Broads Authority Safety Management System External Audit
Report by Head of Safety Management

Summary: This report sets out findings from the recent external Audit of the Authority's Safety Management system.

Members' views are sought on the findings, recommendations and draft Audit Action Plan set out in the Appendices.

1 Background

1.1 The Broads Authority, as a Competent Harbour Authority under the Pilotage Act 1987, is required to comply with the duties and responsibilities set out in the Port Marine Safety Code (PMSC)[1].

1.2 The Code requires that all harbour authorities base their powers, policies, plans and procedures on a Formal Safety Assessment (FSA) and that they maintain a Safety Management System to ensure that risks are reduced to a level which is as low as reasonably practicable (ALARP).

1.3 In 2007, the Authority published a Safety Management System (SMS)[2] to meet the needs of the PMSC.

1.4 The PMSC requires that the SMS is monitored and audited to ensure that it continues to meet the requirements of the code.

1.5 The SMS sets out an audit schedule which culminates in a requirement for a full audit which is to be undertaken by an independent third party to gain an objective opinion of the effectiveness and suitability of the SMS to meet its objectives and to verify continued compliance with the PMSC.

2 Audit

2.1 BMT Isis, a consultancy specialising in marine safety, were selected to carry out the independent audit which took place at the Broads Authority offices on 6 December 2012.

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[1] Port Marine Safety Code, DfT, ISBN 978-1-84864-035-1, dated October 2009
[2] Broads Authority Port Marine Safety Code Safety Management System, Issue 2, dated June 2009

2.2 The Audit reviewed version 2 of the Safety Management System which was issued in June 2009 but reference is made to the draft version 3 dated November 2011 which includes updates to reflect the recent changes in the organisation, the updated issue of the PMSC and the Broads Act 2009.

3 Audit Report

3.1 The BMT Audit report which sets out the audit findings and recommendations is set out in Appendix 1

3.2 The executive summary set out in Appendix 1 for member's reference, and the key points identified are:

(a) that the SMS needs to be updated to reflect the changes due to the Broads Authority Act 2009 and changes in the updated PMSC;

(b) document configuration is reviewed both to ensure that relevant documents are up to date and to align the timing of updates to report into the Broads Authority Annual Report; and

(c) safety performance metrics are developed to report into the Annual Report.

3.3 Members Views are sought on the draft Audit Action Plan see Appendix 2

4 Next Steps

4.1 The Audit report and the draft Action Plan will be taken to the Broads Authority for adoption.

Background papers: None

Author: Steve Birtles
Date of report: 7 February 2012

Appendices: APPENDIX 1- Broads Authority Port Marine Safety Code (PMSC) Audit 2011
APPENDIX 2- Draft Audit Action Plan

