

Orca Kayaking, Inc.



Risk Management Plan

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Introduction

Orca Kayaking is an outdoor education and outdoor recreation company that provides sea kayaking trips for clients, primarily in the Gulf Islands/San Juan Islands, and in other locations on client request. Founded in 2018, the company has conducted safe, adventure-based outdoor education and recreation experiences for hundreds of youth and adults in its program areas.

This Risk Management plan has been developed as an integral part of this organization's commitment to excellence and for the well-being of Orca Kayaking's clients, staff and facilities.

Risk Management Mission Statement

In all of its programs and practices Orca Kayaking, Inc. (OKI) seeks to eliminate fatalities, disabling injuries, and serious illnesses. In addition OKI is committed to reducing other property damage, lost student hours and student program days, injuries, accidents, and illnesses, including those that may have behavioral causes and those involving emotional and psychological harm.

OKI seeks to understand, anticipate, avoid, mitigate and manage risk—the probability or possibility of an adverse outcome or effect; hazard x consequence—and to eliminate it where possible without compromising educational effectiveness or business operations. OKI seeks to determine and proactively respond to hazards—threats to people or property; exposure x probability—and carry out its operations and programs with the least possible contact to hazards. It is understood that all aspects have some hazards and some risks.

The Risk Management Plan is administered by the Director and Risk Management Committee. All OKI staff and participants are responsible for ensuring appropriate management of risk. The Director and the Risk Management Committee is responsible for implementing, evaluating and revising elements of the Orca Kayaking Management Plan.

Philosophy

1. Orca Kayaking is primarily an adventure based, experiential education organization. Risk is inherent to the environment in which we conduct our activities and to the activities themselves.
2. We do not seek hazards for their own sake. We work to minimize hazards when possible and respond promptly and effectively when hazards are encountered.
3. Prevention is our first priority. This is implemented in a variety of ways, including, but not limited to: course site selection, participant medical screening, equipment selection and maintenance, program planning, and staff training.
4. Our approach to risk management is based upon instructor judgment and sound policies and procedures as found in our risk management and other manuals.
5. Effective emergency procedures are a crucial part of our risk management philosophy.
6. Rather than merely restricting activity, we aim to prepare participants through technical training and other means to anticipate and respond to risk appropriately.

Roles and Responsibilities

The Director

The Director shall:

1. Ensure compliance with accreditation and industry standards.
2. Approve risk management procedures.
3. Establish organization structure and responsibilities.
4. Monitor staff selection, training, placement and evaluation.
5. Ensure implementation of emergency planning, and incident reporting, monitoring, analysis, and investigation systems.
6. Provide for ongoing risk management monitoring, including internal and external reviews.
7. Ensure appropriate communication with clients and participants.
8. Ensure overall compliance of organization activities with Orca Kayaking's mission and risk management mission.
9. Recruit, hire, train, supervise and evaluate field staff.

10. Lead screening of client groups and individual program participants.
11. Develop and approve curriculum.
12. Provide participant risk management and hazard avoidance briefings for participants, as appropriate.
13. Provide necessary field staff orientation and training.
14. Establish and evaluate program risk management policies and procedures
15. Implement emergency planning, and incident reporting, monitoring, analysis, and investigation systems.
16. Identify communication points and evacuation routes for all course areas.
17. Provide appropriate assessment and planning data to field staff.
18. Designate and approve acceptable course areas for area activities.

Guides

Guides shall:

1. Assess participants.
2. Implement risk management procedures and monitor and minimize potential hazards.
3. Deliver participant risk management and hazard avoidance briefings to participants.
4. Train participants (i.e. paddling, rescues, etc.)
5. Conduct first aid and emergency medicine up to the level of their certification for FA, WFA, WFR and WEMT certified staff
6. Carry a fully stocked First Aid Kit while teaching or otherwise responsible for program participants
7. Hold minimum required certifications in wilderness and emergency medicine
8. Report all incidents or accidents in a prompt and thorough fashion

In addition, guides shall:

9. Anticipate and assess the physical limitations and fears of participants and identify potential safety hazards for participants
10. Select appropriate teaching sites and paddling routes appropriate to the physical abilities of participants
11. Model behaviors and exhibit actions that raise outdoor risk management awareness of participants
12. Report accidents and identify potential hazards to the Director, using the appropriate forms to include Accident/Incident Report and SOAP note, within 24 hours of the incident or at the earliest possible opportunity
13. Read internal communication for risk management related information
14. Identify communication points such as telephones and ranger stations and the specific evacuation strategy for each course itinerary to the attending adult chaperone
15. Administer first aid and follow emergency procedures when necessary

All Staff

All staff shall be trained and expected to:

1. Identify and report potentially unsafe situations to their supervisor in a timely fashion.
2. Document incidents using the Accident/Illness report form
3. Respond in the event of an accident involving any participant, staff, or volunteer
4. Lead and support emergency evacuations
5. Role model behaviors and exhibit actions that raise risk management awareness of participants

Clients

Clients shall:

1. Provide accurate and timely medical history information.
2. Complete acknowledgment of risk form.
3. Make sound personal decisions about participation in activities.
4. Be open and honest in communication about readiness for activities.
5. Follow staff instructions and use good judgment.
6. Report incidents to staff.
7. Contribute to a supportive climate among participants.

