



Australian Government

Australian Maritime Safety Authority

Regulator Performance Framework

Self-assessment report



2017–18



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Approvals

Title	Name	Signature	Date
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1. Executive summary

1.1 Self-assessment

The Australian Maritime Safety Authority (AMSA) undertook its third annual self-assessment of its performance against the Regulator Performance Framework (RPF) in August 2018.

The self-assessment was informed by:

- the draft 2017–18 AMSA annual performance statements
- AMSA's 2016–17 RPF self-assessment report
- a report on the 2017 RPF external review of port State control related assessments
- the annual results of AMSA's RPF customer survey
- the professional knowledge and experience of AMSA's Executive team.

The 2017–18 self-assessment results broadly indicate that AMSA management:

- believes it has made solid, tangible progress over the past year – notably in the lead up to the National System 'go-live' date of 1 July 2018
- is very aware that there is room for improvement across the range of RPF KPIs, particularly in relation to the domestic commercial vessel (DCV) industry.

The impact of the DCV industry on perceptions of AMSA's regulatory performance is again evident in the 2017–18 RPF customer survey results. The implementation of the National System for the DCV industry (the National System) appears to be generating an ambivalent and possibly negative sentiment towards AMSA, and increasing levels of frustration.

AMSA continues to be fortunate that the daily interactions of its staff with stakeholders and its strong broader reputation contributes to a positive overall perception and a 'buffer' of goodwill. However, AMSA management is very aware that ongoing goodwill is not guaranteed—and is focused on addressing the issues highlighted by the DCV industry and successfully delivering the National System.

1.2 Self-assessment validation

The AMSA self-assessment was again validated by the AMSA Advisory Committee (AAC)—an Australian peak maritime representative body.

The AAC's general view was that the AMSA Executive's self-assessment was 'fair'.

"A fair assessment by all accounts, given the investment the AMSA Executive continue to make to achieve a safer, stronger maritime industry"

Overall there was a reasonably high degree of correlation between the AAC validation and self-assessment results, with the six KPI consolidated validation scores all around the 'agree' mark (5 out of 6), with three in the 'somewhat agree' (4) to 'agree' (5) range, albeit closer to 'agree'; and three in the 'agree' (5) to 'strongly agree' (6) range'. The AAC also agreed with the AMSA Executive's assessment of progress made on opportunities identified in previous self-assessments.

While the variances were not significant/of concern, the AAC's scores and qualitative comments again highlighted the impact of the transition which saw AMSA assume full responsibility for service delivery of the National System on 1 July 2018. Notwithstanding this challenge, the overall sentiment was positive.

"Overall I believe AMSA have performed well given the difficulty of integrating the National System in a single regulator"

"On the whole, implementation of the National Standard for Commercial Vessels is going well"

In regards to opportunities for improvement, the validation:

- reinforced the need to continuously look for more efficient ways of doing business with the DCV industry
- highlighted the importance of providing standardised technical/legislative advice to industry, and minimising the influence of individual interpretation by regulatory officers.

The validation:

- suggests that AMSA is heading in the right direction regarding getting the regulatory balance right (Q1: AMSA helps vessel owners and seafarers safely operate or work on a vessel without getting in the way—validation score 5.65 'strongly agree')
- reconfirmed¹ AMSA's broader focus on trying to improve maritime regulations to create a safer and more efficient industry (Q6) as a strength.

¹ Identified as a strength in the 2015–16 and 2016–17 AMSA RPF self-assessments.

2. Background

2.1 Purpose

The purpose of the Regulator Performance Framework (RPF) is to encourage regulators to undertake their functions with the minimum impact necessary to achieve regulatory objectives, and to effect positive ongoing and lasting cultural change. The RPF commenced on 1 July 2015.

The RPF consists of six outcomes-based key performance indicators (KPIs) which set the Government's overarching expectations of regulator performance:

1. regulators do not unnecessarily impede the efficient operation of regulated entities
2. communication with regulated entities is clear, targeted and effective
3. actions undertaken by regulators are proportionate to the risk being managed
4. compliance and monitoring approaches are streamlined and coordinated
5. regulators are open and transparent in their dealings with regulated entities; and
6. regulators actively contribute to the continuous improvement of regulatory frameworks.

More information on the RPF is available at: www.cuttingredtape.gov.au/rpf

2.2 Requirement

Regulators must self-assess their performance against the RPF annually. The results of the self-assessment must be:

- validated by an approved external stakeholder body—the Australian Maritime Safety Authority (AMSA) Advisory Council (AAC)²
- certified by AMSA's accountable authority³—the AMSA Board; and
- provided to AMSA's portfolio Minister and published no later than 31 December each year.

² On 28 May 2015 the AAC agreed to be AMSA's external validation body for the Regulator Performance Framework (RPF), and agreed the proposed measures. On 1 December 2015 AMSA's portfolio Minister approved these arrangements.

³ *Public Governance, Performance and Accountability Act 2013* (PGPA ACT).

3. Method

3.1 Evidence

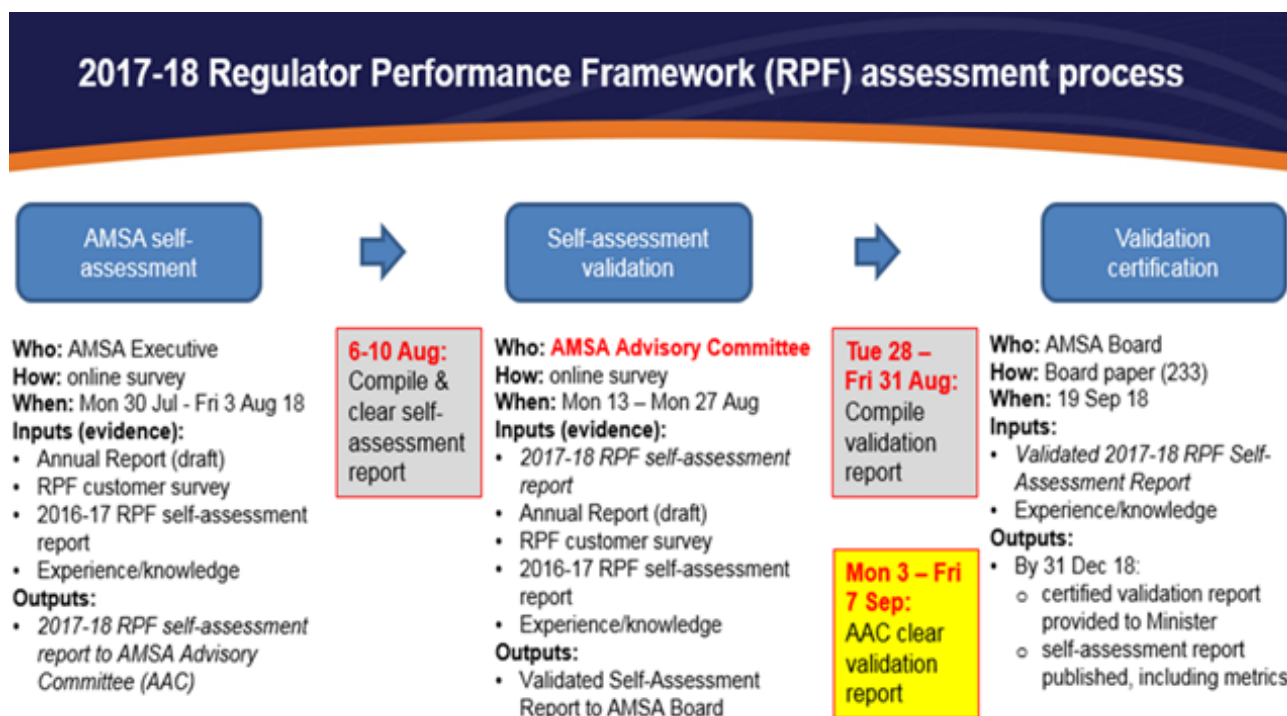
Where possible AMSA leveraged existing processes for data collection and analysis. The primary sources of evidence used for the self-assessment and validation were:

