Standard Operating Procedures for Guided Photography Walks - Joshua Cripps Photography

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Section 1 Documents

1.1 Version table

Version	Amendments made	Approved by	Date
1	Initial Document Created	Joshua Cripps	04/10/17
1.1	Incorporated comments from initial audit	Joshua Cripps	27/11/17
1.2	Updated for re-commencement of operations post COVID-19 pandemic.	Joshua Cripps	31/05/22
	Removed "Sea to Summit Photography Workshops" from entity name, and updated mentions throughout.		
	Minor updates and clarifications throughout		

1.2 SOP document control

We will ensure our Standard Operating Procedure (SOP) documents are readable, identifiable and traceable to our activities.

In order to achieve this our SOP documents will be:

- Identified by a footer that states the name of the organization, version number, the page number and the number of pages
- Reviewed by Joshua Cripps and Tour Leaders annually or 3 months prior to every tour (which
 is sooner) and revised where necessary.
- Signed off as adequate by Joshua Cripps.
- Current and available via intra-company shared drives, as well as in a PDF form on our website, www.joshuacripps.com.
- Protected from unauthorized changes, deletion and publication and backed up via Google
 Drive, backed up to a dedicated folder every revision change.
- Controlled by **Joshua Cripps** as to how and where.
- Removed from circulation if obsolete or marked clearly that they are not to be used.

Archived copies and other safety-related records will be kept for seven years physically in a filing cabinet in Joshua Cripps' office, and virtually via the Joshua Cripps Photography Google Drive account.

NOTE: Once printed, documents are uncontrolled.

Section 2 Introduction

2.1 Description of Activities

Joshua Cripps Photography provides on-location landscape photography instruction to clients of all skill and fitness levels. These workshops take place at scenic locations around the world such as Yosemite National Park and Death Valley National Park in the United States, and various national parks and other scenic lands throughout the South Island of New Zealand. During these tours we spend anywhere between 5-10 hours outside per day exploring the landscape with our clients and helping them improve their photographic skills. We may walk up to 12 km per day (though 6-8 km is more typical) over generally good terrain and trails, but there are no technical requirements for fitness or photographic participation. The workshops vary from 1 day to 3 days to 14 days depending on the location.

Ancillary activities

We contract with four types of ancillary services for our tours: transportation, scenic flights, cruises, and lodging. In each case we abide by each service's SMS.

Locations

This New Zealand photo tour will take place at the following locations:

- Queenstown Gardens
- Moke Lake
- 12 Mile Scenic Reserve
- Diamond Lake
- Rees River Overlook
- Lake Wanaka Lake shore
- Beacon Point, Wanaka
- Lake Tekapo, Church of the Good Shepherd
- Mt Cook National Park (Mueller Lake overlook, Kea Point, Tasman Lake outlet, Hooker Lake track)
- Elephant Rocks
- Moeraki Boulders
- The Catlins Region (Purakaunui Falls, Nugget Point, Tautuku Bay Overlook, Curio Bay,
 McLean Falls, Lake Manapouri Lake shore, Lake Te Anau Lake shore)
- Fiordland National Park (Mirror Lakes, Lake Marian, Monkey Creek, Tutoko Bridge, Milford Sound)

Refer www.joshuacripps.com for further information about our New Zealand Photo Tours.

Section 3 Standard Operating Procedures

3.1 Purpose

Our SOPs were developed to help us provide the best possible guided photography walks with consistency and a high focus on safety. Standards for Good Practice for our walks were adapted from the Good Practices for Alpine Hiking (https://www.supportadventure.co.nz/assets/Alpine-Hiking-ASG-v1.pdf) and Tramping Activities Good Practice Guide (https://www.supportadventure.co.nz/assets/GPGs/Tramping-GPG-Version-1-220819-002.pdf) for our usage.

3.2 Standard Operating Procedure for Guided Photography Walks

The SOPs for guided photography walks consist of Planning, Activity and Group Management, Environment and Hazard Management, Emergency Procedures, Tour Leader Training and Responsibilities, Client Safety, Equipment, Ancillary Services, Incident Reporting, and SMS Reviews.