Risk Management Committee

The Director is the Field Risk Management Officer of the organization, and leads the Risk Management Committee actions.

The Risk Management Committee is composed of the Director and two to ten external members. The Chair of the Committee may be selected on a rotating basis.

The Risk Management Committee will review all new programs for potential risk, and institute a risk management structure for new activities.

Incident Investigation

All incidents requiring external professional medical assistance will be investigated by the Risk Management Officer and reported to the Risk Management Committee.

Medical Training—Field Staff

Staff will be trained and certified by an authorized medical training provider. Exceptions for the use of other providers may be considered by the Director on a case-by-case basis. Field Staff includes lead and assistant guides. In all cases CPR is understood to include adult and child CPR. Training should be by a recognized national provider, or a group whose training syllabus has been reviewed and approved by Orca Kayaking.

1. Kayak Guides. Kayak Guides shall hold a minimum of Basic First Aid and Adult and Child CPR.

Employee Risk Management

Purpose

The purpose of this section of the staff manual is to serve as a guideline for general risk management practices for employees and contractors with Orca Kayaking. Individual conditions may vary due to a variety of circumstances, and in such cases, some of these guidelines may not fully apply. It is the intent of the administrative staff to provide the resources and tools necessary to do the job, keeping risk management as the highest priority.

This section offers basic job risk management information that employees can apply to their particular jobs. At any time an employee feels a hazardous situation or condition exists that is beyond the ability of, level of training of, or tools available to the employee, that individual shall report it to their supervisor.

Employees shall become familiar with risk management policy statement which outlines Orca Kayaking's commitment to management of risks.

Risk Management Policy Statement

Orca Kayaking has a risk management program designed to reduce accidents, injuries, and property damage to both the employees and participants. The health of our participants, volunteers and staff is our primary concern. It is our intention that the mechanical and physical facilities are maintained in accordance with the highest possible standards and that all proper methods and instructions are followed. Orca Kayaking supports an accident prevention program which requires staff to know their jobs, know the procedures to follow to correct hazardous conditions or situations which may arise, and to be motivated to cooperate in maintaining an accident-free environment. ***The urgency of task completion cannot be at the expense of the welfare of staff and clients.***

It is expected that every staff person set the example for both clients and other staff by strict compliance with good risk management practices. This responsibility must be accepted by all staff.

Injury and Illness Prevention Plan

Managing risks on the behalf of staff and clients is a primary commitment of Orca Kayaking. It is OKI's intention that facilities, equipment, and program practices model proper methods and maintenance to prevent injury and illness.

Workplace risk management is every staff member's responsibility. In order to achieve this, staff members shall know their duties, know the procedures to follow to avoid hazardous situations, and be motivated to maintain an accident-free

workplace. The urgency of accomplishing a task should never compromise risk management and prudent practices. We expect staff to question supervisors before engaging in an activity with which s/he is unfamiliar.

Important elements of our injury and illness prevention plan include:

1. Risk management as an integral part of the OKI mission: Acceptable risks that achieve the mission are defined; risks are not taken for their own sake. This is communicated to all staff.
2. Hazard Assessment and Control: Continuous internal and external evaluation of procedures, programs, and equipment and facility maintenance including inspections, peer consultations and accreditation reviews.
3. Incident Investigation: Internal and/or external investigation, analysis, and recommendations from significant incidents.
4. Prevention-Oriented Planning: Prior to courses, procedures, risk management, emergency action, and Injury and Illness Prevention.
5. Risk Management Training: Risk Management Practices, Staff Training, and required emergency care training.
6. Reporting Incidents: Staff members involved, or witness to an accident, injury, close call or other incident shall report it using an Incident Report form.
7. Hazardous Materials Communications Plan: In general, program staff do not use materials which are hazardous in the performance of their duties. Should an employee need to use a chemical that may be hazardous, the Director will make available the appropriate information and training for that chemical before use.
8. Warnings and directions for use of the following commonly used chemicals will be followed: chlorine crystals, hydrogen peroxide, iodine (tincture and crystals), white gas, and liquid propane (LP) gas.
9. Horseplay: Friendly pushing, shoving, jumping, and similar actions are the cause of numerous accidents resulting in injury or property damage. Therefore, it is our policy not to engage in "horseplay." Such activities are not "in the line of duty," and, hence, any injury thus occurring is not compensable under workers compensation, and the financial responsibility of the individual staff member(s).
10. Off-duty activities: Employees are not required to participate in Orca Kayaking-sponsored post-work parties or recreational, social, or athletic activities. An employee's participation in such events or other non-work activities is strictly voluntary, and at the staff member's own risk.

