Safety guidelines online

According to *EOTC – The Missing Manual*, '[the RAMS] form is used by almost all of New Zealands [*sic*] outdoor centres and professional outdoor instructors'. This statement comes indirectly off New Zealand's web resource, *Safe As Outside*, and for me it raises problems. First, I do not view the Risk Analysis and Management System as a universally suitable approach to planning; on the contrary, I associate RAMS forms not with qualified instructors but with trainees. Second, there has been little critical, thoroughgoing debate on the universal suitability of the RAMS. Third, official publications have presented the RAMS in an exclusive and compulsive way. (I refer to the Mountain Safety Council's *Managing Risks in Outdoor Activities*, 1993, the Ministry of Education's *Education Outside the Classroom – Guidelines for Good Practice*, 1995, and Outdoors New Zealand's *Safe As Outside*.) Fourth, I doubt the accuracy of the statement itself; and even if research were to show it to be true, I would want to investigate professionals' motives for deferring to the RAMS regime. Fifth, I would like to see the development of a style of documented risk management that is profoundly different from the RAMS. Finally, how are we to project credibility and dependability – professional polish – if we do not take care with apostrophes? But more on these points later.

'… there has been little critical, thoroughgoing debate on the universal suitability of the RAMS.'

Created partly in response to the Waihao River drownings and other recent outdoor tragedies, *Safe As Outside* (www.safeoutside.org) provides advice about safety on outdoor activities. It addresses itself to boards of trustees, school principals, teachers, parents, and students. I have seen it described as a brilliant safety-in-the-outdoors site. This essay will consider whether, in my view, that description is justified. It will first focus on two specific sections: 'Qualifications and Competency' and 'Outdoor Pursuits Guidelines'. It will then glance back at some guidelines and safety booklets of the past and at the way that dealing with danger changed in the 1990s. More clicking into *Safe As Outside* will then bring my discussion back to 2002 and the coming New Zealand Conference on Outdoor Risk Management.

But stay seated for a moment, before we set off. I said that *Safe As Outside* provides advice. An overview of that advice would help us on our way, and I might as well also drop a few more clues about the drum that I will be beating. *Safe As Outside* presents a Britannica of guidance. It expands on and revises the 1995 Ministry guidelines. It also includes mini-guidelines for specific outdoor activities, adapted from the Education Outdoors New Zealand 1996 publication, *Outdoor Pursuits – Guidelines for Educators*. It adds information, such as provider and instructor databases (under development), that was not in either of these older guidelines. In addition there's a section on how inclusive education fits into education outside the classroom (or is it the other way round?). There are one or two sentences I'd like to get my hands on, to change rubbish into English, and there are pockets of grotesque officialese, yet all the text is interpretable. So, can we congratulate the compilers of the website? Or have they merely created a

'*Safe As Outside* presents a Britannica of guidance.'

Flash and click version of the mid-1990s guidelines, with their basic failings reproduced? There was nothing in the old guidelines that could not be made a mess of again.

Before I try to answer these questions, I need to add a warning about our fast-moving world. Critiquing a website poses a problem that does not occur when reviewing printed matter: while you work on the critique, the website can change. Unnoticed changes can lead to apparent inaccuracies in the critique. *Safe As Outside* was updated while I worked on this essay, but I have tried to keep pace with these changes, up to July 2002. (A CD-ROM version of *Safe As Outside* is imminent, but this too may date quickly.)

One other thing: I will use the words 'awards' and 'qualifications' synonymously, when referring to the industry's mixed bag of leading, instructing, and guiding certificates.

Right. Once more unto the breach …

Deciding the standards of competence of EOTC staff

Perhaps the most perceptive and at the same time equivocal passage in *Safe As Outside* is one titled 'Qualifications and Competency'. A preamble recommends judging staff competence by using 'existing national body standards as benchmarks'. Then the page acknowledges that current practice in selecting suitable staff is often unsystematic, and that minimum standards of competence have always been ad hoc and arbitrary. But then comes the invitation to get lost in complexities: 'Competence can be found in experienced, voluntary leaders no less than incompetence in paid full-time professionals holding numerous awards.' Hey, ho … here we go. This is a sceptic's contribution, the sort of thing I myself would write (without the inept comma), to stir up a lively debate, and it would be difficult and pointless to pursue that debate without precise contexts. The mix of pragmatism and cynicism would only confuse. The experts are here taking the boards of trustees into the middle of the maze and saying, 'Here we are. Now find your way out.' Will that maze, insufficiently signposted, lead them anywhere except to further confusion and inconsistency?

Yet maybe the site has clear signposts. So let us see what cybersafety says on outdoor qualifications.

Named qualifications: now you see 'em, now you don't

Regarding qualifications for instructing activities such as rock-climbing and canoeing, at first sight *Safe As Outside* appears to venture where the Ministry of Education did not: it directly names minimum qualifications, at least for a couple of activities. Glance down the 'Canadian Canoeing' page: ' … moving water … NZOIA Level 2, NZRCA Canoe Instructor or equivalent'. At last! Clarity and precision. Then the let-out, the explanation of 'equivalent', the vagueness and ambiguity we're so understanding about in New Zealand: 'It is recognised that it may not always be possible for tutors involved in teaching canoeing to hold either of the instructor positions and consequently it recommends that [aaarrgh! English!] the staff involved in teaching canoeing and kayaking should show evidence of recent and extensive personal canoeing and instructing experience, preferably with a recognised club or canoeing association.'

'The experts are here taking the boards of trustees into the middle of the maze and saying, "Here we are. Now find your way out."'

This let-out, or perhaps we should call it a let-in, is the 1970s approach. It made sense in New Zealand until the recent growth of tertiary courses in outdoor recreation and outdoor education. But qualifications form a part of industry standards; if our statements on those qualifications are woolly and overflexible – even for apparently sensible and pragmatic reasons – our industry standards themselves become unclear. Don't misunderstand me. I value experience and will spotlight it later in this essay. But highly experienced people should pass award assessments comfortably, provided that they have no weak areas.

A couple of years ago the British Mountaineering Council's magazine, *Summit*, Issue 13, carried an article by Dave Phillpot, reflecting on his assessment for the UK's rockclimbing Single Pitch Award. His first sentence read: 'I have been a climber for fifty years, specialising in middle-grade routes in Britain, the Alps and California.' He went on to describe his assessment modestly and appreciatively. He didn't moan about the expense or the time involved. He didn't ask for exemption. He presented himself for assessment and even learnt something.

The way I see it, we should expect a similar attitude from would-be instructors in New Zealand. We don't need the let-out, the compromise, any more. It is a hangover from outdoor education's pioneer days. But this is a minor criticism. I congratulate whoever decided to specify the two Canadian canoeing qualifications.

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My sense of approval from spotting this breakthrough is short-lived because I next click my way to 'Rock Climbing Pursuit Guidelines' … I glance down the page, as a school senior manager might, seeking a statement on necessary qualifications … Zilch. You're looking in the wrong place, stupid. So I click the 'Tools and Templates' icon, look under the 'Managing Safety In EOTC' tree, open the 'Management' tree, and click 'Qualifications and Competency'. Aha! We're getting somewhere. Now I scroll down to 'Standards of Competence and their Assessment'.

My search halts. I am needing and expecting a simple naming of rockclimbing qualifications, but the information is not here. Instead, this web page conforms to its Ministry hard-copy predecessor; instead of naming qualifications, it transfers that responsibility to other organisations:

> Standards and qualifications for most outdoor skills have been established by the national governing bodies for each activity. Many of these bodies offer proficiency awards or certificates for instructors and leaders in mountaineering, caving, canoeing, sailing, windsurfing, rock climbing etc. and these should be used as benchmarks for minimum standards when setting policies for EOTC programmes.

National governing bodies? Well, shag me. What national governing bodies? Is this wishful thinking? Have I suddenly become out of date? Do the compilers of *Safe As Outside* know something that I don't? Which body is our national governing body for rockclimbing qualifications?

The essence of NGBs is singleness. Ie, one body designs and runs all the qualifications for a particular sport. A true NGB holds a near-monopoly, in my view a desirable and advantageous one.

' … qualifications form a part of industry standards; if our statements on those qualifications are woolly and overflexible – even for apparently sensible and pragmatic reasons – our industry standards themselves become unclear.'

'The essence of NGBs is singleness. Ie, one body designs and runs all the qualifications for a particular sport.'

An NGB's qualifications, in a mature outdoor industry, are reliable, well understood, and universally accepted. The yardstick standards that an NGB sets are not some maximum specifications to be aspired to if you feel like it or ignored if you can find a cheaper (and possibly unsound) alternative; they are the minimum requirements for instructing or leading at a particular level. Finally, proper NGBs are driven by passionate kayakers, climbers, cavers, sailors and the like, and are private bodies, free of government bureaucrats. So their syllabuses do not double as vehicles for the latest social policy and do not carry debatable pronouncements on educational value.

