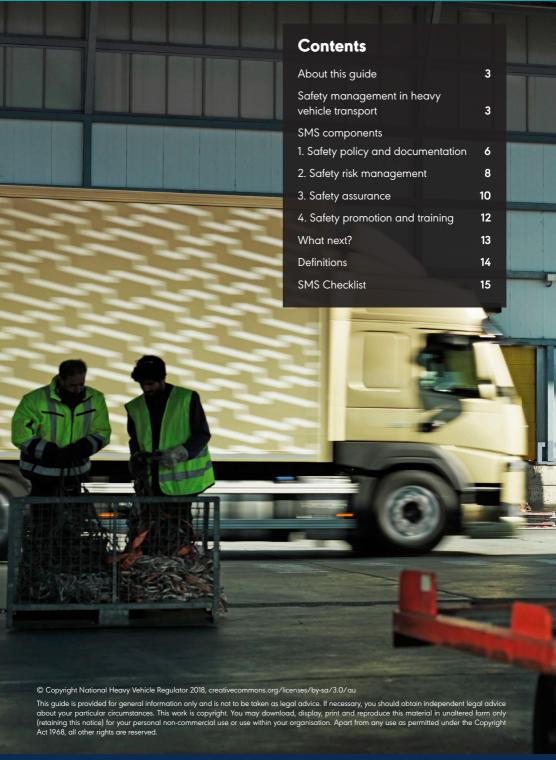
SMS SAFETY MANAGEMENT SYSTEMS



Introduction to
Safety Management Systems
in the Heavy Vehicle Industry

August 2021





About this guide

This guide provides an overview of safety management systems for businesses in the heavy vehicle industry. It:

- highlights why—as an industry participant in the heavy vehicle Chain of Responsibility (CoR)—adopting and actively utilising a safety management system (SMS) is important and beneficial for your business
- demonstrates how an SMS can assist your business to meet its safety obligations under the Heavy Vehicle National Law (HVNL)
- explains what a typical SMS looks like, including its key components
- includes an SMS checklist you can use to identify elements of an SMS already present in your business.

A range of guidance material and tools is available to assist you to develop and implement an SMS. You can download these at nhvr.gov.au/sms and adapt them for your business.

Safety management in heavy vehicle transport

Other safety critical industries, such as rail, maritime and aviation, have gained safety benefits from the adoption and implementation of a structured SMS. Similar safety benefits can also be realised across the heavy vehicle industry and this is one of the reasons why the National Heavy Vehicle Regulator (NHVR) advocates the adoption of an SMS for all heavy vehicle related transport businesses.

An SMS is a great way of helping minimise the risk of safety incidents occurring. Having an SMS also clearly demonstrates that you're taking your safety obligations seriously by adopting a proactive approach to managing hazards and risks in your business.

Key benefits of implementing an SMS include:

- assisting you to meet your safety responsibilities under the HVNL, including those relating to CoR
- providing you with a means to manage risk and enhance safe practices
- assisting your business to allocate resources to the most critical areas that have an impact on safety
- helping your business become a preferred supplier to customers
- providing a framework to make informed safety decisions and increase efficiencies
- potentially reducing costs by proactively identifying risks before they result in an incident or major accident.

Does the size of my business make a difference?

Regardless of the size of a business, all parties in the CoR for heavy vehicle transport activities have a responsibility to ensure the safety of their operation. An SMS can be scaled up or down to suit the size and complexity of any business. For example, a large transport business that undertakes a range of transport activities, with lots of employees and equipment, would most likely require a detailed and more complex SMS to ensure safety throughout their operations.

On the other hand, a smaller transport business may develop their SMS using basic procedures, checklists and other simple tools. While these approaches are different, they can still achieve the same safety outcomes because they are appropriate for the size of the business and the activities it undertakes.

What is an SMS?

An SMS is a systematic approach to managing safety, including the necessary organisational structures, accountabilities, policies and procedures. It should aim to manage safety risks and ensure the safety of a business's transport activities, so far as is reasonably practicable.

When you put your own SMS into practice, it should become integrated into your business. It should reflect the way work is carried out and influence every activity of your business, as well as everyone in it.

As shown in the following diagram, an SMS typically comprises four key components. Under each of these components there are a number of elements that represent important safety activities or processes.



What are my obligations under the HVNL?

Amendments to the HVNL in 2018 will introduce 'safety duties' that must be met by all parties in the CoR. This requirement means that all parties have a duty to ensure the safety of their transport activities, so far as is reasonably practicable.