Planning

Prior to each guided walk Tour Leaders will:

- Estimate activity travel times, considering distance, elevation gain/loss, daylight hours, group size, participant profiles, staff/participant ratios, supervision levels, navigation complexity, terrain analysis, snow conditions, river levels, and weather.
- Identify safe zones and contingency routes.
- Ensure all participants have the required clothing, equipment, and any essential personal medication.
- Ensure that the activity is suitable for the group and each individual.
- Ensure that all participants have disclosed safety critical information, such as hike duration, rendezvous points, cut off times, hazards, etc., and have signed the risk disclosure form (Appendix 7 of SMP)
- Ensure that full disclosure of the risks and their roles and responsibilities has been communicated to the participants.

Because of limited access, weather, and/or communication issues obtaining emergency evacuation can be difficult and lead to lengthy waits for external emergency support. In order to mitigate these issues prior to each guided walk Tour Leaders will:

- Identify and assess the degree of remoteness of the walk.
- Identify and assess the potential complexity, severity, and scale of incidents including the sudden onset of illness at any stage or time of the activity.
- Identify and assess the communication options.
- Identify and assess the emergency equipment and staff competencies required.
- Identify and assess whether emergency services will be immediately available.
- Ensure that sufficient equipment is available to manage group safety during a delay in accessing assistance — sufficient first aid supplies, emergency shelter, two-way communications, insulation mats, torches, heat sources, and food.
- Be prepared for an unplanned night out or the use of an emergency shelter.
- Map the emergency shelters, communication options, and helicopter evacuation sites.
- Disclose to the participants that medical services may take time or be delayed due to adverse conditions.
- Obtain first aid / CPR certification before each tour.

Activity and Group Management

Our activities involve walking (and the use of walking poles) on non-technical sub-alpine terrain. In order to facilitate smooth walks and group activities Tour Leaders:

- Ensure that all planning, operational, and equipment checks are completed.
- Ensure we can access up-to-date weather forecasts.
- Ensure the guides are competent for this activity, with these participants, and in these conditions.
- Ensure the Tour Leader / Client ratio is never less than 1:7, and typically 1:4.

- Ensure clients have all necessary equipment, clothing, food, water, and personal medications during each walk.
- Ensure the terrain is within the group's ability and matches their expectations, experience, and fitness as a group and as individuals.
- Brief participants on specific safety hazards and procedures, including any role they may have to play in an emergency.
- Set up a buddy system and designate a tail-ender.
- During photography, Tour Leaders circulate throughout the group.
- Brief the group on clear no-go areas.
- Ensure there are clear group management strategies around toilet breaks, or where there
 could be opportunities for the group to split up.
- Maintain situational awareness with respect to terrain conditions, weather, location, speed
 of travel and the time of day. If terrain conditions or weather are not what was expected or
 are forecast to change, consider modifying or canceling the activity. Ensure group can access
 to up-to-date information and forecasts.
- Are prepared to share the route, instructional sites, hut and campsites with other users, and consider the impact they could have on our activity from a safety perspective.

Participants know how to:

Activate an emergency call out if the Tour Leader cannot do that for any reason.

Medical conditions. We:

 Record all pre-existing health issues and ensure all necessary medications are available at any time of the activity.

Environment and Hazard Management

Identifying and assessing hazards

Identify significant hazards both systematically and dynamically using a variety of methods:

- Inspecting sites physically.
- Studying maps and photographs.
- Consulting with other industry operators and non-commercial users.
- Reviewing standard operating procedures.
- Reviewing past incident reports and lessons learned.

Managing hazards

Assess all hazards to identify which ones are significant and manage hazards according to the 'eliminate, isolate, minimize' hierarchy of action. Due to the inherent risk of outdoor walking activities, some hazards cannot be eliminated or isolated and can only be minimized. Our hazard management SOP is designed to reduce the risk of harm to acceptable levels.

This SOP focuses on preventing death or other serious harm. And our safety management strategies are focused on managing the hazards considered most likely to result in death or serious harm

including impact injuries from falling, sliding or slipping, external impact, drowning, and hypothermia. The hazards considered most likely to contribute to these are:

- Unsuitable environmental conditions, e.g. weather or snow pack.
- Unsuitable participants fitness, skills, staff/participant ratios and pre-existing medical conditions.
- Unsuitable route selection terrain hazards, too long, too technical or too exposed.
- Unsuitable site choice for an activity or shelter.
- Poor guiding decisions, group management, pace setting, situation awareness, supervision and/or lack of knowledge for the track, route or site.
- Unsuitable staff.
- Not being suitably equipped for the terrain, environmental conditions and emergency situations.

