Boat Safety Scheme Risk Management Process



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Process summary

The BSS Risk Management Process contains a small number of stages and is designed to assist recognition, tracking and management of risks. The process is simple, transparent and has been designed to deliver the responsible and justifiable actions to control these risks.

The most important stage is BSS collecting and verifying relevant information. Verified information is recorded on the BSS **Risk Register**. The **BSS Technical Committee** review the impact of change and recommendations to manage these risks. The **BSS Advisory Committee** considers the acceptability and impact of any recommendations. The **BSS Management Committee** sign-off an action plan, which is then monitored by the **BSS Office** and stakeholder committees. The results are used by the **BSS Technical Committee** to improve risk controls and check their effectiveness.

Introduction and Objectives

Introduction

The purpose of the document is to iterate the process by which the Boat Safety Scheme will achieve its values and visions, ensure that 'real' and accepted boat-related risks are identified and that risk management recommendations to the **Navigation Authorities** are appropriate, balanced, consistent and timely.

This document is the Fourth edition of the BSS Risk Management Process, quality assurance document BSSQA020. Definitions of terms in bold font are included at Appendix D.

Objectives

The BSS Risk Management Process is designed to help the BSS achieve its objective as published in the *Navigation Authority Agreement*¹, namely,

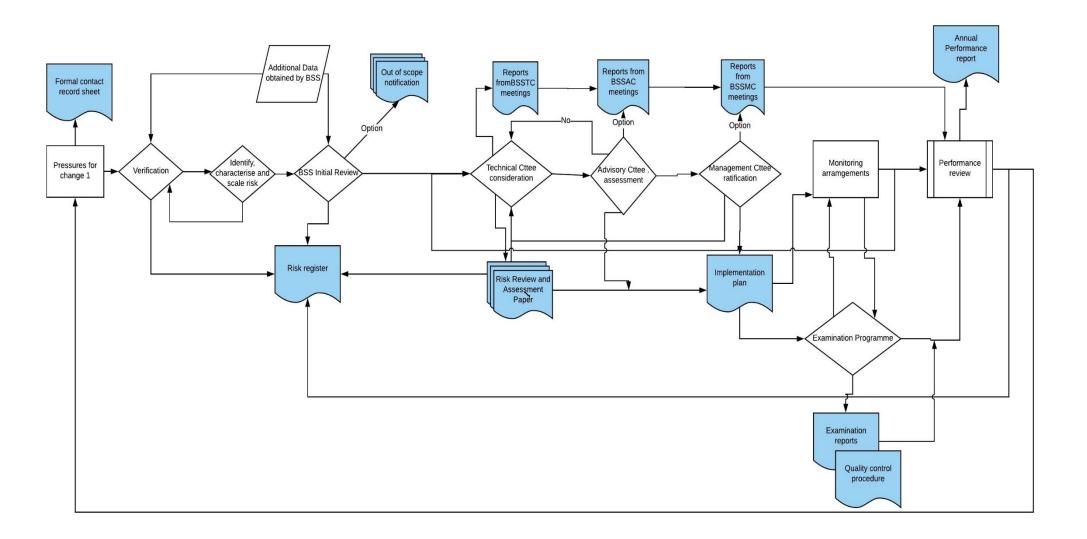
"to help minimise the risk to all visitors to the inland waterways and the waterways workforce, and to help protect adjacent property related to the condition, equipment, and use of boats".

Specifically this means that:

- The safety risks to boaters and others affected by their activities are as low as reasonably practicable.
- The risk of avoidable pollution from boats is minimised.
- The responsibilities of individual boat owners are recognised
- When considering control measures account is taken of their effect on the benefits of the boating activity as experienced by the boater and the acceptability of the resultant risk to the navigation authority, the boat provider (where applicable), the boater and others not participating in the boating activity.
- Key decisions are proportionate, risk-based and effective.

The overall process is outlined in Figure 1, below:





Risk Management Process

Overview

The overall process is outlined in Figure 1.