Broads Authority Port Marine Safety Code (PMSC) Audit 2011

Reference: 31171/D0603/Issue 1
Date: January 2012
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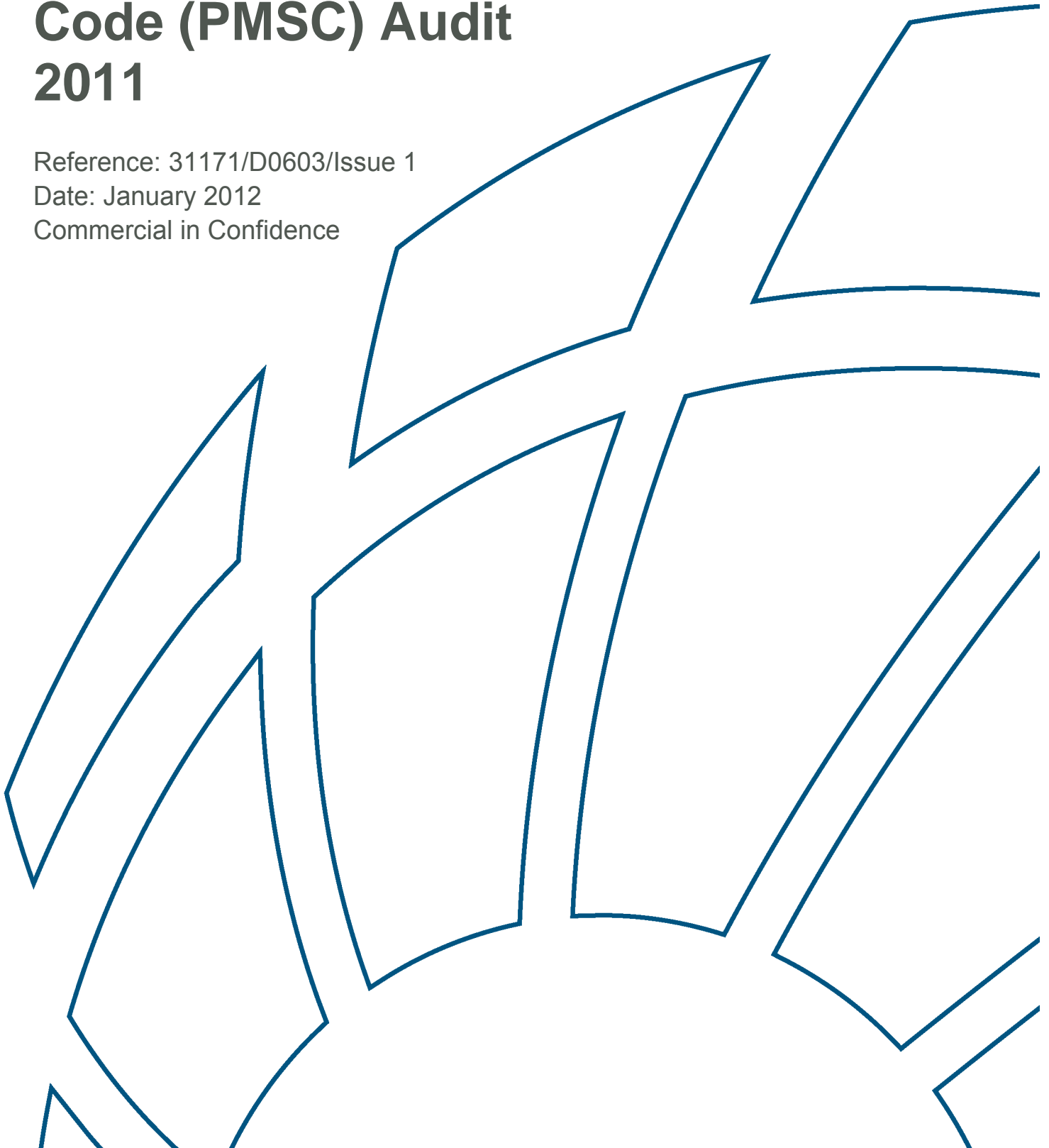
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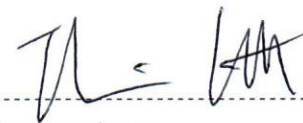
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Executive Summary

BMT Isis was tasked by the Broads Authority to undertake and Independent Safety Audit of their Safety Management System (SMS), Formal Issue 2, June 2009 (Ref 1) in accordance with the requirements of the Port Marine Safety Code (PMSC).

The overall objectives of the Audit were to:

    a.   Consider the overall effectiveness of the Broads Authority's SMS in meeting the Duty Holder's responsibilities under the PMSC

    b.   Seek demonstrative evidence that a randomly selected number of activities have been undertaken to sufficient depth and at the appropriate intervals

    c.   Provide objective and supportive feedback.

The Audit method comprised;

- A study of documentation produced or referenced in support of the SMS;

- Discussion and interviews with selected personnel;

- Sampling of documents, records and publications in order to gauge compliance of the Broad Authorities SMS with the requirements of the PMSC;

- A prepared question bank, structured to give sample coverage to each of the areas covered by the PMSC.

The results of the Audit reveal that safety is being managed well, both actively and reactively, within the Broads Authority. The Head of Safety Management and the Chairman (Duty Holder) are proactive in their attempts to foster a positive safety culture and, through a series of forums, risks are being identified and managed.

