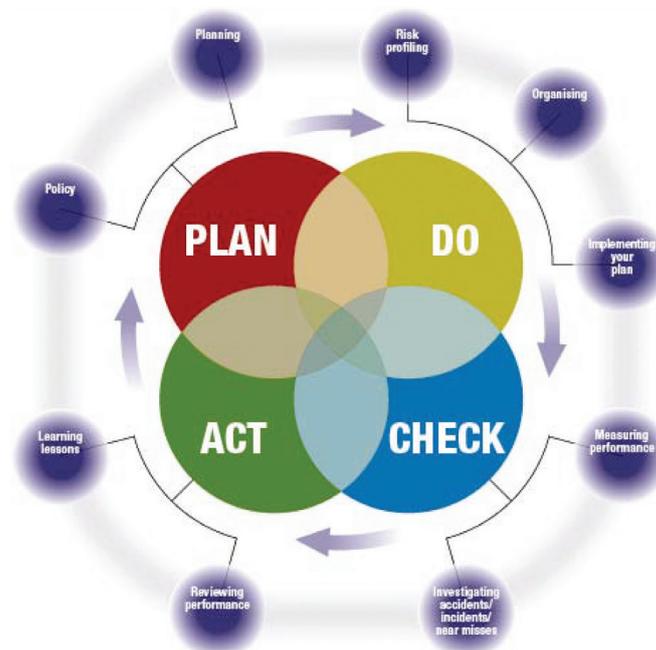
Identifying and managing activity risks

The act of risk assessments is the core and often the best/first step to take when managing activity safety. It is important to remember that it is one step of a wider – ongoing – approach.

The Health and Safety Executive sets out a simple five-step guide² to conducting a risk assessment (RA):

1. Identify hazards
2. Decide who might be harmed and how
3. Evaluate risks, evaluate existing precautions and determine if more is required
4. Record findings
5. Review or establish a review process.

Irrespective of the model taken, providers must have a clear methodology for managing the risk associated with coasteering. Written documentation that outlines the steps taken to identify, manage, review and importantly act upon significant risks gives the most auditable mechanism to prove that a provider has been diligent.



HSE: Plan, Do, Check, Act Model (HSG65)³
Image credit: HSE

It is important to remember that the critical aspect is what you do to identify and manage the significant risks, rather than what you write. Depending on the size of your organisation it is important to have both the action and documents.

2. <http://www.hse.gov.uk/risk/controlling-risks.htm>

3. <http://www.hse.gov.uk/pubns/priced/hsg65.pdf>

What are the common and normal risks in Coasteering?

It is not possible to identify every risk, at every site, for every participant. However there are common risks that are themed into three groups.

These are, impact, drowning and environmental effects. Some examples of the factors within these themes are:

Impact

- Rock falling from above
- Falling or slipping onto rocks below
- Jumping/falling onto submerged rocks
- Jumping from a height into water
- Being swept onto rocks

Drowning

- Entrapment under the water
- Repeated submersion in waves or sea swell
- Unpredicted tidal changes
- Being swept out to sea
- Tidal cut-off
- Getting caught in rip currents
- Sudden immersion into cold water (dry drowning etc)

Environmental Effects

- Sunburn
- Submersion hypothermia, for example, being swept out to sea
- Exposure to cold and windy conditions
- Exposure to high temperatures, hyperthermia, sunburn and dehydration

These risks can be thought about further from four potential contexts

- Where there is no (realistically) foreseeable possibility of a participant ending up in the water
- Where participants may end up in the water
- Where participants will end up in the water
- Where participants may realise an injury from a dry incident

The development of effective risk assessment and Normal Operating Procedures (NOP) will require a thorough knowledge and understanding of all these areas as a minimum. Therefore, the individual or organisation assessing this risk must be able to demonstrate competence in being able to do so.

Tip: Key questions to ask yourself when risk assessing are: *Does my assessment(s) cover the full range of things I actually do? And, what are my critical risks?* For example: Does it include travel with clients to the location? Does it take into account what I do when there is bad or marginal weather conditions?

A simple opportunity to establish this could be at a training or early season preparation day. Have someone note all the key phases/activities during the day, and then go back and check if they carried any significant risks, and then if you have assessed and recorded these.

Control measures mapped to normally encountered risks

Where it is identified that control measures are needed within the risk assessment process, these should be clearly linked. An NOP or other procedure should describe how the control measure addresses the identified risk that require management.

As with normally occurring risks, there are therefore control measures that are normally used to manage those risks. Variances in participant, location and environment may require adaptation or additional control measures, and thus this list should not be seen as exhaustive. Best practice relating to these measures are expanded upon in the practice section.