In fact, the 'Rock Climbing Pursuit Guidelines', which I glanced at earlier, direct readers not to one NGB but to three so-called advisory bodies: the Sport, Fitness and Recreation Industry Training Organisation (SFRITO), the New Zealand Outdoor Instructors' Association (NZOIA), and the New Zealand Mountain Safety Council (NZMSC). One of these bodies, SFRITO, has developed and is promoting rockclimbing instructing qualifications that lack a logged-experience requirement. For example, Unit Standard 14220, Level 5, *Rock Climbing. Instruct Clients in Single Pitch Toprope Climbing and Abseiling*. (From the New Zealand Qualifications Authority website, June 2002.) *Safe As Outside*, by directing readers to SFRITO, is endorsing these qualifications. This apparent approval of arguably unreliable qualifications reflects a political pragmatism within Outdoors New Zealand. Yet to me it seems morally suspect and it echoes a lack of principled leadership from industry experts who should know better.

This disarray is perhaps as close as we will get to compulsory, explicit qualifications for rockclimbing instructors, for the time being. Until the inevitable accident.

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To make my point here, on national governing bodies, I have looked only at rockclimbing, but I could equally have chosen several other activities. For example, which organisation is our national governing body for our Bush 1 and Bush 2 qualifications, and their equivalent unit standards? Is it the NZMSC? Is it SFRITO? Is it the New Zealand Alpine Club (NZAC)? What about NZOIA?

How can a school manager, with no specialist knowledge of the outdoor industry, tell which Bush qualifications can be relied upon and which are not worth a donkey's fart? Not that it matters much; in practice it's probably OK if you get a letter from your local gun club saying that you've done lots of tramping ... something for the risk-management file ... sweet.

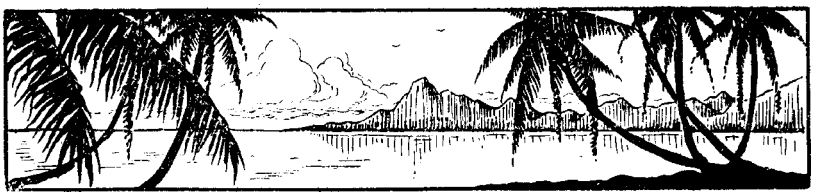
On the whole, the pursuits guidelines avoid naming qualifications. Canadian canoeing, mentioned earlier, is one exception. Mountaineering is another. The 'Mountaineering Pursuit Guidelines' state that the leader 'should have at least the experience and competence to be acceptable to the [relevant] NZOIA Award Level'. How do we decode this ambiguous sentence? Does the leader need to hold the NZOIA award? If yes, why the long-windedness? If no, who decides, without a formal assessment, that a particular leader has 'the experience and competence to be acceptable to the NZOIA Award Level'? One day a court case or an inquiry will focus on this dazzling vagueness. But why wait for that?

' ... who decides, without a formal assessment, that a particular leader has "the experience and competence to be acceptable to the NZOIA Award Level"?'

If happenings abroad have any relevance for New Zealand – I stress the 'if' – the court cases are already there for us to learn from. There has been a series of accidents, inquiries and court cases in Britain in recent years. Several involved the Scout Association, after a number of deaths and incidents on Scout trips or at camps. Magistrates at one court case found that the Scout Council had neglected to follow its own guidelines. Eventually, after a third mountain-walking fatality, the association commissioned an independent inquiry. After that inquiry, one of the inquiry team remarked, 'The challenge that the Scouts face is that it's not just about having rigorous and robust rules – it's in making people stick to them.' The chairman of the trustees of the Scout Association accepted this criticism and commented, 'Because we are a voluntary organisation and our culture was one of come and help us work with young people, we were not hard enough on those who didn't stick to our procedures for getting assessed. We are now.'

Obligatory qualifications do not guarantee safety. They do not eliminate all risk and they do not eradicate human error. But they are the best system available, provided that those qualifications are sufficiently exacting.

Named qualifications: now you see 'em, now you don't. I am confident that soon you will see 'em all, in bold print, rendering parts of this section out of date.



Pursuits guidelines

So far we have navigated backwards and forwards between 'Outdoor Pursuits Guidelines' and 'Tools and Templates'. Let's return to the pursuits guidelines to examine more closely the strivingly comprehensive lists, such as 'Mountain Bikes Pursuit Guidelines', 'Horse Riding Pursuit Guidelines', and 'Rock Climbing Pursuit Guidelines'. Who are these lists addressed to? What is their purpose? I'm not sure. You could equally ask the same question of the source document for these lists, *Outdoor Pursuits – Guidelines for Educators*, 1996.

'Who are these lists addressed to? What is their purpose?'

Let us assume, tentatively, that the 'Rock Climbing Pursuit Guidelines' are directed at anyone in a school who shares responsibility for planning rockclimbing, but who lacks specialist knowledge of this sport. If so I can only view the rockclimbing guidelines with some ambivalence. All right, they might usefully contribute to an organiser's background knowledge. But hang on! A little knowledge can be a dangerous thing, and never more so than in a sport such as climbing. It worries me, the idea of a nonclimber trying to interpret this list, robotically, without the help of a climber. In particular I cringe at the thought of a non-

specialist, acting alone, using this list to fill in a form that will calm senior managers or enrapture the OSH person. That's not what the list is for? Pull the other one.

Perhaps I am mistaken. Maybe all the pursuits guidelines are aimed at instructors. If so, they reinvent the wheel – they half duplicate award syllabuses – and their existence could be considered a vote of no confidence in our confusing proliferation of qualifications. Or maybe they are simply bureaucratic excess. This sort of superfluous duplication used to annoy me. I found it patronising. It offended my qualifications. Now I'm older and nicer and it's harder to get angry. But look at it this way. Our yardstick climbing syllabuses have evolved over fifteen years, since the formation of NZOIA. They are worthwhile qualifications. Any rockclimbing qualification worth having takes a year or two to obtain, at least. Yet what have we, the outdoor industry, now done, after developing this professionalism? We have created a super-duper safety website full of statements such as the one on the 'Key Dangers' of rockclimbing: 'Too many students. Unsafe anchors. Unsafe knotting and anchoring. Falls when placing anchors. Danger to observers.' Bloody marvellous. Wunderbar! Or, in Appalachian mountain talk, I'll be diddly dad burn! Do our instructors need this babyish and arbitrary advice? God forbid that anyone who needs this sketchy list is ever let loose near a crag. A bulleted list of five so-called key dangers of rockclimbing is a primitive simplification. It is arrant nonsense. Laughable. Is there any point whatsoever in writing down 'Unsafe anchors' when the subtle techniques of belay-making demand whole chapters in books and years of practice?

Guidelines should not try to replace instructional manuals and award syllabuses. Our single-pitch instructors should have at least a passing acquaintance with one modern text such as *The Handbook of Climbing* (Fyffe and others). Our higher-level instructors should know their way around one of these texts thoroughly. Our safety guidelines need cover only the areas not embodied in qualifications. The dangers of rockclimbing are ingrained in every instructor as a fundamental part of the experience and technical knowledge needed to gain an award. That's all that the rockclimbing guidelines need to say on dangers.

Yet conceivably I am wrong again. Maybe these 'Outdoor Pursuits Guidelines' are intended as background knowledge for older schoolpupils. If that's the case, perhaps there is a place for them. Certainly, the 'Key Dangers' might have been lifted from some *Boys' and Girls' Compendium of Adventure Sports*.

*

I have used the 'Rock Climbing Pursuit Guidelines' as an example; my reservations about the superficiality of the lists of allegedly most important dangers apply to all the 'Outdoor Pursuits Guidelines'. Take another example, caving, and remember that the 'Key Dangers' lists are intimately connected with the RAMS. If you delve into the further reaches of *Safe As Outside*, you will find the RAMS lurking around. Download it and then inspect the RAMS form for caving. Glance at 'Perils & Hazards'. The list reads: ' … Injury from falls, Entrapment by rising water, Becoming lost, Hypothermia … Becoming stuck in tight passages … ' Jesus wept! If all these threats aren't etched into your subconscious before you go anywhere near a RAMS form, you shouldn't be allowed

'Is there any point whatsoever in writing down "Unsafe anchors" when the subtle techniques of belay-making demand whole chapters in books and years of practice?'

anywhere near a cave. Which begs the question, what are the forms for? Dean Acheson, the US Democrat, when talking about bureaucracy, said that a memorandum is written not to inform the reader but to protect the writer. It seems to me that RAMS forms are completed not to identify dangers or to promote masterly instructorship but to shield your ass – and everyone else's. Ie, to provide evidence of managerial 'correct' practice.

With that last sentence, the RAMS enthusiasts and I reach an impasse. They point out that the listing of key dangers is integral to the RAMS, for entirely practical reasons; I am saying that, for much outdoor-pursuiting, given adequately qualified instructors, the listing of dangers is nonsensical. It results in clumsy and childlike simplification. A few paragraphs back, I called it laughable.

