NZ adventure activities registration scheme – Performance Study recommendations

TIA's overall position

In 2010 adventure tourism operators agreed on eight industry safety principles that underpin safety in the adventure activity sector. These principles continue to provide the foundation for Tourism Industry Aotearoa's advocacy position for the sector:

1. Operators have a positive safety culture driven by committed leaders

2. Operators have a safety management system (SMS) relevant to their operation

3. Operators have an external assessment before commencing operations

4. Operations have ongoing external assessments

5. Operators have competent staff

6. Operators communicate risks and responsibilities

7. Operators have well maintained equipment that is fit for purpose

8. Operators share safety information

The report

Released in November 2016, the *New Zealand Adventure Activities Registration Scheme: A Performance Study* examined the performance of the New Zealand Adventure Activity Certification Scheme during its first three years in action.

The purpose of the study, conducted by Galloway Recreation Research Ltd, was to examine the performance of the Adventure Activities Registration (AAR) scheme in terms of ensuring operators' conformance with the Safety Audit Standard and to examine selected areas of interested regarding consistency, time required, and costs associated with the process.

General points raised by the report:

Benefit versus cost of the audit process

The study says that the AAR scheme has driven an improvement in safety in the adventure activity industry. Improvements were predominately related to operators managing safety via structured/systematic safety management plans however gains were made in practical operational procedures too.

TIA notes with concern that the AARS Performance study also revealed that 66% of operators don't think the benefits of undergoing the audit process outweigh the costs. 25% feel very strongly that the benefits don't outweigh the cost.

> TIA encourages an effort to increase the understanding within industry of the safety gains that have been driven by the audit process, including the role that written safety management plans play in supporting operational safety.

Cost of audit

In the majority of cases, operators are willing to pay a fair price for audits that add value to their operation and/or the wider industry. It is therefore concerning that the largest source of discontent with the scheme is the cost of audits.

The most costly and inefficient audits are those carried out by both an auditor and a technical expert. Ideally, both of those functions should be carried out by the same person. The utilisation of a technical expert in addition to the auditor should only occur on rare occasions.

Audit providers, qualification providers, industry groups and industry training organisations should encourage technical experts to become auditors and auditors to gain the technical expertise to asses a variety of activities.

The model of private sector delivery of this mandatory regulatory audit is unique and presents the sector with an ongoing risk in terms of cost.

> TIA will continue to monitor audit costs and the overall regulatory cost burden on adventure activity operators.
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> TIA encourages the Adventure Activity Audit providers to prioritise and incentivise the utilisation of auditors that can also serve as technical experts.
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> TIA encourages operators to use audit providers who actively include the option for a declaration of conformity for surveillance purposes. A field visit should not occur in between full audits unless it is fully justified on the basis of safety risk.

Specific recommendations made by the report

- **Scheme be aligned with ISO 21101:2014**

The review recommends that the scheme be aligned to the ISO at the next opportunity.

> TIA supports this recommendation as long as it does not alter the scheme's ability to support effective and efficient auditing of adventure activity operators.

- **Audit sampling and reporting**

The review recommends that more guidance is supplied to assist audit providers with making decisions on sampling, and that audit reporting requirements better support sector oversight by the regulator.

> TIA supports this recommendation.

- **Industry Support**

It is TIA's view, and that of the AARs performance study, that WorkSafe New Zealand should continue to provide support for safety in the industry.

At a minimum, TIA believes that this support should include the provision of the widely used [SupportAdventure website](#), and regular review and updates of the Activity Safety Guidelines and the templates for the Safety Management Plan and forms and checklists.

There is also a need for a dedicated human resource to oversee the website content, write and distribute the SupportAdventure newsletter and provide phone and email safety information support for the sector.

- **Regulations scope**

The review recommends the susceptibility of some activities to the regulations should be reviewed and revised.

TIA supports this.

- **Declaration of conformity**

The review recommends that this tool be removed from the audit process.

TIA does not support this recommendation. We see the declaration of conformity as an important tool in the ongoing monitoring of an operator's safety management system (SMS). On-site visits during surveillance audits should be the exception rather than the rule and should only occur if triggered by a risk that the SMS will not meet the requirements of the audit standard.

- **Training of technical experts**

TIA agrees with the report's recommendation that technical expert's receive training, and believes this should extend to auditors wherever possible. The audit scheme is unique internationally; it is a complex model which requires the use of judgement at many stages of its implementation. More oversite and training from the regulator is required to ensure that the scheme delivers the safety assurance and value that it should.

Many of the auditors and the vast majority of technical experts are new to auditing in general and certainly to auditing of this nature. One full round of audits has been completed and the next round will soon begin. Training of the auditors and technical experts is required to enable learning from the first round to be incorporated into auditing good practice for the future.

- **Highlighting the benefits of compliance**

The report recommends that the regulator, audit providers and operators look for ways to encourage sharing of certification with stakeholders, to highlight the benefits of compliance.

TIA does not support this recommendation. We view public perception of safety as already being strong and that the recommended approach could bring it unnecessarily into question.