- the draft 2017–18 AMSA annual performance statements⁴—available as part of AMSA’s 2017–18 annual report available on our website
- AMSA’s 2016–17 RPF annual self-assessment Report
- a report on the 2017 RPF external review of port State control (PSC) related assessments
- the annual results of AMSA’s online RPF customer survey.

3.2 Process

Diagram One below details the overall self-assessment process.

Diagram One: AMSA 2017–18 RPF self-assessment process



⁴ The 2017–18 AMSA annual performance statements reported performance against a range of measures previously identified and agreed as relevant/aligned to the RPF.

3.2.1 AMSA self-assessment

Over the period 30 July – 3 August 2018 the AMSA Executive undertook their third self-assessment of AMSA's performance against the RPF through an online survey. In addition to exercising their professional judgement, the self-assessment was informed by documents listed at section 3.1.

The self-assessment survey consisted of six key statements/questions aligned to the RPF key performance indicators:

- Q1: AMSA helps vessel owners and seafarers safely operate or work on a vessel without getting in the way
- Q2: Our communications with those we regulate are clear and useful
- Q3: Given the risks involved in the industries AMSA regulates, the level of regulation is about right
- Q4: AMSA's compliance and monitoring arrangements are well organised and efficient
- Q5: AMSA explains its regulatory decisions well, and
- Q6: AMSA is always trying to improve maritime regulations to create a safer and more efficient industry.

The response options were:

1	2	3	4	5	6	7
strongly disagree	disagree	somewhat disagree	somewhat agree	agree	strongly agree	n/a

This year's survey also included four questions on AMSA's progress against the opportunities for improvement identified in 2015–16 and 2016–17 self-assessments:

- 2015–16: how much progress has been made:
 - raising stakeholder awareness and visibility of AMSA's decision making?
 - improving harmonisation and coordination of AMSA resources across all ship types and sectors?
- 2016–17: how much progress has been made:
 - providing a higher degree of certainty to stakeholders as to how regulatory oversight under the National system will work?
 - improving engagement and communication with a wide and diverse group of stakeholders—notably the DCV industry

The response options for these questions were:

- no or little progress
- some progress; and
- significant progress.

If the response was 'no or little progress', respondents were asked to explain. If the response was 'some' or 'significant' progress, respondents were asked for examples.

3.2.2 Validation

Over the period 13–27 August 2018 the AMSA Advisory Committee validated AMSA's RPF self-assessment through an online survey.

The purpose of the validation is to be a sounding board for the self-assessment results prior to them being considered by the AMSA Board, and subsequently by AMSA's portfolio Minister.

The AMSA Advisory Committee is a peak maritime representative body comprised of senior representatives⁵ from the following organisations:

- Austral Fisheries
- Australian Antarctic Division
- Australian Maritime College
- Braemar ACM Shipbroking
- Flinders Port Holdings Pty Limited
- Maritime Industry Australia Ltd
- National Offshore Petroleum Safety and Environmental Management Authority
- Port Authority of New South Wales
- Royal Australian Navy
- Shipping Australia Limited
- Stehr Group
- Sea Transport Solutions Pty Limited

The results of the AMSA self-assessment survey were consolidated in a report and provided to the AMSA Advisory Committee, along with the other inputs (evidence) detailed in diagram one, by email on Thursday 9 August 2018 as a precursor to receiving an invitation to take part in the validation survey.

AMSA Advisory Committee members were encouraged to put time aside to review the evidence prior to undertaking the survey.

The validation survey was a variation on the ten (six KPI, four progress) self-assessment key statements/questions. Each question asked the participant to determine:

“whether the AMSA self-assessment result against the relevant KPI/ progress assessment is a fair and accurate representation of AMSA's performance, based on the evidence presented to them and their own experience”.

Each question also detailed the corresponding survey question/statement posed to the AMSA Executive, and the summary self-assessment result.

⁵ CEO or equivalent.

Diagram Two is an example of the validation survey question format for KPIs, and Diagram Three an example of the progress questions.

Diagram Two: example of validation survey KPI question format.

AMSA Advisory Committee 2017-18 Regulator Performance Framework validation survey

RPF KPI 1: regulators do not unnecessarily impede the efficient operation of regulated entities

1. Q1: The evidence and my own experience suggests that the self-assessment result against this KPI is a fair and accurate representation of AMSA's performance (Survey question: *AMSA helps vessel owners and seafarers safely operate or work on a vessel without getting in the way. Self-assessment result: 4.83 'somewhat agree' to 'agree'*)

strongly disagree	disagree	somewhat disagree	somewhat agree	agree	strongly agree	N/A
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments

Diagram Three: example of validation survey progress question format.

AMSA Advisory Committee 2017-18 Regulator Performance Framework validation survey

Progress since 2016-17

AMSA's 2016-17 Regulator Performance Framework self-assessment report identified two specific opportunities for improvement: **Opportunity One** - providing a higher degree of certainty to stakeholders as to how regulatory oversight under the National system will work; and **Opportunity Two** - improving engagement and communication with AMSA's wide and diverse group of stakeholders – notably the DCV industry.

The 2017-18 self-assessment completed by the AMSA Executive asked them to assess progress against each of these areas over the past 24 months. The results are detailed on page 3. In this section you are asked for your views on whether AMSA's progress assessment is accurate/reasonable.