General Risk Management Code of Practice

The following represents working practices that should be followed in all work areas.

1. Always think before acting.
2. Report all hazardous conditions to your supervisor.
3. Report all accidents to your supervisor immediately.
4. Know the location and use of fire extinguishers.
5. Wear appropriate protective clothing and footwear for each job.
6. Exercise caution when lifting, climbing or bending.
7. Know your own personal physical limits. Ask for help when necessary.
8. Do not remove hazard warning devices or tags.
9. Keep fire exits, stairs and walkways free of obstacles.
10. Take the time to do the job right.

Mechanical Jobs

1. Unauthorized personnel shall not be in work areas.
2. Good housekeeping will prevent many accidents.
3. Be aware of emergency procedures for evacuation and power outages.
4. Pressurized containers shall be secured.

5. Operate only equipment you are authorized to use.

Clerical Jobs

1. Use proper seating posture.
2. Be careful around sliding cabinets and file drawers.
3. Exercise caution when lifting or carrying.
4. Exercise caution when using sharp objects (pens, pencils etc.).

Essential Job Functions

If an employee has physical limitations that prevent the employee from performing the essential job functions for which he or she was hired or asked to perform and reasonable accommodation has been made, there may be additional hazards. If special protective equipment is needed, a supervisor shall be contacted before performing any work to discuss and execute risk management solutions.

Risk Management Training for Staff

This document is a staff person guides to effective risk management, and shall be read and referred to as necessary. When a staff person is trained for a specific job, the staff person shall be given additional instruction on work practices, and the proper use of tools and equipment. During employee training the staff person shall have an opportunity to ask questions about any aspect of work that is not understood, and staff are encouraged to do so.

Hazards Reporting

All employees are required to report to their supervisor any hazardous condition or work practice that may exist in any area of OKI practices and programs. There will be no penalty for reporting. Staff are encouraged to eliminate the hazard or condition if it is within his/her scope of work. If an employee does this, he or she should notify his/her supervisor as to what was done and why. There may be certain existing conditions that cannot be immediately repaired or replaced, and need to be looked at from a management/budget perspective. For these situations, please report them to the Director or other appropriate supervisor, and they will be discussed in terms of priority for future projects.

Incident Reporting

Staff shall report to their supervisor all accidents, incidents, and potentially hazardous situations within 24 hours or as soon as possible. The Incident Report form shall be used.

Criteria for filling out an Incident Report include but are not limited to:

1. Any first aid given
2. Any loss of program time by participant due to accident/incident
3. Any accident/incident or near miss that would be useful to document for analysis of trends (e.g. bee stings, slip/falls, poison ivy rash)
4. Any accident/incident or near miss that might result in a recommended program or policy change

Incident reports are given to the Director. The Director reviews, comments and (directly following comments) signs and dates incident report.. The original incident report can then be filed in the Risk Management file, with a copy in the folder for the program on which the incident occurred (if applicable).

Accident Investigation

In the event of an injury, the injured party must report the injury immediately. The injured employee will be required to fill out an employee report of injury. These reports are important to determine causal factors and eliminate future losses. We expect full cooperation in obtaining the necessary information. In some cases, your supervisor will need to interview you in order to fill out a supervisor's report, we also may need additional reports, photos, or even video, depending on the situation. Preserve all evidence and record witness contact information for accurate documentation.

Liability Losses

In the event a participant is injured, we need to gather all the facts about the loss. As a staff person, you play a vital role in helping management sort out facts such as: what happened, why did it happen, how did it happen, who suffered loss, and where did it happen? The post-accident investigation may include reports, witness statements, photos and video, and preservation of evidence. Orca Kayaking expects full cooperation in these investigations and appreciates staff person help in conducting them.

Occupational Safety and Blood borne Pathogens

All field staff whose job is such that there is a reasonable expectation that they could be exposed to blood-borne pathogens shall go through a blood-borne pathogen training, typically in a wilderness first aid course. Verification of current training shall be in each employee's file.

For the safety of OKI employees the following guidelines exist in the event that staff are exposed to blood borne pathogens or are injured on the job.

Blood Borne Pathogens Program

1. Minimizing or eliminating occupational exposure to blood or other body fluids is the goal of this program. Field staff may be expected to incur an occupational exposure to blood or other body fluids through administering First Aid or CPR.
2. All blood will be considered infectious regardless of the perceived status of the source individual.
3. The Director and/or designate is responsible for ensuring that gloves and CPR masks (Personal Protective Equipment [PPE]) are accessible to staff.
4. Items will be considered appropriate only if they do not permit blood/other potentially infectious materials, to pass through/reach the employee's clothing, skin, eyes, mouth or other mucous membranes under the normal conditions of use and for the duration of time that the protective equipment will be used.
5. The Risk Management Officer shall take reasonable action to ensure that staff use appropriate PPE.
6. Gloves shall be worn when it is reasonably anticipated that employees will have contact with blood, non-intact skin, mucous membranes or other potentially infectious materials.
7. Disposable protective gloves and facemasks are to be disposed of after exposure as a biohazard by red-bagging and removal to a biohazard disposal facility.