The process is governed by the **BSS Management Committee**. The process makes extensive use of the broad range of knowledge, experience and expertise provided by the representatives of the associated organisations and professional bodies who sit on the BSS support committees – **BSS Technical Committee** and **BSS Advisory Committee**.

The overall process comprises the following principal elements:

- 1. Identification of pressures for change
- 2. BSS Technical Committee consideration
- 3. BSS Technical Committee recommendation
- 4. BSS Advisory Committee assessment
- 5. BSS Management Committee ratification
- 6. Monitoring arrangements
- 7. BSS Examination programme
- 8. Performance review
- 9. Process review

Each element has a number of stages and BSS staff will be identified by the **BSS Office** to be involved throughout this process.

The identified BSS staff member will be responsible for:

- Identifying, collecting and verifying information provided to BSS Office
- Updating the **Risk Register** and formally collating risk assessments and risk recommendations

BSS Manager will be responsible for:

• Ownership of the administration of the process. Noted in this process as 'BSS Office'

1. Identification of Pressures for Change

BSS Office will maintain a web page, email address and phone line to receive regular updates from external organisations which are relevant to BSS operations and activities.

BSS staff will attend industry events and meetings that fit within the BSS scope and budget constraints.

BSS Office will identify, register and respond to the following information sources when identifying the prevalent pressures for change [see Figure 2]:

Collection of information is the critical step; accurate, timely and relevant data must be collected if accurate decisions are to be made. This process is demanding on **BSS Office** resources and the following table outlines the sources of information.

Figure 2 - Information sources

Торіс	Generated and/or obtained directly by BSS staff	Obtained separately and provided to BSS
Market fluctuations	1. Concerns about products new or inappropriate to the market introducing potential risk, as may be identified through professional activities e.g. events, meetings, media stories.	
Changes to Statutory requirements	 Changes to HSE, MCA Codes/Acts etc. Recreational Craft Directive Essential Requirements and supporting standards Other relevant EU Directives, i.e. Gas Appliance Regulations De-regulation pressures Health and Safety at Work etc Act, 	7. Changes to Statutory Requirements
Specific events and investigations		 8. Statutory organisations 9. BSS investigations 10. Relevant related industries
BSS Committees	 Concerns from committee organisations Concerns from ultimate duty holders (the Navigation Authorities) 	
Boaters/Users		13. Boating associations14. Individual boater's views (inc. on social media)15. Non-boating members of the public (anyone)
BSS Examiners	16. BSS Examination Report analysis17. Quality Control monitoring results18. Examiner role risk assessments19. Examiner body views	
Regulators		 MAIB Recommendations Police and other regulator enforcement action Expressed concerns from HSE, MCA, HM Coroners
Navigation Authorities		23. Staff observations and incident reports24. User observation
Partner Organisations		 Competent bodies such as UKLPG, Gas Safe Register, CoGDEM, HETAS, VSCG. Government/Public bodies such as DCLG, HSE and all local fire and rescue authorities.
Boating trade		27. Expressed concerns from individual traders28. Expressed concerns from British Marine
Incident and Risk Information	29. BSS incident and accident data and analysis30. Results of risk monitoring process (Element 6 of this process)	 Navigation authority incident reports Media, including social media, reports Coroner, Police and emergency services data WAter Industry Database (WAID) data National Water Safety Forum risk reports RIDDOR
System information	37. Review of BSS Examination Quality Management data38. Minutes of BSS support committee meetings	
International	39. Relevant known international standards, codes of practice and incident trend analysis	

1.1 Verification

Once the information has been received, it will be logged on the Formal Contact Record Sheet. All information received will be recorded:

- 1. Date received
- 2. Source
- 3. Information used to determine risk rating for future use
- 4. Logged as falling within or without scope of this BSS Risk Management Process
- 5. **Risk Register** reference for existing known risks.
- 6. Response sent to relevant parties where issues fall outside of the scope of this BSS Risk management process

BSS Office will identify a staff member who will verify the information as accurate and applicable.