Laughable? Why? I want to elaborate this point by staying on caving and by imagining a half-day trip into a mythical Kawahuka Hole, an active stream cave. Kawahuka Hole includes a pitch, a traverse-line, a streamway, a low crawl, and an optional tight squeeze. It is well within the ability of a certain group of schoolpupils, given experienced and competent instructors plus the necessary equipment and clothing. Let us now scrutinise just one of the potential dangers of the trip: the possibility of sudden heavy rain causing the streamway to flood. In Kawahuka Hole such an occurrence would not necessarily be catastrophic because there are easy dry alternatives to the streamway, passages that last saw water 10,000 years ago. On the other hand, flash flooding of the streamway *would* be serious if the group was in the streamway, the instructors having misjudged the weather above ground.

What forestalls that error of judgment? What is it that virtually guarantees sound judgment? The answer, even just for this one danger, is a labyrinthine mix of knowledge and qualities: caving knowledge, acquaintance with this particular cave system, knowing the day's weather forecast, general weather knowledge, and responsible, cautious, level-headed leadership. The caving knowledge would include a basic understanding of limestone geology and geomorphology. The local knowledge would include a precise understanding of the flooding history of Kawahuka Hole; the instructors should have visited the system during wet weather and should know about any incidents that had occurred there. The weather knowledge would include an awareness of the various drainage characteristics of karst, above and below ground, and an appreciation of flood pulses. Pheeew!

I have written all this down to show the complications behind just one of the potential dangers. Were I to repeat the process for all the other dangers, I would end up précising a textbook. Yet the RAMS would have me itemise each danger, such as 'Entrapment by rising water', and would then have me enumerate how to reduce each of the risks.

I contend that these risks can best be reduced not by form-filling but by insisting that instructors hold the relevant caving qualifications. One such qualification is Stage One Caving Instructor, run jointly by NZOIA and the New Zealand Speleological Society (NZSS). Written by cavers for cavers, and incorporating logged experience, the Stage One syllabus includes: conservation, caving ethics, and access; a general knowledge of caving

'I have written all this down to show the complications behind just one of the potential dangers. Were I to repeat the process for all the other dangers, I would end up précising a textbook.'

history; caving equipment and clothing; the organisation and conduct of novice parties; vertical techniques (technical skills for vertical caving with novices, group and personal equipment for vertical caving, party leadership for vertical caving); knowledge of the New Zealand cave search and rescue system; emergencies on novice caving trips (the syllabus specifies seven examples, including hypothermia and underground first aid); bush leadership, bush navigation, and river crossing. The assessment for this qualification takes two days.

So. There we have it. Well done, NZSS and NZOIA. An excellent scheme. The only snag? – *Safe As Outside* does not directly specify a qualification for leading caving. If a potential cave leader doesn't think themself quite up to the mark, they might not risk contacting NZSS or NZOIA to arrange an assessment; they might just copy the list of caving dangers from *Safe As Outside*.

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The foregoing examples have questioned the purpose of the 'Key Dangers' lists in the 'Outdoor Pursuits Guidelines'. To me, looking at these lists in the context of forcing the RAMS upon qualified instructors, they stand full-frontally, with their shallowness exposed. I am not alone in seeing this naked superficiality, but I am virtually alone in writing of it. Furthermore, many teachers see these lists clothed in orthodoxy; the lists are a cornerstone of the RAMS. So I will give you a third example, one which I have used before when questioning the RAMS.

By the time that I gained my Mountaineering Instructor's Certificate, I was well acquainted with Paulcke and Dumler's full-length book, *Hazards in Mountaineering*. And not just from an armchair. I had fallen, cursed loose rock, been lost in the hills, been off-route on faces, been benighted, been stormed upon, even been avalanched. Yet the 'Mountaineering Pursuit Guidelines' of *Safe As Outside* would have me distil all that I have learnt, from years of experience and from a bookshelf of books, into a key-dangers list that is twenty words long: 'Avalanches, Cold injuries, Injuries from equipment or the environment, Slips and falls, Scared students, Hypothermia, Group loss or separation, Weather.' To me, this list seems absurd. So does the implication that, having written down eight key dangers, I should develop strategies to reduce the risks, strategies which would be superior to those I would normally use without listing the eight dangers beforehand. Why am I the only writer challenging this crude mechanism? I invite you to consider the possibility that I am diabolically possessed, foaming at the mouth, and am therefore incapable of following logical reasoning. In fact, I am not the only discontent, but I will explain later why the public questioning of the lists of dangers has been very subdued.

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In summary, I have misgivings about the purpose, about some of the content, and in particular about the message of the 'Outdoor Pursuits Guidelines'.

The realist in me, resigned to the fuzzy thinking and the risk-speak, sees the pursuits guidelines as an obvious addition to the old Ministry guidelines. What else would you expect when you cross the risk-management pig with the managerialism dog? After all, it is now 2002, and the documenting of the arranging of danger is a fact of life, like reality TV.

'The outdoor instructor in me ... sees parts of the pursuits guidelines as a potluck mix of tips – random, incomplete, and duplicative of award syllabuses – a mix which trivialises the instructing of outdoor activities.'

The rebel in me, indelibly marked by bouncing on a climbing rope, sees parts of the pursuits guidelines as a potluck mix of tips – random, incomplete, and duplicative of award syllabuses – a mix which trivialises the instructing of outdoor activities. They switch the emphasis away from long experience and shrewd judgment; away from refined intuition and elegant solutions; away from independence based on skill; away from individualism and flair; what we end up with instead, in these lists, is a sort of naive half-knowledge that is all body and no soul. The thinking behind them presumably fits into some global consensus on risk management, but they read like tips from a Kellogg's packet.

Take, for instance, the bald simplicity of the following statement, from 'Tramping Pursuit Guidelines': 'students proceed at a pace which is appropriate for all group members … ' Really? How nice for them. A trainee leader learns, quickly, that often there is no pace appropriate for all members. They then learn, more slowly, various ways to keep a group together. And finally they learn when to ignore this 'rule', and they learn that the bottom line is that everyone should reach the other end safe and sound, and, ideally, smiling. I am not talking here about the rash and cavalier flouting of a cardinal rule; I am talking about deviating from the norm in a highly controlled way, one which is acutely aware of the complications that could arise and which guards against them accordingly. This learning takes time. You cannot absorb it from a website.

So, back to the start. Who are these pursuits guidelines addressed to? What is their purpose? I still don't know. They fit well into a catch-all website and into a regime, the RAMS, designed for the lowest common factor. In doing so, they read like guidelines for dimwits.

The lists of dangers are ludicrous. It is misleading and delusive to attach any importance to a written list of dangers if the avoidance or minimising of those dangers takes a textbook of learning and years of experience. The RAMS underestimates the sophistication of middle- and higher-level outdoor instructors.

'So, back to the start. Who are these pursuits guidelines addressed to? What is their purpose? I still don't know.'

'The RAMS underestimates the sophistication of middle- and higher-level outdoor instructors.'

Fishing trips and whatnot

Regarding the conduct of less definable, less obviously risky outdoor goings-on, such as 'wild' swimming and 'river walking', recent events both in New Zealand and the UK suggest that both countries' formal, written risk management is still in its early days. We don't have a term, yet, to describe these miscellaneous school trips, which include everything from penguin-watching to traffic-surveying, from farm-visiting to night hiking. So we have to talk lengthily and abstractly. The best I can do is this: EOTC activities excluding all those familiar outdoor pursuits for which instructing qualifications are available. One recent publication uses the term 'nonpursuit-based activities', but the division implied by this label may not always be clear-cut. I've been told that the Ministry's lexicographers are debating a definition of 'pursuit'; this is sensible of them because it is the easiest way to get at 'nonpursuit'.

There is an abundance of possibilities for nonpursuits. This area is complex and difficult – and it is not my speciality. I know a lot about instructing rockclimbing and caving and only a little about supervising picnics and landscape-painting. I don't know

what the answer is, for avoiding the grave dangers of picnicking and painting; I might concede that some sort of beastly risk analysis in unavoidable, nowadays. Yet one thing should now be obvious even to the most enthusiastic RAMS proponent: where water-safety is involved, you cannot just assign the looking for jeopardy to any teacher who doesn't mind filling in forms.

Will *Safe As Outside* reduce the number of clearly preventable accidents?

One hopes so. We'll never know for sure. We cannot tell how many tragedies guidelines prevent; we can only tell how many they do not prevent. *Safe As Outside* will not eliminate all preventable accidents. It is merely another stage of development, building on previous publications such as the 1996 *Outdoor Pursuits – Guidelines for Educators*, itself a 4th edition.

The UK has been developing guidelines for outdoor educators for thirty years or more. To keep things in perspective, bear in mind (if you can tolerate unreferenced facts) that the chance in the UK of a child suffering a fatal accident on a school trip has recently been estimated as only slightly more than the chance of being struck by lightning. But with ten million schoolpupils who spend at least two days out of school each year, a small number of tragedies still occur, and 8 March 2002 saw the inquest verdict for the Yorkshire Dales river deaths of October 2000. A *normally* low-risk river walk had been attempted in a stream swollen by heavy rain; two children were swept away and drowned. The deaths could have been avoided by the simplest of precautions. Teachers had assessed the river walk as a low-risk activity, but had not validated the assessment with anyone with knowledge of the area. Nobody checked the weather forecast on the day. How many times does it need saying? Risk assessment is unreliable when entrusted to teachers not trained in leading groups outdoors. Let's bang it in one more time: filling in risk-analysis forms will not necessarily reveal a danger that is not already in your head either from common sense or from having sufficient experience and the necessary technical knowledge. The well-intentioned paperwork can even lead to overconfidence.