A wide range of topics relating to the PMSC and the Broads Authority SMS were discussed during the audit process, providing the auditors with background information on activities, processes and operation of the Broads Authority.

The Broads Authority SMS is a comprehensive document set (see References) that captures the principles of safety management activities and provides a means of evidencing compliance with the PMSC.

Overall, there is a good standard of compliance with the requirements of the PMSC, but some areas warrant attention. A number of recommendations have been made as a result of this audit process that are detailed fully in Chapter 5.3.15 of this report. These include that:

- the SMS needs to be updated in order to bring it up to date with the current issue of the PMSC (October 2009), as several references and statements are outdated.

- the SMS documentation needs to take into account the establishment of the 2009 Act (for instance in reflecting associated changes to byelaws);

- safety performance metrics should be tracked in the annual Business Plan;

- an improved process of documentation configuration control is implemented so that there is managed consistency between related documentation.

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1   Introduction

1.1   This report has been produced by BMT Isis Ltd for the Broads Authority following a request for an independent audit of their Safety Management System as described in BMT Isis's letter proposal Isis-F-O-140, dated 23rd September 2011 (Reference 2).

1.2   The Port Marine Safety Code (PMSC) (Reference 3) requires that Harbour Authorities should include provision for systematic review of performance based on information from monitoring and from independent audits of the whole system. In addition, Reference 3 also guides ports to carry out a formal review of the whole plan at least every five years.

1.2.1   A significant element of any SMS is the adequacy and effectiveness of its auditing and review functions. Based on best practice within the industry, the PMSC and associated Guide to Good Practice on Port Marine Operations (Reference 5) guides Duty Holders to conduct 'independent audits of the whole system'. Although 'independence' is not defined within the PMSC, the Broads Authority sought total independence from any commercial or operational interest as part of their SMS audit activity.

2   Background

2.1   The Broads Authority

2.1.1   The Norfolk and Suffolk Broads are Britain's largest nationally protected wetlands, comprising rivers, broads, marshes, fens and carr woodland. There are over 200km of navigable waterways linking many National and Local Nature Reserves and Sites of Special Scientific Interest. The Broads are listed under the Ramsar Convention on Wetlands of International Importance, and are home to a diverse variety of rare birds, animals and plants.

2.1.2   The Broads Authority was established as a non-statutory body in 1978 following a report by the Nature Conservancy Council regarding degradation of the Broads.

2.1.3   The Broads Authority was formalised as a statutory authority by the Norfolk and Suffolk Broads Act 1988 (Reference 4), ("The Broads Act"), and began operating as such in 1989, for the purpose of conserving and enhancing the natural beauty of the Broads, promoting the enjoyment of the Broads by the public, and protecting the interests of navigation.

2.1.4   In 2006 the Broads Authority promoted a second Act (the Broads Authority Act 2009), the primary purpose of which was to introduce greater safety controls on the broads and rivers. This act received Royal Assent in July 2009

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2.1.5   The Broads Authority is designated a "Special Statutory Authority", affording the same level of protection as National Park status, but with tailor-made legislation relating to navigation. The Broads Authority therefore balances the duties and powers of a harbour authority with those of a National Park authority.

2.1.6   The Broads Authority is a statutory body and its general duty is to manage the Broads for the purposes of:

   a.   Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;

   b.   Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and

   c.   Protecting the interests of navigation.

2.1.7   It must also consider:

   a.   The needs of agriculture and forestry, and the economic and social interests of those who live or work in the Broads;

   b.   The national importance of the Broads as an area of natural beauty and one which affords opportunities for open-air recreation;

   c.   The desirability of protecting the natural resources of the Broads from damage.

2.1.8   The Authority is funded by central government as well as by tolls paid by users of the Broads.

2.1.9   In May 2011, the Broads Authority undertook organisational restructuring, which amongst other changes saw the combining of the Navigation and Countryside Ranger Services into an Integrated Ranger Service.

