



OUT OF PROVINCE AND REMOTE TRAVEL RISK MANAGEMENT POLICY

Authorizer: Senior Vice President, International Education / Government and Community Relations

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POLICY STATEMENT:

Students, faculty, and staff at Conestoga College travel internationally for various purposes.

For students, these include but are not limited to academic exchange and study abroad, or work abroad, presenting at a conference, participating in an athletic event, completing a research or internship opportunity, volunteering or participating in a student club/society program or joining a class or academic program trip.

For staff and faculty, these include but are not limited to leading students on any activities that require a faculty participant, pursuing scholarly research, collaborating on a research project, presenting at or attending a conference, developing international partnerships, recruiting international students, enhancing Conestoga's international presence and reputation.

Given the global environment in which Conestoga operates, Conestoga is committed to providing a safe and beneficial experience for all travellers who go abroad for college-related activities.

SCOPE:

The Policy applies to Conestoga's entire community and serves as a risk management reference for all organizational stakeholders involved in travel development, implementation, and management.

Conestoga states that responsibilities arising from due diligence are understood and applied at all hierarchical levels.

The individuals' health, safety and security take precedence over asset safety, business continuity or the protection of the organization's reputation. Conestoga is not responsible for

the health, safety, and security of travellers who are not students or staff travelling on College authorized travel

DEFINITIONS:

Safety and Security Management Approaches

Acceptance

This approach aims to reduce threats by focusing on a mission in a welcoming environment in which individuals, the community and the authorities accept the presence of participants and collaborate in the safe conduct of the travel. Through this approach, positive, transparent, and lasting relationships are advocated with local players.

Deterrence

This approach aims to reduce threats through the application of deterrent strategies to secure workplaces and accommodation locations (e.g., the use of barbed wire surrounding the mission site or the use of armed guards).

Protection

This approach aims to reduce vulnerability to a threat by increasing the protection level. This translates into enhanced safety and security features such as installing additional safeguards, purchasing alternative communication equipment in crisis situations (satellite telephone, etc.) using more secure means of transportation in the event of an emergency (ex. armored car, airplane, helicopter, etc.).

Duty of Care

The legal obligation that governs Conestoga College Institute of Technology and Advanced Learning's health, safety and security responsibilities and obligations.

Due Diligence

It is the degree of judgment, care, caution, firmness, and action that can reasonably be expected of a person in certain circumstances. In the context of travel, health, safety and security, due diligence means that the organization and its individuals must take reasonable precautions, considering the specific circumstances of the country of destination, to prevent any incident that would involve the health, safety, and security of individuals and to provide adequate care in the event of an accident, injury, or illness.

Partner

Organization (institutions, suppliers, tour operators, etc.) in the host country or in Canada, that contributes to travel and that collaborates closely with Conestoga to align with the college's due diligence and risk policies

Stakeholders

Refers to the various players that may be involved in travel (travellers, staff members, management, partners in Canada and at the destination, etc.).

Remote Area

Destination that is more than 40 kilometres or 30 minutes by land from a hospital or clinic.

Risk Tolerance Threshold

Maximum risk level Conestoga accepts.

Travel

An Authorized college trip of more than one night, a portion of which takes place in remote areas or outside the province.

Traveller

All participants (students, interns, and volunteers) as well as all Conestoga's salaried employees and contractors who take participate in travel.

POLICY ELABORATION:

Goal

This Policy defines Conestoga's risk tolerance which is framed by legal and economic factors, the destination's safety and security context, the benefits to travellers or the organization, the ability to respond to an emergency, the profile of travellers and potential impacts on reputation. Furthermore, as per its Enterprise Risk Management Policy, the college's risk appetite is influenced by its mission and values, as well as its strategic objectives.

The Policy outlines Conestoga's positions establishing its risk tolerance. Risk tolerance can evolve over time and is contextual. Conestoga reserves the right to apply specific measures and different protocols depending on the situations in which its travels develop and evolve. The College reserves the right to implement new mitigation measures or cancel a travel when it considers that the risk level is or becomes too high.

Objectives

Conestoga is aware of the risks associated with sending individuals on travel. Being responsible and committed, the College adopts a Policy that aims to achieve the following objectives:

- Establish a clear position in terms of travel risk management.
- Provide a framework for the College's travel risk management process, including role and responsibilities.
- Ensure stakeholders commit to their due diligence responsibilities.
- Ensure stakeholder compliance and implementation of travel risk management measures and protocols.