Regarding the risk analyses that failed, and the superficially benign nature of the activities, there are similarities between the Yorkshire Dales accident of October 2000 and the Waihao River one earlier that year on this side of the world. New Zealand readers may like to reflect on the fact that knowledgeable opinion in the UK has described the Yorkshire tragedy as foreseeable and manifestly preventable. Some British experts are saying that, in Britain, elimination of the clearly preventable accidents may now need not more guidelines but either the following of existing guidelines or the occasional court case.

Now hold on tight, for a temporary change in direction …

'Risk assessment is unreliable when entrusted to teachers not trained in leading groups outdoors.'

Guidelines and safety booklets – a backward glance

The evolution of guidelines and safety booklets could be likened to the gradual climbing of Everest, except that we haven't yet reached the summit. A cursory check of one library catalogue quickly yielded *Safety in the Mountains: a Handbook for Trampers and Mountaineers*, 1937. This booklet, from the Federated Mountain Clubs of New Zealand, cost sixpence but was supplied free to club members. It covered some basic principles of tramping and mountaineering, 'without which a climber is merely a source of danger to himself and others'. Climbing mountains in those days was, for some, a clubby affair with well-defined procedures:

> A leader should be appointed before setting out, and his orders should be promptly and cheerfully obeyed. It is safer to obey at once than to undermine your leader's confidence by questioning his decisions.

Then, as now, guideline writers did not confine their attentions to reducing the number of accidents; they also strayed enthusiastically into the mores of their time, in this case into the fundamental values of club members:

> Tramping Etiquette. 9. Conduct when Travelling in Public Conveyances and when Occupying Huts: The conduct of members of affiliated clubs while travelling to and from expeditions in trains, buses, etc ... should be such as to reflect credit on the Clubs and on the tramping and climbing fraternity in general ... avoid undue noise or freedom of language ...

Safety in the mountains ended with a quote from the guide, Pete Graham:

> To become a first class climber one needs years of experience, a high regard for one's responsibilities, and a deep respect for the mountains themselves.

Ten years later, in 1947, came *Safe Climbing*, a booklet from the Tararua Tramping Club. The Honourable W E Parry, Minister of Internal affairs, contributed the foreword. He was optimistic about the impact that this publication would have:

> Personally, I feel that there will be many occasions in the future when this booklet will prove to be the means of saving human life.

Perhaps he meant climbers to put the booklet inside their hats, because *Safe Climbing* offered this advice:

> On the climb talk as little as possible. Orders or advice should be short, precise and given clearly. The wearing of a hat gives considerable protection from falling stones.

Safe Climbing, though, did introduce itself as merely a starter, and it included a bibliography of the classic texts of the time.

In 1962 the Marine Department produced *Safety in Small Craft*, providing some elementary guidance for safe boating. These were still the days of practical common sense, before the hypotheses had arrived, and before the term 'risk management' had ubiquitously entered the general vocabulary, bringing with it – as I see it – a misguided change of emphasis. The first paragraph of *Safety in Small Craft* puts the emphasis properly where it should lie, on experience:

> Would you go up in the air with an inexperienced person piloting an aeroplane? Would you venture out in a friend's new car if you knew he could not drive? Of course not, yet many people go out in boats with inexperienced owner-skippers who know that the water is wet and that's about all.

Later, *Safety in Small Craft* gingerly tackles the matter of New Zealanders and rules and regulations, starting with an observation that I find as pertinent today as it was then:

> Independence is the New Zealander's strongest trait and most times he or she wants to be off on the lonely waters miles from anywhere or anybody.

Just one other, very short section caught my eye (and will bring me, by and by, to the matter of revision):

> Canoeists. You are in a very frail craft. Keep away from waterfalls and larger boats.

That's as far as my reading took me, but guideline connoisseurs might like to check out *Ahoy Skipper! This Will Interest You!*, 1965, and *Ahoy Skipper! Safe Boating Is No Accident*, 1971.

The 1980s and 90s saw a worldwide expansion of the scrutiny of danger. The safetyologists, once confined mainly to mines, farms, tree-felling, road safety, and isocyanates, infiltrated all aspects of human life. If you search a library catalogue, the bulk of the material that you find is post-1980. Whole forests must have been felled. Our bankers and shopkeepers, for instance, now have *Guidelines for the Safety of Staff from the Threat of Armed Robbery*. New Zealand's farmers now have *Guidelines for the Safe Handling, Transportation and Stacking of Large Hay Bales*. There's even a publication about safe practice in morgues, which I would have thought was too late. In 1993 our outdoor industry joined in, with *Managing Risks in Outdoor Activities*, which brought us a special vocabulary, models of human behaviour, and safety-by-form-filling. At about the same time, New Zealand's Members of Parliament made all our cyclists wear helmets, thus saving me from my own stupidity, something that even my own mother couldn't do, but that's a digression, and here's another: did you know that, after a series of Alpine accidents, Queen Victoria wrote to Mr Gladstone asking whether Parliament could outlaw mountaineering?

But don't get sidetracked onto Queen Victoria. We are nearly back to the present day …

'The 1980s and 90s saw a worldwide expansion of the scrutiny of danger.'

The late 1990s – towards a safety-ocracy

Some people might say that I am exaggerating, overreacting to gradual change and progress, and that the primary emphases of our outdoor industry's approach to safety have never altered. I can answer that in two ways. First, with another opinion. Second, with two revealing examples of late-1990s approaches.

In April 2000 I corresponded with a longtime outdoor educator and shrewd observer of the New Zealand scene. Talking about the early part of the 1990s, he wrote: 'Just a little historical aside on the development of risk management in NZ. When it was first developed in NZ there were those adherents who categorically stated that actual technical skills were unnecessary. Then it developed into a Technical Skills versus People Skills debate as if they were unrelated. The Experience factor seemed to be a later player – but then one only truly recognises that in retrospect. So many of the old players still wear their old hats … '

Over a decade, what this correspondent calls 'the experience factor' went out of fashion and then came back in. I maintain, first, that it hasn't yet come far enough back in; and, second, that the emphases in *Safe As Outside* reflect, in some ways if not in all, the influence of the old hats of the early 1990s, the people who underplayed experience – all well-known safety-ocrats. The very people who gave primacy to the form-filling are now more entrenched than ever in positions of influence. So we can hardly expect them to admit their past mistakes. Their professional reputations are at stake. It's even doubtful whether any of them will publicly acknowledge that there are respected figures in the industry – immensely experienced instructors, centre principals, and tertiary lecturers – who coexist with the RAMS only under duress. But I've got this all wrong, haven't I? A different viewpoint is that we have a group of leading professionals who are working together to improve safety. Much labour has gone into this website, from visionaries who saw the need for updated guidelines and who recognised the opportunity for cyber-safety. This is terribly confusing if you can also see a presumptuous and influential coterie that is imposing its safety philosophy on the whole outdoor industry. Maybe the truth lies somewhere between these two sentiments.

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The first example of a late-1990s approach is that of Stuart Eyre, described in 'The best-laid plans', *Journey* Issue 1, July 1997. Stuart tells of a fraught school canoeing trip down the Whanganui: a near-miss, one of those that don't get into the newspapers because everyone goes home in one piece. The account is readable and relatively jargon-free, honest and straightforward. Stuart makes no excuses. But what conclusion does he draw? Does he realise that you should have epics, if you must, with mates, not with schoolpupils? Apparently not. Does he realise that he lacked sufficient experience to be there in the first place? I don't know. Does he realise that there are good reasons for 'the calibre of some NZOIA instructors', mentioned in the introduction and implied to be a higher standard of competence than is necessary? It's hard to tell.

What does he conclude? He acknowledges that he learnt from the epic and he expresses his intention to add more 'should-haves and could-haves' to his RAMS form.

The should-haves and could-haves should have been in his head already – and all ready.

I found Stuart's article difficult to read without screaming. The story exhibited a slavish overreliance on written risk management. Yet it reached publication in *Journey* unaccompanied by any editorial comment of the sort I have just made. Stuart Eyre's blind-spot was understandable. He was a product of the 1990s. He conscientiously analysed what went wrong, as he had been taught to do. The emphasis in his training had probably been on the RAMS; I doubt whether his trainers or the syllabuses had sufficiently stressed experience.

