Educational Visits and Learning Outside the Classroom Policy

October 2023



Version: 2023-2024 Date Policy due to be reviewed: October 2024

Responsible for Policy: Educational Visit Co-ordinator (EVC),

Head Teacher, SLT and Governing Body

'To reach their potential, children and young people need experiences which broaden their horizons, enrich their cultural experience and understanding and improve their well-being.'

1. Introduction

This Policy is for Marsh Hill Nursery School and adopts and uses as a foundation the Outdoor Education Advisers Panel National Guidance (NG) www.oeapng.info
. Birmingham City Council Policy and Guidance for Educational Visits and Learning Outside the Classroom, as the employer underpins this policy. The nursery school provides a rich and varied programme of opportunities for students to learn outside the classroom within the school, the local area and further afield. The programme of educational visits and learning outside the classroom supports the ethos and values of the school in a structured innovative and progressive way to enhance and support young peoples' self-esteem, awareness of others, independence, emotional literacy and resilience, positive attitudes, motivation and behaviour, mental and physical health and environmental awareness.

This is crucial as our young people move into the wider society that the foundations are carefully laid so that throughout their lives, they continue to be successful learners, confident individuals and respectful global citizens.

Overall Aims and Benefits

- To promote and develop independence, self-confidence, self-esteem, self-discipline, self-respect and respect for others.
- To encourage the development of interpersonal and social skills, e.g. trust, co-operation, teamwork.
- To develop learning potential through the introduction of new skills, challenges and experiences.
- To be considerate of others. To develop awareness of the consequences of our actions and behaviour particularly in relation to others.
- To develop positive behaviour and attitudes and to transfer positive behaviour to school and other societal situations.
- To offer individual and group challenges.
- To develop positive awareness of mental and physical health and wellbeing.
- To encourage awareness, exploration and respect for the natural world and local environments.
- To be aware of safety considerations for others and ourselves.
- To become educated, creative and aware global citizens.
- To offer opportunities to step out in our local and wider areas to enhance and broaden our horizons and 'cultural capital'.

This policy covers the supervision of children and young people undertaking experiences beyond the boundary of their normal classroom or environment as

well as some on site learning outside the classroom activities. The Head Teacher and Educational Visits Coordinator are responsible for this policy and the wider learning opportunities it offers. The EVC manages the practicalities. It provides a framework for staff planning of educational visits and learning outside the classroom activities. Visits fall into one of two categories as outlined below

NG 1b Foundations https://oeapng.info/download/2826/

2. Roles

All roles clearly identified on the NG website https://oeapng.info Specific roles are identified and clearly defined as EVC, Visit Leader, Assistant Leaders, Volunteers, Head Teacher, Governing Body and Employer. There is specific guidance and information for each role.

The school has a Trained EVC who is: **Lisa Taylor Hawkins - Assistant Head Teacher**

All visits will have a named visit leader and assistant leaders who are aware of their roles and responsibilities contained within the NG website. Volunteers are managed under the school volunteer policy including relevant DBS checks.

NG documents Roles 3.4a-o

EVC 3.4j https://oeapng.info/download/1122/ (See Appendix A)

EVL 3.4k https://oeapng.info/download/1122/ (See Appendix A)

Head Teacher 3.4g https://oeapng.info/download/1124/ (See Appendix A)

Assistant Leader 3.4i https://oeapng.info/download/1124/ (See Appendix A)

3. Competence of Staff

Staff must be competent and confident in their ability to lead visits. The school recognises the importance of induction training and support to develop confidence and competency in leading educational visits. There are national standards for staff that want to lead adventure activities and the adviser will offer support and advice in that area. The EVC and Head Teacher will assess the competency of members of staff to lead and fulfil specific roles in any educational visit or learning outside the classroom experience.

NG 3.2d, 4.4a Approval of Leaders https://oeapng.info/download/1084/

4. Procedures for all Standard and Enhanced Visits

All visits require planning, preparation and approval. This varies according to aspects of complexity and distance. Staff should become familiar with the OEAP guidance website. The **SIX risk management** variables must be considered in the planning, management and delivery of visits. More information on these

principles is described in Section 7: Risk Management and in the OEAP National Guidance. Visits fall into one of two categories as outlined below:

NG 1b Foundations https://oeapng.info/download/2826/ NG 9a The Radar https://oeapng.info/download/2826/



Standard Visit Procedures:

These are straightforward or routine activities on-site or off site, which can be covered by standard operating procedures and risk assessments. These should be reviewed and revised where there are changes.