In no particular order:

- Participant swim and fitness requirements
- Medical requirements
- Age requirements
- Group competence
- Guides competence and knowledge
- Personal protective equipment
- Guides' safety equipment
- Forecasting conditions
- Safety briefing
- Route options
- Communications
- Guide/participant ratio
- Session duration
- Route Recording
- Pre checking entry from height
- Alternative exits
- Stopping or limiting the session

Use of Emergency Action Plans and contingency plans

Emergency Action Plans (EAPs) and contingency plans are important risk controls. In the event of an incident – perhaps a participant sustaining an injury that affects their ability to continue, it is essential that the group as a whole can be provided for.

Because EAPs often require a rapid response to complex situations it is often beneficial to develop these in liaison with other services (e.g. Marine and Coastguard Agency). It is highly recommended to test the EAP during guide training using a scenario based approach.

EAPs can also be led by shore based staff – for example an overdue group, or lack of expected communication could initiate an escalating EAP to ensure there is an appropriate response.

Contingency plans reduce the likelihood of a group continuing in less than ideal conditions. For example conditions being different to expected, or overcrowding of the selected venue may trigger an opportunity for the guide to select a different opportunity.

Monitoring and evaluation of risk

An important factor in managing risk effectively is the fifth step of the HSE process; review.

In coasteering there are some easy ways to undertake this critical phase.

Debrief and lessons learnt

- From the group there should be an opportunity for each participant to feedback on their thoughts on the session, including any near misses, in a discrete way
- Guides should be able to feedback and review coasteering sessions and have the opportunity to learn from sessions and deal with any specific issues
- In a more formal way, all accidents and near misses should be logged and reported in accordance with all current regulations and legislation. It is desirable for a provider to develop a culture of discussion around near misses, and not of shame culture for making mistakes

Information gathered in the monitoring phase, should trigger a review of RA's and NOP's if there is a serious incident, or any patterns in incidents occur.

Tip: When thinking about the steps (i.e. procedures) you take to manage risk, it's useful to ask yourself *How much do these steps actually affect my/staff/client safety? And, do they affect the chance of the event happening? or do they limit how much harm is done?*

Steps which stop the event happening in the first instance are always better, unless they fundamentally change/devalue the activity benefits. Being clear about core safety steps and the balance against quality or customer experience is important when budgets are limited.

Communicating the risks

It is important to appreciate that coasteering takes place on the basis that participants and guides are engaged in the activity from the basis of informed consent and acknowledge the risks.

A policy on informing the participants of the nature and extent of risks, and what to expect from the activity is a must.

It may be unreasonable to expect a commercial provider to detail the hazards in their primary advertising. However, it may be reasonable, for example, to leave this information until the point of booking or even (in some cases) to the point of departure. The identification of risks should be clear and allow realistic and uninhibited options to any participants who, as a result, wish to decline the activity. The risks should therefore be highlighted as soon as possible after the participants congregate. It may require one-to-one discussions. Never try to persuade a hesitant potential participant that the activity will be safe!

Coasteering providers should ensure that each participant acknowledges the risks involved in coasteering.



Part two Managing risk in practice



Meeting group and individual needs

Medical requirements

It is important that coasteering providers are aware of any medical conditions that a participant may have that will affect their ability to undertake coasteering in a safe and enjoyable manner.

It is recommended that all participants complete a standard medical declaration form listing any pre-existing or current medical conditions that could affect their safety and that of others.

Medical information should be treated confidentially and be obtained in a manner that respects the rights and sensitivities of the individual. Please allow time for the participant to discuss any medical concerns with a guide on a one-to-one basis.

Holding and use of medication

It is best practice for individuals to carry their own medication and administer medication by themselves. However, in the coasteering environment, this may not always be possible and therefore it may be necessary for coasteering guides to carry participant's medication.

If a guide is to carry medication for a third party, it is recommended that it is labelled clearly with the participant's name and exactly what that medication is for and how best administered. Medication should be carried in a waterproof container/bag with the participant shown where it's being kept during the session. It is important that the guide and participant always remain in the same group.

Age requirements

Centres offering coasteering to participants under the age of 18 should conform to AALS licensing requirements and are subject to inspection⁴. Always check local regulations/legislation to ensure operating practices conform to current guidance in place.

There needs be no upper age limit as long as the participant meets the necessary insurance and medical requirements as determined by the provider. Parents ought to be involved in determining the suitability of sessions for very young participants.