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The second example of a recent approach is that described by Mike Spray in 'Outdoor instructors can fly without crashing', *The NZOIA Quarterly*, March 2000. Mike writes about a super-RAMS procedure, a clipboard-and-checklist approach to outdoor activities. For instance, to abseil at the Mt Eden Quarry requires the instructors, 'with clipboard and checklist in hand', to perform 45 pre-activity checks, 15 during-activity checks, and 8 post-activity checks. The premise here is that a modus operandi developed for pilots (humans) to operate aeroplanes (transport machines) should be equally applicable to instructors (humans) supervising abseiling (transport machines?).

At the time of publication of Mike's article, I was editor of the *Quarterly*. I expected the article to generate a full letter-page of debate. Was his premise sound? Was such an approach desirable? Was it necessary? Did he use qualified instructors? If yes, why did he not trust them to work safely without clipboards? But not a single member of NZOIA wrote to comment on the clipboard method.

You can interpret this silence variously. The interpretation most flattering to NZOIA's membership is of an open-minded lot, receptive to new ideas, and tolerant of widely different approaches. That's a nice idea, the acceptance of different structures of risk management. But in reality the tolerance of alternative approaches is highly selective: any of us can happily depart from the RAMS provided that, in doing so, we obey the law of proliferating paperwork.

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Did I hear someone claim that the outdoor industry's approach to safety hasn't altered? On the contrary, the 1990s saw a lurch away from intuition and ease of long practice and towards a quasi-scientific rationalism. Where once experienced instructors enjoyed independence and discretion, they now yield to a safety-ocracy: rule by safety magnates.

It is entirely possible and absolutely normal to lead and instruct with the highest professionalism without writing anything beforehand. Some alpine guides work like this most days of their working lives. I did, teaching rockclimbing, caving, kayaking and sailing for twenty-four years full-time, without one serious accident. I am not saying that leaders do not need to plan their days; I am saying that there are very different ways to plan. Nor am I saying that leaders do not need to plot their responses to emer-

' ... in reality the tolerance of alternative approaches is highly selective: any of us can happily depart from the RAMS provided that, in doing so, we obey the law of proliferating paperwork.'

' ... the 1990s saw a lurch away from intuition and ease of long practice and towards a quasi-scientific rationalism.'

gencies; many of us were lecturing on accident procedure before anyone had heard of the term 'risk management'. For professionals competent enough to deal with menace in ways very different from the RAMS, the enforced use of the RAMS, a part of their legal duty of care (and it looks as if this enforcement is coming), will be not a refinement to their professionalism but a corrosive interference in it. Sheer bureaucratic meddling. Perfunctory and time-wasting. Dispossessing.

Moreover, if some of our outdoor qualifications lack reliability, due to inadequate requirements, no amount of form-filling will compensate for a deficiency in knowledge, skill, or judgment.

2002 – LaserJet safety

Many outdoor professionals may now, in 2002, already be unavoidably buried in paper. I cannot see a reduction of the paperwork in the near future, only an increase. In 1997 in my book *Climbing Lessons*, I stressed the necessity of the parental-consent form and I acknowledged the existence of accident-report forms. Little did I suspect that a manageable handful would become a ridiculous deskful, out of proportion and out of control.

An obvious clue to why this has happened appears on the latest update of *Safe As Outside*, in which the word 'management' has been replaced by 'goverance', a pompous new-millennium buzzword frequently encountered in the pairs 'goverance and globalisation' and 'corporate goverance'. It doesn't matter which word you prefer; either way, education has entered the age of managerialism or goverance-ism. And outdoor education has entered the age of LaserJet safety.

For an indication of what's in store, examine the latest monument to risk management, a publication called *EOTC – The Missing Manual*, available on *Safe As Outside*. Its poorly constructed subtitle is *Procedures for Seeking the Approval, Planning and Implementation of EOTC Events in Schools*. The website presents this publication as an exemplar: a model to be imitated. The message roughly amounts to: Roll up, roll up, see the incredible missing manual.

Here I should stress that *The Missing Manual* isn't the only such publication. There are several partial equivalents, one of which is *Outdoor Safety Management Systems for Primary and Intermediate Schools*, EONZ, 1998, which has some fabulous flowcharts. But let's not complicate things.

'… education has entered the age of managerialism or goverance-ism. And outdoor education has entered the age of LaserJet safety.'

If a school adopts the procedures described in *The Missing Manual*, an afternoon of bouldering, for example, will require a 'Safety Process' that involves four stages of planning and evaluation. This process will include the completion of the following forms: Event Proposal Form, Venue/Facility Safety Form, People Forms (Student/Participant Form, Medical Profile & Risk Disclosure, Student Contract, Parent/Caregiver Contract, Staff/Volunteer/Parent/Caregiver Capability Form), Programme Forms (Safety Action Plan Form or RAMS Form), Outside Provider Forms if applicable (Contracting Checklist, Agreement With Outside Providers, School Responsibilities Agreement), Event Planning Checklist, and Post Event Evaluation (including Accident/Incident Reports).

Lord, have mercy upon us! There must be an ecological limit to the number of forms the earth can sustain. We can blame the Romans, who started the Western bureaucracy by decreeing that every Roman soldier should be able to read and write. In AD 213 the Roman historian, Hacitus, described the administrative duties of Maximus Laximus, a centurion stationed at Brigantium, near Hadrian's Wall. Before dispatching a patrol into the Pict-infested badlands of Northumbria, Maximus sacrificed a goat to Mars and then completed seven routine application forms on *tabula rasa* – scraped tablets, ie clean slates. I'm only kidding. I made that up. But in the example above, the afternoon of bouldering, it is difficult to see how an approach so alien to the spirit of bouldering would not kill that spirit. Following a circuit of boulders is essentially a simple affair; its prevailing element is a spontaneous pleasure from moving on rock, often in a somewhat unplanned and casual way. The liveliness of the activity flows from the enthusiasm of the leader: from his or her love of and feeling for rockclimbing. Oh, sorry, I forgot: you'll need to deal with about ten different forms before you leave the security of the classroom. Am I overstating this? I don't think so. Someone has just told me of a recent school camp, run by one keen teacher and some parent helpers; apparently the paperwork included forty different pages of management documentation.

'There must be an ecological limit to the number of forms the earth can sustain.'

The LaserJet printouts have little to do with competent outdoor leadership and a lot to do with managerial accountability.

I was, however, pleased to spot the 'Acknowledgement of Risk' section in Form 2.2 of *EOTC – The Missing Manual*. Yet its copious capital letters lend it an impersonal, legalistic tone that sounds like the small-print of a washing-machine guarantee. Is this how we want to talk to parents? Letters to parents should project warmth and informality, like outdoor education itself. Such letters can adequately acknowledge risk. We don't need the officialese, the air of weighty authority. And how can we as a profession ever transmit a professional image if our letters to parents treat the possessive apostrophe as an optional extra? You can have 'child' and 'child's' but never 'childs', except in Jamaican creole. We all make these mistakes. Routine subediting could have removed most blemishes of this sort, and not just from *EOTC – The Missing Manual*, but from the whole of the *Safe As Outside* website.

I hope I live long enough to see *The Missing Manual* live up to its name. It is a horrible document, depressing evidence that the apparatchiks have taken command.

Meanwhile, given that safety websites are here to stay, it's high time that we considered what Confucius would have said about digital English …

Grammar and punctuation – do they matter?

I have already acknowledged that most of the text on *Safe As Outside* is decipherable, provided that you read some sentences twice. So, who cares about apostrophes? I do, and anyone whose brain is not a clod can learn how to use them correctly. And who cares about grammar? I do, because bad grammar introduces ambiguity into a discussion.

This is of course dangerous country. My adversaries from different sides of the outdoor industry may now unite and lock me up for pedantry as well as for sedition. I may be stressing a part of professionalism that many outdoor instructors don't give a shit about. They would find a command of written English useful, but it may be secondary to their work skills, and their careers do not hang upon it. Yet some of us do need to be able to communicate clearly in writing: to publish reports, to write syllabuses, to spread ideas. And, believe me, bad English is far harder to read than to listen to. It is not pettiness to condemn a sentence such as this, the grammar of which, incidentally, is perfect: 'Qualifications in human skills are seldom offered as part of these awards and as such offer little safeguard against the personal qualities required to run EOTC programmes.' The purpose of language is to say what we mean; that sentence might have been composed by a drunk.

As well as being spoilt by lazy sentences, *Safe As Outside* is impaired by many minor textual errors. It quickly welcomes us to the Land of the Little White Missing Apostrophe. Some obvious misspellings await a spellchecker. A flock of needless capital letters awaits rounding up. Get a life! you might think, This is a safety resource, not a literary novel. I reject this excuse. Find me a children's storybook with a missing apostrophe. You can't, can you? Give me a convincing reason for the capital s and the capital p in the following: 'Forward, in a timely manner, factual reports on significant accidents and safety incidents within the School to the Principal.' You cannot justify the capitals, can you? Most job titles lost their capitals decades ago. At best, unnecessary capitals merely betray amateurish writing; at worst they convey overbearing officialdom. The tone of our writing, as well as its syntax, is important.