Hepatitis B Vaccine & Post-Exposure Evaluation/Follow Up

1. Orca Kayaking will make the Hepatitis B vaccine and vaccination series available to all designated First Aid responders and whoever may experience occupational exposure, within OSHA guidelines, generally within 24 hours of exposure.
2. Orca Kayaking will provide post exposure follow-up to employees who have had an exposure incident.
3. The Director or designate shall ensure medical evaluations and procedures, including the Hepatitis B vaccine/vaccination series and post exposure follow-up, are made available to employees.

If an exposure incident occurs:

1. Staff shall wash any potentially contaminated skin area immediately with soap and water. Antiseptic towelettes and/or disinfectant solution is provided in the personal First Aid kits for exposure in the field, where hand-washing facilities are not accessible.
2. Post-exposure medical evaluation and follow-up will be made available immediately for employees who have had an exposure incident.

The follow-up will, as supported by OSHA guidelines:

1. Document who the source individual is and how exposure occurred
2. Determine HIV and HBV infectivity and document the source's blood test results.
3. Provide the exposed employee with the source individual's test results
4. Test blood for HBV and HIV status of exposed employee's blood as soon as possible after exposure incident

The Director will give a copy of the OSHA standards to the health care professional responsible for the employee's hepatitis B vaccinations and post-exposure evaluation and follow-up.

Orca Kayaking will provide the circumstances of exposure, results of the source individual's blood tests, if available and all relevant employee medical records. This will be done within 15 days after evaluation of the exposed staff person; Orca Kayaking will provide the staff person with a copy of the health care professional's written opinion for post-exposure evaluation.

Substance Abuse

Orca Kayaking's Drug and Alcohol Use Policy prohibits staff from working under the influence of illegal drugs and alcohol. Studies have shown that substance abuse in the workplace leads to sub-standard performance, absenteeism, increase in accidents, and worker's compensation claims. It is our intention to maintain a workplace free of drugs and alcohol. When employees are working, OKI expects staff to have 100% of their capabilities. Staff shall observe OKI's drug-free workplace policy and maintain a drug and alcohol-free work environment.

Disciplinary Action

Failure to follow prescribed risk management rules and use good judgment may subject staff to disciplinary action, including termination of employment. For Orca Kayaking to be successful as an organization, the company needs everyone's help and commitment to our risk management efforts.

Worker's Compensation

All employees of Orca Kayaking are covered by Worker's Compensation Insurance for injuries arising out of or in the scope of employment. Work-related injuries must be reported immediately in order to ensure prompt benefits. If you have any questions, problems or need more information, please contact the Director.

Benefits

There are three basic kinds of benefits:

1. Medical care: doctor's fees, charges, etc.
2. Temporary disability: cash payments to replace lost wages.
3. Rehabilitation: to get you back to work.

If You are Injured on the Job

Contact your supervisor immediately. The supervisor should then complete a Supervisor's Report of Injury form. It is important for us to know what caused the injury, when it occurred, who witnessed the incident, and why it happened. You will be treated for the injury and given instructions from there.

Getting Back to Work

If your injury is not serious, and the doctor gives you a work release, you may return to your job. If the injury involves lost work days, you will need to have a doctor's release prior to starting work again. There is no cost to you.

Light Duty

In some cases, you may be released to light duty work. On occasion, we have light duty work available. If you refuse this work, you could lose your temporary disability payments.

Field Risk Management

Field Risk Management information is found in the Emergency Response Plan.

General Program Risk Management

Participant Preparation And Screening

1. Pre-trip information shall be provided to all groups and individual participants prior, and preferably at least three weeks prior, to their arrival to by the Director. The information introduces the program schedule, proper equipment (Required Equipment and Clothing List), and medical information for all participants.
2. All participants are screened for dietary restrictions and medical alerts. The staff is provided this information to execute their duties in an appropriately safe fashion.

Participant Orientation

Individuals participating in a trip, upon their arrival, will participate in an orientation by the lead guide or their designate that includes the following safety awareness and emergency procedures:

1. Chain of Command, in the event of injury, illness, fire or natural disaster requiring medical treatment, evacuation or other emergency response.
2. Stay calm and stay put and rescue strategies in the event of getting lost
3. Location of safety equipment and evacuation routes
4. Safety procedures for the particular environment and course type

First Aid Kits

Guides will carry a fully stocked First Aid kit at all times when with clients. Field First Aid Kits will contain the following items:

PAPERWORK	HYGIENE/COMPRESS	MEDICATIONS CONT'D
1 – Contents and Usage List/ Drug Reference Sheet	4 – Tampons	10 – Cough Drops
1 – SOAP note book	4 - Sanitary Pads	1 – Glucose (cake decorating gel)
1 - Pencil	10 - Hygiene Wipes	
1 - 1st Aid Reference Book	15 - Cotton Swabs	EQUIPMENT
2 - Biohazard bags	1 - Cold Compress	1 – Sawyer Extractor Kit
2 – Missing Person forms		1 - SAM splint
3 - Incident Report Form	DRESSINGS	1 - Waterproof matches/lighter
	6 - Pair Latex Gloves	1 - CPR Pocket Mask
TRAUMA BANDAGES	2 - Moleskin sheets	1 – Trauma shears
1 - Triangular bandage	2 - 1" Cloth Tape	1 - 10cc Irrigation Syringe
1 - Elastic Bandage (Ace)	2 - Eye patch	1 – Tweezers
2 - Gauze Wrap	30 - Standard Bandages	1 – Standard Thermometer
3 - Safety Pins	10 – Knuckle Bandages	1 - Whistle
8 – 4X4 Gauze Pads (4 sterile/4 non-sterile)	10 - Jumbo Bandages	
6 – 4X4 Non Stick Gauze Pads	5 – Butterfly closures	EPI KIT
		1 – Vial of Epinephrine
OINTMENTS/TINCTURES	MEDICATIONS	3 - Syringes
2 oz Betadine	20 - Anti-histamine	
1 - Antibiotic Ointment	35 - Ibuprofen	
1 - Sun Block SPF 30+	30 - Acetaminophen	
15 - Alcohol Swabs	4 oz- Electrolyte Replacement Powder	
1 – Hand Sanitizer	20 - Decongestant	
1 – Kitchen Sink	8 - Anti-diarrheal	
1 – Second Skin dressing sheets	15 - Antacid	

Sea Kayaking Policies & Procedures

The kayak program introduces the fundamentals of sea kayaking including equipment, rescues, paddling technique, wind/weather/waves, seamanship, and coastal minimum impact camping. The program is developed according to the needs of the clients.

Sea kayaking usually takes place in the southern Gulf Islands of British Columbia, Canada, and the San Juan Islands, of Washington State USA, though other sites are used on occasion: Tomales Bay in Point Reyes in central California, and, at Santa Cruz Island in the Channel Islands off of Ventura California.

Procedures

1. Minimum staff to student ratio is 1:8, with a minimum of two staff
2. There shall be no travel on the water in the dark.

3. When traveling in a convoy, boats shall be within a 50 yard perimeter of one another.
4. Equipment:
 - a. All individuals shall wear a properly fitting PFD at all times while on the water.
 - b. Individuals paddling into sea caves shall have appropriate lighting in order to see their way.
 - c. Appropriate rescue equipment, such as bilge pump and paddle floats, shall be carried with each group.
 - d. Groups shall carry a marine radio, or other similar telecommunications device such as a cell phone, capable of signaling for assistance while on the water.
5. Staff shall be aware of environmental hazards that may occur while on the water and what to do.
6. All participants shall be trained in and understand the hazards and systems of sea kayaking before you embark on any trip.
7. Rescue on the ocean in sea kayaks involves the use of a paddle float and or a T-rescue. Staff shall be familiar with these techniques before taking a group out.
8. In general, we avoid surfing and surf landings with participants when possible. Surfing with kayaks shall not be permitted unless wave action is very mild and the landing zone is friendly, and only then with Course Director permission.
9. It is acceptable for staff to bring and use their own personal boat, paddle, and PFD, as long as they are in good working condition, with prior Director permission.
10. Kayak groups will remain within one mile of shore, unless approved by the Director.
11. Sea kayaks operating in reduced visibility (less than one mile) shall remain within sight of shore and all other kayaks, at all times.
12. Launching and landing.
 - a. At least one instructor or guide kayak shall be on the water prior to any participant launch.
 - b. At least one instructor or guide kayak shall be on the water until all participant kayaks have landed successfully.
 - c. Staff shall demonstrate proper launching and landing procedures prior to participant launching and landing.

Guidelines

1. When winds reach consistent speed of 32 kph and above, white caps generally will occur. This can happen very quickly (in a matter of a few minutes) and without warning. For inexperienced and experienced paddlers alike, these conditions are very difficult in which to canoe no matter which direction the wind is blowing. Have a contingency plan ready should high winds suddenly occur. If high winds (>32 kph) are forecast, make sure that all members of the Field Team and clients are notified as soon as possible. It is recommended that clients get participants off the water to avoid a kayak capsizing, personal injury, or loss of any gear.
2. Be aware of concerns special to the marine environment. Primary concerns in these areas include:
 - a. Tidal action.
 - b. Winds and subsequent wave action, including refractory waves from the shoreline (particularly near cliffs).
 - c. Surges in sea caves smashing participants against the cave roof (Santa Cruz Island).
 - d. Fitness, physical and mental, of the participants.

Personal Floatation Devices (PFDs)

The PFDs used for our trips are the standard front and back style. Instructors may bring their own PFDs as long as they pass the general inspection criteria listed below. On water travel courses, PFDs must be worn when paddling, or anytime while in the water.