Terrain

In order to prevent and/or minimize terrain hazards Tour Leaders must:

- Analyze the terrain for hazards such as avalanche terrain or river crossings.
- Use terrain that is within the group's ability.
- Identify how the terrain could change during the activity (e.g. changing tides).
- Identify and assess terrain hazards throughout the activity.
- Consider alternative routes or objectives if terrain conditions (and/or weather) are worse than planned for.
- Identify and map no go zones, safe zones and contingency routes and sites.
- Identify new terrain hazards on previously-visited tracks by talking to DOC, land owners, and others.
- Communicate any changes to terrain hazards to the DOC, land owners, and others who should be aware of hazards.

The risk of sliding or falling in dangerous terrain exists whenever clients are traversing hillsides or steep slopes, boulder hopping (rivers and routes), and walking on ridges. In order to manage these risks, Tour leaders must:

- Identify and assess all terrain for the likelihood of participants sliding or falling, given terrain conditions, their footwear, and their ability.
- Assess if any potential slides or falls likely to cause harm, given hazards like rocks, bluffs or hitting others.
- Select routes and sites that eliminate or minimize the likelihood and/or the consequences of hazards.
- Ensure clients have appropriate shoes and poles.
- Consider using safe spotting techniques, hand lines, or other assistance for the participant.
- Remind participants of the risks when the hazard appears.
- Ensure that people stay far enough away from edges to minimize the risk.

- Establish safe zones back from an edge and communicate these clearly to participants.
- Space participants at distances that ensure they will not cause each other to fall and, if someone falls, they will not land on another participant.

In some areas it's possible that participants could also be exposed to rock fall, sliding, and falling hazards. In order to manage these risks, Tour leaders will:

- Identify unstable scree and terrain traps like gullies and moraine walls.
- Identify other user groups potentially dislodging objects.
- Look for the effects of recent heavy rain, high winds or ice.
- Select and adjust walking routes to eliminate or minimize hazards, including avoiding terrain that collects and channels loose rock.
- Monitor for evidence of previous rock fall.
- Identify and use safe zones.
- Monitoring other user groups in the area.

Natural Events

Walking tracks can be exposed to the effects of weather events such as high winds, heavy rain, and lightning. Natural events can be volcanic activity or earthquakes that can create rock fall, gas clouds, and landslides. In order to prevent and/or minimize natural hazards Tour Leaders must:

- Identify and assess the risk of hazardous weather and other natural events.
- Check that conditions are suitable prior to engaging in activities.
- Constantly monitor local weather forecasts.
- Use local no-go indicators (such as extreme rain, wind, cold, or snow) and communicate to participants about canceling due to concerns about conditions.
- Utilize standard emergency procedures.
- Briefing the participants on their roles and responsibilities.

Environmental extremes can lead to hypothermia, cold injuries, snow blindness, dehydration, severe sunburn, and heat stroke/hyperthermia. In order to manage these risks, Tour leaders will:

- Manage the start times and duration of trips and activities to suit the environmental conditions.
- Ensure that participants are equipped with correct layers of clothing.
- Ensure other Tour Leaders are carrying extra clothing and supplies (including extra thermal clothing, emergency blanket, food, water, and heat sources) based on conditions.
- Ensure participants are regularly rehydrating and eating.
- Minimize the time participants are exposed to cold or heat while participating in the activity.

In poor visibility there exist the risks of clients getting lost, the group separating, terrain hazards such as edges or bluffs, slowing down the pace of the activity – possibly resulting in a night out, and/or no helicopter access if required for an emergency. In order to manage these risks, Tour leaders will:

• Cease all guided walks and return to shelter as visibility deteriorates.

- Ensure they are familiar with the terrain and hazards.
- Be competent navigators and are equipped with GPS and maps.
- Keep the group together.
- Continuously monitor weather, dynamic hazards, time management, pacing, participants' ability, and fatigue.
- Ensure that the group is self-sufficient and can spend a night out or deal with delayed help in an emergency.