Sloppy English is only one step ahead of sloppy thinking. It does not signal an able and articulate body of people. A document cannot project the highest standards of safety if its subtitle is an elliptical horror-show: *Procedures for Seeking the Approval, Planning and Implementation of EOTC Events in Schools*. There is an argument that there's English and there's Weblish, and that readers tolerate lower standards of grammar and punctuation from web pages than from books. Well, I don't. Not from a permanent site addressed to, among others, the senior managers of 2,600 schools.

I have great hopes for the future of Outdoors New Zealand. It is an important nongovernmental voice, important enough for it to proofread its publications – its websites and newsletters – more

'A document cannot project the highest standards of safety if its subtitle is an elliptical horror-show … '

assiduously. All our national outdoor organisations now have their websites. Yet behind every dweeby webmaster, there should be a drug-crazed grammar maniac. Without the influence of the latter, the results can be high on imagery and low on credibility.

Experience

Few of our outdoor-safety publications dwell upon experience any more, they just mention it, in passing, but I'm feeling unmistakably belligerent and perverse, and so I want to deliberately deviate from the norm. We're talking about the accumulated knowledge of practical matters. But, like the word 'risk', the word 'experience' means little until you pin some details onto it. So there is a passage that I would like to read in all outdoor-safety manuals and on all outdoor-safety websites. It is titled 'Experience'. It is not about logbook experience before assessment, but about accumulated experience before training. It is not about not getting lost, but about having been lost. It is not about pitching tents correctly, but about having had tents blow away. It is not about preventing hypothermia, but about having been very wet and very cold. It not about placing nuts correctly, but about having had them fall out. It is not about avoiding submerged tree-trunks, but about having been stuck against one. It is not about following 'rules', but about knowing when to break them. It is not about sifting through future dangers, on paper, but about having felt past dangers, in your limbs and in your mind.

And that's only the beginning of the details that I would pin to this word. For experience is not just about possessing technical skills, but about applying them instinctively. It is not just about knowing what you can do with a comprehensive first-aid kit, but about having coped well with little and about avoiding ever needing one. It is not just about fulfilling the requirements of award syllabuses, but about critically scrutinising them.

The section would not mention Event Proposal Forms but would touch upon exquisite mountain joy. It would not call attention to flow diagrams and Plan Exemplars but to companionship and beauty.

Finally, it would point out that beliefs, attitudes, and values can arise partly from textbooks and lectures, but should also come from intuition, and that this intuition can only issue from experience.

This passage does not appear on *Safe As Outside* or in the mid-1990s guidelines that I have mentioned or in *Managing Risks in Outdoor Activities*. These resources do not even open the experience topic at its first page. If we were to judge solely by these resources – which we should not – we would deduce that experience has become our industry's Cinderella: mentioned briefly, but taken for granted, seldom looked at closely, and of too lowly a status to attend the Guidelines Ball. Never mind not answering the questions, *Safe As Outside* is not even asking them.

When is experience not experience? What might appear on the surface to be an impressive accumulation – ten years of sea kayaking – might in detail be limited: all within the Bay of Islands.

How much experience is sufficient? The Nelson Dive Centre judgment questioned the experience of the instructor involved, and in doing so it raised doubts about the experience requirements of the international award held by that instructor. What

' ... like the word "risk", the word "experience" means little until you pin some details onto it.'

are the implications of this judgment for SFRITO's outdoor-instructor unit standards, which lack a logged-experience requirement?

How important is that special type of experience, local knowledge? It is often crucial in enabling the instructor or teacher to concentrate on the needs of the students. Yet a keyword search of *Safe As Outside* did not find one occurrence of the term.

In stressing the need for sufficient experience at the relevant level, I am stating the obvious, merely saying what seasoned climbers and kayakers and the like have always said. But I believe that changed circumstances now demand that the obvious be restated.

The first changed circumstance, I've already referred to: the downplaying of experience by the rise and rise of risk-management-by-form-filling.

The second changed circumstance is the way in which some people enter the outdoor industry. In my day the hillwalking or kayaking, etc came first, the job later. And the philosophising and hypothesising? – in the late 1960s you could have read much of the theory of outdoor education in a month. Today, for many tertiary students, the theory arrives early; the drizzle and the involuntary swims might happen alternately with this theory or they might come later and, depending on the course, possibly only in small doses. Having said that, when I talked recently with staff from two long-established degree courses in outdoor education, one in Scotland and the other in Australia, these staff strongly emphasised the lengthy practical components of their courses. How do New Zealand's tertiary courses in outdoor ed compare? Are they achieving a workable blend of theory and practice? Does the practice include both work on technical skills and work with kids? What lengths of time are we talking about, for the instructing? A month's placement in an outdoor centre? Six months? A year? Questions. Questions. Tell me a year, and I might stop stirring this particular pot.

My passage on experience would end with one last question: what kind of professionals do we want? I would answer it with a quote from Janet Adam Smith's 1946 classic, *Mountain Holidays*. Describing her Italian guide, Othon Bron, she wrote: 'He walked towards the mountains with zest and gaiety, not as a professional going to do a job and collect a fee, but as a man returning to the world where he is most himself and most at home.'

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We have nearly (but not quite) reached a point in this essay where we can stop dissecting bits of *Safe As Outside*. We have excavated a few words of wisdom from the past. We have examined the present – at least, that part of it reflected by *Safe As Outside*. I have beaten my drum for obligatory qualifications, for national governing bodies, for careful plain English, and for a greater stress on experience; I have blown a bugle to lead a late assault against the notion that the RAMS is a universally suitable approach to dealing with danger.

Ahead, in the immediate future, lies a national conference on outdoor risk management. Ahead, into the distant future, remains *Safe As Outside*, already ripe for important and basic revision. The rest of this essay looks ahead at the conference and at the changes that I will be making to *Safe As Outside*, in my dreams. From now on, the drumming and bugling will consolidate the refrain that I have already introduced.

National governing bodies (NGBs) and Risk 2002 – New Zealand Conference on Outdoor Risk Management

Earlier, I said that the essence of NGBs is singleness, and I suggested that for many outdoor pursuits we do not yet have single ruling bodies – only spectacular confusion. Because it is crucial that we acknowledge that confusion, and because some people may be thriving on it and may therefore deny that it exists, I want to illustrate it again. Last time I quoted from the 'Qualifications and Competency' web page; this time I will quote from *EOTC – The Missing Manual*. On page 3 we read that the skills and knowledge of employees [eg teachers] must 'meet the requirements of the Industry Standards Body (SFRITO)'. OK. That's clear. SFRITO is setting the standards, and so teachers will need to hold the instructing unit standards. But then, on page 4, we read that 'qualifications for outdoor skills are established by the national governing bodies for each activity'. Woo-hoo! Even better. Sounds like we have a choice. Let's work out which qualifications are the cheapest and easiest to get.

' ... for many outdoor pursuits we do not yet have single ruling bodies – only spectacular confusion.'

An international comparison is instructive. Almost the first words that you find on the website of the British Canoe Union are: 'The British Canoe Union (BCU) is the Governing Body for the sport and recreation of canoeing and kayaking in the UK.' It's as simple as that. This opening statement is followed by a summary of the BCU's many responsibilities and objectives, including the promotion of proper and safe instruction. Here in New Zealand the same work is done by at least four bodies: the New Zealand Recreational Canoeing Association, the New Zealand Outdoor Instructors' Association, the Sea Kayak Operators' Association of New Zealand, and the Kiwi Association of Sea Kayakers. As if this isn't confusing enough, *Safe As Outside* lists Water Safety New Zealand as an advisory body for Canadian canoeing. And, as I have shown above, our authoritative new manual, offered as a model, categorically identifies SFRITO as the outdoor industry's standard-setter.

Water Safety New Zealand, Outdoors New Zealand, and the Sir Edmund Hillary Outdoor Pursuits Centre will be hosting a conference on outdoor risk management in December 2002. The themes announced do not seem to me to cover our outdoor industry's most pressing needs: first, the evolution of true national governing bodies, in place of our multiple, overlapping dominions; and then, the rationalisation of our outdoor-instructing awards. What we need to do, I suggest, is to get things moving with an exploratory congress on the desirability of NGBs. This get-together would need to be attended by delegates from all the wannabe NGBs, and that would probably include several key figures whose collaborative efforts in the past have foundered on the rock of vested interests. But if the meeting agreed in principle

that NGBs, as described earlier in this essay, are a good thing, it could at least identify sectors where they already exist and the problem sectors where they do not. For these problem areas, there would be no harm in our considering ways to speed up the evolution of national governing bodies

Before I get too carried away, my impression is that some of the intractable problem areas will linger for a long time yet, and that the resolution of them could require all the resources of the New Zealand Negotiation Association, if there is one.

The RAMS and Risk 2002 – New Zealand Conference on Outdoor Risk Management

I started this essay by complaining that there had been little radical debate on the universal suitability of the RAMS. I meant debate in writing, in the industry's publications. Some discussion might have taken place in staffrooms or bar-rooms, but very few published articles have challenged the implicit assumption that the RAMS is the only acceptable approach to risk management. Only one or two writers have had the nerve to defend a distinctly different approach. As far as I know, nobody has actively promoted a radical alternative. So I ought to welcome Risk 2002 as a chance for perceptive comment and energetic argument. But we needed the Peasants' Revolt ten years ago. It didn't happen. We may now be too late to prevent the establishment of the RAMS Enforcement Agency (RAMSEA).