In addition, the executive officers of each party in the CoR must exercise 'due diligence' to ensure the safety of their business's transport activities. The law will require executive officers to:

- keep up to date with the safe conduct of transport activities in their business
- fully understand the hazards and risks associated with their transport activities and how these are being managed
- provide appropriate resources—including people, systems and equipment—to manage their safety hazards and risks effectively.

The new safety obligations will apply to all parties in the CoR. The HVNL defines a party in the CoR as:

- · an employer of the driver
- a prime contractor for the driver
- an operator of the vehicle
- · a scheduler for the vehicle
- · a consignor of any goods in the vehicle
- · a consignee of any goods in the vehicle
- · a packer of any goods in the vehicle
- a loading manager for any goods in the vehicle
- a loader of any goods in the vehicle
- an unloader of any goods in the vehicle.

How will an SMS help me meet my obligations under the HVNL?

When you implement an SMS, you're taking a systematic approach to managing safety. The processes you develop and undertake as part of your SMS can assist you to demonstrate the efforts you're making to ensure the safety of your transport activities. Implementing an SMS can help you demonstrate the following:

Safety policy and documentation

- There is commitment from business owners and managers to ensure and improve the safety of the transport activities the business performs.
- Roles and responsibilities related to safety are clearly defined.
- A process is in place to manage safety when interacting with other parties.
- Policies and procedures are in place that document how work is performed safely.

Safety risk management

- Hazards and risks in transport activities are proactively identified.
- Controls are in place to eliminate or minimise risks.
- Records are made of the efforts to manage risk.

Safety assurance

- Controls are reviewed to ensure they're appropriate.
- Incidents and near misses are investigated to prevent recurrence.
- Monitoring and measuring is undertaken to assess effectiveness
- Findings from assurance activities are used to continuously improve the SMS.

Safety promotion and training

- Employees are provided with appropriate and ongoing training.
- There is open communication about safety.

SMS components

1. Safety policy and documentation

Management commitment

The business owner or executive officer will always be the person ultimately accountable for safety in the business. They can delegate to another person the responsibility for the implementation, ongoing maintenance and continuous improvement of the SMS; however, they cannot delegate the accountability for safety.

The management commitment component of SMS typically comprises a safety policy and safety objectives.

Safety policy

A documented safety policy sets the safety direction for the business. It should be clear, concise and signed by the accountable person within the business.

As a minimum, a safety policy:

- outlines the business owner or executive officer's commitment to safety
- reflects the business's operating environment
- outlines the business's approach to safety
- explains how safety and risks will be managed and by whom
- shows how the business will continuously improve its safety performance.

Safety objectives

An effective SMS will include setting safety objectives. The objectives should be reflective of the safety policy, while also stating specific safety goals and showing the business owner or executive officer's commitment to the management of safety.

Safety objectives can be looked at in terms of short-, medium- and long-term goals but the main thing is that they need to be achievable.

Some examples of safety objectives include:

- conducting weekly safety meetings with employees
- responding to all hazard reports within 24 hours
- reviewing all risks and risk controls at least every six months
- promoting reporting of maintenance issues to reduce vehicle downtime.

In particular, you should consider setting objectives around key CoR areas, such as mass, dimension, loading, speeding, roadworthiness and fatique.

Safety responsibilities

For an SMS to work effectively, everyone in the business needs to be involved. Responsibilities and roles in the SMS will be different for people depending on their role in the business. It's important that everyone is clear about what's required of them and who holds key safety responsibilities.

As part of documenting roles and responsibilities in your business, you should consider developing an organisational chart which shows key positions and their area(s) of responsibility. It's important that the person given the task of maintaining the SMS has a direct reporting line to the business owner or executive officer for safety issues.

Key safety personnel

A small transport business may not be able to have a specific person dedicated to the role of safety manager or safety officer. While the responsibility of these roles may be added to an existing role, it's important that any person selected to perform safety roles has a solid appreciation of and commitment to safety.

The person responsible for the SMS is critical to its success, and they should ideally have operational experience and a sound understanding of safety management principles.

Documentation

Documenting your SMS is essential and this should reflect the size and complexity of your business. Documents in your SMS may include procedures, checklists and forms relating to specific safety risk controls in your business. For example, you could have a procedure that outlines how you undertake driver rostering and scheduling to help ensure your drivers don't exceed maximum fatigue work hours.

