HSWA
HEALTH & SAFETY AT WORK ACT

Safety Audit Standard for Adventure Activities

REQUIREMENTS FOR A SAFETY AUDIT OF OPERATORS

March 2017 VERSION 1.1

New Zealand Government

WORKSAFE
NEW ZEALAND | MAHI HAUMARU AOTEAROA

FOREWORD

THE HEALTH AND SAFETY AT WORK (ADVENTURE ACTIVITIES) REGULATIONS 2016

This standard was developed as required by the Health and Safety at Work (Adventure Activities) Regulations 2016, and was published in the *New Zealand Gazette* on Thursday March 23 2017.

REFERENCE GROUP

The draft text of this updated version 1.1 has been reviewed by a reference group consisting of industry bodies, audit providers and interested individuals.

FURTHER INFORMATION

Further information about the regulatory system is available in the adventure activities section of the WorkSafe New Zealand website: www.worksafe.govt.nz

Further information about safety management systems and activity safety, can be found at the adventure tourism and outdoor commercial sector website: www.supportadventure.co.nz

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INTRODUCTION

New Zealand has some of the most exciting adventure activities in some of the most spectacular locations in the world. Many of these adventure activities are offered to international and domestic visitors by commercial operators.

In addition, numerous students participate in outdoor education programmes provided by commercial operators.

All adventure activities involve inherent risk of harm. The degree of risk varies among activities and locations. It is important that adventure activity operators take all practicable steps to manage the risks and deliver adventure activities safely while keeping alive the sense of adventure and excitement.

To protect the health and safety of staff and participants engaged in adventure activities, and to protect New Zealand's reputation as a world-leading provider of adventure activities, the Government introduced regulations in 2011 to ensure operators have sound safety management systems in place.

The current regulations are the Health and Safety at Work (Adventure Activities) Regulations 2016. They were made under the Health and Safety at Work Act 2015, which is referred to as HSWA.

1.1 THE REGULATIONS

The regulations require commercial operators who provide adventure activities, as defined by the regulations, to pass safety audits and become registered by WorkSafe New Zealand (WorkSafe). Passing a safety audit is required for registration.

WorkSafe must develop and continue to review safety audit standards specifying the requirements that adventure activity operators must comply with to reduce risks when providing adventure activities. Safety audit standards must include requirements to manage the risks of drug and alcohol use by operators and their staff. WorkSafe may publish a safety audit standard, or a change to a safety audit standard, by notice in the *New Zealand Gazette*.

Safety audits are performed by safety auditors recognised by WorkSafe. Safety auditors are engaged directly by operators. A safety auditor must audit an operator for compliance with the safety audit standard that applies to the adventure activities provided by the operator.

If the operator passes the safety audit, the auditor must issue a safety audit certificate to the operator that specifies the adventure activities that were audited. Safety audit certificates are valid for a period specified by the auditor up to a maximum of three years. Renewal is required on or before the expiry date. An auditor may issue a certificate subject to any conditions the auditor considers are required to maintain the safety of the activities, as consistent with the safety audit standard.

1.2 ▸ THIS STANDARD

This is the Safety Audit Standard for Adventure Activities, version 1.1 (February 2017).

This Standard is an update of the *Safety Audit Standard for Adventure Activities*, dated March 2013. The purpose of this update is to make consequential changes resulting from: the creation of WorkSafe in 2013; the Health and Safety at Work Act 2015; and the Health and Safety at Work (Adventure Activities) Regulations 2016. This version also clarifies the language about different technical roles supporting the operator and the audit team.

This standard sets out requirements of a safety management system (SMS) for operators that provide the adventure activities covered by the Regulations.

In addition to the regulated requirements for registration, the scope of this standard includes ancillary services provided by an operator to participants where such services involve serious risk (such as, for example, off-road transport to or from an adventure activity).

1.3 ▸ AUDITING

A safety audit performed against this standard will systematically involve a review of the SMS documentation, discussions with relevant people and observations of practice.

To pass the audit, an operator must satisfy the auditor that their SMS complies with the standard, both in intention and in practice.

1.4 ▸ ONGOING COMPLIANCE

Having passed an audit, it is the operator's responsibility to continue to comply with this standard. They must ensure their safety culture remains positive, the approved SMS is followed, and good practice is maintained. Additionally, they must review their SMS in response to new information or as their business changes.

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DEFINITIONS

The following definitions apply for the purposes of this standard.