*** 9. For Opportunity One AMSA believes it has made 'some' (n=4) to 'significant' (n=2) progress. In your view, this is an accurate and reasonable assessment.**

Agree

Disagree

Comment:

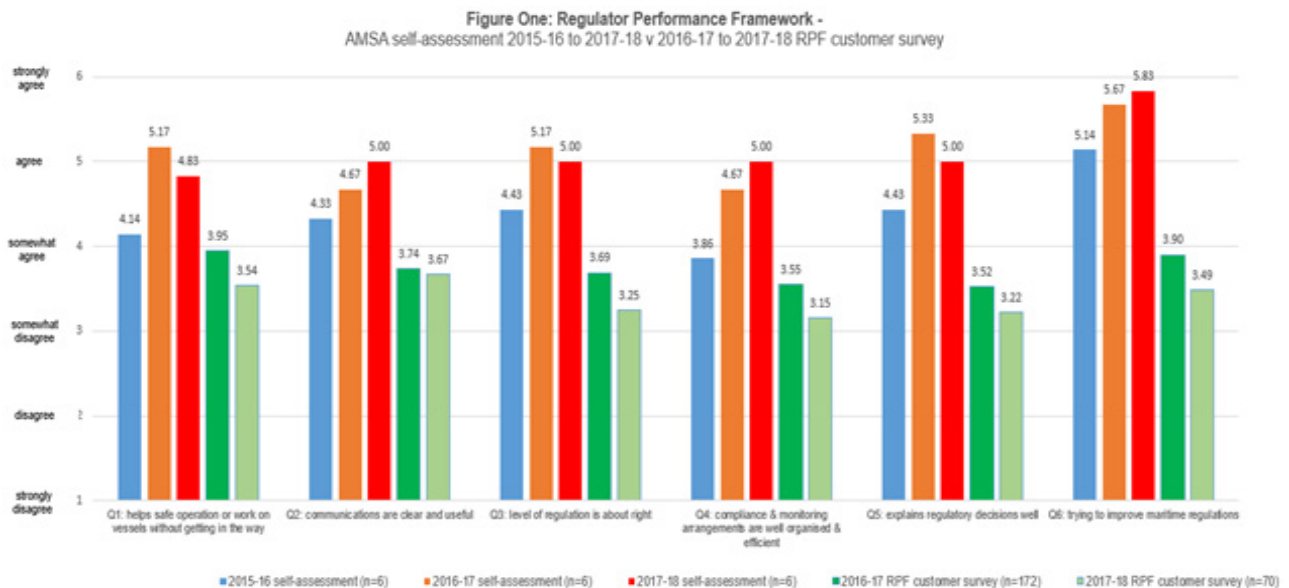
Four of the 12 organisations that compose the AAC responded to the survey (n=4), a 33% response rate. The response rate may be symptomatic of the 'survey fatigue' noted during last year's survey.

4. Results

4.1 Self-assessment against RPF KPIs

The summary results of the 2017–18 self-assessment against each RPF KPI question are shown in Figure One (red bars). For comparative purposes Figure One also shows the:

- 2015–16 (blue bars) and 2016–17 (orange bars) self-assessment results
- 2015–16 and 2016–17 annual results of the RPF customer survey (dark and light green bars respectively) which uses a similar question set, less the questions on progress against opportunities



The detailed results and comments for each self-assessment KPI question are at Attachment 5.1.

4.2 Progress against 2015–16 opportunities

The AMSA Executive self-assessment was that:

- ‘some’ (n=3) to ‘significant’ (n=3) progress had been made in raising stakeholder awareness and visibility of AMSA’s decision making processes through better engagement, education and communication; and
- ‘some’ (n=4) to ‘significant’ (n=2) progress had been made in improving harmonisation and coordination of AMSA resources across all ship types and sectors.

Table One (next page) details the evidence provided by the AMSA Executive in support of their progress assessment.

Table One: Progress assessment—evidence

(a) Awareness and visibility of decision making processes	(b) Improving harmonisation and coordination of AMSA resources
“Clearer information provided on our website. Engagement with various committees. Regional engagement”.	“As we have geared up for the transition on the 1st of July a considerable amount of effort has gone into preparation. This includes whole of AMSA training and awareness sessions, as well as the work undertaken for the operational aspects of our regional offices”.
“Delivery of a new external website; social media campaigns; publication of Working Boats; industry forums”.	“Reallocation of Port State Control resources to domestic vessel preparatory activities. Maturing of AMSA Connect (call-centre function) to improve 1st point of contact inquires and triage questions for subject matter experts in the business”.
“Working Boats, publishing outcomes of consultations”.	“In the move to AMSA fully owning it, harmonisation has been delivered”.
“I think we have made good moves to clear language and easy location of information—along with strengthening regional communication arrangements”.	“Looking to bring gains/lessons learned from all ship types/sectors into an improved AMSA operating model”.
“Consultative structures and communication channels”.	

4.3 Progress against 2016–17 opportunities

The AMSA Executive self-assessment was that:

- ‘some’ (n=4) to ‘significant’ (n=2) progress had been made in raising stakeholder awareness and visibility of AMSA’s decision making processes through better engagement, education and communication; and
- ‘some’ (n=1) to ‘significant’ (n=5) progress had been made improving engagement and communication with a wide and diverse group of stakeholders—notably the DCV industry.

Table Two (below) details the evidence provided by the AMSA Executive in support of their progress assessment.

Table Two: Progress assessment—evidence

(a) Providing a higher degree of certainty to stakeholders as to how regulatory oversight under the National system will work	(b) Improving engagement and communication with a wide and diverse group of stakeholders – notably the DCV industry
“We’ve done a lot but am not confident we are reaching all our stakeholders to deliver a consistent message in this area”.	“A significant push has taken place leading up to 1st July however this will always be an area for continual improvement”.
“Targeted communications across all channels aimed at explaining—in plain English – the changes and how those changes will practically impact operators, seafarers etc”.	“A concerted effort has been made to identify and reach the diverse range of National System stakeholders. The publication of Working Boats; an updated external website; social media campaigns; and the development of the MyBoats applications are examples of improvements”.
“Hard to reach significant (degree of certainty) until we started to deliver and hence prove our words and messages. As we got closer to delivery we were able to engage with more certainty on our processes and approaches”.	“Campaign coming up to 1 July”.
“Consultation processes outlined to all stakeholders and also rationalisation of consultation arrangements with ‘batch lots’ of updates provided on a regular basis”.	“Again, simple language and removing surplus information that served little to no purpose”.
	“Success story of Liaison officer interactions”.