This conference, if it debates the RAMS at all, will automatically approve the party line, which relishes the prospect of 2,600 schools applying the RAMS with impeccable orthodoxy. Only the use of widespread violence would prevent that happening, and such fervour is unlikely to materialise in a workforce that has hardly raised a whimper, publicly. There are reasons for this silence. The words 'apathy' and 'stupor' spring to mind but are probably unmerited. It would be fairer to say that many folk have little time to argue over dealing with perils because they are too busy getting through life. Furthermore, professionals employed in outdoor education or outdoor recreation are wary of openly criticising safety initiatives. However carefully the practical experts state their concerns, laypersons might misinterpret their remarks as irresponsible, and might then misrepresent their attitude as anti-safety. So the doubters say nothing in public. Searching criticism, put in writing, is rare in New Zealand's outdoor industry, and when it does surface it is seldom either contagious or stimulative of public counter-argument. So, regarding risk management, we end up with a system imposed upon us by a tiny safety nobility, despite respectable private opposition.

This particular debate will have to await a new generation of leaders. The minds of our present policy-makers are made up. I'm unconvinced that there's even any point in a conference on risk management … more talk about the RAMS, justifying the unjustifiable. But it's a free world. If people want to sit around discussing the informed evaluation of the probability of a loss occurring, let them. I guess the frequency of this hazardous event would be fairly low, one conference in some years, but I fear that the consequences of my own attendance would fit the continuum from death through to temporary disability.

'This particular debate will have to await a new generation of leaders.'

I will be delighted if the delegates at Risk 2002 prove me wrong by acknowledging that the RAMS is nothing more than a training tool for novice instructors, and that there are more ways of killing a possum than hanging.

These things change

My previous writings on dealing with risks earned a rebuke from an admirer of the Risk Shift Phenomenon, loss control management systems, causal sequence charts and competence-difficulty models. My articles exhibited every depravity of the unschooled mind, being fact-free, journalistic, and blatantly ill-researched, with a proliferation of opinion stated as fact and a measure of cheap shots at collaborative, constructive initiatives. This just goes to show that a real person, in touch with real things, inspires terror in the theorists. Much that I have said in this essay repeats the heresy of the earlier pieces, so I hope that those who disagree with me will at least credit me with consistency.

An alert draft-reader of these pages pointed out a contradiction here: I myself am theorising, he reckoned. Furthermore, he suggested that theorists can be useful, which left me undecided whether to deny that I could be useful or to admit to having joined the oligarchy. If my thoughts do amount to theory, it is an alternative one. It stresses judgment derived from knowledge and experience; it values technical skills and muscular strength; it expects ease of long practice. It is ancient theory and it collides with the modern theory, that of LaserJet safety.

There is another contradiction in this essay, one that sums up my message: I advocate obligatory qualifications for instructing outdoor pursuits but I deplore compulsory use of the RAMS. I can live with that contradiction, faced with a website that mostly shies away from specifying qualifications but which shows all the hallmarks of the RAMS police.

Safe As Outside is receiving about three hundred hits a week, a result that has been described as a phenomenal success for Outdoors New Zealand (ONZ). The website is also apparently receiving regular feedback confirming its usefulness. One can only hope that this acclamation does not blind the site's architects to its shortcomings. Also, in considering the significance of the three hundred hits, bear in mind that *Safe As Outside* has vigorously replaced the 1995 Ministry guidelines, in practice if not officially. The country has about 400 secondary schools and 2200 primary schools. The principals, EOTC teachers, and board members of these 2,600 schools form a captive and mainly uncritical audience that is forced to refer to *Safe As Outside* in default of any up-to-date Ministry alternative. All right, in some respects view the hit-count as a result to celebrate, but also view it as a warning that one lopsided and contentious approach to safety is being imposed upon the whole country. If *Safe As Outside* is indeed a blockbuster, then there's all the more reason to scrutinise it.

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Being in digital form, *Safe As Outside* can be fairly easily revised and improved. Possible improvements range from the rescuing of dangling participles to the adding of named qualifications to all the 'Outdoor Pursuits Guidelines'. Too controversial? Politically delicate? Pass the buck to our mythical 'national governing bodies'? Bollocks. There are three megabytes of RAMS information on this

'If *Safe As Outside* is indeed a blockbuster, then there's all the more reason to scrutinise it.'

website, but few named qualifications. You can fit thousands of words into a megabyte (in some formats, 100,000 words). The adding of named qualifications would amount to a dozen words here and there, in bold print. The pages already contain the sketchy beginnings of what is required.

Safe As Outside results from a collective effort within Outdoors New Zealand, an organisation that represents many outdoor-recreation interests, some of them very different from one another. Someone once said that a committee is a body that finds a difficulty for every solution. So we have ended up with an important new resource that is deeply reticent to name qualifications, with just a few exceptions.

Why specify qualifications for Canadian canoeing but not for rafting? Why for mountaineering but not for rockclimbing? I am alarmed that these new guidelines do not specify a proper qualification for leading caving. I am even more alarmed that, a year after the creation of *Safe As Outside*, the 'Outdoor Pursuits Guidelines' do not even *include* kayaking, never mind not specifying minimum qualifications for kayaking on flat water, on rivers, and on the sea. It is as though kayaking does not exist. (I understand that this omission may eventually be corrected, once several advisory bodies have decided what to advise, in reply to a request from Outdoors New Zealand. Kayaking *is* covered in the inclusive-education context.)

'Why specify qualifications for Canadian canoeing but not for rafting? Why for mountaineering but not for rockclimbing?'

While our university and polytechnic outdoor-education and outdoor-recreation departments are forging ahead into professionalism and high theory (sometimes too fast), our attitudes to our technical qualifications, judging from this website, remain amateurish, variable, and discretionary. Instead of maturing we seem to be almost regressing. Instead of an insistence on the holding of national qualifications, and a pride in them, we have loopholes and small-town individualism. It is thirty years since Graham Dingle set up The Outdoor Pursuits Centre, sowing the seeds of professionalism in the wide sense of that word: know-how and prowess, allied to training and qualifications. And yet, in its report on the Hanmer canoeing accident, the Maritime Safety Authority still finds it necessary to recommend: 'If the company involved in this accident decides to resume the activity ... they should use suitably qualified and experience instructors.' We seem to need deaths to drive this point home. Maybe it's the Kiwi psyche. A dislike of red tape of any sort, whether it be qualifications or form-filling. Something rooted in versatility and resourcefulness, in whitebaiting and grunter-hunting. A complement, even, to the Kiwi spirit. Be that as it may, finding the exact names of qualifications on this site is all crinkum-crankum. It's all twists and turns and links to other websites, like some internet treasure-hunt. In this respect, *Safe As Outside* repeats the worst failure of the 1995 Ministry guidelines. It circumnavigates the issue and hardly ever lands.

' ... our attitudes to our technical qualifications, judging from this website, remain amateurish, variable, and discretionary.'

Finding the names of qualifications should be easy. It should become a common use of the website. All the names need to be here, accessible with a few clicks.

Once that naming of qualifications is complete, the 'Outdoor Pursuits Guidelines' could be trimmed so that they cover only the areas not embraced by the award syllabuses. But if these pursuits guidelines are left unaltered, their introductions should forestall

a fundamental confusion, pointing out that they are addressed to nonspecialists or beginners, not to our leaders and instructors. Without such explanations, a basic question will remain: why do our qualified instructors and leaders need to be given puerile and incomplete lists of dangers? The logic eludes me.

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I have said all that I dare say on national governing bodies, qualifications, and experience, and on what the writer, Keith Waterhouse, called *English Our English*. So I can put my drum away. I haven't quite finished with the RAMS or my bugle, because I haven't yet examined the claim quoted in the first sentence of this essay. So let's do that now. What about the proclamation in *EOTC – The Missing Manual* that '[the RAMS] form is used by almost all of New Zealands [*sic*] outdoor centres and professional outdoor instructors'? Is this claim accurate?

Research could provide a simple answer to this question. But underneath any research finding would lie a pivotal complication: what do we mean by 'used'?

John Davidson, in a letter to the *NZOIA Quarterly*, Number 16, wrote of using bowdlerised RAMS documentation to satisfy the OSH man and headmasters, while at the same time relying on highly experience instructors to make 'appropriate decisions based on incoming information'. He distinguished between closed situations, with relatively predictable outcomes (such as climbing on an indoor wall), and open situations, with less predictable outcomes (such as climbing on Mt Taranaki). He added: 'No one tool provides the answer for all situations though in some circles current Risk Management theory has been elevated to the status of sole accepted practice.'