Third party interactions and contracts

Often businesses will need to involve or interact with third parties as part of normal transport activities. The business will need to determine the extent to which the third parties are involved and their obligation to ensure compliance with the HVNL as part of the CoR. Parties in the CoR that influence or control transport activities are responsible for complying with the 'safety duties' obligations under the HVNL.

To minimise risk and exposure to your business, you should identify the roles of third parties and ensure you consult and communicate with them to coordinate transport activities in a safe manner. Prior to engaging third parties to work in your business, you should consider reviewing their safety and compliance processes and ensure contracts reflect their respective safety obligations.



2. Safety risk management

Risk management:

- is a proactive approach for managing safety within a business
- aims to identify factors that may cause or contribute to incidents so action can be taken to eliminate or minimise the potential for harm or loss
- is a process of identifying, assessing, treating (eliminating or minimising) and monitoring or reviewing the hazards and risks a business encounters.

It's essential that employees are encouraged to report safety incidents and near misses as soon as possible, so these can be investigated and addressed as part of day-to-day risk management.

Hazard identification

Hazards are anything with the potential to cause harm or loss. An effective way to identify hazards is to encourage employees and third parties to continually look for and report hazards in the business.

Hazards can be a range of different things, such as:

- · physical objects that are clearly visible
- behaviours
- a business's policies or procedures.

Some typical hazards that exist in the transport industry include:

- fatiqued employees
- inappropriate speed
- unroadworthy vehicles
- unrestrained loads
- unscheduled delays
- driver distraction
- unsuitable loading and unloading areas.

Identification of safety hazards should always be undertaken when changes that have the potential to impact safe operations occur in a business. For example:

- an organisational (structure, location or personnel) change
- rapid expansion or decline
- · a new route or contract
- new equipment
- changes to process or procedure.

Risk assessment and mitigation/ treatment

Conducting a risk assessment will help you understand:

- the level of harm or loss that could be caused by a hazard
- how different hazards may interact with each other to increase the risk of harm or loss
- which issues need to be addressed and in what timeframe.

Risk treatment is the process of developing and implementing controls to eliminate or minimise the risk so far as is reasonably practicable. The most effective method of risk treatment is, where possible, to eliminate or avoid the risk completely.

Risk monitoring and review

After a risk has been treated, it's important to make sure your controls are working as expected. The best way to do this is to continually monitor and review the processes and procedures that were implemented. Don't wait until something goes wrong—it's important to review the effectiveness periodically.

Examples of monitoring and review include:

- talking to employees and getting their feedback on how a new procedure or piece of equipment is working
- reviewing a sample of trip records to make sure planned rest breaks are taken
- performing spot checks to see if loads are being restrained in line with a newly introduced procedure
- reviewing the business risk register once every quarter to make sure it's up to date and reflects the practical way risks are being managed in the business.

Incident reporting

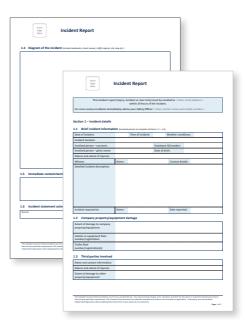
Despite all the efforts towards preventing them, incidents and near misses still occur in all businesses. When these events do occur, they provide the opportunity to learn and improve the SMS. When an incident or near miss occurs, it's essential that it's reported and the appropriate information is gathered and documented. This allows the event to be investigated and analysed to improve future safety outcomes.

An incident report is an ideal tool to gather this information, and it's good practice that the person completing the report is the person involved in the incident or the near miss. If this isn't possible, then it should be completed by a supervisor or someone responsible for the person or for that area or activity.

It's also good practice to develop an incident reporting procedure. Such a procedure could include:

- the types of incidents or near misses that need to be reported
- who needs to report incidents, when and to whom
- instructions for dealing with larger incidents, such as:
 - contacting emergency services
 - preserving the site of the incident
- attending to injuries and ensuring the safety of those involved.

Gathering and collating information from incident reports will help you measure the safety performance of your business and identify any trends in relation to hazards and risks that may require attention.



3. Safety assurance

Safety assurance is a way of checking the ongoing reliability and performance of your SMS. Developing a set of performance measures appropriate to your business will help you determine whether safety is improving over time and whether you're meeting your safety objectives. Safety assurance includes undertaking the following activities to continuously improve safety performance:

- incident investigation
- · performance monitoring and measuring
- safety management processes and practices evaluation.

