

OPERATIONAL AND SAFETY POLICY

‘All outdoor recreation involves some level of risk. Visitor risk management is the systematic identification, analysis and control of the broad range of visitor risks. A risk, in the broadest sense, involves exposure to an unintentional event or situation that can cause a loss. Foresight is essential in risk management because, by being proactive, it is possible to reduce the level of risk. ...only through thoughtful action can an organisation reduce the probability of a risk and limit its negative consequences.’

*World Tourism Organization: Sustainable Tourism
in protected Areas: Guidelines for Planning and
Management, Madrid, 2004.*

Overview

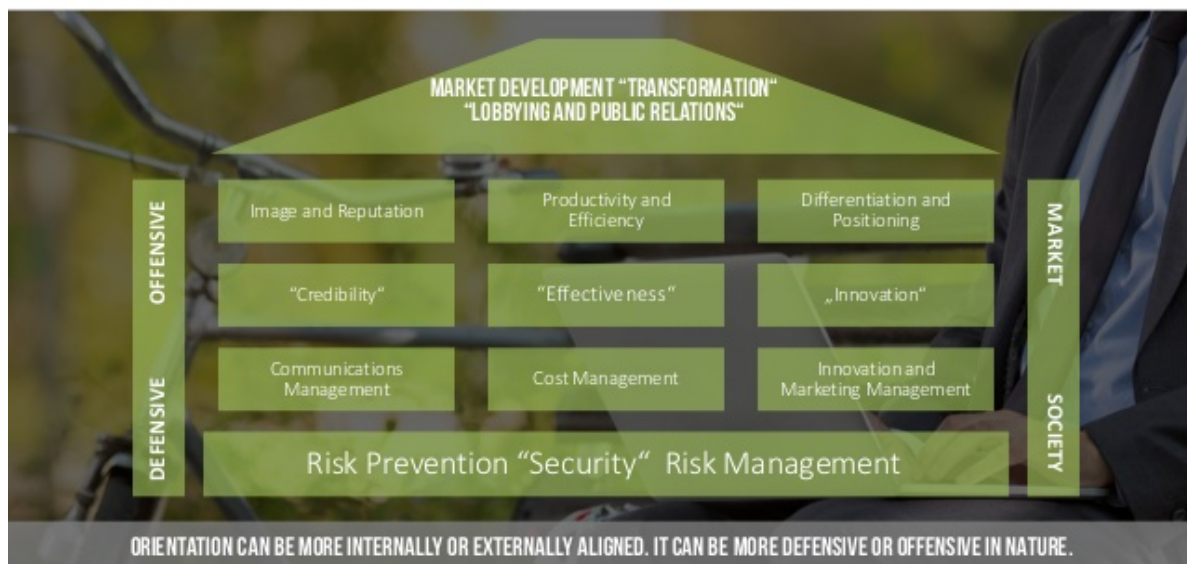
Safety and quality are cornerstones of our work and drive our business development. We are committed to employing an integrated and preventative Operational and Safety Policy and ensuring that everyone we work with – whether client, guide or dog - is protected from all forms of harm, whether physical, environmental or psychological. Hence, we work hard to develop a general awareness of risk within our client and guide groups and to evolve common sense on all levels. Risk assessments are available for general reference, as are the control measures we have in place¹.

The following general factors are in place and form part of our philosophy:

- ☐ Safety is a culture not a dogma and sits at the heart of all we do;
- ☐ Staff are trained and experienced and have a full understanding of their operating environment;
- ☐ Staff strive to adopt relevant industry best practice via continuous professional development and networking.
- ☐ Mentoring and supervision is in place to develop staff;
- ☐ A transparent and open no blame culture exists for all operational and safety matters

SUSTAINABILITY STRATEGY

Strategy Selection



(Representation based on Carl Ulrich Gminder, 2006)



Activities are always planned with safety in mind and we operate without the expectation that a rescue service is available. Operations are planned for self-sufficiency through the use of sound planning, quality equipment and trained personnel.

