

What and Why

Every operator must review its safety management system on a regular basis to ensure that it still complies with the law and is working effectively. The regulations state that the review should be at least once a year.

An SMS review should:

- Assess the effectiveness of the SMS, and identify areas of weakness with a view to rectify these;
- Assess the effectiveness of any changes since the last review;
- Review any notifiable occurrences and procedural breaches since the last review;
- Consider the results from any audits (internal or external);
- Consider the findings of any incident investigations;
- Review any issues that have arisen from any prohibition or improvement notices have been issued.

The review is required to be summarised and reported in the safety performance report to be submitted to ONRSR.

How

Operators may take different approaches to reviewing the SMS. Some will schedule regular document reviews, others will carry out a single annual review. Regardless of the approach taken to review the SMS, the procedure is likely to be the same as the objective will be the same, only the timeframe may change.

The procedure describing the process to carry out an SMS review should be documented as part of the SMS and included in the document control process.

The main steps for conducting an annual SMS review will include:

- Seeking input from stakeholders prior to starting the review on how the SMS can be improved, with a reasonable timeframe to respond (Refer to consultation processes in the SMS);
- Scheduling a meeting of the Executive Committee/ Board with sufficient time to work through the steps required under the law;
- It would be beneficial for key members of the management team who are responsible for the implementation of the SMS to attend any review meeting;
- Ensuring an agenda is issued and meeting notes are recorded;
- Review of feedback received from the stakeholders consulted prior to the review;
- Review of any notifiable occurrences since the last review and any findings of investigations;
- Assess the status of any audit findings since the last review;
- Review of any other SMS breaches and why they occurred;
- Review of the risk register for currency;
- Noting if any prohibition notices or improvement notices have been issued, and if so, what action has been taken;
- Establishing the process and responsible persons to update any procedures or risk assessments as a result of the findings of the review;
- Follow up in subsequent Committee/Board meetings on progress to any action plan.

Things to consider include:

- It is possible to agree different timeframes for review with ONRSR, once a risk assessment process has been carried out to determine a proposed alternate timeframe;
- The Executive Committee/Board should not be expected to know every document within the SMS, and they will rely upon the information provided to them together with the knowledge and skills of the key managers;
- Where a dedicated SMS Review will occur, operators could consider a standard agenda that details the process to be followed;
- Where the review is carried out over the period of a year, the SMS review procedure should clearly state this, and should include an indicative plan for review of the various components;
- There is nothing in the law that requires that the review is to include every document included in the SMS;
- Where actions are required, a plan should be developed to ensure that these are prioritised appropriately, with dates and responsible persons appointed;
- For ease, the operator may consider reviewing the annual audit schedule as part of the SMS review;
- Findings from SMS reviews must be reported in the operator's safety performance plan which is sent to ONRSR.

Who

The Executive Committee/ Board may wish to sign off on SMS Review procedures as part of their governance processes.

The Committee/Board are required to attend and participate in SMS review procedures to assure themselves that the SMS is working effectively, and any deficiencies are identified, and a plan developed for improvements.

Key managers should ensure that they have a full understanding of the operators SMS, and their own area of responsibility and accountability.

Responsibility for the management and implementation of the SMS should be included in job /role descriptions for nominated position holders.

When

There are several approaches that can be taken for a review of the SMS:

- Annual single review by key management group;
- Ongoing regular reviews scheduled throughout the year and included in board /committee meetings;
- Combination of both.

Each operator should determine which approach works best for them, taking into account their resources and the nature and scope of operations.

Where an annual single review is scheduled, a specific meeting should be scheduled.

Where regular reviews are carried out, the plan for these should be described in procedures for the SMS review and included in the SMS.

Smaller less-complex operators may wish to review the entire 29 elements of the SMS over a period greater than 12 months.

Where an operator wishes to seek agreement from ONRSR to conduct their SMS review over a period greater than 12 months, they should take a risk-based approach and ensure that the safety risk does not increase with a reduced scrutiny of the SMS. Operators could consider applying their Change Management procedures for a proposed change of this type.

List of relevant documents (internal)

SMS Documents

Element 3 – Governance & Internal Controls

Element 7 - Document Control & Information Management

Element 9 – Safety Performance Measures

Element 10 – Safety Audit Arrangements

Element 13 - Consultation

Element 16 – Risk Management

Risk Register

Links (external)

[ONRSR Website – Guideline - Safety Management System](#)

Appendices

A. [Example SMS Review Meeting Agenda Template](#)