Procedures

Instructors must ensure that PFDs:

1. Are Coast Guard approved Type II or III PFDs
2. Are in good condition, with appropriate buoyancy and without rips or tears or missing/malfunctioning components such as zippers or buckles
3. Are worn correctly
4. Snugly fit the person wearing them (this means it cannot be pulled over the head of an unconscious person)
5. Field staff shall comply with all rules and regulations of program areas regarding use of PFDs.

Care and use of PFDs includes:

1. To keep PFDs in good condition they should never be used as seat cushions, pillows or back rests (or anything else for which they were not designed).
2. In inclement weather, PFDs should be worn over clothing to allow Instructors to see that the PFD is worn in the correct manner.
3. When not in use, PFDs should be clipped to the thwarts or placed at the feet of the individual.

New Program Planning

All new proposed programs will go through the New Program Plan (NPP) development, as outlined below. Staff, led by the Director, shall prepare the document and submit to the Risk Management Committee for review.

- 1) **Brief description of the program** – Identify all the basic information for the New Program. Evaluate what exactly is being proposed to do, when, for how long, with whom, and where.
 - a. New Program Start Date
 - b. Intended length of program

- c. Number of participants per program session and annually
 - d. If the New Program involves a new area, prepare a reconnaissance report
 - e. Outline a succinct start-to-finish description of the New Program activities, in sequence if possible.
- 2) Program Goals and History
- a. Why are you proposing this New Program?
 - b. What do you hope to accomplish with this New Program?
 - c. How does this New Program relate to the Orca Kayaking mission statement?
 - d. How does this New Program integrate the philosophies of experiential and adventure education?
 - e. Is this New Program modeled off an existing program? If so, how so?
- 3) Screening of and Preparation of Participants – What are the screening issues? What specific information will the participants need to prepare for this New Program?
- a. the program involves a new activity(s), detail adjustments to your current screening and preparation materials/
 - b. If this program involves a new population, detail research of specific health concerns and/or limitations of that population.
 - c. If the program involves a new activity(s), detail adjustments to your current screening and preparation materials.
 - d. If this program involves a new environment, e.g., altitude, heat, cold, wet, detail adjustments to your current screening and preparation materials.
- 4) Special Hazards Posed by Participant Population – Consider age, body size, health and fitness, and behavioral issues.
- a. If you are proposing a new age group, do you have the appropriate size equipment?
 - b. Does your current student to staff ratio need to be adjusted?
 - c. Are the physical demands of the program appropriate for the population?
 - d. Are there any additional equipment needs for this population?
 - e. What types of incidents with this population can be anticipated?
- 5) Staffing – What skills, certifications, and qualifications do the staff need to work this program; including instructional staff, support staff, and administration.
- a. Outline the responsibility of each position. Identify a responsible party for all aspects of the program operations.
 - b. Outline the hiring criteria for each position, include job description.
 - c. Determine staff ratios and the chain of command.
 - d. Identify additional training and orientation needs; internal and external.
 - e. Does the current staff have the skills necessary to instruct the New Program, or does it require hiring outside your current pool?
- 6) Activities to be used in the New Program – What are the activities for staff and participants.
- a. List all activities; highlight new activities.
 - b. Identify the risk associated with each activity.
 - c. Identify the instructional/briefing information the participants will need for each activity.
 - d. Review industry standards for each activity.
 - e. What type of incidents can be anticipated?
- 7) Equipment Requirements – Identify new or special equipment required by staff and participants to participate in, and deal with, the activities and environment of the program.
- a. List gear needed for any new activity.
 - b. Special gear needs for new population
 - c. Additional rescue equipment to support a new program area
- 8) Transportation Requirements – Are there any new transportation needs? Will you provide the transportation or will a subcontractor provide it?
- 9) Subcontracting of equipment or services – If you are planning to subcontract any services or equipment it is important to evaluate the subcontractor.
- a. Outline all subcontracting to be done.
 - b. Identify the organization's safety record.
 - c. Identify the organization's level of liability insurance coverage, any accreditation's, certifications and licenses held.
 - d. Identify training/certification of organization's staff in program activities and first aid.
 - e. Review the organization's Emergency Action Plan.
 - f. Identify maintenance, inspection, and retirement schedules of the equipment to be used.
 - g. Do a hands-on inspection of equipment or facilities to be used.
 - h. Outline the working relationship between the two organizations indicating specifically who is responsible for each aspect of the New Program. E.g., when outside staff are involved, who has the final authority in an emergency in the event of a significant incident, which organization would respond to the medical, families or local authorities.
- 10) Hazards of the new program environment–
- a. Provide maps, photos, guidebook descriptions and any other information on the area in which you will be operating.

