Good Practice for Adventure Activities
A Guide for Audit Teams

1. What is good practice?

It is a legal requirement to operate to good practice. The audit process is designed to check that an operator is meeting this legal requirement.

Good practice is defined within the Safety Audit Standard for Adventure Activities as:

> *The range of actions currently accepted within the adventure and outdoor sector to manage the risk of harm to staff, participants and visitors.*

Good practice is the benchmark for acceptable policies and procedures. It is activity specific, although there will often be similarities with other activities that manage similar risks and hazards.

It is important to be clear on the terms accepted practice and best practice and how they differ from good practice.

Accepted practice

Practice that is accepted as good practice by a sub-group of a sector. This practice, although accepted by this group, may not necessarily be aligned with what the broader sector views as good practice – it could be higher or lower.

Best practice

Practice that is above the good practice benchmark.

2. Who determines good practice?

Within the audit team, there are two functions related to good practice:

- The auditor must have sufficient knowledge and understanding of good practice for the activities to ensure effective communication with other audit team members, including technical experts.
- Technical experts must have a high level of knowledge of the activities, including knowledge of current good practice and how this can be reflected in a safety management system.

It is primarily the role of the technical expert to assess the extent of conformity with operational good practice (as directed by the auditor).

3. Where can you find good practice information?

The audit standard states that:

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:

a) *Activity safety guidelines*

b) *Codes of practice or conduct*

c) *Other recognised/approved guidelines*

d) *Accepted professional practices.*

This means you could access information on good practice via written or verbal sources (technical experts). Good practice exists whether it is written down or not.

Written sources

There are various types of written information on good practice, and a variety of names that go with them, e.g. codes of practice, guidelines, and rules. These names can be misleading. Except where a document is a legal requirement, or developed directly by a regulatory or government agency, there is essentially no pre-determined weighting or hierarchy to the resources.

Using written sources

It is important to remember that written sources of information must always be supported by expert interpretation in the context of each operation.

Written sources of good practice information are very useful if they cover relevant topics, were informed by experts, are available to all, and are current. They get much less useful as soon as one of these things is compromised and establishing good practice becomes more and more reliant on TE opinion.

Things to check before use

Before deciding how heavily to rely on a written document for information on good practice, check the following:

- Is it a legal requirement to follow the document?
- Is it accepted by the sector as representing good practice?
- Is the information current?
- Was it informed by suitable experts and broadly consulted?
- Does it cover all relevant topics areas? If there are gaps, ensure you access good practice information from another source.

Using government rules or regulations

Regulatory rules have been developed by both Maritime New Zealand (MNZ) and the Civil Aviation Authority (CAA), e.g. MNZ rule part 81 and CAA rule part 115. WorkSafe NZ administers the Adventure Activity Regulations.

Operators covered by government rules and regulations are legally required to comply with their recommendations. If they do not, they will either fail an audit or need to apply for an exemption from a particular part of the rule or regulation.

Using government developed guidance material

If the government develops guidance material or codes of practice, they expect that it will be followed. Auditors and incident investigators are expected to use the guidelines to identify good practice.

However, government guidance material is not a legal requirement unless it is referenced in legislation or a regulation. If an operator manages safety in a different way, they will need to justify this to the auditor and, if the guidance material is current, this is unusual.

Using private-sector developed guidance material

The quality of guidance material developed by the private sector may vary, and it should be used with discretion. However, it may be very helpful for providing recommendations on good practice.

Following the recommendations of this guidance material is not a legal requirement. Safety auditors and incident investigators may use the material to help identify good practice, particularly when the guidance material was developed by experts using a consultative process, and is current.

Activity Safety Guidelines are private-sector developed. They are regarded as a reliable source of information on good practice due to their coverage of relevant topics, development process, and regular reviews. ASG development takes into account the recommendations of relevant ISOs, AS/NZ, and AS standards.

International standards (ISOs), Australian /New Zealand standards (AS/NZ) and Australian standards (AS) are all regarded as reliable sources of information due to their development processes. They do however vary in their currency, what topics they cover, and their fit for the New Zealand context.

Advantages of written information

- Everyone can quickly and easily find out what good practice is.
- They help make good practice consistent nationally.
- Good practice information for one activity can often help inform good practice standards for another activity that has similar risk and hazards, although it will seldom be exactly the same.

Disadvantages of written information

- If they are not informed by experts and not current, they are likely to be incorrect.
- They vary greatly in what they cover and the depth to which they cover it and will not always cover all the areas that need to be considered when checking good practice.
- They cannot cover all circumstances.
- There will sometimes be other ways to meet safety requirements, and sometimes these other ways will be better for the situation than those recommended in the written document.
- If they are not available to all, they are vastly less useful.

If an operator's system varies from that in the written information

Sometimes an operator will meet good practice in a different way. This could well be the best thing for them to do for their particular environment.

However, it is important to check that they know they are operating differently from normal good practice and that a technical expert has verified their system as meeting good practice.

If the written source is a legal requirement, the operator will need to have a documented exemption from the corresponding regulatory body.

Verbal sources of good practice information

Verbal good practice information can be accessed from TEs – someone with very high skills and knowledge in the specific adventure activity. The Adventure Activity Certification Scheme details what constitutes a TE, including listing relevant qualifications where they exist and using them as a benchmark for attestations. See the certification scheme for more information.

Using technical experts

A TE, in conjunction with an acceptable written source of good practice information, is the ideal combination.

Ensure that TEs have clear direction on:

- How to engage with the operator during the site visit and what other staff they may need to involve in the process, e.g. guides and instructors.
- Any written good practice documents that they should be using and how much they can rely on them to accurately represent good practice information.
- What to check – equip them with a checklist that they can use in the field.
- Any particular areas where they need to focus as a result of stage one of the audit.
- How they are expected to check each part of the checklist, such as by seeing a particular type of evidence or by asking questions.
- How they are expected to present their findings back to the auditor.

Advantages

- A TE will provide current information and can contextualise it for a particular operation.
- TEs should bring some national consistency to operating standards.

Disadvantages

- TE interpretations of good practice may differ from an operator's and arguments may result.
- Interpretation of good practice may vary from one TE to another.
- A TE may not necessarily know which procedures are required to be checked to establish good practice for an audit – they may need guidance from the auditor.

4. Things to watch out for

- Automatically condoning accepted practice as good practice.
- Raising the benchmark for good practice to best practice.
- Assuming that good practice for managing a particular hazard will be the same from one activity to another, or from one site to another.
- Relying on written good practice information without checking its usefulness.
- Using written sources of information as 'must do' documents rather than using a TE to contextualise them for the operation.
- Assuming that written good practice information will cover everything that needs to be checked to establish good practice.
- Assuming that TEs will automatically cover everything that needs to be checked to establish good practice.