

Engineering excellence into competence

Guidance for developing a
Competency Management System



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This document is endorsed by the RISAS Board.

RISAS is the Railway Industry Supplier Approval Scheme. It provides assessment and certification for suppliers of critical products and services, on behalf of the whole GB mainline rail industry. For more information go to www.risas.co.uk

RSSB provides a range of knowledge, analysis, and powerful information and risk management tools to support the whole rail industry in improving performance, safety and reducing cost. This includes managing the RISAS scheme, and accrediting approval bodies (RISABs) to carry out assessments and supplier certification.

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Purpose

The purpose of this document is to provide guidance to both suppliers and Railway Industry Supplier Approval Bodies (RISABs) in respect of Competency Management Systems during assessment under the Rail Industry Supplier Approval Scheme (RISAS).

Specifically, section B.7 of RISAS/003 'Supplier Assessment Module' covers the requirements for Competency Management Systems and refers to this document for guidance. The content of this document should therefore be referred to when judging the relative adequacy of Competency Management Systems as part of any RISAS assessment activity.

Although specifically designed for use by RISABs and suppliers, the guidance in this document should be of use for the development of competence management systems in all areas of the industry.

Introduction

Assessment of a supplier against RISAS provides a duty holder with an appropriate level of assurance against the requirements of the Railway and Other Guided Transport Systems Regulations (ROGS), in respect of risks related to the supply of maintenance and material (Regulation 5(1)(d)(i)).

In the area of Competency Management Systems, the Office of Rail Regulation (ORR) publishes **Railway Safety Publication 1 (RSP1) – ‘Developing and Maintaining Staff Competence’ 2007**. Adoption of the principles of RSP1 thereby provides assurance to duty holders in this area.

The competence of personnel working on critical products is essential to the safe operation of the railway and therefore RISAS/003 includes the requirement that the supplier shall be able to demonstrate that it has a Competency Management System (CMS) consistent with the requirements of RSP1 mentioned above.

Experience with undertaking RISAS supplier assessments has identified common issues with Competency Management Systems being predominantly ‘compliance-driven’ (based around former Railway Group Standard GO/RT3260) with little or no integration into a supplier’s overall business management systems, thereby providing no strong link between competency, safety and culture.

What experience has shown is that both suppliers and RISABs would benefit from suitable guidance (including examples of good practice) in terms of a how the principles of RSP1 should be addressed in practice.

Reference to and adoption of the relevant guidance within this document will ensure that RISAS remains both up to date and at the forefront of good practice as well as keeping abreast of latest industry developments and research in this area.

1

Relevant literature



There is a wide range of literature, most of which is readily available and up to date in the form of published good practice guidance documents, research reports, etc. Some major references are listed below, containing principles, definitions and generic advice on the subject of competency.

RSP1 Developing and Maintaining Staff Competence, Issue 2, 2007 (ORR)

This is the principal reference document that RISAS refers to in the area of Competency Management. The document contains 15 principles covering the cycle of design, implementation, monitoring and review of a Competency Management System, supported by examples of models.

RSP4 Safety Critical Tasks – Clarification of ROGS Regulations Requirements, Issue 1, 2007 (ORR)

This document states the specific requirements for every “Controller of Safety Critical Work” to ensure that those undertaking this type of work are competent and that there is an up-to-date record of their assessment. Additionally it specifies the need for monitoring of both competence and fitness.

RS/100 Good Practice Guide on Competence Development (RSSB)

This document is currently being prepared by RSSB and is due for publication in 2013. RS/100 will replace the following Good Practice documents:

- *RS/220 Good Practice in Training*: This document focussed on training as a complete programme and explored assessment of knowledge and the performance of a skill
- *RS/221 Good Practice Guide to Train Driver Training*
- *RS/501 Good Practice Guide on Simulation as a Tool for Training and Assessment*
- *RS/701 Good Practice Guide on Competence Review and Assessment*: This document was concerned with competence associated with the consistent performance of tasks to a specified standard and that knowledge was up to date with rules and procedures
- *RS/702 Good Practice Guide for Driver Assessment*

RS/100 will also incorporate outputs from recent/current Research and Development projects as well as other leading practice from within the industry and beyond.

RS/232 Good Practice Guide on Cognitive and Individual Risk Factors

This document introduces the concept of human error and how this can be managed. It highlights the link between human error and safety and links competence to not only traditional areas of training and staffing but extending this to organisational culture and environmental conditions.