TERM	DEFINITION
Activity	Adventure activity as defined in regulation 4 of the Health and Safety at Work (Adventure Activities) Regulations 2016
Ancillary services	Services provided by an operator to participants that supplement and support the operator's adventure activities. **Note**: Ancillary services should be included in an operator's safety management system. Safety audits against this standard will review only those ancillary services which involve a serious risk to health and safety (such as, for example, off-road transport to or from an adventure activity).

Engage	Engaging means consulting with workers who carry out work for the operation; and who are (or are likely to be) directly affected by a matter relating to work health and safety.
	
	Engaging with workers requires:
	> that relevant information about the matter is shared in a timely manner
	> that workers are given a reasonable opportunity
	  – to express their views and raise health or safety issues in relation to the matter
	  – to contribute to the decision-making process
	> that the views of workers are taken into account by the PCBU
	> that the workers are advised of the outcome of the engagement in a timely manner.

Good practice	Range of actions currently accepted within the adventure and outdoor sector to manage the risk of harm to staff, participants and visitors. Good practice should also reflect relevant standards recognised within the sector for the safe provision of adventure activities where these exist. This may include, but is not limited to: > activity safety guidelines > codes of practice or conduct > other recognised/approved guidelines > accepted professional practices.
Harm	Harm is illness, injury, or both, and includes physical and mental harm caused by work-related stress.
Hazard and serious hazard	A hazard is anything that does or could cause harm, and includes a situation where a person's behaviour may be an actual or potential cause or source of harm to themselves or to another person (for example, due to the effects of fatigue or drugs and alcohol). A hazard includes anything that does or could cause harm from prolonged exposure, or harm that does not usually occur or become apparent until later. A serious hazard is a hazard that does or could cause a notifiable event.
HSWA	The Health and Safety at Work Act 2015
Incident	Event that caused or could have caused harm to any person. **Note**: An incident that did not cause harm is also called a 'near miss', 'near hit', 'close call', 'near-accident', or similar.
Must and should	'Must' refers to requirements that are essential for compliance with this standard and with the regulations. 'Should' refers to matters that are recommended.

TERM	DEFINITION
Notifiable event	A notifiable event is defined in section 25 of HSWA as meaning any of the following events that arise from work: > the death of a person > a notifiable injury or illness > a notifiable incident.
Notifiable incident	Notifiable incident is defined in section 24 of HSWA as meaning an unplanned or uncontrolled incident in relation to a workplace that exposes a worker or any other person to a serious risk to that person's health and safety arising from an immediate or imminent exposure to: > an implosion, explosion or fire > an escape of gas or steam > an escape of a pressurised substance > an electric shock > the fall or release from a height of any plant, substance, or thing > the collapse or partial collapse of a structure > other items listed in the Act.

Notifiable injury or illness	Notifiable injury or illness has the meaning defined in section 23 of HSWA, which includes (in part):
	(a) any of the following injuries or illnesses that require the person to have immediate treatment (other than first aid)
	    (i) The amputation of any part of their body
	    (ii) A serious head injury
	    (iii) A serious eye injury
	    (iv) A serious burn
	    (v) The separation of their skin from an underlying tissue (eg de-gloving)
	    (vi) A spinal injury
	    (vii) The loss of a bodily function
	    (viii) Serious lacerations
	(b) An injury or illness that requires, or would usually require, the person to be admitted to hospital for immediate treatment
	(c) An injury or illness that requires, or would usually require, the person to have medical treatment within 48 hours of exposure to a substance
	(d) Any serious infection to which the carrying out of work is a significant factor
	(e) Any other injury or illness declared by regulations to be notifiable.

Operator	A PCBU who provides an adventure activity to a participant. **Note**: 'Operator' includes but is not limited to a sole trader, company, partnership, trading trust, incorporated society and charitable trust. 'Operator' includes a person or other legal entity that provides adventure activities as a contractor to sports or recreation clubs, and/or to associations representing sports or recreation clubs, and/or to registered schools or tertiary education providers – that is, the organisations that are not covered by the regulations as defined in regulation 4. 'Operator' includes a 'principal' as a person or other legal entity that engages any other person or other legal entity as a contractor to do any work for gain or reward.

TERM	DEFINITION
Operation	The business and organised action, process or manner of providing an activity or ancillary service.
Participant	Person who participates in an activity and is not staff.
PCBU	PCBU (Person Controlling a Business or Undertaking) has the meaning defined in section 17 of HSWA
Policy	Intentions and direction of the operator as formally expressed by the top leadership.
Provide	'Provide' is defined in section 3 of the Regulations as meaning where an operator directly provides the activity in person, or indirectly provides the activity through an employee or other person.