Administrative and Legal Framework

Conestoga's entire community must respect the customs and laws in force in the regions, provinces, states, and host countries while respecting Conestoga's ethical foundations and values.

This document complements the College's Enterprise Risk Management Policy, procedures, and other relevant policies regardless of where the travel takes place, including:

- Off-Campus Activity Policy and Procedure
- Sexual & Gender-Based Violence Policy
- Enterprise Risk Management Policy
- Protection of Privacy Policy
- Privacy Breach Procedure
- Acceptable Use of Technology Policy and Procedure
- Discrimination & Harassment Prevention Policy and Procedure
- Student Rights and Responsibilities Policy and Procedure
- Purchasing Policy and Code of Ethics
- Procurement Procedure Relative to Value
- Employee Code of Conduct

This Policy is also subject to the following legislation:

- Criminal Code R.S.C. (1985), c. C-46

Appendix A provides an overview of the legislation listed above.

Implementation

Senior Vice President International Education, Government and Community Relations and Senior Vice President Academic, Student Affairs, Human Resources and Research are responsible for ensuring the implementation of this Policy.

Review Mechanism

College Leadership ensures that this Policy is reviewed every 3 years. Depending on the volume of travellers, the number of travel events and their risk levels, some sections may need to be updated before the established deadline.

1. COMPLEMENTARITY

The Policy is part of a process to implement a Travel Risk Management Strategy based on the diagram in Appendix B. All components of this plan are complementary and ensure effective risk management.

Preventive Measures and Risk Management

The many decisions and elements discussed in this Policy are transformed into management and preventive measures. These procedures, guidelines and tools enable the College to manage risks and respect the threshold of Conestoga.

Crisis Management Protocol

Conestoga has formalized a crisis cell which, once activated, is responsible for efficiently responding to emergency situations according to predetermined procedures. The operating mode of the crisis cell and its members' roles and responsibilities are detailed in this document.

Standard Operating Procedures (SOP)

Conestoga uses procedures to follow for the most likely problematic events during a travel. The College expects everyone involved to refer to it during crisis management. Conestoga is committed to informing its stakeholders of the SOP and ensuring their understanding to optimize interventions.

Monitoring and Evaluation

Conestoga monitors, controls, and evaluates all components of its travel risk management plan. To do so, the College uses evaluation tools that help determine whether the objectives have been achieved. If not, the College implements the corrective measures that are part of the travel risk management continuous improvement process.

2. SECURITY MANAGEMENT APPROACHES

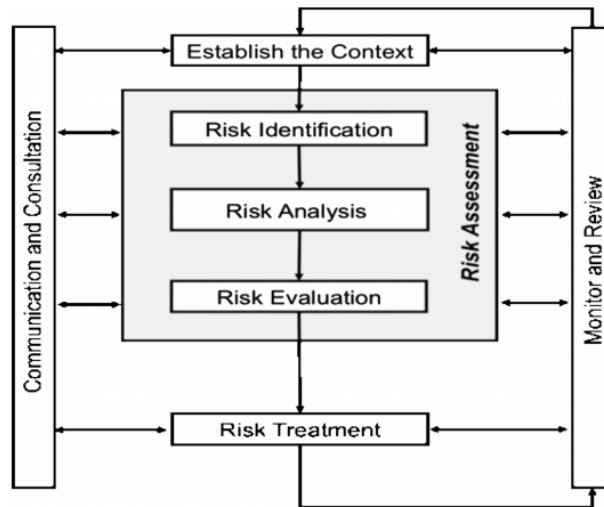
Conestoga adheres to the principle that safety and security are the result of robust risk management. The security management approaches implemented are part of the organizational strategy to be put in place.

Conestoga actively manages aspects related to its travellers' safety and security. The College chooses to stay in destinations that accept their presence. Conestoga promotes positive and transparent relationships with local stakeholders. The College accepts that certain protective or deterrent measures are in place based on the local safety and security culture.

The safety and security context of the visited countries may evolve rapidly and involve adapting the security management approach in place. The College recognizes the possibility that the risk level in a country may change during the travel and agrees to implement, when necessary, additional protective or deterrent measures. Conestoga relies on the support of its stakeholders to help it implement the appropriate measures.