Developing an integrated approach to NTS training and development (RSSB research ref T869)

As a result of reviews of incidents and accidents in the rail industry non-technical skills (NTS) – previously referred to as ‘behavioural skills’ – have consistently appeared as key contributors. This report focusses on the identification and classification of NTS and their importance in competence assessment.

2

Principles of competency management



Components of competence

The approach that will appear in RSSB's guide 'Good Practice in Competence Development' will break down competence into three categories:

Technical skills and underpinning knowledge

These are the practical skills referred to by RSP1, combined with the knowledge needed to practice them.

For example:

- Operating a piece of equipment through knowing how it works
- Measuring a distance by understanding the units of measurement involved

Technical skills tend to reflect standard company work procedures which are meant to meet the requirements of a prescriptive set of instructions.

Non-technical skills (NTS)

These are generic skills that can enhance the way that a task or procedure is carried out and can increase safety by helping to manage unplanned events and errors when they occur. By developing these skills, staff can learn how to deal with a range of situations, including those which are more novel.

By their very nature, non-technical skills are difficult to standardise and are not prescriptive; they tend to involve an individual's judgement and can be subjective, and are therefore difficult to predict. The key feature of non-technical skills is that they represent the 'human factor' element that determines how an individual applies a technical skill.

Functional skills

These are core practical skills in language, numeracy, information and communications technology (ICT).



What is meant by 'skills'

Changes in the nature of work have meant that what represents a skill is much broader than ever before. Nowadays skills can be soft, generic, core, transferable, social, and relate to employability or personal effectiveness and not simply technical ability; areas which at one time would never have been associated with skills at all.



Competency Management Systems (CMS)

Practical skills referred to within RSP1 do not include those skills that fall outside of technical skills, for example, decision making, communication and conscientiousness. The RSSB guide defines 'competencies' as: 'the skills (technical and non-technical) and underpinning knowledge that enable someone to demonstrate a certain level of competence'. It is important therefore that any assessment of 'competence' should consider non-technical as well as technical skills.

Competency frameworks or CMSs should reflect the relative levels of skills, experience and behaviours within an organisation's personnel. It is important that any CMS takes account of all of these functions and that there is sufficient assessment of the variety of skills rather than focussing on practical skills alone. It can be demonstrated that CMSs which only assess technical skills are not adding value to an organisation's activities and are purely about demonstrating compliance with given standards and regulations.



Integrated approach – safety culture

The safety culture of an organisation is the product of individual and group values, attitudes, perceptions, competencies, and patterns of behaviour that determine the commitment to, and the style and proficiency of, an organisation's health and safety management.

RSSB has developed a web-based Safety Culture Toolkit that allows rail companies to assess their own safety culture, and determine the actions that they could take to tackle the issues that have been identified, without the need for extensive external support.

The link between the effectiveness of the CMS and the safety culture in the company should be properly understood. Organisations with a positive culture can create an open atmosphere of communication and co-operation where competence is seen as something that is continually developed, rather than as a means to trip employees up. In such an environment, competence is not seen as something that is 'done to you', by the company, but as something that each individual or team owns and has control over.