Reasonably practicable	'Reasonably practicable' has the meaning defined in section 22 of HSWA
	
	Unless the context otherwise requires, reasonably practicable, in relation to a duty of a PCBU, means that which is, or was at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters, including—
	(a) the likelihood of the hazard or the risk concerned occurring; and
	(b) the degree of harm that might result from the hazard or risk; and
	(c) what the person concerned knows, or ought reasonably to know, about—
	   (i) the hazard or risk; and
	   (ii) ways of eliminating or minimising the risk; and
	(d) the availability and suitability of ways to eliminate or minimise the risk; and
	(e) after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.

Risk and serious risk	Risk (in a general sense) is the effect of uncertainty on organisational objectives. (See *ISO 31000:2009 Risk management – Principles and guidelines*). In this standard, unless the context requires otherwise, a risk means a chance of harm. It is a potential failure to ensure the health and safety of participants, staff and others involved in an activity. **For example** a risk of spinal injury may be identified in an activity. If that injury happened, the operator would not reach a safety objective of zero notifiable injuries in a season. In this standard, a **serious risk** means a chance of a notifiable event. **For example** it is uncertain which people will be affected and when, but there is a foreseeable chance of decompression illness causing a notifiable event in SCUBA activities. Decompression illness would be identified as a serious risk. In practice a hazard (gases dissolved in the body) is managed to reduce the likelihood or severity of harm from decompression illness, as a way of trying to reach the operator's safety goals. **Note**: This use of the term 'serious risk' simplifies the update of section 5 in this standard. The definition used here should not be relied on to interpret 'serious risk' in HSWA (where it is not defined).
Risk disclosure	Statement from the operator of the risks involved in participating in the activity, and a statement from the participant on any issue that could affect safety such as health factors, fitness or water confidence.

TERM	DEFINITION
Safety management system (SMS)	Documented management system for directing and controlling an operation in regard to safety.
Standard operating procedures (SOPs)	Detailed, written information and instructions or plans for performing a particular activity or task (including ancillary services). **Note**: SOPs are considered an 'administrative control'. In the context of section 5.2 SOPs do not eliminate or minimise risks. After risks have been eliminated or minimised so far as is practicable, SOPs manage the remaining risk.
Staff	Person or persons responsible for leading, guiding, instructing, supervising or supporting an activity, or otherwise taking responsibility for others within the activity. **Note**: This meaning is narrower than 'worker' as defined in HSWA. This standard retains the term 'staff' because 'worker' has a broad sense including some people who might not have delegated responsibility for providing adventure activities. For example, trainees and people gaining work-experience are 'workers' but may not be appropriate for a safety-sensitive 'staff' role with responsibility for others during an adventure activity. Staff may be employees, contractors or volunteer workers. In most cases, staff will exclude trainees, people gaining work experience, accompanying adults, and others with only limited supervisory roles. Therefore, their safety will be managed as for participants in the activities.
Technical adviser	Person or group of people that has professional credentials such as a high-level, nationally recognised qualification, or extensive knowledge, skills and experience to assist an operator with various technical tasks, including advising and reviewing the policies, procedures and practices relating to an activity. **Note**: This term has been changed from Version 1.0 which used the term 'technical expert'. 'Technical expert' is used (with a different definition) by the NZ Adventure Activities Certification Scheme in relation to audit team members. This change clarifies that an operator's technical adviser is not the same as the audit team's technical expert. An operator's technical adviser(s) may be contracted by, or closely connected to the operator. The credentials may be achieved by combining those of two or more people, who may be staff members. In contrast, technical experts are required to be fully qualified as an individual and they must be independent of the operator.
Top leadership	Person or group of people associated with the operator's organisation who direct and control the operations at the highest level within the legal entity. Top leadership is equivalent to the 'officers' of a PCBU as defined in the HSWA. **Note**: Top leadership has the power to delegate authority and provide resources within the operation, and is ultimately responsible for the operator's compliance with health and safety law and good practice. The form and nature of top leadership depends on the operator's legal status and the scale of the operation. It may include directors, trustees, board members, executive managers, or an owner/operator. It does not extend to any holding company or other form of separate ownership.

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SAFETY MANAGEMENT SYSTEM (SMS) REQUIREMENTS

The operator must establish, document, implement, maintain, and continually improve an SMS in accordance with the requirements of this standard, and must determine how they will fulfil these requirements.