3. TRAVEL RISK MANAGEMENT PROCESS

Conestoga chooses to refer to ISO31030 to define its travel risk management practices. The diagram below refers to the steps to address travel-related risks in a manner that meets the organization's tolerance threshold. The process must be followed and applied to all of the College's travel risk categories. As such, a travel for which the residual risks are acceptable to the organization is approved.



The process in place promotes continuous improvement in risk management and therefore the health, safety, and security of travellers.

Travel Risk Assessment

Guiding Principles

- The risk assessment process is applied to all of the organization's travels, even when reconducted.
- According to the risk level of a destination, the relations developed with the partners on site and the results of the risk assessment process, Conestoga decides if a field visit is mandatory prior to a travel.
- The recurrence of destinations and activities involving students are prioritized for a few years (3 to 5 years).
- Conestoga advocates for the development of partnerships that are aligned with its partnership framework.
- Conestoga advocates that travels involving students be organized in collaboration only with a partner to whom it can delegate travel-related risk management responsibilities.
- In cases where travels involving students are developed without a partner, travel managers have knowledge and experience of the destination. Additional preventive and risk management measures are implemented (local guide, driver, or others depending on the context).
- While the College community is encouraged to collaborate in identifying diligent partners, the final selection rests with Conestoga, as per defined by its partnership framework.
- The travel-related risk assessment considers the destination (country, region), the nature of the activities pursued (internship, research, business development, etc.) as well as the individual vulnerabilities of travellers.
- If the planning of a travel extends over several months (including Professional Development Leave) and the context in which it will take place evolves, it may be necessary to redo part or all the risk assessment.
- To approve a travel, Conestoga considers its organizational vulnerabilities (available human and financial resources, cybersecurity, programming, opportunities, etc.) as well

the impacts on its finances, its operations, the safety of its community and the learner experience.

Steps to Assess Travel Risks

For all Conestoga's travels, the following steps are taken. [Appendix C](#) outlines each of these steps in more detail.

1. Travel Risk Identification

- Understand the destination's safety and security context
- Identify activities pursued at destination and their characteristics
- Consider vulnerabilities

2. Analyze Identified Risks

- Assess the Risk Level of Identified Risks

3. Manage Risks

- Validate control measures in place, and where required, apply additional risk management strategies
- Assess capacities of partner organization

4. Monitoring

Before departure and during travel:

- Monitor the risks that have been identified or that could arise
- Identify elements or events that could have an impact on the travel's safety and security and travellers' health

5. Reporting

- The process is presented and reported

Risk assessment allows for informed approval of a travel. In case of doubt concerning the health, safety, and security of people, the organization reserves the right to refuse a travel.

4. CONESTOGA'S TRAVELLERS

All travellers must comply to Conestoga's predeparture procedure and approval process. Conestoga ensures that travellers meet the criteria related to their role and responsibilities and the travel's specific context. Conestoga considers the risks identified through the travel risk assessment process.

Conestoga reserves the right to refuse any person's participation in a travel for reasons deemed legitimate that may compromise its success or safe and secure conduct (physical or psychological health condition, known bad intentions, behavioural problems, criminal record, etc.).

Conestoga does not allow travellers to be accompanied by relatives, friends, or minors.

Student Trip Leaders

Conestoga selects its student-led trip leaders. The College ensures their ability to provide safe and quality accompaniment (ability to mitigate risks and contribute to crisis resolution, languages spoken, first aid training, ability to supervise the work carried out, etc.).

Conestoga recognizes that certain skills can be acquired. To meet the initial selection criteria, the organization commits to raise awareness or train the trip leaders who are members of the College's staff.

5. PARTNER ORGANIZATION SELECTION

Conestoga selects partners that contribute to its duty of care and travel risk management. Contracts or agreements signed with partners follow the partnership framework and respect, when applicable, the procurement policy.

The College assesses the partner organization against pre-established criteria on an ad hoc basis throughout the relationship.

For those partners already working with the College, the latter commits to assessing them. If this assessment does not demonstrate that the partner organization meets Conestoga's safety expectations and that there is a lack of capacity or interest in incorporating the required changes, the partnerships will be challenged and possibly interrupted.