Enhanced Visit Procedures:

These visits of enhanced complexity will require more detailed, careful planning and management. Such visits may include visits outside of the local area. All visits are required to be planned and sent to the EVC, and will then be approved by the EVC and Head Teacher. The EVC can provide advice on these visits if required. Approval for visits of greater complexity will require advanced consultation and discussion before undertaking any detailed planning. Initial preapproval should be embedded within the school educational visit processes.

E visit; Web based Educational Visits educational visits management resource and tool.

BCC Education Services are now running an on-line notification system, which is a web-based educational visit planning, management and notification system. This can support the work of EVC's and Head Teachers. All BCC and those schools that have an SLA with BCC ESS for Educational Visits and Learning Outside the Classroom can have access to this resource. Support from Advisers can be sought.

5. Consent for Visits

It is important that informed consent is gained in advance of any external visit or activity by providing and communicating information to the parents as regards the visit.

NG 4.3d Parental Consent https://oeapng.info/download/1264/

6. Risk Management, Planning and Preparation:

This involves a careful consideration of the questions below

- Identify the significant issues or potential risks on this visit that young people, staff or helpers are exposed to.
- What are the actions (control measures) that you can put in place to mitigate the risks to an acceptable level.

Thorough preparation for a visit must be undertaken. The EVC and the Head Teacher should be consulted regarding the arrangements, nature and purpose of the visit. The key points below for all visits should be addressed in the planning:

Key Points for all visits:

- All Educational Visits must have clearly identified aims, benefits and objectives.
- All Educational Visits must have an approved competent Visit Leader.
- The Head Teacher/Senior Manager/ EVC makes the approval for an Educational Visit and for the designated competent Visit Leader role.
- All visits must provide evidence of a prepared written risk assessment.
- Visit Leaders must be able to access all supporting information relating to the visit, e.g. emergency contacts, itinerary, names and group detail.
- EVC's must retain and record all supporting information centrally.
- Parents must be fully informed of all arrangements and costs.
- All necessary permission/consent slips must be obtained.

The following must be addressed in further planning:

- Matters of supervision, Provider checks, content of the day(s) activities, first aid and transport must be considered and organised in advance.
- Planning support, notification forms, provider statements, checklists and generic risk assessments can be accessed through school resources intranet and information on the OEAP Website below:

Outdoor Education Advisers Panel Website www.oeapng.info

NG 3.3e Checklist Visit Leader https://oeapng.info/download/1100/

NG 4.4f Checklist Assessing the Provider https://oeapng.info/download/1154/

NG 4.4g Selecting External Providers and Facilities

https://oeapng.info/download/4431/

NG 8q Provider Statement (Word Version) https://oeapng.info/download/1268/

The 6 main considerations in undertaking risk assessments are:

- Type of Group; characteristics, age, competence, fitness, special, medical and individual needs
- Staffing: competency, experience, qualification and ratios
- Equipment; quality and suitability
- Venue/Activities Environment; Location, conditions, weather

- Travel; distance from base, support
- Emergency Procedures

Considering these issues as themed considerations can facilitate the process and professional collective discussion.

Risk Assessments and planning should be in place and must be passed on to the EVC/ Head Teacher/Senior Leader as follows:

All standard and enhanced visits at least 4 weeks prior to the visit..

A copy of all Risk Assessments and planning will be retained by the EVC and copies should be able to be accessed on all visits.

NG 4.3c Risk Management - An overview https://oeapng.info/download/1144/ NG 4.3e Risk management - What to Record and How https://oeapng.info/download/2684/

7. Group Management and Supervision

Full details about group management, ratios, supervision of group, medical conditions, are all found via the Visits Leaders Role buttons on the OEAP National Guidance website.

Decisions with regard to staffing and suitability of visits will consider:

- The nature and duration of the visit and the planned activities;
- The location and environment in which the activity is taking place;
- The nature of the group including the number of students and their age, sex, ability and needs; (behavioural, medical, emotional and educational).
- Staffing ratios are a risk management issue, and will be determined through the process of risk assessment detailed in section 7.