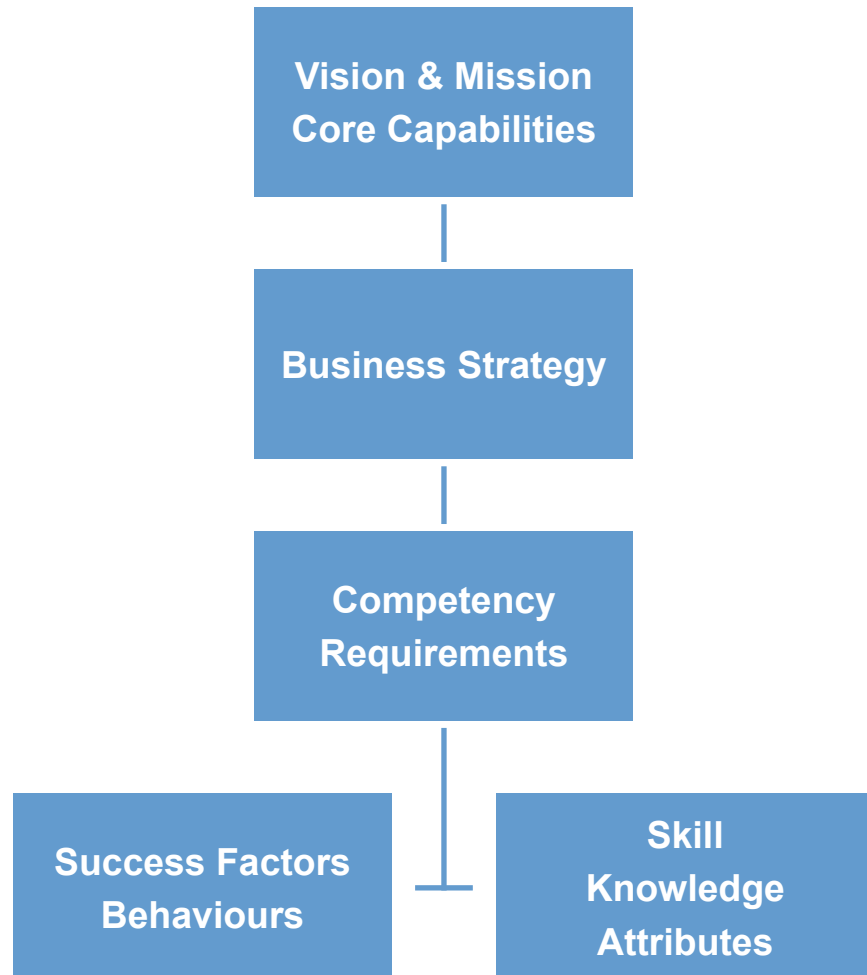
Integrated approach – link to business plan

The business plan generally sets out where an organisation wants to go, and how it seeks to get there – usually by defining a series of specific objectives or activities.

The key factor for a CMS is to ensure that it meets the requirements of the organisation now and in the future; that employees will be competent to undertake work for the duration of any contract with due regard to the degree of risk involved. It is important that the objectives and processes necessary to deliver the customer's needs are established.

2 Principles of competency management

Therefore any CMS should be designed around the existing business plan with consideration for current and future workload. A successful CMS should be integrated into the business model as below:



3

Good practice



Links to performance data

Some companies link the information within their CMS database into workforce planning and absence reports. This is used to flag up and restrict an individual from working in a field in which they were either not competent, or where they were exposed to a level of risk (this could be for anything ranging from health through to competency concerns). This approach is an example of good practice and provides a clear joined up approach, linking competency and safety.

The design of databases for the recording of CMS results can be varied; however there are consistent themes which enable core reports to be compiled which demonstrate competency on an individual, skill and/or site basis. This flexibility is once again an example of good practice.



Integration into the business management system

For a CMS to be integrated into the business management system of a company it should reflect the strategy, aspirations/objectives and challenges faced. The CMS should be reviewed and updated where necessary to take account of advances in technology, emerging practices and industry safety data. CMS is an effective tool for driving business improvements.

Network Rail has developed a new focus for its CMS which is a 'suitably resourced, logical and integrated cycle of organisation activities used to manage the competence of people undertaking specific work'. The new competence model incorporates occupational and professional competence as well as non-technical skills.



Recognition of external qualifications

There is a common theme throughout the CMSs examined which draw upon external qualification standards to benchmark skills to be assessed; for example, benchmarking against the GoSkills NVQ framework for Railway Engineering units or benchmarking against the criteria required from professional bodies, eg IMechE, ICE, IPM etc



Competency and culture

In practice developing a correlation between safety management and competency management can encourage organisations to move away from a 'blame culture' and adopt a culture of continuous improvement.

London Underground Limited (LUL) uses a learning management system (LMS) as a way of encouraging learners to develop their competence. The system is open and visible to all employees, and most courses are available to all of them. The RSSB guide 'Good Practice in Competence Development' will give further details of this scheme.