Where information has been verified as either inaccurate or inapplicable, this will be marked on the Formal Contact Record Sheet.

Once it has been verified as accurate, it will then be added to the **Risk Register** (or the **Risk Register** will be updated).

1.2 Identify, characterise and scale risk

BSS Office will identify a staff member who will identify the character and scale of the risk in a qualitative way and will ensure that sufficient investigation and research to identify:

- 1. What the current risk level is for existing risks.
- 2. Whether the level of risk may have increased significantly and whether a Critical Group (see Appendix A) of those exposed to the risk may have been identified.
- 3. What is the scale of any gap between actual risk level and desired risk level?

This will be determined by the **BSS Office** staff member considering the following factors:

- 1. Does the issue fall wholly or partly within the BSS Risk Management Process scope (from a thematic and geographic aspect)?
- 2. Is the issue within an already recognised high risk area?
- 3. Are there any relevant stakeholder or political expectations to whether the BSS should respond?
- 4. Who are the persons potentially affected? are they participants, non-participants, do they belong to a Critical Group?
- 5. Are there any identifiable unintended consequences?
- 6. Are there pressures for changes to examinations from stakeholders?
- 7. Are existing communication strategies adequate?
- 8. Are existing arrangements robust to cope with changing circumstances of the risk groups e.g. pattern of employment/ activity/ engagement?
- 9. Is there evidence of a historical issue in terms of statistics of accidents and ill health and reports of investigations into particular incidents?
- 10. Is there a recognised perception within stakeholder groups that there is a problem to be addressed?
- 11. Is there evidence that suggest that existing arrangements are not fit for purpose?

12. Is there a need to act immediately to control any risk?

The BSS staff member will suggest an initial prioritisation of the level of risk as:

- 1. No apparent change in risk level
- 2. Low potential risk
- 3. Medium potential risk
- 4. Immediate action needed to address risk

The BSS staff member will record the information used to determine the risk rating on the Formal Contact Record Sheet.

The initial review will aim to be completed within one calendar month of receipt of the issue being logged on the Formal Contact Record Sheet. The findings will be presented to the **BSSTC** at the earliest opportunity, for discussion at the next **BSSTC** meeting. Significant extensions should be agreed between BSS staff member and the BSS Manager based upon the prevailing information.

Where the level of risk is determined to be high, the process will be fast-tracked by the **BSSTC Chair** as appropriate to the risk presented.

Issues outside of scope

Where an issue falls outside BSS scope or is considered low risk, not warranting further investigation, the Formal Contact Record Sheet and **Risk Register** will be updated accordingly, and the relevant BSS Committees and other stakeholders informed for review at the next meeting. This will provide the BSS Chairs with the opportunity to take a contrary view or raise further questions with the **BSS Office**. A record of the contact will be retained on the Formal Contact Record Sheet.

1.3 The Risk Register

The **Risk Register** will be owned by the BSS Manager. The BSS Manager authorises BSS staff members to update and change the **Risk Register**.

The **Risk Register** will contain the following information as a minimum

- 1. Risk reference
- 2. Risk topic area of risk
- 3. Action plan to control risk (reference to)
- 4. Risk owner

The **Risk Register** will be a live document. Old copies of the **Risk Register** will be archived indefinitely. Each new version of the **Risk Register** will have a specific version control reference, determined by the BSS Manager so that changes can be tracked.

The current **Risk Register** will be available to **BSS Office** staff members, authorised contractors and BSS Committee Chairs only, who will review the register outside of meetings, as they deem to be necessary.

The **Risk Register** will be made available to the Chair of BSSTC quarterly or on request. The BSSTC Chair will determine which items will need to be passed to BSSTC members for agreement at the next meeting.