Whilst we use only modern, correctly maintained equipment and put a great deal of emphasis on staff training, participants must still accept a certain element of risk during their safari since we cannot control everything about the dogs and the Arctic environment. If weather or group needs dictate, we reserve the right to change or, very occasionally, even cancel, activities to ensure everybody's safety. If individuals are placing themselves or the group at risk by their actions, we also reserve the right to remove the person, or persons concerned, from the activity².

All of our social, environmental and ethical risks are reviewed as part of our risk assessment process. The impact and materiality of each risk area is considered and appropriate measures are taken to manage or mitigate them. In so doing, our activities are continually reviewed and improved in order to reduce environmental impact as far as possible.

Each year, our farm is inspected annually by inspectors from Finland's department of Health and Safety as well as by our local vet. Between them, they check the welfare of the dogs, consumer protection standards and general product safety. They inspect our risk

¹ ECOT A2 Legal Compliance

² ECOT A2 Legal Compliance

assessments, operating guidelines, safety equipment, safety procedures and liability insurance. Our company is known for having one of the most comprehensive safety plans of any safari company and we have been told on more than one occasion by inspectors that it is always a pleasure to come to our farm since it is easy to see that the dogs are happy, healthy and well cared for and that the guides are positively energised and working within well-defined systems³.

Whilst our company is known for having one of the most comprehensive safety plans of any safari company in the region and inspectors comment on the dog welfare standards and the well-defined systems within which the daily work life operates, the current legal standards do not really protect dogs or clients as well as they maybe could. That being so, we are working on a number of projects, some EU-funded, which are designed to address this and to take official standards to the next level⁴.

One such project is Finland's Travel Safety Passport Project which Anna and Pasi both took part in and became instructors for. Anna had previously organized a number of risk assessment and outdoor safety training courses in the UK through the Royal Geographical Society where she worked, and had also been part of the development of British Standards BS8848 (Specification for the provision of visits, fieldwork, expeditions and adventurous activities outside the United Kingdom) so risk and safety planning is an area of expertise within the business.

Another EU project which they helped to set up and in which they participated was designed to drive higher safety and quality standards within husky companies in the area. Dog sledding is considered of low importance, at present, when it comes to decision making by those in the Ministry of Forestry and Environment. Whilst it makes sense to us that reindeer herders have high priority in decision making, it is unclear why snowmobiling takes priority over more natural activities like sledding and skiing – particularly given that dog sledding is one of the key drivers of international tourism in the region. Since our destination's stated development goals are to maintain the integrity of the area and the natural lifestyles it supports rather than becoming an alpine-style holiday resort, building bridges and understanding as to why dog sledding operations should be taken into consideration when making decisions about area use targets is of vital importance to the long-term sustainability of the region⁵.

Legal Governance

Finland's government has the responsibility not only for our economic health, but also for the overall good of our citizens and visitors. Various legislations are in place which cover public health and safety, environmental health and so on – although these generally deal with the minimum requirements expected of a responsible tourism industry. These have to be balanced against the needs of the private sector whose primary concern may be the sustained economic viability of their industry.

A sustainable industry approach to dog sledding needs to protect both shared resources and the reputation of the industry from abuse by private sector members who may not have the industry and the public's best interests in mind. To that end, developing and adopting self-imposed 'industry standards' w.r.t. quality and safety – effectively 'raising the industry's bar' – will have positive impacts long term. Whilst these can only be legally enforced when the requirement is also named in tourism legislation, adhering to self-regulated standards may be a condition of membership in certain organizations, certification or labeling, or a condition of being advertised by a particular industry association.

Some examples of tourism-related legislation are:

- ☐ Travel and Tourism Act & Regulations
- ☐ Health Regulations for Hospitality Operations
- ☐ Regulations for Food Service Operations
- ☐ Fire Safety
- ☐ Firearms Safety
- ☐ Wildlife Act
- ☐ Parks Act and Regulations
- ☐ Environmental Regulations
- ☐ Fishing Regulations

Legislation in Finland

- ☐ Valtioneuvoston asetukset pelastustoimesta (787/2003). [Pelastustoimi](#) (rescue legislation)
- ☐ [Valmismatkalaki](#) (28.11.1994/1079). (package tour legislation)
- ☐ [Terveydensuojelulaki](#) (763/1994): (health protection legislation)

Tourism safety



Tourism safety enhances the competitiveness and fluent operations of businesses as well as increases the travellers' feeling of safety and security.