3   Audit Methodology

3.1   The Audit method comprised:

   a.   A review of the existing Broads Authority SMS;

   b.   A days audit visit to the Broads Authority offices;

   c.   Sampling of documents, records and publications in order to gauge compliance of the Broads Authority SMS;

   d.   A prepared question bank, structured to give sample coverage to each of the areas covered by the PMSC.

3.2   Using a combination of the four techniques, the auditor undertook a review of the following:

   a.   The scope of operations within the Broads Authority jurisdiction and the ways in which safety-related decisions are made and implemented;

b.   The documented SMS and records produced in support of the SMS;

c.   Emergency planning, resources and responsibilities;

d.   Current and future compliance with the PMSC.

3.3   The audit visit was undertaken on Tuesday 6th December with the auditors (Lee Rhodes and Julian Lockett of BMT Isis) meeting with the Broads Authority's Director of Operations, Trudi Wakelin and Head of Safety Management, Steve Birtles.

3.4   The auditors considered the following documentation:

a.   SMS documentation;

b.   Hazard Management documentation;

c.   Navigation Committee Minutes;

d.   Risk assessments (supporting method statements for work);

e.   Generic Guidance (E.g. Towing);

f.   Broads Plan 2011;

g.   Business Plan (1 and 3 year targets).

3.5   In addition to checking for content and coverage, the opportunity was taken at the audit to explore how the Broads Authority's Safety Management System supported some recent organisational changes, and how it is applied to manage changes to activities and infrastructure.

4 Audit Findings

4.1 Audit Questions

Audit Question	PMSC Ref	Findings	Recommendations
Has a commitment to complying with the standards laid down in the PMSC been made?	Code 2.1	Although it is evident during discussions with representatives of the Broads Authority that there is a commitment to comply with the standards laid down in the PMSC, there is no statement within the SMS that states this. Section 1.7 of the Broads Authority SMS contains the Broads Authority Navigation Safety Policy. The Policy states that it shall develop and maintain an effective SMS to enable the Broads Authority to undertake and regulate marine operations in a way that safeguards the Broads, its users, the public and the environment.	Update Introduction chapter of the SMS to include reference to the commitment of the Broads Authority to comply with the standards laid down within the Code. References to sections of the PMSC are outdated and require a review and update.

Audit Question	PMSC Ref	Findings	Recommendations
Have executive and operational responsibility for marine safety been clearly assigned? Have Duty Holder's responsibilities been assigned? Designated Person - independent, with direct access to the board)?	Guide Section 2.1.1D	Section 2 of the Broads SMS contains a comprehensive description of the Roles and Responsibilities of those accountable, under the PMSC, for marine safety. The Broads Authority is composed of appointed Members. The Board, collectively and individually has responsibility as 'Duty Holder'. The Head of Safety Management has been nominated to act as 'Designated Person'. During the audit process it became evident that the Designated Person has clear responsibilities, with direct access to the Board.	
Has formal risk assessment been used to eliminate risk or reduce it to as low as reasonably practicable? Was the risk assessment undertaken by people who are qualified or appropriately skilled to do so?	Code 3.5 - 3.7	Sections 9 and 10 of the Broads SMS contains details of the Formal Risk Assessment process undertaken by the Broads Authority. All hazards within the Hazard Log (April 2011) are considered by the Boating Safety Management Group and the Broads Authority's Navigation Committee to be ALARP. The Navigation Committee, supported by the Boating Safety Management Group and Stakeholder Group, provide safety advice and input into the risk assessment process. It is considered that this representation of members satisfies the Codes requirement for qualified and appropriately skilled personnel. Navigation Committee agendas and minutes are promulgated on the Broads Authority website.	