2 BSS Technical Committee (BSSTC) consideration

BSSTC will consider each new and changed risk recorded on the **Risk Register**. They will use their technical knowledge and expertise alongside any commissioned expert views collected, to identify the cause and consequence of the risk factor and to suggest pragmatic plans to control these risks where these are needed. The **BSSTC** will achieve this by:

- 1. Agreeing the characterisation of the risks identified;
- 2. Identifying any uncertainties in the information provided;
- 3. Working to close any gaps in knowledge necessary to accurately establish the level of risk;
- 4. Agreeing the level of risk for each risk factor;
- 5. Creating proposals to control the risks, presented as a **Risk Review and Assessment Paper (RRAP)**.
- 6. Identifying areas where new controls will positively and negatively impact other risks and amend any existing risk action plans as necessary.

If there is any benefit in evaluating the risk level and the demands of any possible controls the BSSTC may decide to quantify the risk to assist with identifying the scope of the issue and potential controls. This will be specific to can include:

- 1. Numbers of people exposed per year
- 2. Numbers of relevant pieces of equipment or boats
- 3. Geographical spread or location specific information
- 4. Accident and incident numbers and statistics from same and similar incidents or industries.
- 5. Trends from critical groups identified
- 6. Quantified engineering assessments
- 7. Issues identified for consideration on the RRAP

Consideration will be given to the factors identified in Appendix B when determining tolerability.

There will be two main outputs from the **BSSTC**.

- 1. An up to date risk rating for each identified risk factor
- 2. **RRAP** for each risk item (or an agreed risk control plan if the risk item is deemed not to warrant a **RRAP**)

The **BSSTC** will meet in accordance with the most recent Terms of Reference for the Committee.

The **RRAP** (or risk control plan) including any recommendations will be passed to the **BSS Advisory Committee Chair** for consideration to be added to the agenda of the next meeting, or distributed more urgently if deemed necessary.

3 BSSTC Recommendations

When setting recommendations to control each risk, the **BSSTC** will consider the risks and tolerability of these factors before and after the suggested ALARP mitigation measures.

Upon agreement, the **BSSTC** will formulate and frame any necessary actions for the management and regulation of public risks. The **BSSTC** will use the principles in Appendix A, B and C as a guide.

Risk control recommendations will be made with full consideration of the cost and effort of implementation against the benefits derived. The full range of recommendations will be considered, including 'no action at this time' and the introduction of further BSS Examination Checking Procedures (ECP). Consideration will be given to the priority for risk treatment, comparing the other identified risks and the budgets available.

The results will be documented within the **RRAP**.

Each finalised **RRAP** will contain the following information:

- 1. Statement of the risk and any Critical Groups
- 2. Consideration of ALARP proposals and reduction in risk
- 3. Tolerability and impact of risk controls
- 4. The expected benefits to be gained from the recommendations
- 5. Who will be responsible for implementing the plan
- 6. The proposed actions
- 7. Resource requirements and contingencies
- 8. Reporting and monitoring requirements
- 9. Timing and scheduling

BSSTC will not record each and every rationale, only the recommendations considered to be proportionate, relevant and suitable will be recorded on the **RRAP**.

4 BSS Advisory Committee (BSSAC) Assessment

The **BSSAC**² will receive the **BSSTC RRAP**, consider the issues and then evaluate the recommendations, giving consideration to the following questions:

- 1. Will the recommendations achieve the desired aims?
- 2. Do the recommendations themselves introduce new risks?
- 3. Will the monitoring arrangements provide a suitable check of these risk and controls?
- 4. Do the recommendations complement other recommendations?
- 5. Do the recommendations support the BSS aims and objectives?
- 6. Do the recommendations help support BSS stakeholder objectives?

If consensus supporting endorsement of the recommendations contained within the **RRAP** is achieved, the paper will go to the **BSS Management Committee** (**BSSMC**)³.

If consensus is not achieved, any comments will return to **BSSTC** for consideration and if appropriate, the **RRAP** amended. Any lack of consensus between **BSSTC** and **BSSAC** will be reported to **BSSMC**.

Where the level of risk is determined to be high, the process will be fast-tracked by the BSSAC Chair and BSSTC Chair, as appropriate to the risk presented.

² BSSAC considers the operation and impact of the Scheme and represents the BSS stakeholders.