The competitiveness of Arctic tourism is based on the sustainable use of nature. The safety network is built on cooperation and trust among the stakeholders and respect of local involvement and culture.

Safety is an essential part of quality in tourism businesses. Networking and the sharing of expertise brings added value to the participating companies.

Tourism safety tools:
www.tourismsafetytools.fi
www.arcticguide.fi

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Civil safety



Civil safety concerns inhabitants' safety and security as well as wellbeing. Civil safety and security channels local and regional resources in cooperation with regions, inhabitants, organisations and businesses.

The effectiveness of cooperation is based on the management of existing resources and shifting emphasis from reactive to preventive work.

Civil safety is developed in close cooperation with local SMEs. The approach is based on the award-winning model EPSA 2013.

Municipality tuning guide:
<http://www.lappt.fi/en/living>

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Safety through regional and interregional cooperation

The aim of the Arctic safety cluster is to strengthen interregional networks and safety business opportunities. The cluster brings together companies, authorities, research and educational organisations, NGOs, regions and towns. The cooperation is carried out in civil and tourism safety.

³ ECOT A2 Legal Compliance

⁴ ECOT A2 Legal Compliance

⁵ ECOT A2 Legal Compliance

- ☐ [Laki kulutustavaroiden ja kuluttajapalvelusten turvallisuudesta](#) (30.1.2004/75). (Product Safety Act).

MONO ([Matkailun Ohjelmajärjestelyjen normisto](#)) / Tourism program service norms includes guidelines for tourism related to:

- ☐ Snowmobiling
- ☐ Nature recreation /moving in nature (summer/winter) and cross-country skiing o Adventure and experience activities
- ☐ Riding and biking
- ☐ Water activities

Lapland has a strong tourism brand, the maintenance of which requires hard work. If an accident occurs on the safari of a Lappish tourism company, it can affect the entire Lapland tourism industry. For this reason, Lapland's tourism operators and security stakeholders have created a safety network which aims to ensure the safety of tourism services. The initiative to develop provincial-wide tourism safety through an Arctic Security Cluster came from tourism companies and was then developed by, and is still coordinated by, the Lapland University of Applied Sciences / Tourism Research and Training Institute (MTI). The cluster includes Lapland's research and education organizations, companies, authorities, associations and municipalities, which together develop the safety of the tourism industry and everyday life in Lapland.



As most of Lapland's tourism companies are micro-enterprises, this network-like development enables companies to learn from each other and to develop the security of their services together. Most of the work in the security cluster focuses on prevention, and aims to ensure the smooth running of the tourism industry, providing security tools for travel businesses, and providing training (such as the Arctic Guide course). Most of the tools are published in both Finnish and English, in recognition of the internationality of arctic guides and include, for instance, contract security guidelines since expensive litigation in a foreign court can lead to the bankruptcy of a small business. A tourism crisis communication network can also make key players immediately aware of any safety issues that have occurred, thereby allowing facts-based and effective crisis communication.

The REILA project, implemented together with the Lapland Rescue Department, Metsähallitus and 14 Lapland municipalities, developed the safety of outdoor routes by improving route markings and rescue practices and locating signs which were introduced also into the Road Traffic Act.

MTI also implemented a project with the support of the Rural Development Fund (on our recommendation) to promote the welfare of animals used in tourism and to increase the skills of entrepreneurs.

In the international arena, Lapland University of Applied Sciences represents Lapland in the interregional *Digitalisation and Safety for Tourism* partnership. In it, Lapland University of Applied Sciences and Lapland stakeholders co-operate with other European tourist areas to attract investment. Despite the tremendous growth in tourism, Lapland is still a relatively small tourist destination. The partnership has brought Lapland to the same negotiating tables with large, traditional tourist areas and operators, and has also brought Lapland into contact with NECSTouR, a major pan-European tourism advocacy organization and many Laplanders have been invited to attend and speak at EU events and Lapland has been well represented at the European Tourism Forum and European Tourism Days.