Risk-based training needs analysis

RSSB has developed a methodology and template for risk-based training needs analysis that supports decisions about competence development/management activities (including initial and refresher training/assessment) as part of the development of a CMS. The methodology comprises of three main stages:

1. Role definition
2. Training priority assessment
3. Training options analysis

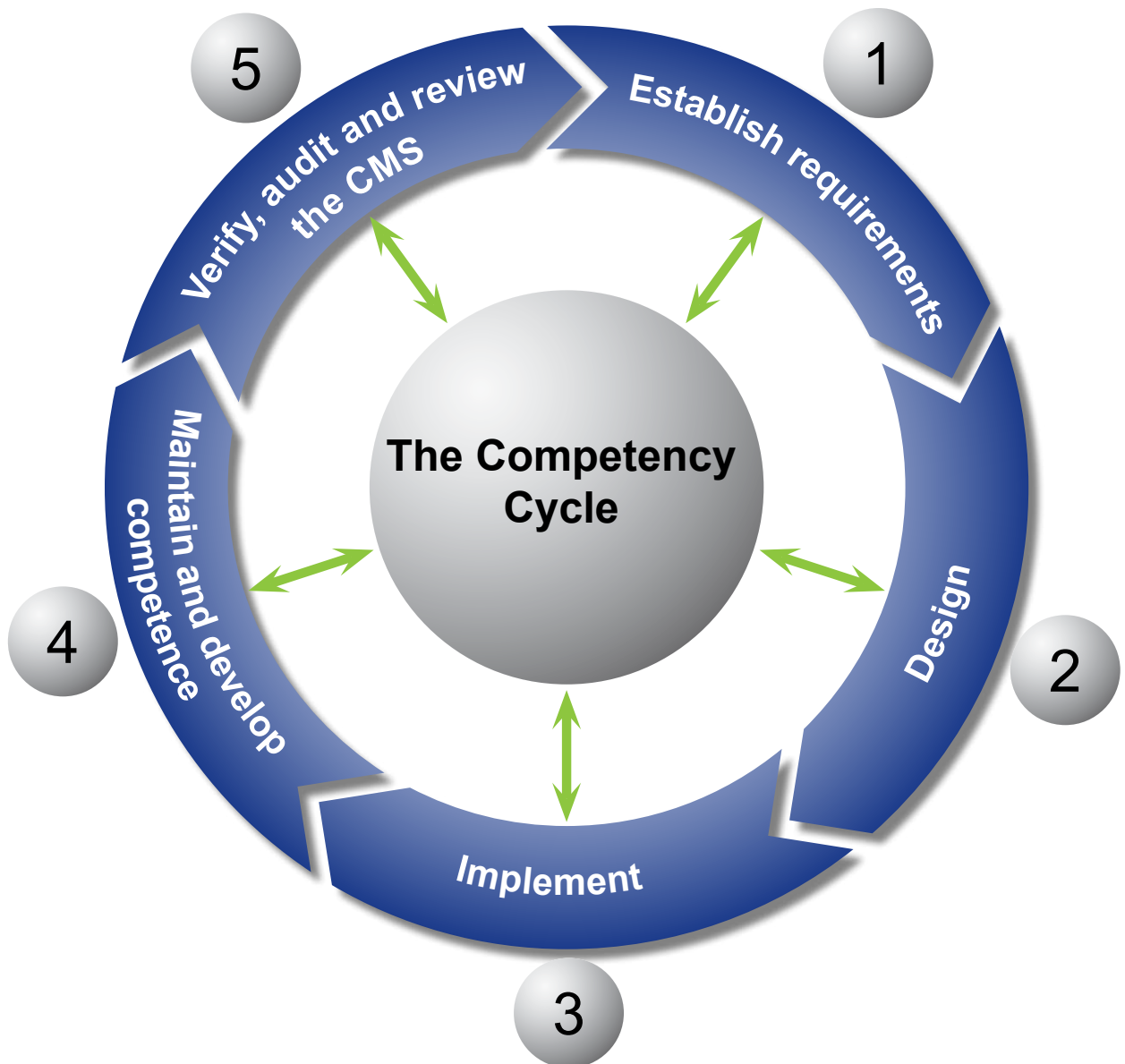
Further details will be available in the RSSB guide 'Good Practice in Competence Development'.

4

The competency cycle



The competence management system cycle as illustrated below seeks to align the process with other management activities by providing a step-by-step approach.



ORR Competency Management System Cycle

4 The competency cycle

Phase		
1	Establish requirements for the CMS	<ul style="list-style-type: none"> • Identify activities and assess risks • Select standards
2	Design the CMS	<ul style="list-style-type: none"> • Develop procedures and methods • Decide how to meet the standards • Establish requirements for training, development and assessment • Maintain managers' competencies
3	Implement the CMS	<ul style="list-style-type: none"> • Select and recruit staff • Train, develop and assess staff • Control activities undertaken
4	Maintain and develop competence	<ul style="list-style-type: none"> • Monitor and reassess staff performance • Updates the competence of individuals • Manage sub-standard performance • Keep records
5	Verify, audit and review the CMS	<ul style="list-style-type: none"> • Verify and audit the CMS • Review and feed back

Guidance is outlined in this section to assist in the interpretation of this model. When making a decision regarding the design of any CMS, it is recommended that organisations should link the content to their business plan(s) to ensure that the needs of the business are reflected.