I asked several tertiary lecturers to comment on the claim that the RAMS form is used by almost all centres and professionals. I will not print their names or institutions, as this would risk their being associated, wrongly, with my sentiments, but I will relay the core of what they said. One replied:

> ... we do not use RAMS here ... except as a tool for getting students to consider risk and its management for sessions they may be teaching in a supervised capacity. When I contract in staff to teach our courses they are assumed to be well endowed with judgment (arising from years of cumulative outdoor experience). Indeed our staff selection processes and general team-teaching approach (plus our moderation and support of staff in the field) provide what I regard as a solid framework for managing risks.
>
> From my way of viewing the world, RAMS is an excellent tool for beginning instructors/educators, and for students working towards such. RAMS is certainly not something that can ever substitute for years of outdoor leadership experience! I regard the claims of RAMS holding widespread acceptance across the 'industry' as inaccurate, especially within the tertiary sector and for contractors providing outdoor instruction. I agree many in school-based education are utilising RAMS, but perhaps more as a damage-control tool than an effective teaching resource.

'[John Davidson] added: "No one tool provides the answer for all situations though in some circles current Risk Management theory has been elevated to the status of sole accepted practice."'

A second tertiary lecturer replied that he didn't know whether the statement was true. He thought that it might be true of professionals in outdoor centres, but he didn't have a clue whether it was true of independent, self-employed professionals. In both cases, this was guesswork. He knew of no research that had investigated the 'how' of risk management in this context.

Another contact, a teacher in a secondary school, replied, of RAMS forms: 'I don't mind producing them. It doesn't take long. I did them all a couple of years ago and now I just photocopy new ones each year. OK, they serve no practical purpose, they are just a reassuring placebo for the senior managers, but that's how it is, these days.'

That is not of course completely how it is. Some commentators see the RAMS as very much a functional tool and see RAMS forms as providing much more than just psychological benefit to anxious bosses. Rob Hogan, writing in the latest *Australian Journal of Outdoor Education* (Vol 6, No 2), strongly backs 'the RAMS process': 'In my experience it is most usefully employed by an organisation to prepare standing orders for operations and the conduct of regularly scheduled program activities.'

Just a tool for training novice instructors? Merely a reassuring placebo for administrators suffering from what used to be called, in Britain, warden's disease? A vital planning tool? It would be nice if each of us were allowed to make up his or her own mind. But most of us will not be granted that liberty.

Deeply as I distrust RAMS forms, it looks as if they may be the nearest thing to eternal life we'll ever see on this earth. Eighteen months ago a Ministry of Education committee of the great and the good recommended to the Minister, Trevor Mallard, that the completion of RAMS forms be mandatory for all school field trips. The committee also, crucially, made several recommendations connected with the awareness and expertise of the teachers and managers who would fill in and approve those forms. But Mr Mallard is a busy man and a socialist, and he hasn't yet decided whether to double the profits of Carter Holt Harvey.

Where has ten years of formal risk management got us to? And where are we heading? An increasingly common train of events, recognisable in recent accidents in several countries, starts with apparently adequate or even impressive risk-analysis documentation. The papers might include the question: 'Has the provider identified all potential risks?' Someone will have ticked this or written 'Yes.' Then befalls the accident. Eighteen months later the consultant's report or the coroner's report appears:

> Rams Enforcement Agency Report XZ768/03 ... A risk analysis had been executed, but it did not take cognisance of all contingencies and therefore it failed to comply with contemporary industry precepts, as formulated in the *Operational Parameters Manual* of the Wellington Outdoor Safety Academy (see Appendix 1). The plan did not delineate the area of crevasses marked as B on Map 3 (see Appendix 2). Nor did it emphasise that crevasses can sometimes be concealed by snow, thereby presenting therein a substantial hidden threat. Since the accident, the company has expedited a comprehensive audit of its Instrument of Risk Analysis. We recommend that, additionally, the company weekly re-check and if necessary amend its RAMS Operating Certificates, paying particular regard to alterations

in the crevasse field. Our inquiries also found that two of the clients had not sufficiently comprehended the dangers of ski mountaineering after heavy snowfall. The company should revise its safety briefing of clients to encompass a full elucidation of the risks of glacier travel. The time set aside for this preparation should be sufficient to allow for a joint reading of the company's documented risk analysis.

Far-fetched? Only partly. The Maritime Safety Authority's report on the Hanmer canoeing accident says that the 'risk factors need to be recognised, assessed and understood by the participants before they enter the water, to enable them to make informed decisions about their safety'. And the report also seems to suggest a heroic synthesis of risk analysis and disclosure: 'The Investigator was of the opinion that it would have been better had all the adult participants engaged on the canoe trip been involved in the preparation of the RAMS.'

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Rob Hogan's article in the *AJOE*, mentioned above, talks about a modified RAMS that limits the meaning of 'risk' to something that results in death or disabling injury. The EONZ publication, *Outdoor Safety Management Systems for Primary and Intermediate Schools*, presents an assortment of risk-analysis forms, slightly simplified yet still basically merely variations on the original RAMS forms. These changes were inevitable. But only modification? We need more than that. We need a flexible attitude towards styles of documented risk management, and we need to develop and respect written approaches that are radically different from the RAMS. Microsoft tables are not the only way to organise your thoughts or to present information; prose in information booklets can do the same job. An outdoor centre might have every justification for phrasing its risk analysis in broad terms, such as:

> Kawahuka Hole presents the normal risks of Level 1 caving, as considered by the NZOIA Stage One Caving Instructor qualification. All our trips into Kawahuka Hole are lead by a holder of this qualification.
>
> The cave makes a terrific novice trip. It provides great flexibility, there being easy alternatives to all the more challenging sections. The Kawahuka streamway offers a beginners' trip *par excellence*, a gravitational half-hour of water chutes and plunge-pools, the stuff of legends. Staff members should be aware, however, that this streamway has seen several incidents caused by flooding. These incidents have occurred during spring snowmelt or during heavy storms. There are five exits from the streamway. These climbs involve nothing more than very easy scrambling but are not obvious to locate on your first trip into the cave; all new staff members need to visit this cave on a staff-training trip before assisting on a student trip.
>
> We have not identified any other dangers in Kawahuka Hole over and above the ordinary risks of caving at this beginners' level.
>
> As is normal practice in novice caving, on all our trips into Kawahuka Hole we carry an underground emergency kit. We also leave a comprehensive emergency kit at the cave entrance. Any incident underground will be dealt with by the instructor

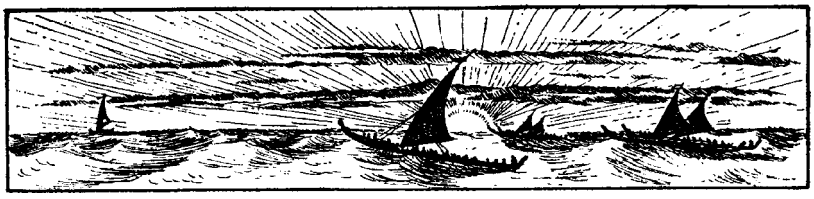
' ... we need a flexible attitude towards styles of documented risk management, and we need to develop and respect written approaches that are radically different from the RAMS.'

in charge judging the situation, making decisions, and taking appropriate action, based on his or her technical training and extensive recorded caving experience.

Despite its merits and its common sense, this style of documentation would not meet approval. The approach identifies idiosyncrasies, but it does not explicitly list every known hazard and it does not identify ways to eliminate, isolate, or minimise those hazards. Instead, it does the unthinkable: it emancipates qualified instructors, trusting their judgment and crediting them with brains. Current orthodox documentation does not place much confidence in those instructors. Instead, it subjugates them and it attempts mission impossible: it relies on listing the full, unabridged spectrum of dangers and on describing in writing how to avoid or diminish those dangers. For Kawahuka Hole this would mean reproducing a cave survey and a guidebook description, précising the *NZOIA Instructor Syllabus Cave One*, and condensing a caving textbook.

Outdoor education is a beautiful idea. Our middle- and higher-level award-holders are dedicated and impassioned people with sophisticated skills. Yet they now have to operate in a safety-management miasma – the managerial flab, the officialese, the RAMS regime – that has become a passionless and one-dimensional parody of safe instructorship.

In the *NZOIA Quarterly* Number 14, page 12, Mike Boyes equated the holding of several NZOIA Level 2 awards to a degree, and he likened a Mountain Guides Association award to a postgraduate qualification. The RAMS makes no allowance for such competence and learning; it expects the same style of documentation from a UIAGM guide as it expects from the organiser of a Form 3 pond investigation. We need to challenge the view of the RAMS as a universally suitable approach, for all leaders and instructors and for everything from primary-school picnics to alpine mountaineering. We need to give outdoor instructing back to outdoor instructors. It's time to end the unhesitating submission to the opinion and dogma of safety experts. The honour and pride of qualified instructors requires them to have a system of their own.



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Imperial orthodoxy or the Peasants' Revolt

If enough readers reply on the issues that I have raised, I will try to find the time to publish their letters or longer contributions in an issue of the occasional newsletter, *Expanse*. Email: pete.mcd@paradise.net.nz

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Update, 2003

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