The SMS must include an overarching safety management policy. The policy must express the operator's commitment to: compliance with health and safety legislation; prevention of notifiable events; and continual improvement. The policy must state who is responsible for the SMS. The operator should have a document or statement summarising the components of their SMS and how they relate to each other.

The further requirements of this standard are set out in the following sections.

> **Note**: An SMS can differ from one operator to another due to the:
>
> > size of operation and type and range of adventure activities
> >
> > complexity of the adventure activities
> >
> > competence of persons leading the adventure activities.

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LEADERSHIP AND MANAGEMENT

IN THIS SECTION:

4.1 ▷ TOP LEADERSHIP COMMITMENT

As officers, top leadership must take steps to:

> gain an understanding of the activities

> gain a general understanding of the hazards and risks associated with the activities

> ensure that the operation has available the appropriate resources to establish, implement, maintain and continually improve the SMS

> verify the provision and use of those resources.

Top leadership should:

> approve the operator's safety management policy

> ensure that the importance of effective safety management, and of conforming to the SMS, is communicated to staff, participants, contractors and relevant other parties

> require and review regular reports on safety performance

> ensure that operations comply with health and safety legislation, and that the SMS achieves its intended goals and objectives.

4.2 ▷ LEGISLATION, STANDARDS, CODES OF PRACTICE AND GUIDELINES

The operator must identify the legislation (including local bylaws), standards, activity safety guidelines, codes of practice, and similar information that is relevant to the safe management of their adventure activities. Similarly, the operator should do this for their ancillary services also.

This information must be used to inform development of the SMS. Reports obtained by the operator from technical advisers and/or technical experts should also be used to inform development of the SMS.

The operator must monitor this information to ensure the SMS remains up-to-date and consistent with any changes as appropriate and that their operations continue to comply with such requirements.

4.3 ▷ SAFETY GOALS AND OBJECTIVES

The operator must set goals and objectives that address safety and effect improvement. Objectives should be specific, measurable, achievable, relevant and time-bound.

Note: Safety objectives are steps towards achieving broader safety goals, and may relate to areas such as, for example, individual training plans, training courses, or peer reviews.

When establishing safety objectives, the operator should consider:

> hazards and risks

> technology and usage options

> financial, operational and business requirements

> the views of staff and relevant other parties.

The operator must engage with staff in establishing safety objectives and the plans to meet those objectives.

The operator must monitor and record the results of implementing safety goals and objectives.

4.4 ▸ ROLES, RESPONSIBILITIES AND AUTHORITY

The operator must ensure that staff comply with the relevant requirements of the SMS.

The operator must ensure that specific authorities and responsibilities for safety requirements are assigned to competent staff. As appropriate, such responsibilities should be recorded in performance agreements, contracts or other documentation.

Roles, responsibilities and authorities must be communicated to staff to ensure there is a clear understanding of who is responsible at any given time for each aspect of ensuring the safety of every person associated with the activity.

The operator must assign responsibility and authority for:

> ensuring the SMS complies with the requirements of this standard

> reviewing and evaluating the performance of the SMS

> monitoring the performance of staff in relation to assigned responsibilities and delegations

> regularly reporting to top leadership on safety performance

> reviewing incidents.

Note: An individual who operates without staff will have the full responsibility.

4.5 ▸ COMMUNICATION

The operator must establish, implement and maintain procedures for communicating relevant safety information to and from staff, participants, potential participants and other parties.

Note: 'Other parties' may include other PCBUs who have overlapping duties with the operator. See also Sections 33- 34 of HSWA.

The operator must have procedures for risk disclosure between the operator and participant, and subsequent acknowledgement.

The operator must establish and maintain policies and procedures for receiving complaints and using any complaints about safety to review the SMS.

Safety must be addressed regularly at internal meetings. Decisions and any action points arising from these meetings must be communicated to staff and implemented.

4.6 ▸ STAFF INDUCTION AND TRAINING

Staff must be inducted into the operator's SMS before they take responsibility for others within an activity.

Employees should have a training plan.

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RISK AND HAZARD MANAGEMENT

IN THIS SECTION:

5.1 ▸ RISK AND HAZARD IDENTIFICATION AND ASSESSMENT

The operator must implement a systematic process to:

> identify the reasonably foreseeable risks arising from their activities

> identify the reasonably foreseeable hazards that could give rise to risks in their activities

> assess each risk and hazard to determine whether it is serious.