Phase 1: Establishing requirements

This phase of any CMS is focused on the following principles:

- **Principle 1: Identify activities and assess risks**

Identify the work activities and assess the associated risks to determine those that have the potential to affect the safe operation of the railway or that affect occupational health and safety, ie those activities where the competence of people to control risks is important.

- **Principle 2: Select standards**

Select or develop the competence standards to ensure that the identified risks are controlled consistently.

Here we are concerned with establishing what business activities affect operational safety and the health and safety of employees, visitors and contractors etc including legislative requirements. On a practical level the needs of the business should be reflected within the CMS and suitable reference to training and development plans to ensure that future competency needs are met.

An exercise of competency mapping can identify the key competencies for a particular position in the organisation, and then use those to make informed decisions regarding job-evaluation, recruitment, training and development, performance management, succession planning etc. A risk-based training needs analysis can be used to devise the competency and assessment needs. This analysis would take account of the business risk inherent in the operations conducted.



Phase 2: Design the CMS

This phase of any CMS is focused on the following principles:

- **Principle 3: Develop procedures and methods**

Quality assurance processes, procedures and methods should be developed which are designed to ensure the CMS consistently achieves the intended results.

- **Principle 4: Decide how to meet the standards**

Establish the most suitable methods for the development and assessment of staff against each competence standard in order to meet the required levels of competence.

4 The competency cycle

- **Principle 5: Establish requirements for training, development and assessment**
Establish the training and development needs and competence assessment requirements of staff, recruits and managers.
- **Principle 6: Maintain managers' competencies**
Maintain the competence of those (managers) operating the system and ensure that they understand their responsibilities.

The CMS needs to meet the requirements of the relevant industry standards, codes of practice and customer contracts. The training and assessment methods should be appropriate to the nature of the work being undertaken. It is good practice to utilise a range of tools and techniques for this to enable a more holistic conclusion to be reached concerning achievement of competency. Training methods can include both formal and informal learning that can take place in the classroom or the workshop and can be wide in their application. Small team briefings which include few numbers of employees discussing high risk or precision based competency can be just as effective as larger short courses. Organisations should avoid using a one size fits all approach to CMS development to ensure that the CMS is relevant to their particular business needs.

Format, Scope and Content

Current CMSs in practice across the industry can fail to provide sufficient coverage of employees; it is a common pitfall to only assess the competency of employees at the 'sharp end' whilst failing to assess and monitor the competency of decision makers within organisations. Additionally CMSs fail to take advantage of new technologies in recording, benchmarking and delivering a functional competency database.

The ideal platform for recording competency information is a database; many organisations utilise payroll or personnel packages that can be developed to facilitate a CMS. Whichever platform is used it is vital that the CMS is integrated into other management reporting systems to allow for cross referencing of information (KPIs), for example accidents/incidents and near miss reporting, attendance information, product recall/warranty/reject/scrap information, etc. Equally the database should be flexible enough to allow for easy production of a range of management reports which will support business operations.

Assessment of technicians is not sufficient in minimising business risk; to do so the CMS should be expanded to all employees who impact on the processes involved, from team leaders/supervisors who have a duty for both production and safety to those engineers and managers who are making decisions at the most senior level of any organisation.

To ensure that an integrated approach to competency is achieved there should be links through to other business processes including recruitment, promotion, reward and retention. Additionally it should not be presumed that the possession of a professional qualification ensures competency; this should be reviewed in line with organisation measures to guarantee that professional development pathways are being followed.



Phase 3: Implement the CMS

This phase of any CMS is focused on the following principles:

- **Principle 7: Select and recruit staff**
Staff should be selected and recruited using previously selected standards and methods.
- **Principle 8: Train, develop and assess staff**
Train, develop and assess the competence of staff and recruits using methods appropriate to the previously selected competence standards.
- **Principle 9: Control activities undertaken**
Control processes should be established to ensure that staff and contractors only undertake work for which they are competent.