6. RECOGNITION OF ROLES AND RESPONSIBILITIES

Conestoga delegates roles and responsibilities for travel risk management to its stakeholders. The College ensures that its stakeholders are clearly informed of their roles and responsibilities and are committed to meeting them. As such, they learn about the best practices established and made available by Conestoga.

Failure to comply with any of the stakeholder's roles or responsibilities may result in administrative or disciplinary action, up to and including termination of a partnership and withdrawal or repatriation of a traveller to Canada at their expense.

7. AWARENESS AND TRAINING

Travellers

Conestoga implements a pre-departure training program and collaborates in training on arrival in the host country given by the partner organization. These trainings cover all aspects of travel risk management.

Social Media

The use of social media by travellers and stakeholders poses a risk of loss of information control. This can pose a threat to the health, safety and security of travel, travellers, and partners. Conestoga therefore raises people's awareness of social media use in the context of their travel before departure.

Cybersecurity, Data, and Intellectual Property Protection

Threats to the security of information assets are numerous and their economic, operational, reputational, and legal impacts can be significant for the College and its stakeholders. Conestoga communicates to its travellers the safeguards to be implemented and the information management means to be used to mitigate the risks. Stakeholders are made aware of the rules and guidelines to follow and the penalties for non-compliance.

Illegal Actions in Canada

Any illegal actions in Canada, although legal or tolerated in the destination country, are prohibited by Conestoga.

Illegal Actions at destination

The College shall make travellers aware of the importance of respecting the laws of the destination.

Professional Development

In the interest of continuous improvement, staff and faculty can develop or strengthen their travel risk management skills through training and other awareness-raising or professional development activities, provided by Conestoga.

8. RIGHT TO REFUSE TO TRAVEL

Conestoga is committed to clearly communicating to its travellers its risk tolerance level. The College informs them of the risks involved in participating in a travel.

Conestoga stipulates that anyone considering that the risk level of a travel is too high has the right to refuse to go. The College recognizes that if the level of risk in the country where the travel is taking place increases, the individual's right to withdraw also applies.

Any person who considers that their gender, identity, sexual orientation, religion, ethnic origin, nationality, or medical condition, among other things, may put them in a vulnerable situation during the stay has the right to refuse to travel or to ask to withdraw. Conestoga is responsible for informing travellers for whom one of the above reasons may pose a risk in the countries of intervention.

9. HEALTH

Conestoga recognizes that there are risks to the health of its travellers. To mitigate these risks, the College places great emphasis on traveller awareness and uses a pre-departure medical process that varies depending on the nature and duration of the travel.

Immunization

Conestoga strongly recommends that travellers consult a professional to be aware of recommended vaccines. The College requests that an acknowledgment of health risks be signed by the traveller. Any traveller can be refused or denied travel/entry if they do not meet the required policies/rules of the college, country of departure, or country of arrival at the time of travel.

Code of Conduct and Responsibilities While Travelling

Conestoga requires all staff and students travelling to adhere to the same code of conduct and responsibilities while travelling. These are outlined in the aforementioned policies. Travellers should consult with HR (staff) or Conestoga International (students) for any questions regarding legal questions, prohibited items, medication, cultural conduct, or any other matters that may require clarification prior to travel.

First Aid

Conestoga states that in the case of individual travel, the specific risk analysis will reveal the relevance to train travellers in basic first aid to support the management of minor injuries. In the case of student travels, at least one group leader is trained in basic first aid including cardiorespiratory resuscitation (CPR). The specific risk analysis may reveal the relevance for first aid training to be specific to remote areas. The training costs are covered by Conestoga. A first aid kit is provided to student groups by the College. At least one member of the group is trained to use its content. It is the traveller's individual responsibility to have a personal first aid kit that includes, among other things, his or her own specific medication.

10. COMMUNICATIONS

Conestoga maintains a reliable two-way communication process with travellers throughout the travel. The College informs them, as well as the stakeholders at the destination, of the regular communication procedures and those implemented in the event of an emergency.

11. ACCOMPANIMENT RATIO for student groups

To ensure safe management of its group activities, Conestoga states that all groups be supervised by at least two group leaders for trips of 1 to 20 participants (1:10). This ratio is subject to change depending on the risks identified, number of travellers, the activities carried out, the management capacity of the partner organization at destination and the risk prevention and management measures in place.