NG 4.3b Ratios and Effective Supervision https://oeapng.info/download/1142/ NG 4.2a. Group Management and Supervision https://oeapng.info/download/1138/

8. Behaviour and Inclusion

The School's inclusion policy and behaviour standards will be applied to all visits. For purposes of inclusion, specific advice on this issue is contained in the document below. Each visit leader must consult with the relevant member of the SLT/EVC to ascertain any issues relating to the individual, special, medical and behavioural needs of students.

NG 3.2e Inclusion https://oeapng.info/download/1086/

9. Safeguarding

All adults involved have a duty of care and responsibility to promote the safety and welfare of the children and young people in their care. This includes during outdoor leaning and off-site educational visits. Leaders should follow and familiarise themselves with the guidelines provided in the School's Safeguarding Policy. Visit Leaders should liaise with the DSL to ensure they are informed of any children who may be particularly vulnerable or have specific safeguarding needs. They should further ensure the other staff/adults are made aware as necessary as well as using these considerations within the risk assessment and management process.

4.3e Safeguarding https://oeapng.info/download/1288/

10. Pre- Checking Venues and External Providers

The suitability of the venue must be researched. This includes checking if the providers are able to meet the intended learning outcomes and group needs. (See Risk Management: Section 7)

NG 4.4f Checklist Assessing the Provider https://oeapng.info/download/1154/ NG 4.4g Selecting External Providers and Facilities https://oeapng.info/download/4431/

11. Quality Badges Accreditation and Licencing

Birmingham City Council and the OEAP endorse and support the use of the Council for Learning Outside the Classroom (CLOtC) Quality Badge. https://lotcqualitybadge.org.uk

Therefore the organisation that holds this award provides a quality or safety 'benchmark' that is externally verified. Similarly this is the case if an Outdoor provider has an Adventure Activities Licencing Authority (AALA) licence where safety paperwork does not need to be examined. If a Provider does not hold an external accreditation or verification they should complete the Providers Statement below. If in doubt consult your EVC or Adviser.

NG 8q Provider Statement (Word Version) https://oeapng.info/download/1268/ NG 3.2f AALA Licencing https://oeapng.info/download/1088/

12. Adventure Providers National Accreditation

Reference should also be made to nationally accredited provider schemes including Adventure mark and AHOEC Gold Standard and other national governing body centre approval schemes. If in doubt consult your EVC or Adviser.

Note: Notification is required for Adventurous Activity visits.

13. First Aid Procedures

The need to have a first aid trained member of staff on the visit will be dependent on the nature of the visit. This includes

The nature of the group and activity

- Potential injuries associated with the activity
- The extent to which the group is isolated from emergency procedures A basic level of first aid support must be available at all times. First aid and other medical needs should always be considered in the process of planning and Risk Assessment of any visit. Where possible it is desirable that visits will be staffed with one member of staff who is first aid trained, though this may not always be possible. This will require that one or more of the staff leading the activity:
 - 1. Knows how to access, and can access, qualified first aid support.
 - 2. Has a working knowledge of first aid and is competent to use the first aid materials carried by the group.
 - 3. For children in the Early Years Foundation Stage (EYFS), there is a statutory requirement that at least one person who has a current paediatric first aid certificate (This has been temporarily modified by the Government during the COVID-19 outbreak).
 - 4. Consideration should be given to medical issues when travelling particularly when there are, for example, more than 2 coaches or the party is not travelling together.
 - 5. Where a group is in an isolated location or there is some remote supervision e.g. D of E there should be a qualified first aider available as support. This is part of the risk management process.
 - 6. This policy should be read in conjunction with the school's first aid medication policies including the consideration of Epi-Pen and asthma policy. Spare asthma relievers and adrenaline auto injectors within their expiry date can be carried as an emergency backup.

NG 4.4b First Aid https://oeapng.info/download/1148/

14. Emergency Procedures, Incident and Accident reporting

The school has a robust and clear emergency action planning procedure in place in the event of an emergency. Every visit leader and assistant leader must be familiar with emergency planning procedures and reporting mechanism. All staff should

- Receive induction and training to understand and operate this process.
- Be familiar with the plan and have easy access to key information and resources.
- Be competent to fulfil their role in an emergency.
- Complete reporting and recording process in the event of an incident, accident or emergency events.

There are four categories dependent on the nature of the incident.