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Audit Question	PMSC Ref	Findings	Recommendations
Has the entire risk register been reviewed at least annually? Has the Authority considered publication of its risk assessments, where appropriate?	Guide Section 4.1.1F/G	The most recent Hazard Review was conducted by the Boating Safety Management Group on the 21st April 2011. Representatives from the Broads Hire Boat Federation, Director of Waterways, PMSC Designated Person, Head of Construction and Waterways Strategy Officer all attended. The results of the review meeting are available via the Broads Authority website.	
Have accident reports from other ports and harbours (e.g. MAIB reports) been taken into account and relevant changes applied to the SMS to reflect lessons learnt?	Guide Section 4.4.10	The Broads Authority are members of the Association of Inland Navigation Authorities (AINA) and receive regular updates and information regarding safety related incidents. Causes of incidents and incident trends are discussed within the AINA Safety Issues Group (to which the Broads Authority are members) and shared amongst all members. The Broads Authority is closely linked to the National Boat Safety Scheme in which information regarding significant national events is shared. The Broads Authority are also members of the local Maritime and Coastguard Authority Marine Safety Sub Committee in which safety issues are discussed, both for inland water and sea related issues.	
Is a statement regarding the port's performance with respect to the PMSC and Safety Plan included in the Authority's annual report?	Code 3.10	Currently the Annual Report does not contain a statement regarding the Broads Authority's performance with respect to the PMSC and safety plan. The 5 Year Business Plan does include a statement. The possibility exists to include metrics/targets for improvements in safety performance in annual Business plan (whether input or output measures). E.g. No of new ideas raised, implementation time for safety related works, safety promotional events attended, leaflets distributed, as well as reductions in injuries, near misses, damage to property etc	It is recommended that the Authority consider including within the Annual Report, a statement regarding the Authorities performance with respect to the PMSC and safety plan.

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Audit Question	PMSC Ref	Findings	Recommendations
Does the DP have processes and procedures to ensure that he/she remains aware of PMSC related information? (Other than audit)	Guide Section 2.2.26	The Designate Person must have a thorough knowledge and understanding of the requirements of the Code (and supporting Guide to Good Practice) and associated port and marine legislation. It was identified during the audit process that the mechanisms for the Designated Person to be kept informed of changes/updates to the PMSC could be improved.	It is recommended that a procedure be developed and included in a strategy document, Safety Plan for example, as to how the Designated Person remains aware of PMSC related information and performance. One mechanism might be by the Broads Authority taking membership of the UK Harbourmasters' Association (See www.ukhma.org)
What are the liaison and consultation arrangements with interested parties and stakeholders?	Guide Section 3	The Broads Authority has a Governance Team that is responsible for all committees, sub-groups and working groups. Information on the various committees and sub groups is readily available via the Broads Authority website and via local press.	

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Audit Question	PMSC Ref	Findings	Recommendations
Are emergency response procedures in place? Is the emergency response plan readily available?	Guide Section 5.1.1	The Broads Act does not give the Broads Authority a responsibility to act as an emergency service and is not declared a Search and Rescue resource by the H.M Coastguard and as such there is no requirement for an Emergency Response Plan. The Broads Authority do operate an 'On Call' system, providing 24 hour 365 days a year standby facility for the emergency services.	
Are navigation marks maintained in positions to be of best advantage, with appropriate markings? When was this last reviewed?	Guide Section 6	The Broads Authority adopt a continual process to ensure that navigational marks are maintained and in the correct position. Marks and signs are continually inspected and reviewed by Rangers. Additional markings and signage has been required as part of the Environment Agency Flood Alleviation Programme. A 'Navigation Channel Marking Policy' has been adopted for this 20 year project.	
What Bylaws are in place?	Guide 7.4.6	The auditor was informed during the meeting on the 6th December that the Broads Authority currently have 4 Byelaws in force. Currently there are no plans to revoke existing Byelaws or introduce new ones.	Section 6.3 of the Broads Authority SMS states that there are five Byelaws currently in force. Confirmation of the number of Byelaws in existence is required and the SMS updated to reflect current status.

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5   Conclusions

5.1   General

5.1.1   The results of the Audit reveal that safety is being managed effectively within the Broads Authority areas of responsibility. The Head of Safety Management is proactive in his attempts to foster a positive safety culture and, through a regular series of forums, identified risks are being addressed and managed.