International cooperation requires a lot of work to access and benefit from networks. "Compared to other Europeans, Finns are more result-oriented; international co-operation requires perseverance. International networking requires meetings, travel, increasing the carbon footprint with air travel, and therefore there must be clear goals for each trip," says MTI Project Manager Eija Raasakka. The aim of international cooperation is to obtain direct investment financing and growth opportunities for Lapland's companies. One example of successful international cooperation is the ARCSAR project, which received Horizon 2020 funding in the autumn of 2018 to work with 21 European partners to develop Arctic and northern maritime safety and disaster preparedness in the region.

Safety Planning

Safety is a part of quality. Our comprehensive safety plans ensure that we have the necessary skills and equipment for carrying out each of our products safely and knowing what to do should emergencies arise. Safety planning covers everything from staff to dog to client welfare. The Company Directors are responsible for ensuring that the systems laid down in this document are adhered to. Regular quality checks are in place to ensure the maintenance of this policy and the company's operational systems. In addition, our safety folder is made available to all full time staff and they are responsible for following the systems for their area of operations⁶.

The systems in place are common sense and logically laid down. They ensure that both safety and quality are maintained at the highest levels, ensuring that Hetta Huskies continues to have a name associated with high quality as well as safe and enjoyable products. Having said this, maintaining and transferring knowledge about company procedures is difficult in all companies and this is a particular challenge when there are changing seasonal staff. In addition to our comprehensive autumn training period⁷, therefore, we rely on a combination of communication through targeted whatsapp groups, staff briefings; setting daily reading targets and training sessions to get and keep staff up to speed in terms of quality and safety. In the winter season, for instance, we have daily briefings for staff which incorporate weather forecasts as well as an overview of the day's products so that people can plan and prepare for changing conditions. Similarly, we have daily feedback sessions at the ends of the day if there are learnings that need to be extended to a wider group.

Safety is a common interest for the whole destination and has to be dealt with holistically, in both the destination and in the company. The customer tends to use many services in the region; transportation, accommodation, dining etc. and program services are only one element. The safety journey normally starts when the customer looks at the information on our website or contacts a tour operator. After booking the trip, the customer receives information concerning the activities and their safety in the location (driving license regulations, how to dress in cold weather etc). The safety process for customer continues as he/she arrives to the destination, uses transportation to the hotel / our farm and engages in activities etc. The guides are responsible for the reception of the clients and the delivery of safety information relevant to the type of safari they are taking part in. For sledding, they receive a lecture about safety and snowmobiling, the rules and behaviour, signs etc. If the customer is struggling to access the information because of a language barrier, we have the sleigh driving instructions translated in an app available in over 20 languages and the farm tour itself in c.6 languages.

Our customers take safety for granted. They need to feel as comfortable as possible and to not need to have to worry about any external factor outside his/her visiting purpose. They should not notice any safety issues or problems because they should have been well taken care of in advance. For our staff, safety means that they have a good working environment and that they do not have to fear any accidents, injuries etc. A product or a service cannot be of good quality if safety is not handled well⁸. There is a feedback reporting included in the quality system. For example accidents and other abnormal activities, deficiencies and customer complaints are reported there. The information can be reviewed afterwards to see whether there were corrections made based on the reports⁹.

All of our social, environmental and ethical risks are also reviewed as part of our risk assessment process; at minimum annually but also, following any key development. This keeps the systems at an appropriate level in relation to the volume and diversity of our products. The impact and materiality of each risk area is considered and appropriate measures are taken to manage or mitigate them. In so doing, our activities are continually reviewed and improved in order to reduce environmental, cultural, etc impact as far as commercially viable and new targets are set annually.

Our technical advisor who assists with our cold-safety planning is Dr. Paul Richards (UK) and our medical advisor is Dr. Patrick Peters (Benelux). Unfortunately, there is currently no remote medicine support system for either animals nor humans within Finnish systems, despite all of the learning potential from remote calling that could have been developed during Covid. I have approached both the lead veterinarians and the lead medical doctor of the region about this – and chased on a number of occasions - but in both cases, heard nothing back.