Other users can create rock fall, avalanches and other hazards. In order to manage these risks, Tour leaders will:

- Notify and coordinate with all other known users of the area.
- Monitor other groups in the area.
- Contingency plan around the limitations resulting from other users, such as the loss of a photographic or instructional site.

Access to tracks, routes and sites can often include environments suited to bees and wasps. Participants may also be allergic to other substances. In order to manage these risks, Tour leaders will:

- Screen participants for any known allergies.
- Carry epi-pens or adrenaline if required.
- Ensure that if participants know they are allergic they are carrying their medication.
- Avoid disturbing hives on walks.
- Consider placing those who are allergic in a position farthest from the hive.
- Consider checking on conditions with DOC, landowners, or other users before entering an area.

Protecting the environment

All our tours practice Leave No Trace ethics in order to protect and preserve the natural environment. All clients and Tour Leaders are briefed on Leave No Trace principles during every tour orientation.

Emergency Procedures

Despite active risk management emergency situations can occur. The following SOPs deal with our emergency response plan.

Tour Leader Training

Tour Leaders must be CPR / First Aid Certified before tour begins.

Tour Leaders must read and sign off emergency response plan.

Tour Leaders must conduct an emergency response drill prior to the tour which includes evaluation and feedback.

Emergency Response Plan

In general most emergency situations require the same response, which must be invoked whenever the situation surpasses the Tour Leaders' ability to control it. In an emergency situation Tour Leaders will:

- 1. Coordinate response with other Tour Leader. Prior to each outing designate Tour Leader 1 and Tour Leader 2.
- 2. Determine status / safety of clients. If necessary move clients to a safe zone.
- 3. Determine safety of situation. If situation is unsafe move all unaffected clients to a safe zone.
- 4. Direct second Tour Leader to contact emergency personnel (via phone, radio, or in-person).
- 5. Begin CPR / First Aid as applicable only when situation is safe and further injury to additional clients or Tour Leaders is not a factor.
- 6. Second Tour Leader will assist with CPR / First Aid as necessary AFTER emergency personnel are contacted.
- 7. If one Tour Leader is incapacitated (or in the event of trips with a single tour leader), other Tour Leader will designate an appropriate client to contact emergency personnel and assist with CPR / First Aid.
- 8. Assist with extraction / evac of clients as required by emergency personnel.

Specific emergency response plans are spelled out in the SMP, Appendix 5.

Accessing external emergency support

All guided walks take place in areas where external emergency support is available. In order to ensure this support is available as soon as practical in an emergency situation Tour Leaders will:

- Constantly monitor group location and be able to describe track and location to emergency personnel.
- Carry mobile phones and know emergency telephone numbers (111).
- In case of loss of mobile phone service Tour Leaders will map out locations of closest phones (at hotels, restaurants, etc.).
- In case of no mobile phone service, one Tour Leader will go to the location of nearest phone
 to contact emergency services. The other Tour Leader will stay with the group. Both Tour
 Leaders will carry walkie talkies to enable communication.

Contingencies for limited access to emergency support

Some of our tour locations (such as Fiordland National Park) may have limited access to a rapid external emergency response, leading to a risk that injured participants may spend longer without secondary emergency care. In order to help manage this risk in an emergency situation Tour Leaders will:

- Inform participants of the risk of a prolonged wait for emergency support in the event of an incident.
- Choose less challenging and shorter walking tracks and photographic areas in remote locations so as to minimize risks of emergencies as well as aid speed of response.
- Have additional resources (such as additional first aid equipment, clothing, food, water) to manage an injured participant for longer periods of time.

Communication systems

In order to communicate with external support we will utilize a primary communication system and multiple backup communication systems.

- Primary communication system is comprised of three mobile phones (for Tour Leader 1, Tour Leader 2, and the bus driver) in good working order with charged batteries. Tour Leaders are constantly monitoring areas of service.
- Our backup communication system is composed of three parts:
 - 1. A CB / Long Range Radio in our tour bus.
 - 2. A Garmin InReach personal locator beacon and satellite communicator.
 - 3. A check in system with each hotel of the tour. Tour group is expected to arrive by a certain time each day. If the group does not arrive hotel calls Tour Leaders' phones. If no answer, hotel calls previous hotel to confirm check out. If group checked out of previous hotel then contact emergency services.