Some exceptions require that a group be supervised by a single person. In this case, Conestoga identifies one or more group members as an emergency resource to support the group leader or act as a contact person and group leader if necessary. The involvement of the partner at the destination is adjusted accordingly.

12. TRAVELLING WITH MINORS

Conestoga does not allow minors to participate in a travel. Travellers must be at least 18 years old at the time of departure.

13. EXTENSION OF STAY FOR PERSONAL PURPOSES

For student group travels, Conestoga does not allow students and designated group leaders (faculty or staff) accompanying the group to extend their travel beyond the official dates of the

College's activity. For other types of travel, travel outside of approved dates of travel is not the responsibility of Conestoga.

14. INSURANCE

Conestoga requires all travellers to have a travel insurance policy valid for the duration of their stay.

15. INCIDENT REPORT AND EVALUATION

Health, safety, and security-related incidents or events are all reported using the *Declaration of a Safety and Security Related Incident* form, whether it is a minor, imminent, potential, and major or near miss incident. The form requires that all information be disclosed, whether it be a rumour about safety or information from a more credible source.

Following each travel, an evaluation of the safety aspects is carried out. This evaluation helps document good practices and highlights the problematic elements to be addressed before the next travel.

REFERENCES:

[Travel, Meals, and Hospitality Expenses Policy](#)

REVISION LOG:

8/18/2023 Academic Coordinating Committee

APPENDIX A — LEGAL FRAMEWORK

Article 217.1 of the Canadian Criminal Code stipulates that anyone who undertakes, or has the authority, to direct how another person does work or performs a task is under a legal duty to take reasonable steps to prevent bodily harm to others¹. Sections 22.1 and 22.2 impose potential criminal responsibility on organizations and their agents for negligence and other offences. Anyone working for an organization could be charged with a criminal offence in the event of a breach of the responsibilities described in the law. Therefore, any person responsible for directing work has the obligation to exercise due diligence and must take reasonable steps to ensure the safety of workers and the public.

Due Diligence Defence

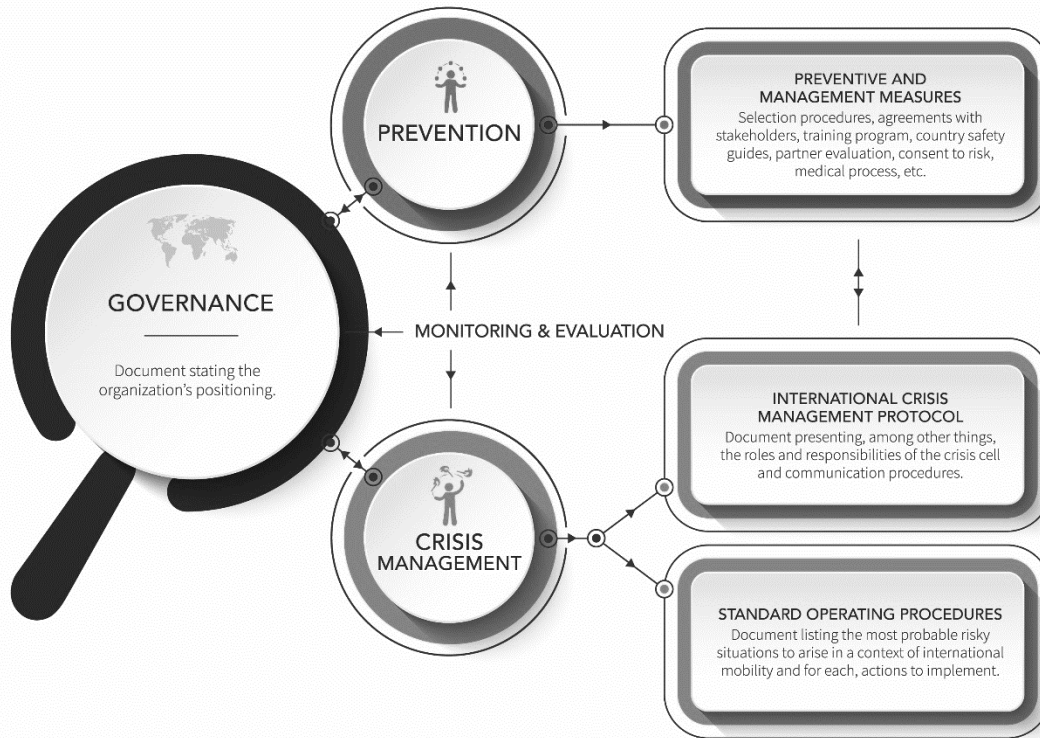
The organization prosecuted for criminal negligence may invoke a due diligence defence. There are three (3) essential duty of care elements that have been identified in the case law regarding violations of health and safety legislation: prevention, efficiency, and authority. Due diligence is the degree of judgment, care, caution, firmness, and action that can reasonably be expected of a person in certain circumstances.