³ BSSMC are responsible for all significant policy decisions

5 BSS Management Committee (BSSMC) Ratification

The **BSSMC** will review the recommendations from the **BSSAC** and ratify the **Risk Register** and all **RRAP** papers as appropriate, giving additional consideration to the intended actions of the BSS being:

- 1. Appropriate and proportionate
- 2. Have minimal unintended consequences (such as adverse effects on the boating experience or hidden costs)
- 3. Supported by stakeholders
- 4. Supported by the boating and general public who may be affected by boating activity

The **BSSMC** will then ensure that sufficient resources are made available to implement the recommendations via an Implementation Plan created by **BSS Office**.

BSSMC will set any parameters for monitoring and review. If no specific parameters are set then any benchmarks included in the BSS Annual Risk-activity Plan will be applied

The results of the meeting will be recorded in the published notes of the meeting.

6 Monitoring Arrangements

The Implementation Plan will be developed by the **BSS Office** to include requirements for resources, consultation and communication concerning each item ratified by **BSSMC**.

The Implementation Plan will identify how the controls will be checked and monitored, including,

- 1. Who will check,
- 2. How will the check be conducted?
- 3. What are the indicators for monitoring the plan
- 4. What is the measure of success?
- 5. How will non-conformance be reported?

If new BSS Requirements are introduced these requirements will be subject to periodic review by the **BSS Office** and failure rates will be monitored and reported at least quarterly to **BSSTC** and **BSSAC**. This data will be recorded in the minutes of the meetings, subject to any personally sensitive data being removed.

The results of the review will be monitored by BSS staff, as identified part of 1, Identification of Pressure for Change, above.

7 BSS Examination Programme

The BSS Office will maintain the BSS Examination Programme.

In addition to the monitoring arrangement identified in Element 6; the quality of the BSS Examination Programme will be monitored by the **BSS Office** which records and evaluates the following factors as a minimum:

- 1. Number of Examiners
- 2. Number of Examiners up to date with the required training
- 3. Rate of Examinations per Examiner
- 4. % of faults detected per Examiner
- 5. No. of boats assessed
- 6. No. of any formal complaints received or any other intelligence gathered
- 7. Results of any peer review activities
- 8. Results of quality control assessments.

The monitoring arrangements applied to the BSS Examination Programme will ensure that the Scheme is robustly applied by Examiners and that BSS examination data is robust.

8 Performance review

The results from the monitoring identified in the Implementation Plans will be reported by the **BSS Office** to **BSSTC** and **BSSAC** for review during their periodic meetings.

The **BSS Office** will also collate an Annual Performance Report with the results of the BSS Examination Programme; this annual report will demonstrate how the work of BSS has been:

- 1. Appropriate and proportionate and consistent in application
- 2. Have minimal unintended consequences (such as adverse effects on the boating experience or hidden costs)
- 3. Supported by stakeholders
- 4. Supported by the boating and general public who may be affected by boating activity

This report will be provided to the **BSSTC**, **BSSAC** and stakeholders via their representatives.

9 Process review

This process document is subject to 5-year review by **BSSMC**, or sooner if **BSSMC** determines any need.

BSSTC will be responsible for determination of the standards of the process review, initiating the 5-year review and making any recommendations for change through **BSSAC** to **BSSMC**.

BSSTC can make recommendations for review at any time, through BSSAC to BSSMC.

Appendix A - Critical Groups

Introduction and Purpose

The BSS Risk Management Process highlights the importance to successful risk management of identifying persons within the boating population who may be at substantially higher risk than the average across the whole population. These persons, referred to as 'Critical Groups', may require more detailed work to establish them as a defined group who experience these higher levels of risk.

Definitions

For the purposes of the BSS Risk Management Process, a Critical Group is defined as follows:

A critical group is a subset of the overall boating population within the scope of the BSS who by virtue of their ability levels, behaviours, knowledge, exposure to technical hazards, areas of operation etc. experience substantially higher risks compared with the mean exposure across the whole boating population.