- b. Provide a description of the climate and condition of the terrain in the area at the time of the proposed New Program.
 - c. List all hazards of the environment, e.g., flora, fauna, human, and local political issues or permit concerns.
 - d. Are there any special evacuation needs due to the environment?
 - e. Do you have a contingency plan if an environmental factor changes and prevents you from accessing the New Program area? For example, fire, river dries up.
 - f. What types of incidents can be anticipated?
- 11) Procedures to Deal with the Hazards – Prepare a plan to address all the hazards and needs you have identified in headings 4,5,6 & 10.
- 12) Emergency Procedures– Identify the evacuation procedures for the New Program area and outline the resources that are available.
- a. What communication options are available?
 - b. How long will it take to reach an outside resource for assistance?
 - c. What specific resources are available, both human and equipment?
 - d. Who is the contact person for the local search and rescue units?
 - e. What are the technical capabilities of the local search and rescue units?
 - f. What is the level of care provided at the local hospitals? Where can you go for a higher level of care if needed?
- 13) Emergency Communications – Outline your communication plan between the field operations, your headquarters, medical facilities/consultants, emergency evacuation resources, and law enforcement and land management agencies.
- a. Will your current on-call system for emergencies be appropriate for this New Program?
 - b. Are there management agencies that will need to be in the information loop in the event of an emergency?

Emergency Response Plan

Orca Kayaking has an established Emergency Response Plan. This Plan is reviewed annually.

In addition to the field-based response outlined in that document, comprehensive legal representation may be necessary. Orca Kayaking has retained the services of attorney Phineas Oort, Esq. in Seattle, WA for business and non-litigation matters. Litigation-related legal matters are generally handled by our liability insurance company; our broker is Hibbs-Hallmark of Tyler, Texas. The insurer will generally retain a legal firm to defend Orca Kayaking against claims. Current contact information for Phineas Oort and Hibbs-Hallmark is in OKI administrative files.

Notification Sequence and Call Guide

Orca Kayaking has an established Notification Sequence and Call Guide for emergency response. This document is updated annually and is to be found in the Emergency Response Plan.

Critical Incident Stress Debriefing

Critical incident stress debriefing (CISD) may be necessary in the aftermath of an emergency situation. Situations indicating CISD include fatalities, disabling injuries, mass casualties, and other emotionally distressing events. If CISD is necessary, it will be conducted by a qualified individual or team as designated by the Director.

Media Relations

Authorized Personnel

The Director and the Chair of the Risk Management Committee are primary spokespeople to the media. Staff should refer all inquiries to the Director and RMC Chair. Under no circumstances shall staff or others speak with media representatives without express authorization from the Director or RMC Chair.

Guidelines

1. In general, if the incident occurred within the OKI community and involves primarily our own personnel, we respond to the media. If our incident affects the outside community, we initiate contact with the media. When possible, we will draft a written statement to release to the media.
2. Orca Kayaking legal counsel and public relations advisor will advise the Spokesperson regarding information to be released to the media.
3. Time is important in dealing with the media. Inquiries should be handled as promptly as possible in accordance with the legal guidelines listed below. The press will want to know:

- a. What happened.
 - b. Where it happened.
 - c. When it happened.
 - d. Who was involved (i.e. names and personal data, not only of those injured, but rescuers and caregivers as well).
 - e. They will also, in all likelihood, solicit opinions and emotional responses. Neither is appropriate. Stick to the facts.
4. Spokesperson will:
- a. Provide accurate and full disclosure of the facts and cooperate to every extent possible with the news media.
 - b. When information cannot be released, explain why (e.g. relatives have not yet been notified; doctor's orders prohibit interview of survivor, etc.).
 - c. When given conflicting information by sources, determine which version is accurate before release.
 - d. Refrain from speculation and, when the answer to a query is not known, so state.
 - e. Provide the media with background material on Orca Kayaking risk management policies and record, if appropriate.
 - f. Make certain all media and reporters have equal access to information.
 - g. Upon discovering that erroneous information has been given to the media, provide information as soon as possible. When a reporter prints or broadcasts erroneous information, inform the reporter (not his/her superior) and provide the correct information.
 - h. Keep the Chair of the RMC informed of any developments which might involve Orca Kayaking liability or reflect adversely on Orca Kayaking.

Restrictions

No one, including the Spokesperson, should release any information that identifies responsibility for an accident without first consulting legal counsel. Specific problems arise when:

1. Attribution of fault or criticism of conduct, policy, or equipment is made public without a full explanation of the circumstances of the accident developed through the complete Orca Kayaking investigatory process.
2. Information regarding the nature of injury or illness is released prior to diagnosis by a licensed medical physician.
3. Names of victims are revealed prior to notification of closest relatives.
4. Estimates of property damage are released.