It is highly recommended that children participating in coasteering activities are offered bespoke and independent sessions, taking into consideration age, group size, supervision, ability and behaviour. It is recommended that children are not grouped together as part of an adult session unless they form part of the same party/group.

Children will normally require parental/guardian permission to take part in coasteering activities.

4. <http://www.hse.gov.uk/aala/>

Identification of group competence

A policy ensuring identification of group competence is essential in identifying experience, special needs, and physical and medical condition of the participants. Particular attention should be paid to establish the water confidence and swimming ability of participants before undertaking activities and dynamically during the coasteering session.

As a result of identifying group competence it would be equally acceptable to either select the route on the basis of the group's abilities or select the participant group on the basis of the venue.

The unexpected 'panicker'

Sometimes even strong swimmers will panic when they fall or jump into deep, cold water. They may not be able to help themselves and their violent actions can sometimes make a rescue very difficult. It is good practice to anticipate this by:

- Carrying out realistic scenario-based training (in a controlled environment) on the importance and practicalities of reaching, throwing and swimming rescues, particularly of struggling 'casualties'. In some situations a throw bag may be appropriate, although its use would need to be practiced.
- Positioning a competent person where they can effect a rescue, preferably by reaching or throwing.
- Introduce clients progressively to challenge.

Acknowledgement of risk

An acknowledgement of risk form should outline any associated risks and fitness/medical requirements. It is important that such forms capture the participant's name, contact details, contact person, other information and their signature to confirm they appreciate the risks and agree to the terms and conditions outlined by the provider.

This is not a disclaimer and does not indemnify the provider from any statutory responsibility.

A note on disclaimers: Disclaimers have no standing in UK law and do not remove the duty of care a provider has.

Forms that explain a common understanding of risk associated with the normal conditions of activity and in recording of who the participant was, are useful.

Forms that seek to indemnify the provider from a negligent act have no standing, and are nullified by the Unfair Contracts Act (1977). They should be treated as signal that the provider has a poor grasp of the required safety arrangements.

Session duration

The duration of the session needs to be appropriate to the age, abilities, equipment and expectations of the participants (individually and collectively).

Guide/Participant ratio

It is appropriate to have a policy on guide and participant ratios, group size, use of assistants and other relevant people. This should take account of group management difficulties associated with only having one guide, which can arise at some venues. Similarly, some providers find it useful to have two separate groups operating at the same venue, being available to give mutual support if required.

It is recommended that the group size does not exceed 10 with a single guide (not including the guide) or 16 with two guides. Groups exceeding 16 participants may be better managed as two or more separate groups. The ratios may vary depending on the participant's ability, local conditions, participant's expectations or guide experience and other factors.

Policies should also indicate under what circumstances assistant guides or trainee guides can affect the ratios.

Safety equipment and clothing

Purchase and maintenance

Equipment provided to participants is often a key control measure for risks associated with coasteering.

There are a number of standards relating to items such as helmets, PFD's and rescue equipment. These should be understood and followed.

It is important to be able to manage this equipment for safety, and also for best value of the equipment for the provider.

Equipment should be individually identifiable. Records of when the equipment came into service, inspection and retirement should be kept. A clear and separate quarantining procedure should be available for equipment with defects. This equipment should be inspected by a competent person.

Rotation of equipment extends the life of the equipment and is desirable for operators on both a financial and safety level.

For Participants

It is important that all participants have the correct and fitting safety equipment prior to leaving the activity centre and are allowed the opportunity to try it on to ensure it fits well. Equipment should be available in a range of sizes.

The following equipment is recommended for all participants, regardless of ability and experience. Suitably fitting:

- Approved helmet
- Approved buoyancy aid
- Full body wetsuit
- Wetsuit boots, trainers or canyoning boots (closed toes)

For Guides

Guides should have the following equipment and carry additional selected equipment to support the group while conducting a coasteering session:

Personal:

- Suitably fitting approved helmet - fit for water-based activities.
- Suitably fitting approved buoyancy aid (with adjustable shoulder straps, side-panel adjusters and chest/waist straps)
- Wetsuit – suitable thickness
- Wetsuit boots, trainers or canyoning boots (closed toes)
- A standard first aid kit supplemented as appropriate for the coasteering environment. It is recommended the first aid kit only contains supplies that can be delivered by the level of the first aid training acquired by the guide)
- Throw line
- Whistle
- Watch
- Knife
- Communications – hand-held VHF and/or mobile telephone

Optional safety equipment (dependent on venue, conditions, expectations and ability and other factors):

- Day/night, rocket or mini-signal flares
- Rescue tube
- Fins
- Extra rope
- Karabiner and sling
- Dry bag for medication, group names, maps, and energy food/water