Examples

The examples below illustrate some of the factors that in themselves or in combination, can lead to a Critical Group:

Ability and Competence Limitations

- Experience
- Training
- Knowledge
- Physical ability (lack of ability, impairments)
- Intellectual ability (mental health and capacity)

Behaviour

- Use/abuse of protective equipment or safety systems
- Intentional/unintentional ignoring of advice or instruction (verbal or written)

Craft Condition

- Equipment type faults
- Inadequate installation
- Incorrect use (intentional or not)
- Random faults

Identifying Critical Groups

- Use of incident data (WAID etc) to correlate incidents with factors listed above.
- Monitoring changes to patterns of use (established or new)
- User feedback
- Expert opinion
- Testing incident rates for suspected critical groups against the mean (whole population)

Appendix B - Tolerability of Risk factors

For each actual or potential hazardous situation, the process considers:

- Likelihood of occurrence
- Range of outcomes
- Who may be affected and to what extent
- Availability and effectiveness of risk control measures
- Cost of implementing risk control measures and their effect on the nature and extent of participation in the activity and the ability of a responsible party to pay
- Priority for implementing change.

The following four factors will be considered when determining the tolerability of risk:

- 1. ALARP. Showing that a principal requirement of health and safety law has been met.
- 2. **Personal acceptability**. Evaluating the acceptability of the risk to participants and non-participants.
- 3. **Risk-benefit assessment**. Ensuring as far as possible that risk control measures do not detract from the health and well-being benefits to participants (*this is relevant to any new mandatory BSS requirement being considered*).
- 4. **Other effects**. Identify any adverse effects of the risk control measure particularly on the environment and on the accessibility of boating activity.

These factors are described below.

Where the considerations of personal acceptability, risk-benefit and other effects leads to a reconsideration of the risk control measures, the ALARP assessment will be repeated to show that risks remain as low as reasonably practicable.

(a) ALARP

The requirement is to reduce risks as far as reasonably practicable, not to eliminate or minimise them. The (*Appendix C*) assessment will determine whether the estimated level of risk is judged to be at a high, medium or low level within the ALARP region.

For existing risks assess whether the risk could be expected to decrease or increase and if the latter, whether the risk could be considered no longer to be as low as reasonably practicable.

Any risks in excess of 'high' can be considered intolerable to the duty holder even where the participant may be prepared to take the risk. For risks classed as 'high', a correspondingly high level of expenditure or resources is justified in order to reduce them. For risks classed as 'low', little or no commitment of resources will be necessary beyond what may be considered as good practice.

(b) Personal Acceptability

In considering the overall acceptability of a new or changed risk the **BSS Office** will consider the extent to which it is likely to be acceptable to the members of the public, whether participants or non-participants. The **BSS Office** may choose to consult with groups to establish levels of acceptability.

Factors which act against risks being acceptable are:

- **Unawareness of the risk**, therefore depriving the affected person of any opportunity to accept the risk, take mitigating action, or remove themselves from the risk.
- Benefits of the risk not apparent or going to others. Taking appropriate boating risks brings benefits to the individual (see below) but may be considered unacceptable if it means others, especially non-participants, have risks placed upon them.
- Accident rates are perceived to be high although in reality they may not be.
- Little or no control over outcomes. Risks are likely to be considered more acceptable where those potentially affected consider they have a degree of control over outcomes that falls within their level of competence.
- **Children may be affected.** Any risk where children may be affected especially if they are the predominant group at risk.

(c) Benefits from Boating activities

The activity of boating brings with it a wide range of benefits to the participants' health and well-being which include:

- A slower, more relaxed pace of life
- Access to pleasant environments less affected by noise and pollution
- Access to biodiversity through 'green corridors'.
- Educational benefits through access to a semi natural environment and historic network
- Helping to sustain a historic and vibrant waterways network for society to enjoy

These are reflected in the Navigation Authorities common goal of making every visit to the waterways a safe and pleasant experience. The effects on these benefits of proposed changes to risk and their control need to be considered and where there appears to be a reduction in benefits then consideration should be given to alternative methods for risk control and taken account of in the ALARP assessment.