4.4 Analysis

4.4.1 Self-assessment against RPF KPIs

Overall, there has been no change from the 2016–17 self-assessment results. The average remains steady at 5.11/ ‘agree’.

There have been small movements across all the individual RPF KPIs, but given the small sample size of the AMSA Executive (n=6) these movements are immaterial.

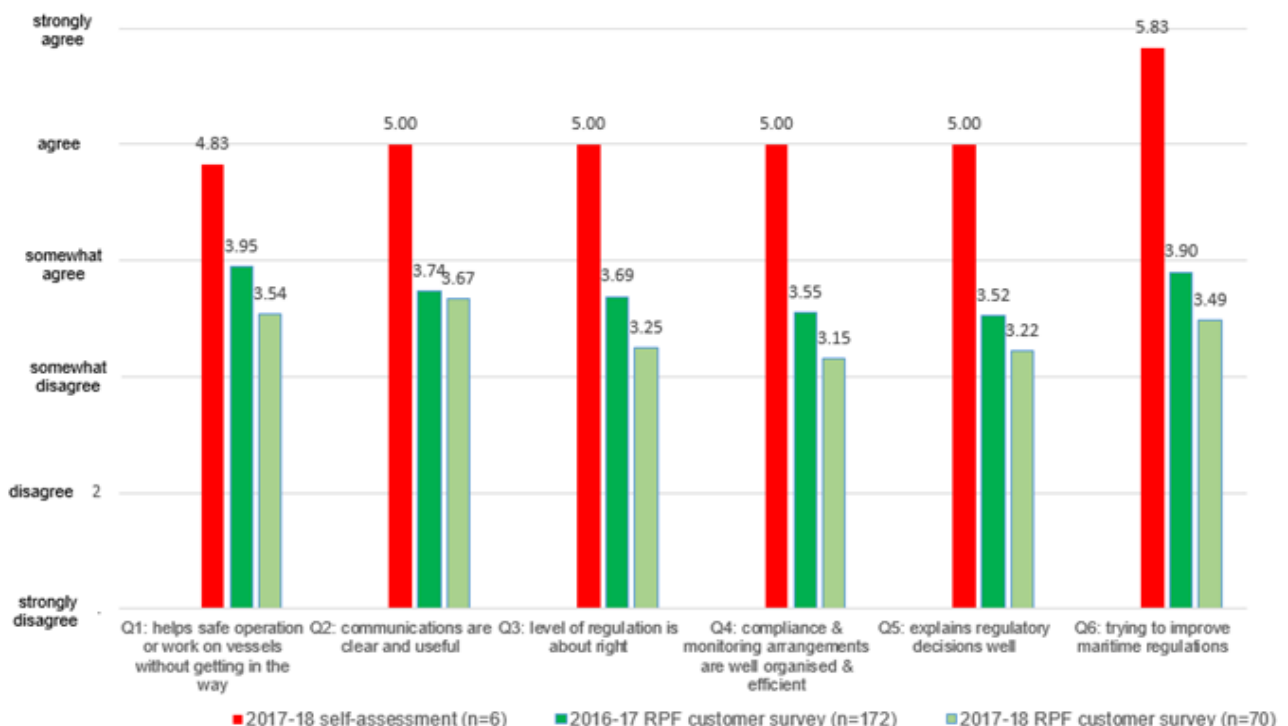
Of note, the strongest result recorded was again for KPI 6—AMSA is always trying to improve maritime regulations to create a safer and more efficient in industry—5.83/‘strongly agree’. The qualitative comments for both the RPF KPI questions and progress questions (Tables One and Two above) suggests that this result has been driven by perceptions that solid, tangible progress has been made across the board over the past year—while acknowledging that there is still a lot of work to do.

Significant improvement initiatives, notably those in support of the implementation of the National System, underpins this positive sentiment.

4.4.2 Self-assessment against RPF customer survey

While the self-assessment result remained steady, there has been a small drop across all KPIs in the annual RPF customer survey results compared to last year – Figure Two.

Figure Two: Regulator Performance Framework -
AMSA self-assessment 2017-18 v 2016-17 to 2017-18 RPF customer survey



Although RPF customers continued to rate AMSA in the 'somewhat disagree' to 'somewhat agree' range overall, there was an average decrease of 0.31 across the KPIs.

The biggest decreases were seen in:

- Q1: AMSA helps vessel owners and seafarers safely operate or work on a vessel without getting in the way—down 0.41.
- Q3: Given the risks involved in the industries AMSA regulates, the level of regulation is about right—down 0.44.
- Q6: AMSA is always trying to improve maritime regulations to create a safer and more efficient industry—down 0.41.

The widening difference in perspectives between the AMSA 2017–18 self-assessment and RPF customer survey results suggests that the AMSA Executive's view of regulatory performance is more holistic—including both preparation for the National System and the regulation of vessels subject to SOLAS; whereas the RPF customer survey results were again heavily influenced by DCV industry participants.

4.4.3 Impact of domestic commercial vessel participants

The RPF customer survey results indicate that DCV, as a single nationally regulated industry group, continues to be ambivalent towards AMSA, and in some areas, is increasingly frustrated.

The 2017–18 year saw the transition from State and Territory arrangements to the National System, culminating in AMSA assuming responsibility as the national regulator on 1 July 2018. Qualitative comments from the RPF survey strongly suggest that some DCV industry participants have real and immediate concerns about the impacts on them and their livelihood resulting from the introduction of the National System. These concerns have duly been reflected in the quantitative KPI results.

The DCV industry makes up just over 54% (n=38) of RPF customer survey participants (n=70). This relatively high participation rate impacts disproportionately on the results, and may have led to the increasing gap between the Executive self-assessment results and customer survey results

Given the large stakeholder numbers within the DCV stakeholder base (66,000+), the statistical significance of 38 respondents may also be reflective of a smaller number of disgruntled vocal stakeholders.

The results of the 2017 external RPF review of AMSA's port State control (PSC) related assessment—where AMSA was rated as 'excellent' overall—along with RPF related results in AMSA's draft 2017–18 annual performance statements, provides further evidence of AMSA's strong performance across its broader regulatory functions. This evidence was considered by the AMSA Executive as part of its 2017–18 self-assessment, but would not have necessarily influenced—or be seen as relevant to—a number of RPF customer survey participants.

While the 2017–18 RPF customer survey results may not be wholly representative of AMSA's broader regulatory performance, they provide a useful insight as to the 'voice of the customer', and AMSA's impact in its regulatory role. The DCV industry is now AMSA's largest stakeholder group, and will therefore play a central role in gauging AMSA's long-term success.