5.1.2   The Audit found that the SMS requires an update to bring it in line with the latest update to the PMSC (October 2009) and that management of change of the document should be addressed.

5.1.3   Risks are regularly reviewed and in line with the guidelines detailed in the Guide to Good Practice (GTGP, Reference 5), consultation with the local community and user groups is conducted.

5.2   Compliance with the Requirements of the PMSC

5.2.1   The PMSC comprises a Policy document, together with a Guide to Good Practice (GTGP, Reference 5). The Code allows some degree of interpretation in application, in order to allow Port Authorities a degree of latitude in ensuring that the systems that are implemented are those that suit their particular operational challenges and environment.

5.2.2   The PMSC does, however, set out a number of principles and 'measures'. For compliance to be most clearly demonstrable, the implementation of these should be reflected in statements of responsibility, policies, procedures and through evidence of proactive risk management. In particular, the PMSC requires a proactive approach that is based on the ongoing application of risk assessment in support of decision-making, with further references to the need to show a commitment to continuous improvement in risk management.

5.2.3   In the case of the majority of the measures set out by the PMSC, effective processes and practices are in place, recognising that (with a minimal level of prescription being included in the PMSC) the decision on achievement of 'compliance' with each of the general principles of the PMSC is not a 'black and white' issue.

5.2.4   There is significant evidence that the measures of the PMSC are being implemented by the Broads Authority. Whilst there is a necessary degree of interpretation regarding the requirements of the PMSC, it is considered that evidence of compliance could be strengthened in the following areas:

5.2.5   Safety Management System Updates - During the audit process it was identified that there is no clear timeline for updates to the SMS to be implemented and published. Currently updates to the SMS are done on a section by section basis as this was felt to be easier for the members.

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5.2.6   It is felt that management of changes to documentation should be linked to the Annual Hazard Review (this would allow for any updates to Hazards status to be included in the updated SMS).

5.2.7   <u>Near Miss and Incident Reporting</u> - The Broads Authority uses a web based system to record incidents, accidents and/or near misses. Broads users have the facility to report incidents and near misses online, by post or via telephone to a dedicated Broads Authority member of staff.

5.2.8   Annual incident reviews are conducted by the Broads Safety Management Group (BSMG) with incident numbers recorded within the annual report. The Annual Report is reviewed by the Navigation Committee prior to it being presented to the Board.

5.2.9   The figures indicate that from 2003, the numbers of incidents reported has significantly increased, this has been attributed to the implementation of the Broads SMS in 2003.

5.2.10   <u>Pilotage</u> - "Harbour Authorities are accountable for the duty to provide a pilotage service; and for keeping the need for pilotage and the service provided under constant and formal review" (GTGP - 8.1.1 A).

5.2.11   Greater clarification on the need for a Mud Pilot and the requirement for training is needed.

5.2.12   Whilst a Mud pilot has not been required for some time, the possibility exists that one may be required, and there is some uncertainty as to how such a requirement would be satisfied. It is recommended that a strategy be implemented for circumstances when a Pilot is required at short notice.

5.3   Other Findings

5.3.1   <u>Broads Act 2009</u> – The drafting of the Act has incorporated one of five byelaws, although this is not reflected consistently in documentation. There is also a possible problem in the drafting of the Act, in that implementation of the Recreation Closure Policy and the Unserviceable Craft Policy might be impeded should control for Breydon Water not transfer to Broads Authority control.

5.3.2   It is however understood that the two provisions that are affected could be enacted as extensions of the Broads Authority's existing powers under the 1988 Act (specifically through extension of the power relating to "temporary closure of the Waterway" and the extension of the powers relating to the Removal of Wrecks") and therefore that, whilst specific further consideration would need to be given to implementation of the two policies, this possibility does not cause the Broads Authority undue concern.

5.3.3   During audit interviews, it was stated that a decision by the Board on transfer of control would be made in January 2012.