Incident: This can be dealt with within the visit team. There may be communication with the base contacts.

Emergency: This is beyond the coping mechanism of the team and requires base support. The emergency action plan for visits can be activated. The school takes control of the situation. Advice can be sort as needed.

Critical Incident: This is beyond the coping abilities and strategies of the visit team and the school base support. The employer takes control of the situation to support the visit team, participants and school. Critical Incident contact numbers are used

Major Incident: This is declared by the Police (in the UK) or authorities if outside the UK.

This policy integrates into the School Emergency plan, which addresses all emergencies.

Section 4.1 Good Practice OEAP National Guidance guide NG 4.1b Emergencies and Critical Incidents - Overview https://oeapng.info/download/4697/

NG 4.1d Emergencies and Critical Incidents – Guidance for Establishments https://oeapng.info/download/4713/

NG 4.1c Emergencies and Critical Incidents – Guidance for Leaders https://oeapng.info/download/4725/

15. Transport

National Guidance contains full information for cars, minibuses and public transport. Please ensure that you request and book minibus transport at least four weeks in advance of the visit. Coach transport should be considered and booked at the earliest opportunity.

NG 4.5a Transport General Considerations

https://oeapng.info/download/1162/

NG 4.5b Transport in Minibuses https://oeapng.info/download/1164/

NG 4.5e Hiring a Coach https://oeapng.info/download/2869/

NG 4.5d Seat Belts and Child Restraints https://oeapng.info/download/2540/

16. Participant Information and Data Protection including the Use of Photography and Video

It is vital for the health, safety and welfare of all those involved in visits that relevant, pertinent and up to date information is available to leaders and external providers for effective planning and in the event of an emergency. Personal data and sensitive information should be available to those that need but this data should be treated carefully and kept secure. There should be a consideration of how this is carried and also disposed of securely when no longer needed. Staff should refer to the relevant polices and procedures relating to data protection, photography, video's, the use of mobile phones, cameras and other similar devices when on a school visit. Correct permissions for usage should be sort with a due regard to safeguarding considerations.

NG 4.4j Participant Information and Data protection

https://oeapng.info/download/2545/

17. Evaluation

Staff should follow the school evaluation procedure. They should complete an evaluation to aid and inform future visits. Involvement of young people in this process would always enhance the evaluation. A copy of the evaluation is to be sent to the EVC no more than three days after the visit. This is an important part of the educational visit process and allows practitioners to reflect on practice, achievement and learning outcomes. How did it go in terms of planning supervision risk management? Were there any incidents or accidents? What worked well? What did not work so well? Collective visit team evaluation is valuable. What learning needs to be shared with colleagues?

18. Insurance

The school has comprehensive insurance. Prior to any external visit we will check to ensure it covers all aspects that you will require cover for. *Read the small print carefully*. Double check natural disaster and pandemic clauses in the insurance and what the policy covers for visits that take place within the UK and overseas. Information with regards to insurance should be provided for and checked by visit leaders in consultation with the EVC. This section refers to insurance specifically related to learning outside the classroom and educational visits that are usually offsite. Other general insurance aspects including for example, public liability, employer's liability, professional indemnity and motor vehicle insurance should be sourced from the business manager or financial officer as well as the Local Authority, your employer or Trust.

NG 4.4c Insurance https://oeapng.info/download/1150/ Reference: BCC Education Safety Service 'Educational Visits and Learning Outside the Classroom Policy and Guidance 'Section 14

19. Finance

All financial aspects for a visit must follow clear school processes and guidelines including timely budget preparation, accounting and collection of monies. Parents / Carers must have sufficient notice of charges to enable them to make payments, and communication should including the detailed timelines for payments.

Parents / Carers should also be told of any arrangements that the school may have for any young people that need support with the cost of any visit.

NG 3.2c Charging for School Activities https://oeapng.info/download/1082/ BCC Schools Financial Manual and Guidance

20. Inclusion

Principles:

• There is a presumption of the right or entitlement for all young people to participate in the activities offered by the school.

- Accessibility through direct or realistic adaptation or modification.
- Integration through participation with peers.

It is unlawful to:

- Treat a young person less favourably
- Fail to take reasonable steps to ensure that disabled persons are not placed at a substantial disadvantage without justification
- Expectations of staff must be reasonable, so that what is required of them (to include a given young person) is within their competence and is reasonable

Any difficult decisions should be supported by the EVC, SLT Head Teacher and should be recorded carefully.