In order to communicate internally in order to manage the group, Tour Leaders will:

- Keep group together to facilitate in person communications.
- If group separates or one Tour Leader needs to seek external emergency support in a non-coverage area, Tour Leaders will carry walkie talkies to facilitate communication.
- Create internal group management plans and fail safes.
 - E.g. if one Tour Leader takes a group 10 minutes farther down a track, set hard return times.

Tour Leader Training and Responsibilities

Safety responsibilities and competence requirements

Tour Leaders are chosen based on their experience or demonstrated skill in the following areas:

- Experience and good judgment in leading photography tours.
- Technical, teaching, and guiding skills, including photographic equipment and location knowledge.
- Risk management, group management, and leadership skills.
- Ability to operate in accordance with standard operating procedures.
- Familiarity with and understanding of the operational environment.
- Familiarity with and signature of SMS, including SOPs and emergency procedures.
- Ability to communicate safety requirements/directions clearly to the participant.
- Emergency management skills including first aid and CPR training.

Verifying competence

This section looks at using certifications to verify skills, and how to verify those skills that are not covered by certifications.

- Certifications: CPR and First Aid training must be demonstrated by each Tour Leader through a current CPR / First Aid certification, valid throughout the duration of the tour.
- SOP and SMP competencies are demonstrated through a review and signature of both documents.
- Other competencies are demonstrated by in-person observation.

Tour Leader training

Tour Leader training is focused on understanding and internalizing the SOPs and emergency procedures, and highlights procedures that are new or have changed. Training consists of classroom sessions and drills for each SOP. This compulsory training is conducted prior to each tour and Tour Leader participation is signed off by Joshua Cripps.

Identifying and managing unsafe staff

We do not permit a person to conduct or undertake safety related tasks if they are in such a state of impairment that they may be a hazard to themselves or to any person on the activity. Impairment could be due to alcohol, drugs, injury, fatigue, or illness. Tour Leaders must identify as a hazard any Tour Leader, bus driver, or client who is unable to perform safety tasks as required to fulfill the responsibilities of their role. In this case the Tour Leader's responsibility is to remove the person from the role requiring performance of safety tasks. Please see the full Drug and Alcohol policy in the SMP, Section 7.

Client Safety

This section looks at three key aspects of managing participant safety: ensuring participants are suited to the activity, informing participants about safety, supervising participants.

Ensuring participants are suited to the activity

In order to minimize risks associated with client fitness, prior to the tour Tour Guides will assess:

- Necessary fitness and any specific physical abilities required.
- Psychological factors such as the ability and likelihood to follow instructions, fears, phobias, and confidence at height and over swing bridges.
- Age.
- Medical issues, particularly medication that must be taken, any pre-existing injuries or conditions, and the fact they will be in a remote environment with restricted access to medical resources.

Establishing age guidance

We do not have specific age requirements on our trips. As long as clients meet the minimum physical requirements and are willing and able to follow instructions then they are welcome.

Identifying and managing unsafe participants

We do not permit any person to participate in an activity if they are in such a state of impairment that they may be a hazard to themselves or to any person. Impairment could be due to factors such as social, psychological, cultural/language barriers, alcohol, drugs, injury, or fatigue. Tour Leaders must identify as a hazard any participant who is unable to perform safety procedures or follow instructions. In this case the Tour Leader's responsibility is to increase supervision levels over the client or remove them from the activity.

Informing participants about safety

Managing safety is more effective if participants are well informed, particularly on the risks and requirements of guided photography walks. This section looks at three key aspects of informing participants about safety: pre-activity risk disclosure, delivering safety information and checking for understanding, and general safety information.

Pre-activity risk disclosure

Before beginning the activity Tour Leaders shall inform each participant of the following:

- Guided walking involves some risk of serious harm or death. Participants should be aware that the operator cannot totally guarantee the participant's safety.
- The activity may be mentally and physically demanding.
- The participant needs to follow the Tour Leaders' instructions at all times and understand that this is critical to their safety and that of the group.
- Significant hazards may be encountered that cannot be avoided or that place extra responsibility on the participant. These include:
 - The risk of a prolonged wait for emergency support in the event of an incident.
 - Trips with limited communication access to external emergency support.
 - Trips where the activities demand particular technical skills of the participant, such as descended steep slopes or rocky areas.