5.3.4   <u>Extension of SMS to cover land as well as water based activities</u> - During the audit process, the subject of extending the SMS to cover land based as well as water-based activities was discussed.

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5.3.5   The Broads Authority is likely to benefit from adopting a common approach, where possible, encompassing but not compromising land or water related legislation. There would be a need to safeguard reporting lines and ensure that the suggested benefits can be achieved in practice.

5.3.6   A scoping process, looking at workload aspects, reporting lines, interdependencies, practicalities with reference to committees, types of representation needed and how/whether decision making can be undertaken in suitable groups and brought together could be conducted.

5.3.7   <u>High Speed Activities (Water skiing)</u> - In 2007/08 an evidenced base review was conducted into high speed activities on the Broads (originally classified as a Category A Hazard). The results from the review led to the conclusion that that the risk from these high speed activities could be adequately managed. A voluntary code for users was established which became mandatory in 2010.

5.3.8   <u>Safety Culture</u> - There appears to be a strong safety culture within the Broads Authority with regular promulgation of information disseminated to a wide user community. Information is published via Notice to mariners, Broadcaster newsletter, Broadsheet newsletter, Norfolk & Suffolk yearbook, Skippers Guide, Anglia afloat, local newspapers and via updates to the Broads Authority website.

5.3.9   The existence of a staff suggestions scheme, the pursuance of initiatives such as 'Super Safety days' with schools and safety education support given to local events also highlight the Broads' commitment to improving safety and raising awareness.

5.3.10   <u>Generic Risk Assessments -</u> The Broads Authority conducts generic risk assessments for day to day activities. Documents are kept on the Broads Authority intranet along with paper copies kept on all Broads Authority vessels.

5.3.11   Task supervisors are responsible for selecting the relevant generic assessment for individual work tasks. Assessments take into consideration Health & Safety of staff along with relevant Personal Protective Equipment (PPE) needed.

5.3.12   <u>Major Projects</u> - The Environment Agencies Flood Alleviation Programme has resulted in civil engineering works being undertaken throughout the Broads, including; the raising and reconstruction of flood embankments and replacing steel pilings.

5.3.13   During the course of the project, additional navigational markings and signage has been required. This has been in the form of temporary signs until vegetation and habitat has been established and the temporary signs can be removed.

5.3.14   The Broads Authority has produced a specific Navigation Channel Marking Policy and set up an Officer working group.

5.3.15   <u>Configuration Management –</u> Maintenance of the currency and consistency of SMS Documentation would benefit from the development of a consistent set of documents that avoid replication or specific referencing, except to the one definitive place that the extant policies and procedures are identified. It may be beneficial to maintain a separate list of Hazard Management Actions, with minutes of meetings serving to record their completion status.

6   Recommendations

6.1.1   Table 6-1 contains the Recommendations that were derived from the review of documentation during the audit process. These aspects focus on providing support to the case for compliance with the PMSC.

1	References to sections of the PMSC within the existing Broads Authority SMS are outdated with respect to the PMSC and the 2009 Act, and require review and update. It is recommended that the Broads Authority SMS be updated.
2	It is recommended that the Introduction chapter of the SMS is updated to include reference to the commitment of the Broads Authority to comply with the standards laid down within the Code.
3	It is recommended that the Authority considers including a statement regarding the Authority's performance with respect to the PMSC within the Annual Report, supported by metrics as appropriate.
4	It is recommended that the Broads Authority delegated 'Designated Person' identify ways in which to remain informed of all changes to the PMSC and Guide to Good Practice.
5	It is recommended that a strategy be considered and implemented for dealing with a potential short notice requirement for a Mud Pilot.
6	It is recommended that the Broads Authority develop a schedule for planned updates of the SMS, including a timeline of updates related to major organisational or other changes.
7	It is recommended that the Broads Authority introduce a document control procedure to ensure that all safety related documentation is maintained up to date at the correct issue status.
8	It is recommended that the Broads Authority SMS and Website are updated to reflect the change in the number of Byelaws currently in force.
9	It is recommended that the Broads Authority investigate and consider how the provisions within the Act might be implemented in the event that Breydon Water is not transferred Broads Authority control.