Internal safety investigations

It's important that incidents and near misses are investigated to determine how the event happened and whether there's anything that can be done to improve your SMS. Your internal safety investigations should seek to identify 'what went wrong' so that future safety performance can be improved rather than focusing on 'who is at fault'. If an incident does occur, it's important to understand the chain of events leading up to the incident and identify factors that may have contributed to the event.

Once an investigation is complete, it's important to communicate throughout the business the findings, changes to processes and lessons learned. For example, communication can be accomplished through toolbox meetings, emails and safety alerts. It's important to distribute this information to employees to demonstrate that their input has been heard and appropriate actions have been taken.

Safety performance monitoring and measurement

An SMS should include processes that allow you to:

- understand if your SMS is doing what you intended it to do
- identify areas that aren't working well
- make adjustments so the system can be continuously improved.

For example, if you want to see whether the training you delivered was successful, you could monitor how employees perform the activity in the workplace. If you find the training hasn't been successful, then you can conduct additional training or adjust your training methods or material to improve outcomes.

Another important function of this process is to monitor events that represent increasing safety risk or a developing issue. For example, through a monitoring activity you may identify a number of driver reports about excessive loading times at a particular depot. This information will enable you to engage with the depot management to fix the problem before it results in a driver becoming impaired by fatigue or breaching work and rest hours.

Customers and third parties interacting with your business should have confidence your activities are conducted safely. You should encourage their feedback and involve them in your monitoring and review process whenever possible.

One of the methods for measuring safety performance is to undertake periodic audits of key elements within the business. This can be as simple as undertaking regular checks of activities, procedures and processes.

Change management

Change can be daunting for any business and may impact on safety by creating risks that haven't been previously assessed. Managing and communicating change is vital to ensure that change does not result in adverse effects to safety. It's worthwhile to consider a structured approach to change, ensuring you involve those in your business who will be impacted by the change.

Keep in mind that changes in your business can introduce hazards which can affect the safety of operations. You may make changes to meet business demands to be more flexible. While changes need to be made effectively and efficiently, your main focus should be implementing them safely. A change introduced to improve safety may actually introduce safety risks elsewhere, as change creates the potential for unintended consequences. Therefore, it's important to assess the risk of the change prior to implementation.

Continuous improvement

The information you gain from safety assurance activities, such as investigations, reviews and audits, allows you to identify areas in your SMS that could be improved. All organisations should regularly review whether or not they're achieving their safety objectives. This should ensure your SMS remains effective and relevant.

Continuous improvement of your SMS may be achieved by:

- periodically reviewing and re-assessing your risk management processes
- implementing corrective actions from incident investigations
- implementing recommendations and corrective actions from audit reports
- sharing information with other similar businesses and parties in the CoR
- receiving newsletters and information from transport and safety regulators.



4. Safety promotion and training

Safety promotion will assist you to set the tone for your SMS and help foster a strong safety culture. It will also encourage awareness that your business is committed to safety. Safety promotion should communicate lessons learned, safety information, safety procedures and key safety messages from the leaders in the business

As soon as anyone enters your business, they should sense and appreciate that you're committed to safety.

Training and education

The key function of safety training is to ensure employees have the appropriate skills and understanding to play their part in effectively managing the business's safety risks. Safety training ensures employees know what's required of them and how to do it. Safety training should focus on identifying and minimising hazards and risks and be delivered in a way that employees can understand.

The business should ensure:

- all employees have the ability to perform their tasks safely and the skills to adapt when things don't go as planned
- all employees are aware of the hazards and risks associated with their duties
- all training is recorded and retained on employees' files
- refresher training is conducted so employees have up-to-date knowledge of safe work practices and their role in the SMS.

Safety communication

Safety communication is essential to developing and maintaining open two-way communication. It ensures employees are informed of important safety information and encouraged to provide feedback and ask questions. Effective safety communication can assist with growing a positive safety culture within the business, especially when the leaders promote a consistent safety message and lead by example.

Safety communication should:

- ensure all employees are made aware of the business's SMS
- · convey safety critical information
- explain why particular actions are taken
- explain why safety processes and procedures are introduced or changed.

Safety communication can:

- promote 'good-to-know' safety messages and information
- promote your SMS and various roles and responsibilities
- · be formal or informal
- be conducted through toolbox talks, meetings, briefings, conferences and so on.



Positive safety culture

A culture where safety is promoted and involves everyone in the business is essential for an SMS to make a difference. A positive safety culture encourages open and honest communication and reporting without blaming employees, looking instead at the system to establish where improvements can be made. It's important for your business to learn from incidents and near misses so that future safety performance is improved.