NG 3.2e Inclusion https://oeapng.info/download/1086/

21. Coronavirus

Due consideration should be given to managing and planning activities during a pandemic and as the world comes out of a current crisis. Marsh Hill Nursery School will follow relevant Government, Local Authority and Employer guidance. Standard operating procedures should be reviewed to take into account any precautions that need to be made. This particularly relates to social distancing, group sizes, personal protective equipment, hygiene whether indoor or outdoors, onsite or off site. Venues should be considered that offer minimum interaction with the public and other groups from other establishments.

The same attention should be given to hygiene outdoors as well as indoors

- Wash and sanitize hands including when going outside
- Wash hands before and after touching shared objects such as activity equipment
- Wash hands before eating, after using the toilet
- Wash hands after getting on and off transport such as a minibus and when returning inside
- Avoid touching objects shared by the public including doors and gates where possible
- Avoid activities that involve touching each other
- Sanitise equipment before usage

Staff should have available antiseptic hand gel, antiseptic wipes, tissues, bags for waste, gloves and facemasks, disposable aprons and eye protection for administering first aid.

NG Coronavirus 4.4k https://oeapng.info/download/4835/

22. Help Support and Monitoring

Support, Advice and professional discussion are available from the EVC. The Head Teacher with the support of the EVC monitors Educational Visits in terms policy process and practical field visits. The EVC can seek additional support from the Educational Visit and Outdoor Learning Advisers.

Current Education Visit Advisers

Tom.Lilley@shapestone-oc.co.uk 07980 266367 Richard.Batty@shapestone-oc.co.uk 07432 053936

Advisers monitor notifiable visits on behalf of Birmingham City Council as the employer. The school has an SLA with BCC Education Safety Services. The Advisers offer help, advice and support as full and accredited members of the Outdoor Education Adviser Panel.

Woodcock Street School is supported also by BCC School and Governors Support, which covers Critical Incident Management

First point of contact: 0121 303 2541 (O8.30 -16.15)

Email school.support@birmingham.gov.uk

Out of hours Incidents (16.15- 0830) BCC CCTV Control Centre 0121 303 4149 Ask for the resilience duty officer

23. References

- Outdoor Education Advisers Panel National Guidance for the Management of Outdoor Learning, Offsite Visits and Learning Outside the Classroom https://oeapng.info
- 2. NG 5.3 How to Write an Establishment Visit Policy (This needs to be read at the same time as the template policy to guide you) https://oeapng.info/downloads/policies-planning-and-evaluation/
- 3. Department for Education DfE Guidance November 2018: Health and Safety on Educational Visits

 <a href="https://www.gov.uk/government/publications/health-and-safety-on-educational-visits/health-and-safety
- 4. Health and Safety: Responsibility and Duty for School https://www.gov.uk/government/publications/health-and-safety-advice-for-schools

Appendix A Roles and Responsibilities

EVC

- Be a champion for all aspects of educational visits and outdoor learning
- Challenge colleagues across all curriculum areas to use visits and outdoor learning effectively and contribute to the well-being of all.
- Supports and Oversees planning within employers and school/academy requirements and timescales
- Supports and advises colleagues in planning visits
- Mentors leaders and aspirant leaders supporting their on-going training and development
- Oversee and support visit monitoring identifying any training needs

- Keep their EVC qualification and training up to date
- Support your Head Teacher and Governors / Trustees in approval situations
- Ensure the visit or activity is evaluated against its aims for learning and development
- Keep your SLT and Governors/Trustees informed about visits/outdoor learning taking place and their contribution to establishment effectiveness
- Liaise effectively with your Educational Visits and Learning Outside the Classroom Adviser for help, support, training and guidance
- Comply with any employer or national guidance including the OEAP National Guidance www.oeapng.info
- Monitor the school/academy educational visit process procedures and policy and report to the Head Teacher and SLT
- Ensure all visit leaders have access to emergency contacts and protocol
- Ensure there is adequate insurance particularly for residential and overseas visits
- Ensure that all child protection, safeguarding and inclusion issues are considered.
- Ensure that any requirement from the employer for notifying or submitting a visit or activity for approval is followed