4.4.4 Summary

The 2017–18 self-assessment results broadly indicate that AMSA management:

- believes it has made solid, tangible progress over the past year—notably in the lead up to the National System 'go-live' date of 1 July 2018
- is very aware that there is room for improvement across the range of RPF KPIs, particularly in relation to the DCV industry.

The impact of the DCV industry on perceptions of AMSA's regulatory performance is again evident in the 2017–18 RPF customer survey results. The implementation of the National System appears to be generating an ambivalent and possibly negative sentiment towards AMSA, and increasing levels of frustration.

AMSA continues to be fortunate that the daily interactions of its staff with stakeholders and its strong broader reputation contributes to a positive overall perception and a 'buffer' of goodwill. However, AMSA management is very aware that ongoing goodwill is not guaranteed—and is focused on addressing the issues highlighted by the DCV industry and successfully delivering the National System.

4.5 AMSA Advisory Committee validation

The summary results of the AMSA Advisory Committee's (AAC) validation of the self-assessment results against the six RPF KPI areas are shown in Figure Three below (green bars).

Readers should note that the validation results:

- indicate how strongly the AAC agrees or disagrees with the AMSA self-assessment (red bars)
- are not the AAC's direct assessment of AMSA against the RPF key performance indicators and survey questions.



With regards to progress against the opportunities identified over the past two years, all four AAC respondents agreed with the AMSA Executive's assessment that 'some' to 'significant' progress had been made (see page 6).

2015–16:

Opportunity One: raising stakeholder awareness and visibility of AMSA's decision making processes through better engagement, education and communication.

Opportunity Two: improving harmonisation and coordination of AMSA resources across all ship types and sectors.

2016–17:

Opportunity One: Providing a higher degree of certainty to stakeholders as to how regulatory oversight under the National system will work

Opportunity Two: Improving engagement and communication with a wide and diverse group of stakeholders – notably the DCV industry

The detailed results and comments for each validation question are at Attachment 5.3.

4.5.1 Analysis

Overall there was a reasonably high degree of correlation between the AAC validation and self-assessment results, with the six KPI consolidated validation scores all around the 'agree' mark (5 out of 6), with three in the 'somewhat agree' (4) to 'agree' (5) range, albeit closer to 'agree'; and three in the 'agree' (5) to 'strongly agree' (6) range⁶.

The AAC also agreed with the AMSA Executive's assessment of progress made on opportunities identified in previous self-assessments.

The Department of Prime Minister and Cabinet advise that variances between self-assessment and validation results do not have to be resolved prior to reporting to the Minister, but should be explained.

While the variances were not significant/of concern, the AAC's scores and qualitative comments again highlighted the impact of the transition which saw AMSA assume full responsibility for service delivery of the National System on 1 July 2018. Notwithstanding this challenge, the overall AAC sentiment was positive and the AAC's general view was that the AMSA Executive's self-assessment was 'fair'.

By comparison, the AMSA Executive's self-assessment, while undoubtedly acknowledging the National System, also reflected on AMSA's wider regulatory performance including functions such as port State control where AMSA has a very strong international reputation as an exemplar.

In regards to opportunities for improvement, the validation:

- reinforced the need to continuously look for more efficient ways of doing business with the DCV industry
- highlighted the importance of providing standardised technical/legislative advice to the DCV industry, and minimising the influence of individual interpretation by regulatory officers.

The validation:

- suggests that AMSA is heading in the right direction regarding getting the regulatory balance right (Q1: AMSA helps vessel owners and seafarers safely operate or work on a vessel without getting in the way—validation score 5.65 'strongly agree')
- reconfirmed⁶ AMSA's broader focus on trying to improve maritime regulations to create a safer and more efficient industry (Q6) as a strength.

⁶ Identified as a strength in the 2015–16 and 2016–17 AMSA RPF self-assessments.

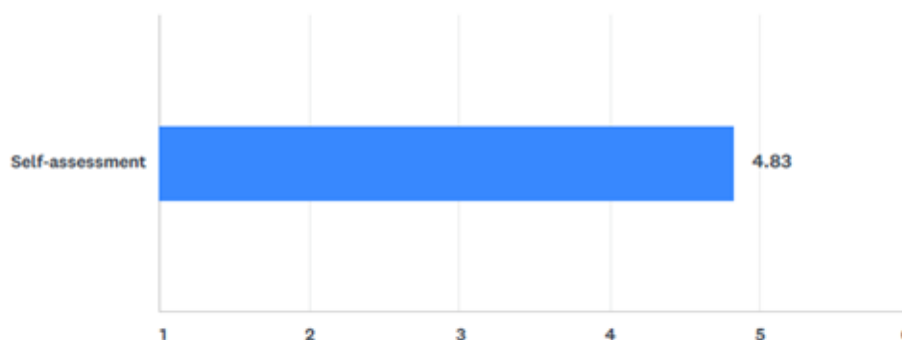
5. Attachments

5.1 AMSA 2017–18 RPF self-assessment detailed responses

RPF KPI 1: regulators do not unnecessarily impede the efficient operation of regulated entities.

Q1 AMSA helps vessel owners and seafarers safely operate or work on a vessel without getting in the way

Answered: 6 Skipped: 0



	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	TOTAL	WEIGHTED AVERAGE
Self-assessment	0.00% 0	0.00% 0	0.00% 0	16.67% 1	83.33% 5	0.00% 0	6	4.83

Comments:

“I think this is our intention, and in some areas we are on the right path e.g. Safety Management System workshops and guidance”.

“The transitional arrangements shifting responsibility from the States and Territories to AMSA for service delivery under the National System for domestic commercial vessels has not been as simple and straight forward as both industry and AMSA would have liked. As consequence, and understandably, there has been some friction and resistance to the introduction of ‘one system for all’. Nevertheless, AMSA remains committed during this bedding-in phase to listen to what industry has to say and to take action where justified”.

RPF KPI 2: communication with regulated entities is clear, targeted and effective.

Q2 Our communication with those we regulate is clear and useful

Answered: 6 Skipped: 0



STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	TOTAL	WEIGHTED AVERAGE
0.00%	0.00%	0.00%	16.67%	66.67%	16.67%	6	5.00
0	0	0	1	4	1		

Comments:

"We have taken greater effort to understand our audience, sometimes things are complex and it can be a challenge to reflect this in simple guidance material".

