

A practicable risk-based example of implementing new regulatory approaches using Queensland Recognised Standard 22 (Management Structure for the development and implementation of the SHMS)

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ABSTRACT

This paper provides an example of how industry can respond to new regulatory approaches to Mining Health & Safety by introducing a robust and practical approach to the implementation of Recognised Standard 22 (RS22). Based on experiences of the authors gained from a number of mine operations across Queensland, it offers a snapshot of the experiences, challenges and reservations faced collectively by industry.

Recognised Standard 22 “Management Structure for the development and implementation of the Safety and Health Management System” was gazetted in August 2021. It states a substantially new way for the Site Senior Executive (SSE) to develop and maintain a Management Structure for the purpose of development and implementation of the Safety and Health Management System (SHMS), requiring the SSE to determine the competency requirements of all Management Structure positions and delegated responsibilities associated with the management of risk; including where there is an absence of competencies prescribed by legislation.

A number of challenges exist within the detail of Recognised Standard, leading to varied interpretations, implementation and compliance. Working with several coal mines (operating and under construction), arguably the single-biggest challenge identified has been how to find a balance between compliance and practicality – considering cost, operational interruption, and ongoing compliance.

The approach put forward by the authors requires a well-considered rationale and approach to the application of training and skilling; and equally so, how to maintain the coordination of these training needs around the changes to the Management Structure, the Risk Register and succession planning for key roles. Software-based solutions such as ‘My Competency Expert’ are increasingly being relied upon to address the needs of SHMS regulatory requirements, such as compliance with RS22 – especially in the face of ongoing Management Structure changes, site risk profiling and the coordination of training needs management.