Visit Leader

- Be specifically confident and competent for the type of visit and activities you plan to lead
- Be approved by your employer/school/academy to carry out the lead role
- Choose the most appropriate environment for learning or development outcomes.
- Liaise with the EVC to clarify any visit aspects
- Complete any relevant procedure, documentation and approval process.
- Ensure effective supervision
- Lead on risk management including collective discussion with the visit team
- Define the roles and responsibilities of other leaders and helpers that are part of the visit /activity team
- Ensure activity leaders are competent
- Ensure child protection and safeguarding issues are considered
- Ensure there is clear provision for any age, health, medical, individual, special or behavioural needs for pupils and staff team
- Provide relevant visit information to other leaders including aims of visit
- Ensure parental consent has been obtained
- Ensure access to first aid
- Ensure all leaders have access to emergency contacts and protocol
- Evaluate all aspects of the visit
- Report any accidents or near misses
- Appoint a competent deput

Head Teacher For Detailed Role and Responsibilities go to: NG Head Teacher 3.4g https://oeapng.info/download/1124/

- The Head Teacher should oversee and provide the overview in terms of competent support for educational visits within the school or academy
- The Head Teacher mirrors the responsibilities of the EVC although many of the roles are delegated to approved competent person

Below are the very detailed roles and responsibilities from the OEAP National Guidance document referenced:

- The Head Teacher should oversee and provide the overview in terms of competent support for educational visits within the school or academy
- The Head Teacher mirrors the responsibilities of the EVC although many of the roles are delegated to approved competent person
- Ensure you are familiar with your employers policies for educational visits and learning outside the classroom
- You ascertain that all visit leaders are appropriately competent, confident and accountable to carry out their roles and responsibilities.
- You have clearly identified either yourself or a suitable member of staff as the EVC and that the designated person meets the employer's requirements including undertaking EVC training.
- You have access to expert advice such as from a competent outdoor educational visits / outdoor education adviser
- Details related to off-site activities and visits (including personal details of both participants and leaders) are accessible at all times to designated 24/7 Emergency Contacts in case of a serious incident;
- There are suitable emergency procedures in place for each visit, and your establishment has an Emergency Plan for off-site visits, including procedures to procedures to procedures are appropriately informed in the event of a serious incident;
- All activities and visits comply with this guidance are notified or submitted for approval as required
- Outdoor learning is included within the process of self-evaluation providing evidence that may support how it contributes towards providing evidence that may support how it contributes towards school improvement and overall effectiveness;
- If you are not leading the visit, you should follow the instructions of the designated Visit Leader (who should have sole charge of the visit);
- When you take part in a visit or activity, you and other members of the Visit Leadership Team are clear about your role;
- If you are not leading the visit, you should follow the instructions of the designated Visit Leader (who should have sole charge of the visit);

- Suitable child protection and safeguarding procedures are in place, including vetting at an appropriate level of all adults including volunteers, helpers and visitors
- You have assigned sufficient time for leaders to organise activities and visits properly; [SEP]
- You support an apprenticeship/succession planning culture to ensure sustainable activities and visits and the development of competent leaders and EVCs;
- You support your EVC in ensuring that: all activities and visits are
 effectively supervised with an appropriate level of leadership, information
 has been shared with parents and consent has been given if required;
- Arrangements have been made for the medical needs and special educational needs of all participants and staff;
- Inclusion issues are addressed
- Suitable transport arrangements are in place and meet any regulatory guirements;
- Suitable Insurance arrangements are appropriate;
 [1]
- You obtain best value. Consideration must be given to financial management, choice of contractors, and contractual relationships;
- Where charges are made to parents, these are within legal and employer requirements;
- Proper procedures are in place to account for the visit finances;
- Establishment policy identifies the types of visit that require a preliminary visit state yet staff; state yet a preliminary
- Risk Management is proportionate, suitable and sufficient.
- Where the activity or visit involves a third party provider: appropriate checks have been made and assurances obtained, a clear contract is in place setting out what the contractor is to provide, the provider holds sufficient indemnity insurance
- All visits are evaluated against their objectives this should also cover best value, teaching and learning, quality of experiences, addressing issues raised by any incident, and informing future visits;
- There are contingency plans in place to deal with changing circumstances during a visit (Plan B);
- Serious incidents are reported to the employer as required by your employer's guidance, meeting the requirements of RIDDOR.