Staff should all

- ☐ Understand the importance of Risk Management Planning; be able to identify the essential components of a Risk Management Plan and Crisis Management Plan.
- ☐ Receive information and training about health and safety requirements and have access to the written health and safety policies and plans¹⁰.
- ☐ Understand the risks of the Arctic environment: hypothermia and cold injuries (what are the symptoms, how to treat them), snow and ice conditions, cold injuries and ensure that sufficient spare clothing and equipment is available for all reasonable eventualities. Guides should be prepared and vigilant in its avoidance but should also know how to recognize symptoms should they happen.
- ☐ Know the risk avoidance strategies that should be communicated to arctic visitors: the dangers of sunburn even when it's cold; getting enough sleep under a 24-hour sun; use of sunglasses to avoid snow-blindness; etc
- ☐ Be thoroughly familiar with local and regional health and safety regulations.
- ☐ Know their own capabilities and those of their clients linked to the dangers posed by the arctic environment and know how to act accordingly (for instance, although locals might take risks on Spring Ice, this is not something we should do with clients!)

⁶ ECOT A2 Legal Compliance

⁷ Green Activities 1.2 (I)

⁸ Green Activities 1.2 (I)

⁹ ECOT D.2. 3 Harmful Substances

¹⁰ Green Activities 4.1

- Plan 'far from help' journeys thoroughly in order to reduce risks, and increase self-sufficiency and survival chances through the use of trained personnel, quality equipment etc. Have a designated base manager who can receive emergency calls at all times.
- Understand the need for insurance; different kinds of insurance; how insurance rates are set; Understand our accident and near-miss recording systems and the challenges of how to record incidences appropriately¹¹.
- Understand the ways in which technology can enhance safety (cameras, communications, gear etc)

Safety training follows a SMART framework¹², with clear guidelines for impactful employee training. It includes first aid skills, the arctic safety value chain, directives (we call them situational cards) which provide guidance about what to do in different circumstances as well as in emergency cases and accidents; dressing for the cold, etc.

It is based on a range of developed presentations, one-on-one training against specific targets, a mentored self-training/continuation training programme and online assessments. It includes, for instance, periodic training on health and safety practices like the use of communication devices (e.g. radios/walkie-talkies, cell phones, satellite phones) and making sure that these are available and are used appropriately, a plan for emergency situations, including actions in case of accidents, fire etc. (emergency numbers, access to ambulance, fire extinguisher, first aid training). But it is not just about basic safety practices. Periodic training also covers things like customer service which can include training about optimising customer service according to customer needs, language skills, appropriate customer communications and behavior, etc.

We live in very litigious times in which people do not want to be responsible for their actions. The more professional a program we operate and the better the care we can provide at the scene of an accident and its follow up, the more reasonable the client is likely to be if they have simply tripped over a root because they weren't looking where they were going.

Risk Management Planning

'While any effective risk-management procedure has many purposes, the reduction of injuries being perhaps the most obvious, the issue of personal integrity and craftsmanship is also important. Good risk management is satisfying and rewarding – and integrity is reason enough for doing anything'. *Will Leverette*

We aspire to provide genuinely adventurous activities which have an element of real risk. We can only do this by having robust systems of safety and risk management. Each activity, whether land or water based, has been reviewed by operational staff, significant risks and hazards are identified together with action required and control measures for their mitigation. The Risk Assessments are reviewed on an ongoing basis¹³.

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World Tourism Organization: Sustainable Tourism in protected Areas: Guidelines for Planning and Management, Madrid, 2004.

Anna has run many courses in risk assessment and safety planning and has read all of the standard literature¹⁴ and both Anna and Pasi have been part of one of England's busiest mountain rescue teams and yet still actively encourage people to head into the wilderness - safely. Doing that responsibly in the arctic, however, demands a fairly advanced level of self-sufficiency and knowledge of local ways and customs and these are skills and knowledge platforms that we are keen to share.