Note: This standard does not prescribe the method used to determine seriousness.

The operator must engage with staff when identifying hazards and assessing risks arising from their activities.

The operator must ensure that a technical adviser, either in-house or external, is involved in this process of identification and assessment.

Note: Hazards and operating conditions that may increase risk include:

> drug or alcohol impairment of any person involved in a safety-sensitive role in the activity

> weather – directly and indirectly affecting the activity, including the effects of the weather on the environment

> participant abilities that could affect safety management, including language comprehension, technical skill level, behaviour, and physical and mental fitness (including drug or alcohol impairment)

> remote or isolated work.

> fatigue and repetitive tasks

> combinations of simultaneous risks.

5.2 ▸ RISK MANAGEMENT MEASURES

The operator must eliminate serious risks arising from their activities, so far as is reasonably practicable.

Note: By definition, an adventure activity includes some serious risk. The requirement is to eliminate unnecessary serious risks.

When it is not reasonably practicable to eliminate serious risks, the operator must minimise the serious risks arising from their activities.

In minimising risks, the operator must (if reasonably practicable) take one or more of the following actions that is most appropriate for the risk:

> substituting the hazard giving rise to the risk with something that gives rise to a lesser risk

> isolating the hazard giving rise to the risk to prevent anyone coming into contact with it

> implementing engineering controls.

The operator must manage the remaining risk arising from their activities, by using the administrative controls and/or personal protective equipment that are most appropriate for the risk.

The operator must engage with staff when making decisions about ways to eliminate or minimise risks.

Note: The requirements of this section focus on prevention of notifiable events arising from adventure activities and some ancillary services involving participants. The operator should also eliminate or minimise other risks in line with their duty under HSWA (section 36(1)(a)). That duty may be considered by audit teams in relation to section 4.1-4.3 of this standard but it is not normally a major focus of audit effort.

The requirements of this section do not cover all requirements of the law in relation to support functions (such as office work, workshops etc) that are more likely to be subject to the Health and Safety at Work (General Risk and Workplace Management) Regulations 2016.

5.3 DRUG AND ALCOHOL USE

The operator must assess the level of risk in their operations caused by staff potentially being impaired by drug and alcohol use. The operator's risk assessment must take into account the nature of the activities provided by the operator, and the nature of their workforce.

The operator must have a policy for managing the risk of drug and alcohol impairment among staff. The policy must be based on the assessed level of risk to health and safety.

The policy must include the operator's methods for monitoring the drug and alcohol hazard, and their plans for responding to staff impairment due to drugs or alcohol.

The operator must engage with staff during this risk assessment and policy development.

Note: Operators should refer to the publication *Guidance for Managing Drug and Alcohol-Related Risks in Adventure Activities* (The Ministry of Business, Innovation and Employment, January 2013) for assistance.

06/

STANDARD OPERATING PROCEDURES (SOPs)

6.1 ACTIVITY SOPs

The operator must develop, implement and maintain SOPs for each activity.

The operator must engage with staff when proposing changes that may affect the health and safety of workers.

SOPs must conform to good practice for the activity, and address each of the following items under this section on SOPs.

6.2 STAFF COMPETENCE

SOPs must describe the required staff competence for each activity. A formal and systematic task assessment must be conducted for each activity to determine the required staff competence.

The operator must ensure staff have the required competence for their assigned tasks or are directly supervised by someone with the required competence.

The operator must ensure staff have their competence verified through appropriate processes of assessment and revalidation.

Note: Nationally recognised qualifications should be used where relevant.

6.3 DYNAMIC MANAGEMENT OF RISKS

In addition to outlining control measures for serious risks, SOPs must require staff to continually identify and manage risk levels during each activity.

Staff must have the authority to halt an activity if they identify increased risks (or combination of risks) that threaten the safety of any person associated with the activity.

6.4 SUPERVISION

The operator must ensure participants are adequately supervised.

SOPs must specify:

> the maximum ratio of participants to staff for each activity as determined by good practice

> the positioning of staff in relation to participants during the activity

> how and when supervision ratios and positioning should change for differing circumstances.

Note: Circumstances requiring changes to supervision structures could include differing participant abilities, weather conditions, staff competence and time constraints.

6.5 CLOTHING AND EQUIPMENT

SOPs must specify the clothing and equipment that is required to ensure safety during the activity.