Media Relations

1. We are obligated to deal with the media, because the public has a right to know. In addition, if you don't tell your side of the story, someone else will tell theirs.
2. Develop relations with the media before incidents. Identify your talent and spokespeople—individuals who look distinguished, trustworthy and professional, and who are telegenic, articulate and who interview well.
3. From a public relations standpoint, the objective is to have a one-day story and avoid a continuing series of headlines and features dragged out over a period of days and weeks. Toward this end, we should provide the news media with as much detail as possible, as early as possible.
4. You will find the media more cooperative if you deal with them in a straightforward manner with facts, subject only to legal constraints, consideration for closest relative, protection of the injured, and good taste. Hesitancy or improperly dealing with the press in an emergency situation may escalate news coverage.
5. Most interaction with the news media will take place over the phone. Rather than reading a "canned story" to the caller, the Spokesperson should have a written list of key points for reference, and tell the story in their own words. Message points should be distributed to anyone who may take a call, in case the spokesperson is unavailable.
6. Determine a list of key points and stick to them. Do not allow the reporter to convince you to speculate, deviate from your message, or provide opportunities for sensationalizing the story. Select three to four key points. Stay on message!
7. Practice. Have your materials—press release template, stand-by statement template, organizational message points, risk management message points, and other standard message points—together.
8. Key points for a sample disaster involving ill or injured participants may be along the lines of the following:
 - a. **Our primary concern is for our clients** (sets a compassionate tone)
 - b. **Our Situation Response Plan worked as designed, and participants received medical care**
 - c. **We are working with the authorities to determine the facts and cause** (shows you have nothing to hide; avoids having to say 'I don't know.')
9. The image of concern and caring projected by the Spokesperson may have an important effect on the eventual tone of the story that appears. It is important to impress on the media any kind of humanitarian, thoughtful acts taken by Orca Kayaking (i.e. Director visits scene, RMC Chair visits family etc.).

10. Anticipate the media. Recognize stages and elements of the story. Use the media to your strategic advantage. Anticipate the flow of the story: reporter opens at scene, establishes premise, cuts to victim/witness/official, where things stand now, where things may go, dramatic wrap-up.
11. Depending upon the nature of the emergency, some members of the media may come to the OKI office facility. Plan to have an area ready in which to locate any members of the press who show up. The location should be near but separate from the site of the separate from the Emergency Response Team.
12. To summarize, the media are important in helping to shape people's opinions. Good media relations are essential in an emergency. You will help create a positive environment under difficult circumstances if you:
 - a. Speak plain English
 - b. Never lie
 - c. Do not speculate
 - d. Are always courteous
 - e. Cooperate, but hold your own ground and stick to your message points
 - f. Do not allow yourself to be provoked

Regional Media Resources

SEATTLE TIMES

1000 Denny Way, Seattle, WA 98109

Phone: 206.624.7323 (READ) or 888.624.7323 (READ), <https://www.seattletimes.com/contact/>

SEATTLE POST-INTELLIGENCER

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Kristina Moy, Editorial Director, kristina.moy@seattlepi.com 206-640-5600

KOMO NEWS

KOMO-TV CHANNEL 4

Suite 340, 140 4th Ave. N., Seattle, WA 98103

206.404.4000

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KOMO-FM 97.7

140 4th Avenue North, Seattle, WA 98109

206-404-3187

Radio Newsroom: 206.404.5666

gcgreenberg@sbgstv.com

Incident Reviews

Critical Incident Investigations will be conducted in the event of an Orca Kayaking fatality or disabling injury, or when called for by the Director. The investigations have an internal and external component.

Internal Critical Incident Investigation

An Internal Critical Incident Investigation or Internal Review is a review of the situation, including recommendations for changes, conducted by an Internal Review Team composed of employees and Risk Management Committee members.

1. The Director shall conduct an Internal Review, generally within two weeks of a critical incident.
2. The incident review will answer, to the best of its abilities, the Who? What? When? Where? and How? of the incident. It shall include a log of events, student and staff interviews, and an accurate factual account of the incident. It shall also make formal recommendations for organizational changes.
3. The Chair of the RMC will review the report and formulate their own recommendations within two weeks. The final report and recommendations will be returned to the Director for action.
4. If required, policies and procedures will be changed or instituted immediately to reduce the likelihood of reoccurrence of the incident or similar incidents.

External Critical Incident Investigation

An External Critical Incident Investigation is a review of the situation (including recommendations) conducted by outside consultant(s) selected by the Director, and the Chair of the Risk Management Committee.

1. The External Review team will be appointed by the Director and Chair of the RMC within 48 hours of notification of the incident.
2. The External Review team will be composed of three to five authorities in sea kayaking, outdoor risk management, legal or related safety issues. None of the team may be an employee, Director or volunteer with OKI. Generally, a professional specialist in safety reviews and risk management will lead the team.
3. The External Review team will be supported to visit the incident site, interview those involved, analyze Orca Kayaking policies and procedures, and take any other reasonable steps to uncover information necessary to determine facts and establish recommendations relative to the incident.
4. The External Review team will forward a written report of its findings to the Director and Chair of the RMC. This will include:
 - a. Cause(s) of the incident
 - b. Compliance of OKI staff to OKI Risk Management policies and procedures
 - c. Recommendations, if any
5. The Director and Chair of the RMC will write a final report in response to the findings of the External Review team, to include:
 - a. Actions taken or planned
 - b. Compliance with the recommendations of the Internal Review and External Review, or non-compliance and the reasons therefore.