Although we have a great deal of experience in standard risk management planning, we realized early on in the development of our husky-safari risk assessments that we would need to approach them in a slightly unusual way. Rather than develop risk management documents for each of our 2km, 4km, 6km, 9km etc safaris, (which would mean a) updating 10s of documents each time we decided to amend one thing, and b) making staff unlikely to really read each document with sufficient focus to pick up subtle differences between different operational needs), we have instead developed a series of modular risk assessments in which we identify, in separate documents, risks to staff, risk to dogs, risk to clients, risk to equipment, etc, which apply to all of our husky tours since so many of our programmes essentially have the same risk components.

Each of our day safaris, for instance, follow the same format. We prepare the dogs ready for the tour at the farm whilst someone else welcomes clients and gives them a tour of the farm and driving instructions. We then leave from the startline, carry out a tour which may or may not include a stop in a wilderness cabin, return to the farm and put the dogs away. Etc. It doesn't make sense to develop 10 pretty much identical documents – all of which would need to be updated should something new arise. Hence, we have identified common risks relevant to all, and assessed the level of each risk by considering exposure, probability, consequences and whether or not our control measures can eliminate or sufficiently reduce the probability or severity of the risk to allow it to go ahead. We consider the instances in which we may be able to transfer the risk through liability insurance or waivers and we monitor and review our risk management plans to see if our control measures have been effective.

We have still identified and analysed all possible risks (physical, financial), effectively stated how much risk is acceptable, who will manage it and what amount of risk the client is accepting and how they need to acknowledge that acceptance. We also have

¹¹ Green Activities 4,2

¹² SMART stands for specific, measurable, achievable, relevant, and time-framed

¹³ Green Activities 1.2 (I)

¹⁴ Eg *Legal Liability and Risk Management in Adventure Tourism*, by Ross Cloutier, provides detailed and easily understandable advice on preparing your Risk Management Plan. The World Tourism Organization's *Sustainable Tourism in protected Areas: Guidelines for Planning and Management*, also includes a succinct 'Guidelines for the Risk Management Process' (adapted from ANZECC), page 78. The Royal Geographical Society has a number of booklets specifically on Risk Management and Off-site Safety planning.

emergency/crisis management plans and much more. When we have a non-standard product, it has its own standalone risk assessment which takes into account the particular features of the itinerary itself. The safety plans are prepared in compliance with the legislation and are shared with Tukes and, indirectly, in terms of location access, with the Ministry of Forestry (but not with other third parties prior to route excursions)¹⁵.

We have looked at how to include digital liability waivers for various products including kit rentals and multiday safaris and have trialled incorporating these into the standard online booking process for all products but we haven't yet decided if this is the best way forward. The reliability of a Waiver can change from year to year. The extent to which a waiver protects a company in the case of a lawsuit has become increasingly complex. Additional factors include (but are not limited to) how and when the waiver was administered, whether or not the client really understand the risk, whether or not they felt coerced in any way, whether or not they felt like they had ample time to decide whether or not he/she was willing to accept risk. Where any lawsuit will be heard – whether in the country of the tour operator, the tour provider or the plaintiff is also a question of extreme importance because of its financial and legal implications.

Risk management is simply another area of competence that needs to be added to a person's tick list of outdoor skills. It ties together all the highly diverse components of outdoor education/recreation and complements the whole. As outdoor professionals, we have obviously spent a great deal of time in our lives focusing attention on the development our skills. The more obvious technical skills such as navigation, cold safety, dog handling are of great importance. However, strong interpersonal skills such as counseling (staff on staff), facilitation and conflict resolution are also essential within this profession.

We have route cards developed from both a staff and a client perspective for each of our key safari routes as well as for suggested activities that people can take part in during the summer - and these are accessible also through various apps. We talk about the skills and fitness needed to take part in our various tours in all of our marketing material and even go through the different skills and fitness levels needed for – and risks involved in the participation in - the SAME tours based on changing seasonalities¹⁶. We could work through and put visual difficulty codes against each tour to make this information more easily accessible in the next 12-24 months.

Kit lists are provided for both short and long tours and these are available in a number of different languages¹⁷.

¹⁵ Green Activities 5.3

¹⁶ Green Activities 5.4

¹⁷ Green Activities 5.4