Delivering safety information

Safety information will be delivered by Tour Leaders prior to every tour in two ways:

- The SMP and SOP documents and forms will be available to all participants via downloads on our website. This fact will be delivered to clients in our pre-tour information packet.
- At the beginning of each tour during the tour orientation briefing, safety information and safety plan documents will be summarized and made available to participants.

Tour Leaders shall ensure, as best as is practical, that the participant has understood the safety information.

General safety information

Tour Leaders shall instruct participants in awareness and techniques pre-activity and during the activity. These factors include:

- Awareness of and warnings about the hazards of the activity.
- The importance of listening to and following the instructions of the Tour Leaders.
- Methods for maintaining body temperatures through clothing systems and regular hydration.
- Emergency procedures for the site, such as staying where they are and waiting for instructions from the Tour Leaders.
- The ability of any Tour Leader or client to halt an activity if it becomes unsafe or the hazards unmanageable.

For parts of the activity involving a known hazard Tour Leaders shall inform participants of:

- The hazard and warn of its dangers.
- Options for avoiding the hazard, safe, and no-go zones.
- Any relevant communication systems such as visual hand signals.
- Applicable emergency procedures or self-rescue techniques.

Supervising participants

Our supervision system is in place to ensure that a good supervision framework is provided to those who are responsible for safety during our activities. The supervision system is based on the risk associated with guided walking. In order to provide appropriate supervision during our activities:

- Tours will contain a maximum of 14 participants and there shall be two Tour Leaders for every seven clients.
- Each Tour Leader shall be directly responsible for supervision half of the clients on the tour, and indirectly responsible for supervision the other half. This includes:
 - Maintaining lists of room numbers at hotels.
 - Making sure your specific clients are aware of and present at call times.
 - Supervising clients during guided walks.
 - Supervising clients during planned and unplanned stops such as meals, restrooms, etc.
- Tours shall be structured to allow Tour Leaders and clients to receive a minimum of six hours of sleep per night, with additional breaks during the day.
- Responsibility groups may be shuffled between Tour Leaders if certain clients require more supervision than others.
- Each Tour Leader is responsible for making sure the supervision SOPs are being followed.

Equipment

This section looks at participant and Tour Leader equipment, emergency equipment, and equipment maintenance, testing, and inspection.

Participant and Tour Leader equipment

Tour Leaders shall ensure that all participants use the following equipment:

- Clothing that is sufficient to protect participants from risks such as hypothermia, and is appropriately fitted for the activity.
- Footwear that is sufficient for the environment.
- Flashlights / Torches / Headlamps, particularly on longer trips and when there is short daylight.
- Equipment / clothing that provides protection from all elements.
- Necessary medication.

The following clothing packing list shall be sent to each participant:

- Warm synthetic clothes in layers (no cotton), and a warm, windproof jacket. We recommend
 a layering system of a synthetic, wicking base layer, and insulating layer like a down or fleece
 jacket, and a shell for protection against wind and rain.
- A warm hat, gloves, and good socks.
- Sunscreen and a wide-brim hat (NZ experiences strong UV so this is very important!).
- Rain jacket, rain pants, and waterproof gloves for wet days.
- Footwear: lightweight hiking shoes are recommended for most days, but something waterproof will be essential as well as we are almost guaranteed to see rain. Waterproof hiking shoes or lightweight boots are a perfect choice.
- Balaclava (optional, for those of you who get cold easily).
- Additionally, you may enjoy investing in a cheap pair of fishing waders or rubber boots once you arrive in New Zealand. We will be near many lakes, streams, rivers, bays, and waterfalls, and being able to be in the water can add a special perspective to your photos.

Emergency equipment

Tour Leader equipment

Each Tour Leader shall carry the following emergency equipment:

- Clothing.
- Communications equipment (cell phones, walkie-talkies).
- First aid kit.
- Emergency blanket.
- Extra food and water.
- Ignition source.
- One Tour Leader shall carry a Garmin InReach Personal Locator Beacon.