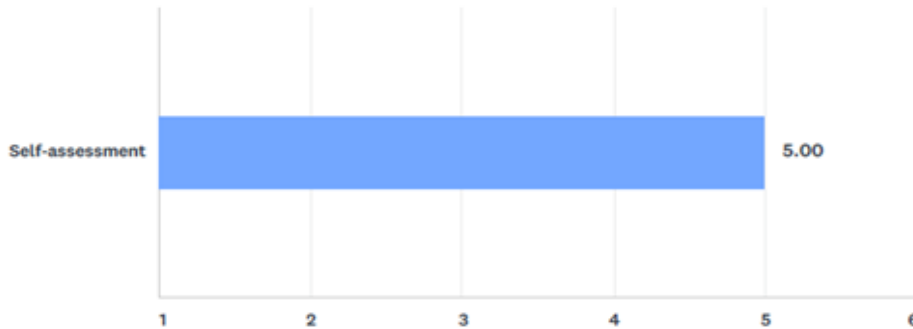
"A concerted effort has already been made to understand how our diverse range of stakeholders like to be communicated with, but there is more work to do to understand the specific segments that make up our stakeholder base and make the most of the channels available (web, social media, traditional media) to reach those segments".

"Agree, but only based on the information that we have been previously provided by the States.....and this has been proven to be very problematic".

RPF KPI 3: actions taken by regulators are proportionate to the risk being managed.

Q3 Given the risks involved in the industries AMSA regulates, the level of regulation is about right

Answered: 6 Skipped: 0



	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	TOTAL	WEIGHTED AVERAGE
Self-assessment	0.00% 0	0.00% 0	0.00% 0	0.00% 0	100.00% 6	0.00% 0	6	5.00

Comments:

“The new risk based approach to surveys is a positive step. We need to work closer with the fishing vessel industry to improve safety outcomes but this doesn’t necessarily require the introduction of more regulation”.

“In regards to the National System, many of the vessels that make up the fleet have been subject to varying levels of safety regulation under previous state and territory arrangements. As such, there is a wide disparity in safety culture and attitudes towards regulation across the fleet which can manifest in criticism of AMSA’s efforts. AMSA understands the reasons behind the criticisms, and will work through the issues with industry.

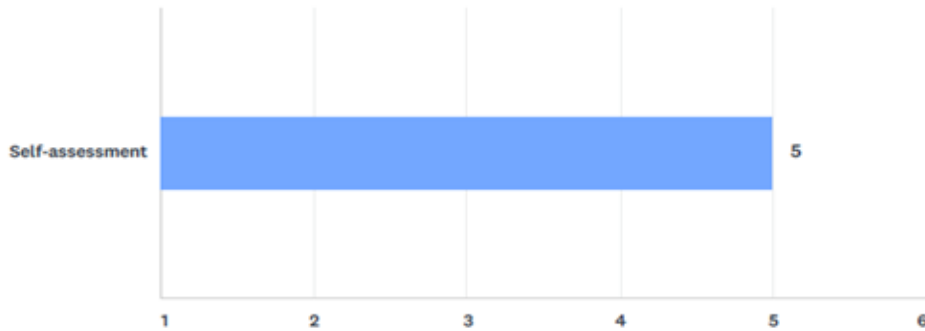
However, seafaring is a dangerous business and AMSA is committed to seeing the number of fatalities in the domestic fleet trend towards zero. With regards to international shipping, the external review of our Port State Control function in 2017 showed that AMSA’s risk based inspection approach is considered international best practice and an exemplar”.

“Agree but no matter how much we try to provide a light touch to regulation, some stakeholders (the ones who probably need strong regulation!) will always complain that it is too much”.

RPF KPI 4: compliance and monitoring approaches are streamlined and coordinated.

Q4 AMSA's compliance and monitoring arrangements are well organised and efficient

Answered: 6 Skipped: 0



	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	TOTAL	WEIGHTED AVERAGE
Self-assessment	0.00% 0	0.00% 0	0.00% 0	16.67% 1	66.67% 4	16.67% 1	6	5.00

Comments:

"I think this is still a 'work in progress' and there are partnerships and agreements that still need to be matured, but on the right path".

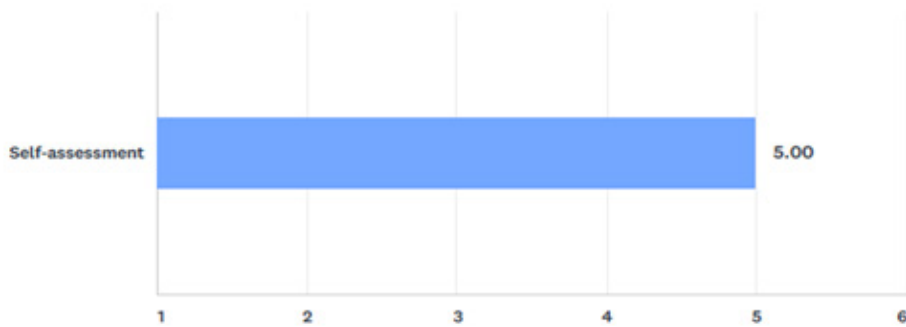
"The National System transition is a significant change for all concerned, and it will take a period of time for AMSA to understand what works and what doesn't; and for industry to become comfortable with the new relationship. Change brings uncertainty and anxiety, and a degree of understanding and empathy will be required to negotiate the 'bedding-in' period over the next 12-18 months".

"And will improve further and information fields are populated fully. Coming from a very low base with what some States undertook previously".

RPF KPI 5: regulators are open and transparent in their dealings with regulated entities.

Q5 AMSA explains its regulatory decisions well

Answered: 6 Skipped: 0



	STRONGLY DISAGREE (1)	DISAGREE (2)	SOMEWHAT DISAGREE (3)	SOMEWHAT AGREE (4)	AGREE (5)	STRONGLY AGREE (6)	N/A	TOTAL	WEIGHTED AVERAGE
Self-assessment	0.00% 0	0.00% 0	0.00% 0	0.00% 0	100.00% 6	0.00% 0	0.00% 0	6	5.00

Comments:

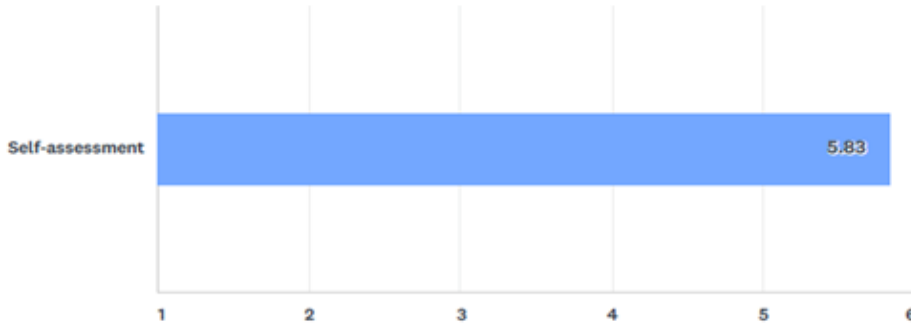
“Something we continually work on and demonstrated through our engagement with various committees (both AMSA run and external), industry and public consultation etc”.