Identifying and planning routes, checking conditions

Pre-activity checklist – prior to participant arrival

Prior planning is essential to the smooth enjoyable delivery of a coasteering session. Things that should be confirmed before every session

- Which guide is leading the coasteering session
- An understanding of the RA's and NOPs for the session being delivered
- Can the chosen route be led safely on that day with that group by the chosen guide(s)?
- Cancellation/alternative plan if the sea conditions change or other factors vary or deteriorate, including new sites and session duration
- Escape routes and early completion exits are known
- Equipment has been checked
- Check there is a system to collect details from participants – contact details, medical issues, acknowledgement of risks. This could all be on one form

Safety briefing

The safety briefing forms an intrinsic part of communicating informed consent and acknowledgement of risk by the participant.

Therefore there will generally need to be a policy on the existence, content and presentation of a safety briefing. Participants should be advised on what they can do to help ensure their own safety. It may not be appropriate for guides to deliver all relevant instructions in one briefing. Verbal communication at some venues can be very difficult so prior thought should be given to what needs to be explained, where and when.

These items should be covered as a minimum

- Introduction of coasteering guides and their role
- Description of coasteering, such as what coasteering is
- Keeping equipment on at all times
- Alternative plan/cancellation
- How to enter the water safely
- Swimming alongside the cliffs, submerged rocks
- Exiting the water safely
- Climbing on the rocks
- Swell and tides
- Jumping procedures and participants' competence and confidence
- Swimming and walking through caves

- Marine life (cuts, stings, poisons, barnacles, and others)
- Bunch-up procedure
- Emergency procedure in case of an accident, for example, immediately halt activity
- Emergency escape routes
- Signals
- Group safety
- Environmental factors
- Self-awareness and awareness of others
- Communication

Providers should decide whether a system of hand signals is necessary and introduce this at an appropriate point.

It is absolutely essential to make sure that everybody is happy and understands all procedures before entering the water.

Identification of route options

It is beneficial to have the option of alternative routes or alternative start or finish points. In some cases the degree of difficulty or the duration of the session, or both, can be determined by varying these. On the day, the most appropriate route or variation on the route should be used depending on factors such as the weather conditions, experience and expectations of the group, group number and experience of staff available.

Guides should allow for groups and individuals to progress within a selected route. An example would be to start with low-level jumps before asking a group or individual to jump from a highest platform or ledge on the chosen route.

New routes should only be considered for competent and experienced guides. Conservation and interaction with the natural landscape should be considered when selecting a new or alternative route. Permission from relevant stakeholders, landowners/managers should be sought prior to establishing new routes.

Examples of basic desirable attributes of a coasteering location/route:

- Parking/drop-off point in a car park or area able to facilitate the coasteering group and other location users. Ideally not roadside or location with heavy traffic
- Start point or beach, sheltered with easy safe access for group and emergency access point. Often used as the briefing area away from the immediate start point
- Ability to enter water easily and safely or to begin around rocky route, with scope to train those unfamiliar with terrain
- Group catch-up points – areas where all in group can assemble for break or briefing along the route
- Easy step/jump into water at low height to practice total immersion and water-entry techniques

- Each jump/water-entry point to have a safe take-off point; participants able to feel comfortable and balanced before leaving rock
- Regular escape points on routes used by inexperienced groups
- A coastline with natural protection for varying wind directions, allowing for change in weather while on the water, coastline.
- Deep-water areas with sheer rock steps along the route for jumps and challenging sea conditions

Communications

When out during the activity, the group should carry suitable means of raising the alarm, if possible carrying more than one means of communication such as mobile phones in waterproof covers or hand-held VHF radio.

Route recording

Before the coasteering session commences, it is advisable to leave with a third party (centre/office). Route notes and written details should have the following information:

- Number of participants/names including all guides
- Start and estimated finish times
- Route details
- Any known medical concerns
- Emergency contact information carried, if any
- Transport details (registration number etc)
- Other important information.

There should also be a written procedure for the shore contact person to follow in the event of a no-show or distress call, or other emergency situation, with details of who to contact and other information.

Checking a site – entry from height

On arrival it is advisable, particularly at low water, at a new venue or an unfamiliar stage of the tide, to carry out a reconnaissance. Depending on the location and proposed activity this could include:

- Going down to water level to examine exit points. Determine whether someone should be located there to assist with exiting and whether they should have equipment to reach or throw to a swimmer in difficulty.
- Wade in and, if necessary, duck-dive to check the bottom for obstructions, depth, current and other hazards. It may be appropriate to be attached to a throw line, although not if there is a strong current. A mask and snorkel search might also be considered at some venues.
- It is recommended that guides check unfamiliar depths prior to any jumps taking place.