General emergency equipment

Group emergency equipment will be maintained that is sufficient and suitable for managing group safety and chosen based on identified emergency scenarios. The following items may be included as required:

- Group shelter and heat sources, e.g. space blankets, heat packs, bivy sacs, ground insulation.
- Water.
- High-energy food.
- Complete first aid kit.
- Light sources and spare batteries.
- Bus radio.
- Additional clothing (rain jackets, synthetic base layers, beanies, and gloves).

Accessibility of emergency equipment

Each Tour Leader will carry the required equipment. General emergency equipment shall be kept on board the bus.

First aid supplies

A complete first aid kit is kept on board the bus at all times. Tour Leaders will carry field first aid kits.

Equipment maintenance, testing, and inspection

Before each tour all equipment shall be inspected and tested to ensure its reliability. Faulty or damaged equipment will be replaced.

Ancillary Services

This section specifies the SOP when working with ancillary services. We utilize four types of ancillary services, transportation, lodging, scenic flights, and boat cruises.

 When actively engaged with the ancillary service (for example, while in the hotel, on the coach, during a scenic flight, or during a cruise), our SMS and any directives regarding safety become secondary to the SMS and directives provided by the ancillary service. Emergency procedures can be found in the SMP, Appendix 5

Incidents

This section specifies the SOP for responding to incidents, how incidents are communicated internally and externally, and how incidents influence the SMS. We define an incident as:

- Any occurrence that disrupts the tour such that time is lost dealing with the occurrence.
- Any occurrence that require any client or tour leader to leave a tour to seek medical or other professional attention.
- Near-miss, or non-injury occurrences that expose a weakness in the SMS.

Responding to Incidents

After the incident is over Tour Leaders present during the incident shall respond by:

- Describing the incident: what happened before, during and after the incident.
- Describing the result of the incident: injury, property damage, near miss, etc.
- Investigating and identifying the causes of the incident. Did the incident result from:
 - Human error.
 - Negligence.
 - Poor decision making.
 - Poor communication.
 - Equipment failure.
 - · Weather.
 - Environmental or other natural causes.
 - Other causes.
- Detailing if/how the incident could have been prevented by a different course of action.
- Describing recommended changes to the SMS, SMP, or SOPs in order to prevent similar incidents in the future.

Communicating Incidents

Internal Communication

- Tour Leaders shall record and report incidents to management via the Incident Report form, Appendix 4 in the SMP.
- Incidents shall be reported as soon as practical.

External Communication

- Tour Leaders shall report incidents involving crime to the police as soon as practical.
- Management shall report all "notifiable events" (these include incidents resulting in serious harm or near-misses that could have led to serious harm) to Certifier, as well as Worksafe NZ as soon as possible and within seven days (via the forms at www.business.govt.nz/worksafe/notifications-forms/accident-serious-harm).

SMS Improvements

Management will be responsible for following up on incidents, modifying the SMS as necessary, and communicating any changes to Tour Leaders.

- Recommended changes to SMS will be reviewed from the Incident Report form and evaluated for inclusion in the SMS.
- Serious harm incidents will prompt a review of the SMS.
- Every incident will be reviewed to see if a trend is forming. Trends will prompt a review of the SMS.
- Changes to the SMS, SMP, or SOPs will be communicated from management to Tour Leaders, requiring signature of the changes by each Tour Leader, and new training if applicable.
- Changes to the SMS, SMP, or SOPs will be communicated from management to other relevant parties, such as other concessionaires or DOC.

SMS Reviews

A full internal safety management system review will be conducted before each tour by all Tour Leaders and management. Reviews will also take place after any incident that caused or might have caused serious harm (this includes client complaints). These reviews check that:

- Safety systems and SOPs are aligned with industry recommendations and are at or above industry good practice.
- The safety management plan accurately reflects our systems and procedures.
- Everyone in the operation follows the agreed safety systems and procedures.

Management is responsible for ensuring that reviews take place, but everyone in the operation is responsible for being part of the process. Results will be recorded and shared with all Tour Leaders and other similar operators.

External audits of the SMS will be conducted every three years or as required by the DOC concession.