6-1 - Recommendations

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7   References

1   Broads Authority Safety Management System, Formal Issue 2, June 2009

2   Broads Authority Safety Management System Audit, Isis- F-O-140, 23rd September 2011

3   Port Marine Safety Code, Department for Transport, October 2009

4   Norfolk and Suffolk Broads Act, 1988 (c. 4)

5   A Guide to Good Practice on Port Marine Operations, Department for Transport, October 2009

Appendix 2

Draft	Date 8th February 2012

PMSC Safety Management System Audit Action Plan

Audit Recommendation	Description	Action	Officer	Target Compl Date	Progress to Date	Completed
1	References to sections of the PMSC within the existing Broads Authority SMS are outdated with respect to the PMSC and the 2009 Act, and require review and update. It is recommended that the Broads Authority SMS be updated.	Update Safety Management System with appropriate references to the updated PMSC, Broads Authority Act 2009 and organisation re-structure	HofSM	Oct 2012	Safety Management System Document has already been drafted to reflect the changes in PMSC, with references to the Broads Authority Act 2009 and the restructure. This draft document will be finalised and issued when the annual Hazard Review is completed in September in order to link into a standard update timetable reference recommendation 6.	
2	It is recommended that the Introduction chapter of the SMS is updated to include reference to the commitment of the Broads Authority to comply with the standards laid down within the Code.	Update Safety Management System to reflect the organisations commitment to compliance with the Code.	HofSM	Mar 2012		
3	It is recommended that the Authority considers including a statement regarding the Authority's performance with respect to the PMSC within the Annual Report, supported by metrics as appropriate.	Statement and metrics to be developed for inclusion in the Annual Report	CEO, HofSM	Jun 2012		

Appendix 2

Draft	Date 8th February 2012

PMSC Safety Management System Audit Action Plan

4	It is recommended that the Broads Authority delegated „Designated Person identify ways in which to remain informed of all changes to the PMSC and Guide to Good Practice.	Apply for membership to the UK Harbourmasters Association	HofSM	Feb 2012	Membership Granted Feb 2012	
5	It is recommended that a strategy be considered and implemented for dealing with a potential short notice requirement for a Mud Pilot.	Strategy to Be developed to further define when and whether a mud pilot is required.	HofRS, HofSM	June 2012		
6	It is recommended that the Broads Authority develop a schedule for planned updates of the SMS, including a timeline of updates related to major organisational or other changes.	Develop timetable for regular updates to the Management System	HofSM	Mar 2012	Timetable agreed to update the SMS after each annual Hazard Review, updated SMS to be published in November each year.	
7	It is recommended that the Broads Authority introduce a document control procedure to ensure that all safety related documentation is maintained up to date at the correct issue status.	Develop an interim document control procedure	HofSM	Mar 2012		
		Set the Safety Management System as high priority for rollout of Authority wide Document Management System (DMS)	DofCM	Mar 2012		

Appendix 2

Draft	Date 8th February 2012					
PMSC Safety Management System Audit Action Plan						
			Implement Priority actions for DMS rollout ref Broads Authority Strategic Priorities 2012/13 ref 4.6	DofCM	March 2013	
8	It is recommended that the Broads Authority SMS and Website are updated to reflect the change in the number of Byelaws currently in force.	Update BA Website and Safety Management System		HofSM	Oct 2012	Safety Management System Document has already been drafted to reflect the changes to byelaws from the Broads Authority Act 2009. This draft document will be finalised and issued when the annual Hazard Review is completed in September in order to link into a standard update timetable reference recommendation 6. The Website has been updated.
9	It is recommended that the Broads Authority investigate and consider how the provisions within the Act might be implemented in the event that Breydon Water is not transferred Broads Authority control.	No further Action to be considered at this point as the future of Breydon Water is still unsure. Review in the event that Breydon water is not transferred to the Authority.		HofSM	July 2012	