A positive safety culture relies on trust. Employees should be encouraged (and possibly rewarded) to be involved in preparing and providing ongoing support to the SMS. Support from senior management—where employees can easily see that safety is a priority—encourages everyone to be involved. Business owners and executive officers should lead by example through their actions, behaviours and decisions to reinforce that safety is key to the business's success.



What next?

The information in this guide provides an overview of the components of an SMS and explains the importance of each of these when it comes to improving safety in your business.

Now you have a better understanding of what a typical SMS looks like and how it works, you can begin to plan, develop and implement your own SMS. To help you along the way, the NHVR has created a range of SMS guidance materials and tools you can download from the NHVR website at nhvr.gov.au/sms and adapt for your business, if required.

Before you get started, it's suggested you complete the SMS Checklist on page 15. This will help you identify any SMS elements you may already have in place and enable you to focus on those SMS elements you need to develop.



Definitions

The following definitions apply to terms used in this guide:

Term	Definitions
Assessment	The process of observing, recording and interpreting individual knowledge and performance against a required standard.
Audit	A formal activity to assess the effectiveness of a management system by examining and measuring the level of compliance achieved over a given period of time.
Change management	A systematic approach to controlling changes to any aspect of processes, procedures, products or services, both from the perspective of an organisation and individuals. Its objective is to ensure safety risks resulting from change are minimised.
Executive officer	Executive officer of a corporation means: a director of the corporation any person, by whatever name called and whether or not the person is a director of the corporation, who is concerned or takes part in the management of the corporation.
Hazard	Anything with the potential to cause harm or loss.
Incident	An unplanned, undesired event that adversely affects the safety of operations.
Investigation	A process conducted for the purpose of incident and accident prevention which includes the gathering and analysis of information, the drawing of conclusions, including the determination of causes and, when appropriate, the making of safety recommendations.
Just culture	An organisational perspective that discourages blaming the individual for an honest mistake that contributes to an accident or incident. Sanctions are only applied when there is evidence of a conscious violation or intentional reckless or negligent behaviour.
Near miss	An unplanned event that did not impact the safety of operations but had the potential to lead to an incident.
Risk management	A formal process for identifying, understanding and controlling risks that have the potential to disrupt or impact on safety.
Safety Management System (SMS)	A systematic approach to managing safety, including the necessary organisational structures, accountabilities, policies and procedures, which is integrated through the business wherever possible.

SMS Checklist

Use this checklist to help you identify which SMS elements you may already have in place.

When you're completing the checklist, it's important to keep in mind the size and complexity of your business. Some of the items may not be applicable to your operations. Additionally, some items may already be partially in place or carried out informally.

Yes - This item is implemented in the business

Partially - Only parts of this item are implemented in the business (perhaps as an informal process)

No - This item is not implemented in the business

Not applicable (N/A) - Not appropriate given the size and complexity of the business

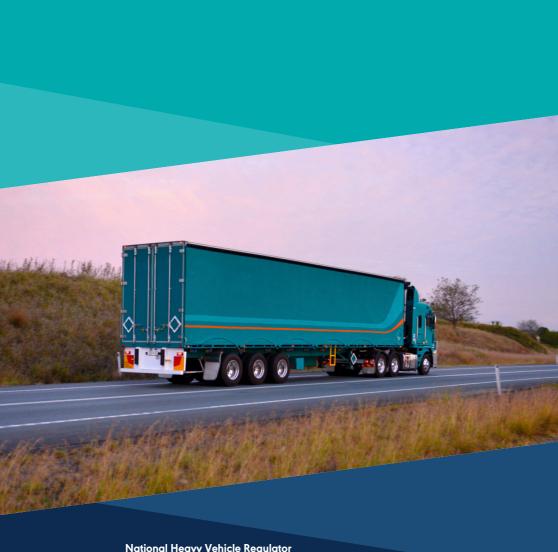
SMS components and elements		Partially	No	N/A
Safety policy and documentation				
Management commitment				
Does your business have a safety policy that documents the commitment to safety and is supported and signed by the accountable executive officer?				
Is the safety policy readily visible to all employees?				
Is there a statement in the policy regarding 'just culture' which discourages the business from blaming an individual following an incident and states that disciplinary action is only considered when there is deliberate violation, intentional recklessness, negligent behaviour or wilful misconduct?				
Does your business have sufficient resources (financial, human, material) to support the SMS?				
Has your business identified and documented safety objectives which support the safety policy?				
Are the safety objectives measurable?				
Are the safety objectives periodically reviewed to ensure ongoing relevance?				
Safety responsibilities				
Are the roles and responsibilities of managers relating to the SMS documented (e.g. safety manager, transport manager, training manager)?				
Are roles and responsibilities relating to the SMS for all employees in the business clearly documented in position descriptions?				
Is everyone in your business clear about their safety duty obligations as a party in the Chain of Responsibility (CoR) under the Heavy Vehicle National Law (HVNL)?				