“International (convention) shipping is well serviced. The framework for domestic vessels is a work-in-progress, and there are opportunities for improvement as we continue to build our understanding of domestic fleet operations”.

RPF KPI 6: regulators actively contribute to the continuous improvement of regulatory frameworks.

Q6 AMSA is always trying to improve maritime regulations to create a safer and more efficient industry

Answered: 6 Skipped: 0



	STRONGLY DISAGREE (1)	DISAGREE (2)	SOMEWHAT DISAGREE (3)	SOMEWHAT AGREE (4)	AGREE (5)	STRONGLY AGREE (6)	N/A	TOTAL	WEIGHTED AVERAGE
Self-assessment	0.00% 0	0.00% 0	0.00% 0	0.00% 0	16.67% 1	83.33% 5	0.00% 0	6	5.83

Comments:

“One of the opportunities we have been handed as the national regulator is to work with industry to achieve better safety outcomes. This doesn’t necessarily mean ‘more’ regulations, in fact ‘improved’ maritime regulations could be taken to mean less regulation and less complexity”.

“Continuous improvement is central to AMSA’s regulatory philosophy. Delivering a safer industry and a more efficient industry are not mutually exclusive goals, however, delivering those goals for an industry that has vastly different needs and expectations is a challenge for us”.

5.2 AMSA 2016–17 RPF self-assessment detailed responses

Q1: The evidence and my own experience suggests that the self-assessment result against this KPI is a fair and accurate representation of AMSA's performance (Survey question: AMSA helps vessel owners and seafarers safely operate or work on a vessel without getting in the way. Self-assessment result: 4.83 'somewhat agree' to 'agree')

Answered: 3 Skipped: 1



	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	N/A	TOTAL	WEIGHTED AVERAGE
validation	0.00% 0	0.00% 0	0.00% 0	0.00% 0	33.33% 1	66.67% 2	0.00% 0	3	5.67

Comments:

"I sense the fact that AMSA leadership openly espouse this thinking is a very positive step, hence a fair appraisal".

Q2. The evidence and my own experience suggests that the self-assessment result against this KPI is a fair and accurate representation of AMSA's performance (Survey question: our communications with those we regulate are clear and useful. Self-assessment result: 5.00 'agree')

Answered: 4 Skipped: 0



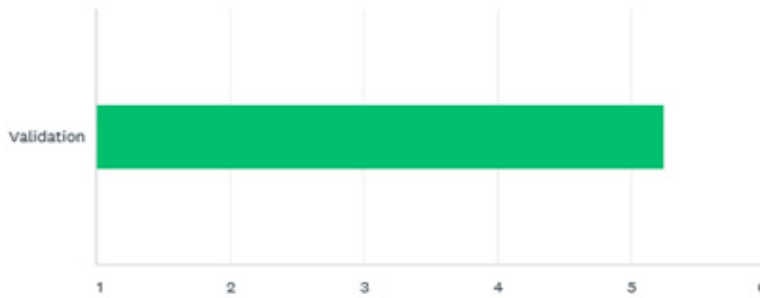
	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	N/A	TOTAL	WEIGHTED AVERAGE
Validation	0.00% 0	0.00% 0	0.00% 0	25.00% 1	75.00% 3	0.00% 0	0.00% 0	4	4.75

Comments:

"Certainly agree from my experience and perspective, although, I expect it would be possible to read too much into individual, negative responses from vested external sources, when drawing your own conclusions".

Q3. The evidence and my own experience suggests that the self-assessment result against this KPI is a fair and accurate representation of AMSA's performance (Survey question: given the risks involved in the industries AMSA regulates, the level of regulation is about right. Self-assessment result: 5.00 'agree')

Answered: 4 Skipped: 0



	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	N/A	TOTAL	WEIGHTED AVERAGE
Validation	0.00% 0	0.00% 0	0.00% 0	25.00% 1	25.00% 1	50.00% 2	0.00% 0	4	5.25

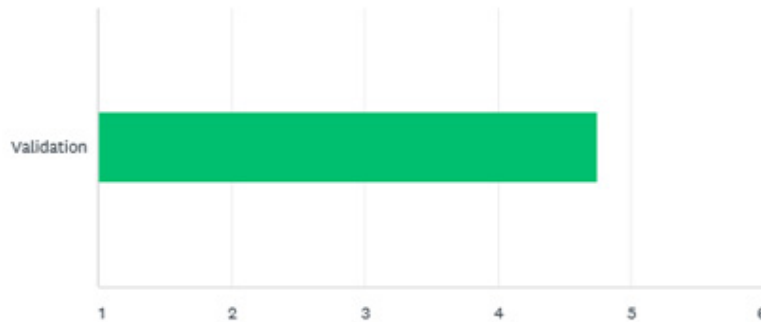
Comments:

“While this is an understandable and reasonable assessment, in my view, given the level of change under the national law, it is hard to conclude these processes are as efficient as they could be. Not saying it is bad, but I am sure this will improve with time”.

“The approaches to compliance can be assisted with notice to Masters of impending port State control inspections to make the process more efficient”.

Q5. The evidence and my own experience suggests that the self-assessment result against this KPI is a fair and accurate representation of AMSA's performance (Survey question: AMSA explains its regulatory decisions well. Self-assessment result: 5.00 'agree')

Answered: 4 Skipped: 0



	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	N/A	TOTAL	WEIGHTED AVERAGE
Validation	0.00% 0	0.00% 0	0.00% 0	25.00% 1	75.00% 3	0.00% 0	0.00% 0	4	4.75

Comments:

"No doubt this is the intention of the Executive, and therefore a reasonable score, however, it is very difficult to engage and placate such a large group of diverse entities, many of whom are clearly uncomfortable with any change".