- There may be considerable advantages if the participants also wade in as a trial, particularly if the activity will involve jumping in from a height. The shock of sudden immersion in cold water can be very overwhelming.
- It is recommended that guides demonstrate jump techniques and provide the opportunity for participants to practice jumping from lower-level heights first and only be allowed to progress to higher jumps if their technique is acceptable.
- Water entry heights need to be carefully considered with dynamic risk assessment. Factors including participant ability, sea/weather conditions, water depth, access and the stability of jumping points and participant behaviour all need to be considered when selecting a suitable height.
- To reduce the risk of spinal injuries, it is highly recommended that guides do not encourage participants to dive, flip or perform stunts while jumping from any height.
- Ledges and projections: If it is necessary to jump outwards in order to clear ledges and projections, or simply to reach the water, it is recommended that participants start with jumps that do not require this so as to build up technique and confidence. They should not be allowed to progress to higher jumps until both are acceptable.
- At the take-off point for all jumps, guides should assess the possibility of being pulled off the ledge by a participant and the likely consequences. They may find it necessary to secure themselves to something stable. This allows the guides to approach the edge to give assistance or support.

Remember that the likelihood and seriousness of injuries from hitting the water incorrectly will increase with height. However, even if entering the water correctly, the likelihood and seriousness of injuries will increase with height. Considerations and consequences will vary considerably from person to person, jump to jump and day to day. It is therefore unrealistic to determine a height below which a jump can be considered safe and above which it becomes ill-advised.

Alternative exits

Some venues have a number of possible entry and exit points. Knowledge and familiarity of these escape routes have clear benefits, particularly if it becomes necessary or desirable to cut a trip short. Some consideration should be given to any extra equipment that may be required for particular exits, ascents or a retreat.

Remote locations

Coasteering often accesses remote and isolated locations considerations associated to this should be factored into the risk assessment. Some locations can be particularly remote and a thorough review of some factors is necessary, particularly with regard to:

- Communications (including mobile phone signal)
- Emergency help
- Emergency action plan
- Food, drink, shelter and warm clothes
- Additional first aid equipment
- Guide/participant ratio
- Group and guide experience

Forecasting conditions

A policy for obtaining and interpreting weather forecasts, water levels, sea state and other conditions is a must.

Further, It must be clear who is to do this, when it is to be done, and what action they will take for a range of possible forecasts.

These could include, but may not be limited to, modification of the venue, change of venue, cancellation and/or return of payment. If the addition of an assistant guide is the response, then there must be a mechanism whereby a suitable person can be deployed in the given time span.

Insurance and competence

Insurance

Coasteering providers must ensure they have correct and in-date insurance for conducting coasteering with the public on a commercial basis.

Guide competence and training

The ability of the guide to be able to undertake dynamic risk assessments is essential. This ability is primarily based on experience. There should be a clear methodology for training and/or observing sessions.

There are easily demonstrable external qualifications, First Aid, Water Rescue and rope based qualifications that can form a supplemental part of a guides documentation. These qualification should be appropriate to the session being run.

A competent person should assess the competence of a guide for the type of session that is to be delivered.

Terminology

Coasteering - involves participants travelling across rocks and through water, using a variety of techniques including climbing, swimming and jumping into water, along a stretch of the coastal intertidal zone. It is most often undertaken as part of an organised group activity.

A Guide - is the leader or instructor of a group.

Participants - are people taking part in the organised session under the leadership of a guide.

Providers - describe an individual or organisation that leads the activity of coasteering. We make no distinction between profit making or non-profit making organisation.

AAIAC Adventure Activity Industry Advisory Committee

AALS Adventure Activities Licensing Service

EAP Emergency Action Plans

MCA Maritime and Coastguard Agency

NOP Normal Operating Procedure

RA Risk Assessment

RLSS Royal Lifesaving Society UK

RoSPA Royal Society for the Prevention of Accidents

SLSGB Surf Lifesaving Great Britain

The National Coasteering Charter is the body recognised by the majority of providers to represent coasteering in the UK. The current aims are to publish and maintain agreed minimum safety standards; develop and disseminate current good practice, in order to keep clients and providers safe.

The NCC plays a role in being the go-to place for external stakeholders with coasteering related questions. Local and national groups meet to discuss and develop practice regularly. The NCC is staffed entirely by volunteers and funded by providers who pay a membership subscription.



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