SMS components and elements	Yes	Partially	No	N/A
Key safety personnel				
Does your business have a safety manager/officer or someone appointed to implement, manage, communicate and promote the SMS?				
Is there a position description outlining the responsibilities of the safety manager/officer/appointed person?				
Does the safety manager/officer/appointed person have a direct reporting line to the executive officer?				
Documentation				
Does your business have an SMS Manual which outlines the safety requirements and direction for the business?				
Are policies, procedures and processes relating to safety and transport activities documented (e.g. drug and alcohol policy, fitness for duty policy, load restraint and working at height procedures)?				
Are all documents current and maintained through document control, version and revision dates?				
Third party interactions				
Does your business assess a contractor's safety performance before engaging their services (e.g. subcontractor company prequalification form and/or interview)?				
Does your business have contracts or service level agreements with third parties and are the safety standards they must meet clearly outlined?				
Does your business regularly audit contractor safety performance for compliance and agreed safety standards?				
Safety risk management				
Hazard identification				
Does your business have a process in place to identify and record hazards?				
Is the reporting of hazards encouraged by senior management?				
Risk assessment and mitigation/treatment				
Does your business have a risk register in place to assess risks created by hazards, develop and implement controls, and ensure the ongoing effectiveness of risk controls?				
Is the risk register regularly reviewed and updated?				

SMS components and elements	Yes	Partially	No	N/A
Incident reporting				
Does your business have a formal process in place for reporting incidents and near misses?				
Does your business have a procedure in place to acknowledge incident reports and provide feedback to the initiator on the outcome(s) of the report?				
Is the reporting of incidents and safety issues encouraged by senior management?				
Safety assurance				
Internal safety investigations				
Does your business have a process in place to investigate incidents and near misses?				
Does the investigation process aim to identify factors contributing to an incident (e.g. behavioural, organisational, equipment)?				
Does the investigation process take into account the safety duty obligations of parties in the CoR?				
Does the investigation process focus on improving the safety of operations rather than blaming individuals?				
Safety performance monitoring and measurement				
Does your business conduct regular checks of work activities associated with documented procedures and processes?				
Does your business have Safety Performance Indicators (SPI) in place to measure the business's safety performance?				
Are the SPIs monitored and periodically reviewed for relevance?				
Change management				
Does your business have a method of managing change to ensure safety (e.g. new vehicle type, fleet expansion, new work sites, new work activities)?				
Is the method for managing change documented in a procedure?				
Does the change management procedure include a requirement to assess risks associated with the change?				
Is safety performance monitored after the change?				
Continuous improvement				
Are improvements made to the SMS following outcomes of				

SMS components and elements	Yes	Partially	No	N/A
Safety promotion and training				
Safety training and education				
Does your business provide training to employees so they understand their role in the SMS?				
Are employees trained in safety duty obligations and where their role sits as a party in the CoR?				
Are employees trained in the business's safety policies and procedures (e.g. hazard reporting, incident reporting, fatigue management policy, how they can support a positive safety culture)?				
Are employees encouraged to attend safety-related training?				
Are training records kept for all employees?				
Has your business established mandatory and role-specific training requirements (including induction training) for all roles (e.g. a training needs analysis and training matrix)?				
Is there a documented process for evaluating training effectiveness?				
Has your business considered the need for refresher training within their training requirements?				
Safety communication				
Does your business conduct ongoing safety promotion activities (e.g. regular briefings, toolbox talks, newsletters, display board)?				
Does your business readily share safety-related information with its employees (e.g. identified safety issues, feedback from hazard and incident reporting)?				
Positive safety culture				
Does management/leadership play an active role in ensuring workplace safety is a top priority?				
Do all employees in the business see that the responsibility for working safely is a shared responsibility?				
Do employees have support from management to cease work in the event of an incident or if they have a safety issue or concern?				
Does open two-way communication occur between employees and management regarding safety?				

Notes



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