The operator must ensure clothing and equipment is:

> suitable for the nature of the activity and any associated hazards

> a suitable size, fit and reasonably comfortable for staff and participants

> maintained, repaired or replaced so that it continues to be in good working order

> maintained, repaired or replaced so that it continues to be clean and hygienic, and

> available in sufficient quantities for the scale of the operation.

The operator must ensure that information, training or instruction is provided on the proper wearing or use of the clothing or equipment that is provided to staff and participants.

The operator must ensure staff and participants are clothed and equipped for the activity in accordance with the SOP.

The operator must ensure that clothing and equipment used is fit for purpose whether provided by the operator, the participant or a third party.

6.6 FIELD COMMUNICATIONS

The operator must develop, implement and maintain procedures that enable staff to seek assistance during the activity.

Note: When developing procedures for field communications, the operator should take into account:

> remote or isolated work

> the nature of the activity

> the age and abilities of participants

> available technology

> the operating environment.

6.7 ANCILLARY SERVICES

The operator should develop, implement and maintain SOPs for their ancillary services.

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EMERGENCY PREPAREDNESS AND RESPONSE PLANS

The operator must establish and maintain emergency preparedness and response plans for foreseeable emergencies.

The operator must engage with staff while developing emergency plans.

The plans must include procedures for:

> stabilising the situation and accounting for staff and participants

> assigning responsibilities and authority for implementing emergency response plans, including who must notify emergency services and when.

> rescue or evacuation of people involved in the activity.

The emergency preparedness and response plans must be known by staff and made available to participants and other relevant parties.

Note: Other relevant parties may include the local police, and/or other PCBUs.

The emergency preparedness and response plans must be tested and reviewed periodically, reviewed after an incident or emergency, and revised as required.

Adequate first aid supplies must be available at all times during the activity.

The operator must ensure that staff and participants have ready access to someone with an appropriate and current first aid qualification.

08/

INCIDENT MANAGEMENT

8.1 ▸ INCIDENT RESPONSE

The operator must develop procedures for responding to incidents, including communicating and recording incidents internally, and reporting notifiable events to the relevant authority.

The procedures for recording and reporting incidents must be communicated to staff.

> **Note**: The procedures should identify which incidents are to be recorded in addition to notifiable events.
>
> See sections 55-57 of HSWA for legal requirements relating to notifiable events.

8.2 ▸ INCIDENT REVIEW

The operator must establish a process for investigating and reviewing incidents, understanding the underlying causes, identifying improvements to the SMS, and analysing trends.

Recommendations from incident reviews must be implemented and communicated to staff and relevant other parties.

09/

DOCUMENT CONTROL

The operator must ensure that the documented information required for the SMS is:

> readable, identifiable and traceable to the activity

> periodically reviewed, and revised where necessary

> signed off as adequate by a competent and responsible person

> current and available at appropriate locations

> adequately protected from unauthorised modification, deletion and publication

> removed from circulation if it is obsolete, or clearly marked that it is not to be used.

Note: Obsolete SMS documents should be retained in archived form, that is, suitably identified and protected against damage, deterioration, or loss.

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CONTINUAL IMPROVEMENT

IN THIS SECTION:

10.1 ▶ PROCESS

The operator must develop, implement and maintain a process to ensure continual improvement of the SMS and safety outcomes.

This process should be conducted through internal reviews of adventure activities, reviews of incidents, and internal review of the SMS.

Where available, collated data and information from the adventure and outdoor sector must be considered.

10.2 ▶ INTERNAL REVIEW OF THE SMS

The operator must review at least annually the performance of the SMS against the SMS's stated safety goals and objectives.

The review should take into account any audit findings, reports from technical advisers and/or technical experts, and analyses and recommendations from specific reviews, including reviews of incidents.

10.3 ▶ INTERNAL REVIEWS OF ADVENTURE ACTIVITIES

The operator must conduct scheduled internal reviews of their adventure activities to ensure compliance with this standard. In addition, the operator must review their adventure activities when prompted by:

> audit findings

> proposed changes to the adventure activities provided, including the sites used, that may change the hazards or the seriousness of the risks or hazards

> changes to the environment in which the activity is conducted

> changes to key staff

> incidents and emergencies

> changes in legislation, standards, activity safety guidelines, codes of practice or similar information.

> identification of a new relevant hazard or risk.

The operator should involve technical advisers to assist in the review process.

The operator must ensure that:

> the reviews are conducted by people with current competence in the activity

> any opportunities for improvement are identified

> outcomes are communicated to staff and other relevant parties

> any actions resulting from the reviews are implemented.

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