When applied in the context of travel health, safety and security, due diligence means that Conestoga must take reasonable precautions, taking into account the particular circumstance of the country of destination, to prevent any incident involving the health or safety and security of individuals and provide adequate care in the event of accident, injury or illness.

As a result, all persons who have a role or responsibilities in overseeing a travel undertaken by the organization have an obligation to exercise due diligence in all aspects of its planning, of its related activities, the working environment and the training of staff and travellers.

¹Section 217.1 uses the term "others", which is intended to protect the public, contrary to the Labor Laws present in many Canadian provinces, which apply only to workers.

APPENDIX B – TRAVEL RISK MANAGEMENT STRATEGY



APPENDIX C — TRAVEL RISK ASSESSMENT process

1) Identification of Travel Risks

Understanding the Destination’s Safety and Security Context

For international travel, Conestoga refers to the Global Affairs Canada (GAC) website to identify the risk level of the country and regions visited during the travel. GAC identifies four (4) risk levels. The table below shows the organization’s tolerance in relation to the GAC classification.

GAC – Risk Levels		Organization’s Decision*
1	Exercise normal security precautions	The travel involving students is temporarily authorized. The risk analysis process is required for final approval. For staff and faculty, the travel is authorized.
2	Exercise a high degree of caution**	The travel involving students is temporarily authorized. The risk analysis process is required for final approval. Particular attention is paid to the stability of the destination. The organization ensure that no foreseeable event (elections, demonstrations, etc.) could influence the safety, security, and health of people during travel dates. The PESTEL analysis does not anticipate that the risk level will increase during the travel beyond Conestoga’s risk tolerance. For staff and faculty, the travel is authorized.
3	Avoid non-essential** travel	The travel involving students can’t take place. For staff and faculty only: - Travel deemed essential is temporarily authorized. To obtain final approval: - The risk analysis process is required. - Reasonable preventive measures are implemented. - A contingency plan is developed.
4	Avoid all travel	The travel can’t take place.

*This chart presents the general positioning of Conestoga College. Exceptions are possible if travellers demonstrate the essential nature of the travel if mitigation measures are in place or can be put in place with reasonable efforts and if a robust contingency plan is developed.

**If Level 2 or 3 regional warnings are present, travel may be temporarily approved provided these areas are avoided or sufficiently removed from the areas being visited.

For all travels, Conestoga conducts a destination analysis based on the *PESTEL*² method. It identifies external factors that may impact Conestoga and its stakeholders. To do so, the College refers to multiple credible³ sources, including the GAC website.

Identify Activities Pursued at Destination and Their Characteristics

Conestoga identifies the risks related to the activities carried out during the travel.

²<https://blog.oxfordcollegeofmarketing.com/2016/06/30/pestel-analysis/>

³ If necessary, Conestoga also refers to the websites of the French, English and Australian government.

The College compiles the overall picture of the activities and lists the characteristics (logistics, transportation, accommodation, etc.).

Consider the Vulnerabilities

The risk identification process considers organizational vulnerabilities and the characteristics of an individual (gender, sexual orientation, religion, ethnic origin, physical or mental health condition, etc.).

2) Analyze Identified Risks

For each risk identified, Conestoga assesses the risk level considering the likelihood of a risk occurring and its impacts.

3) Manage Risks

For each risk, a risk management strategy is applied to achieve a residual risk level that is consistent with Conestoga's risk tolerance.

Managing

- Validate control measures in place, and where required, apply additional risk management strategies
- Assess capacities of partner organization

Monitoring

Before departure and during travel:

- Monitor the risks that have been identified or that could arise
- Identify elements or events that could have an impact on the travel's safety and security and travellers' health

Reporting

- The process is presented and reported

Make Final Decision

Based on its risk tolerance, the College approves the travel or not.