(d) Other effects

- Environment. Consideration of carbon and other emissions to the environment and the effects on flora and fauna (e.g. reference to the Green-Blue Environmental Code of Practice).
- Inclusivity and Access. The effects of changes on the access of special needs or other minority groups to boating activity.

Appendix C - Risk Estimation Process within the ALARP Region

A risk considered to be within the ALARP region is divided into areas of nominally high, medium and low risk.

When evaluating a change to an existing risk or a possible new risk control measure it may be that the original and the new risk both fall within the same area. In this case it will be necessary for the **BSS Office** to make a judgement as to whether the risk is the same, higher or lower.

The **BSS Office** can choose to use the following ALARP check formula if this assists the decision-making process (see more on ALARP <u>here</u>)

If it is not considered clear or there is uncertainty that the risk is ALARP in terms of risk to people it will be necessary to consider possible additional risk reduction measures and evaluate the resulting risk level. When there is confidence that the measures, current and proposed, can be considered to provide risks which are as low as possible at proportionate⁴ cost then the acceptability of the risk taking into account other risks and the benefits of the activity should be determined.

Risk Assessment Characterisation⁵:

Immediate action needed to address risk (towards the borders of unacceptability)

- Significant likelihood of a single fatality within 5 years
- Potential for multiple fatal incidents
- Potential for incidents with multiple fatalities
- Regular occurrence of serious injuries
- Most incidents have potential to escalate to serious or fatal outcomes
- Fatal incident within last 5 years

Medium potential risk

- Fatalities possible but unlikely within 15 years
- Some potential for escalation to serious or fatal outcomes

Low potential risk (tending towards 'broadly acceptable')

- Negligible potential for fatalities
- Little or no potential for escalation to serious or fatal outcomes
- No potential for multiple fatalities
- No actual fatalities recorded

No apparent change in risk level

- The situation offers no identifiable increase in normal life risks

⁴ The higher the risk the greater the expenditure considered justifiable to reduce that risk. ⁵ Numerical fatality periods based on BS8800 factored by 10 for risks to public from workplace activities.

Appendix D - Definitions

- a) **BSSTC** is a stakeholder committee calling upon technical expertise and representing the various 'customer groups' of the BSS, namely the navigation authorities, the user groups, examiner bodies and the marine trade. Additional technical expertise can be called upon as required.
- b) **BSSAC** is the stakeholder committee that makes recommendations to the BSSMC on matters pertaining to the operation and impact of the BSS. The customer-group interests are also evenly represented on this committee.
- c) **BSSMC** is the committee that determines and sets in place an overall management framework which ensures the quality, cost effectiveness and the long-term viability of the Scheme. All key decisions including those concerning any new BSS requirements, the need for BSS safety awareness initiatives are made by BSSMC.
- d) **BSS Office** made up of full-time BSS staff who are responsible for administration of the process. Ultimate responsibility for process administration rests with the BSS Manager.
- e) **Critical Groups.** Sub-sets of h) who by nature of their use of their boat or the particular equipment on it may be exposed to a higher level of risk. See Appendix A for further discussion.
- f) **Navigation authorities.** Organisations with statutory or other legal responsibility for the management, maintenance and operation of navigable inland waterways for navigation.
- g) **Non-participants**. Any other person(s) including other boaters who may be affected by the actions of, or a hazardous event involving, a boat subject to the BSS requirements.
- h) **Participants.** Owners, occupants or users of boats that are subject to the BSS requirements.
- i) **Risk Register.** The repository for all risks identified; it includes information about each risk, e.g. nature of the risk, reference and any mitigation measures. The Risk Register helps BSSTC track issues and address any escalation of risk as it arises.
- j) Risk Review and Assessment Paper. The product of the BSS Risk Management Process for identified risks and containing BSSTC risk control recommendations. See Element 3 for more detail.