Q6. The evidence and my own experience suggests that the self-assessment result against this KPI is a fair and accurate representation of AMSA's performance (Survey question: AMSA is always trying to improve maritime regulations to create a safer and more efficient industry. Self-assessment result: 5.83 'agree' to 'strongly agree')

Answered: 4 Skipped: 0



	STRONGLY DISAGREE	DISAGREE	SOMEWHAT DISAGREE	SOMEWHAT AGREE	AGREE	STRONGLY AGREE	N/A	TOTAL	WEIGHTED AVERAGE
Validation	0.00% 0	0.00% 0	0.00% 0	25.00% 1	0.00% 0	75.00% 3	0.00% 0	4	5.50

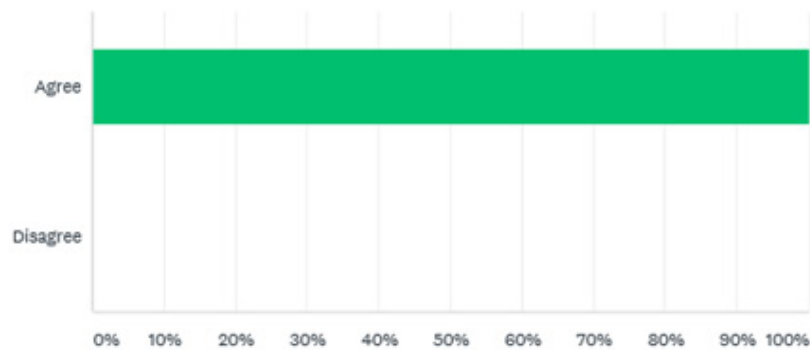
Comments:

“Core function—surprised if there was any other response from the Executive. There is no doubt much more work to do and I believe we are in good hands”.

2015–16 Opportunity One: raising stakeholder awareness and visibility of AMSA's decision making processes through better engagement, education and communication.

For Opportunity One AMSA believes it has made 'some' (n=3) to 'significant' (n=3) progress. In your view, this is an accurate and reasonable assessment.

Answered: 4 Skipped: 0



ANSWER CHOICES	RESPONSES	
▼ Agree	100.00%	4
▼ Disagree	0.00%	0
TOTAL		4

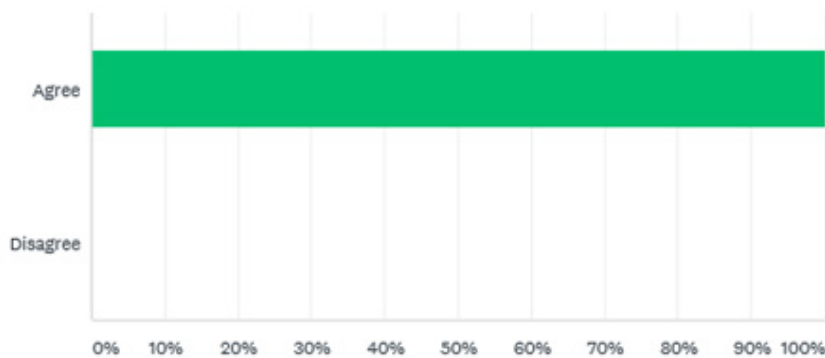
Comments:

"Fair call—they have endeavoured to reach out to all".

2015–16 Opportunity Two: improving harmonisation and coordination of AMSA resources across all ship types and sectors.

For Opportunity Two AMSA believes it has made 'some' (n=4) to 'significant' (n=2) progress. In your view, this is an accurate and reasonable assessment.

Answered: 4 Skipped: 0



ANSWER CHOICES	RESPONSES	
▼ Agree	100.00%	4
▼ Disagree	0.00%	0
TOTAL		4

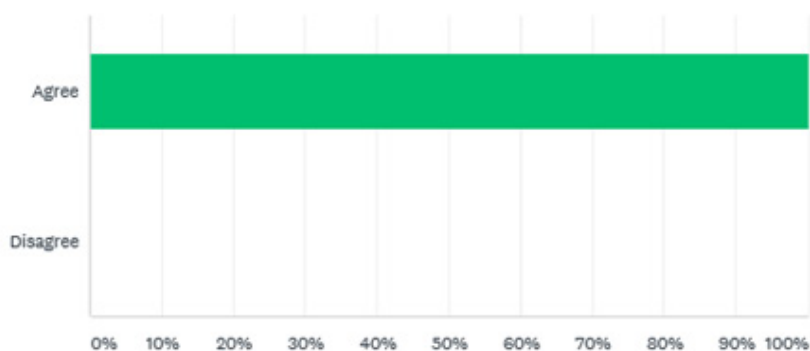
Comments:

“Local Liaison Officers have been a good initiative”.

2017–18 Opportunity One: raising stakeholder awareness and visibility of AMSA's decision making processes through better engagement, education and communication.

For Opportunity One AMSA believes it has made 'some' (n=4) to 'significant' (n=2) progress. In your view, this is an accurate and reasonable assessment.

Answered: 4 Skipped: 0



ANSWER CHOICES	RESPONSES
Agree	100.00% 4
Disagree	0.00% 0
TOTAL	4

Comments:

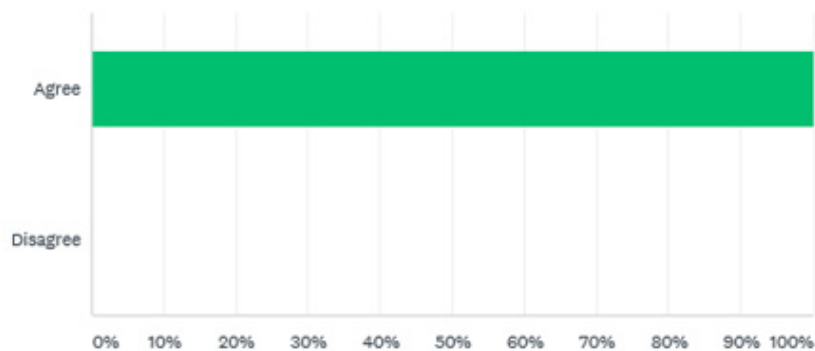
"AMSA has made some good strides in this area but there is still room for improvement in regards to compliance issues operators' face with the National Standard for Commercial Vessels (NSCV) and uncertainty around such. Particularly as at times it is extremely difficult to get advice from AMSA directly and surveyors have differing interpretations of identical sections of the NSCV".

"Now time to demonstrate how it works".

2017–18 Opportunity Two: improving engagement and communication with a wide and diverse group of stakeholders – notably the DCV industry

For Opportunity Two AMSA believes it has made 'some' (n=1) to 'significant' (n=5) progress. In your view, this is an accurate and reasonable assessment.

Answered: 4 Skipped: 0



ANSWER CHOICES	RESPONSES
Agree	100.00% 4
Disagree	0.00% 0
TOTAL	4

Comments:

“Big challenge, will take time”.

General Self-Assessment Validation Comments:

“Overall I believe AMSA have performed well given the difficulty of integrating the National System in a single regulator”.

“On the whole implementation of the NSCV is going well, however more works needs to be done within AMSA in providing a system for operators to obtain technical/legislative advice directly so we are not reliant on the interpretation of surveyors—who can have differing views on the same issue”.

“A fair assessment by all accounts, given the investment the AMSA Executive continue to make to achieve a safer, stronger maritime industry”.



2017–18
Regulator Performance Framework
Self-assessment report

AMSA 305 (11/18)