There are basic rules for assessing competency and these have been designed to ensure that the results of any assessment are credible and reliable; therefore the CMS should meet the following criteria:

- Valid; ie relevant to the learning outcome and assessment for which competence is required
- Authentic; ie is produced by the employee
- Current; ie are recent to create confidence that the same skill, understanding and knowledge is present
- Sufficient; ie fully meets the requirements of the assessment criteria

4 The competency cycle

All those involved in the CMS must be competent to undertake those roles and responsibilities in addition to having achieved an expected level of competency within the area of specific assessment. Assessment should be reliable and consistent; this requires clear and consistent processes for conducting assessments. Different methods of assessing should be selected to ensure that the purposes of assessments are adequately addressed. Evidence of competency can be obtained from any of the suggested methods below:

- Direct observation of the learner's performance by their assessor
- Outcomes from questioning
- Products of the employees work
- Personal statements and/or reflective accounts
- Outcomes from simulation, where permitted by the assessment strategy
- Professional discussion
- Authentic statements – witness testimony
- Evidence of prior learning

A combined approach to determining competency should be adopted whereby both dedicated assessors and line managers contribute to the evaluation of both the technical and non-technical skills. These assessors and managers should be trained against the adopted/devised CMS standards and methods to ensure that they themselves have an understanding of the CMS and its drivers.

Evidence of competence can come from a range of sources including but not restricted to:

- Current practice – where evidence is generated from a current job role
- A programme of development – where evidence comes from a learning/training programme
- The recognition of prior learning - where an employee can demonstrate that they can meet the criteria through knowledge, understanding or skills they already possess
- A combination of these

It is common practice to benchmark competency against external qualification standards, for example, the GoSkills NVQ framework for Railway Engineering units or criteria required from professional bodies, eg IMechE, ICE, IPM etc. There is an assumed level of quality when using external qualification standards as they themselves would have been subjected to a process of external review and verification.



Phase 4: Maintain and develop competence

This phase of any CMS is focused on the following principles:

- **Principle 10: Monitor and reassess staff performance**
Monitor and reassess the competence of staff to ensure performance is being consistently maintained and developed.
- **Principle 11: Update the competence of individuals**
Update the competence of individuals in response to all relevant changes including changes in legislation, standards and equipment.
- **Principle 12: Manage sub-standard performance**
Identify sub-standard performance and restore competence.
- **Principle 13: Keep records**
Maintain adequate records of assessments and make them available when requested.

Employees should be given appropriate feedback on assessment to promote and encourage continuous improvement; this principle should be adopted regardless of the level of competency demonstrated. Regular and consistent performance reviews can ensure that the competence of employees is monitored and developed. The performance of people, their skills, knowledge and experience that they bring to their work is fundamental to whether the strategic business objectives are achieved. Performance can be maximised where individuals are supported and given opportunities to develop knowledge and competence associated with the work that they do now, and in preparation for the future.

A commitment to competency development can encourage the development of a learning organisation, promoting lifelong learning and excellence in service provision. Additionally, it can enable organisations to take full advantage of emerging opportunities in both technology and collaboration. There are numerous advantages for managing and developing competency, for example,

- More specific and objective assessment areas are identified
- A more objective dialogue regarding competency and performance can be achieved
- Company strategy, values and culture are reinforced

4 The competency cycle

- Effectiveness of training and development is increased
- Common understandings of role requirements are achieved
- Performance criteria necessary for effective recruitment and selection processes are established
- Specific gaps in competencies can be easily identified and addressed



Phase 5: Verify, audit and review the CMS

This phase of any CMS is focused on the following principles:

- **Principle 14: Verify and audit the CMS**
Verify and audit the competence management system to check on the competence assessments and the assessment process.
- **Principle 15: Review and feedback**
Company management should review the whole system, analysing safety performance data together with the information from verification and audit, and feed back into and update the requirements for the competence management system, leading to changes or modifications to system design.

With the increased emphasis on quality, standards and accountability there is pressure to improve both performance and accountability and to this end, the effective management of staff within an equality environment is now widely recognised as an important business practice.

It is essential that the importance of internal quality assurance in the assessment process is understood and addressed. Quality assurance ensures that the assessment meets the requirements of the CMS and that standards are achieved. Additionally it ensures standardisation across assessments and employees that promote a robust system of external quality assurance.

It would be expected that a CMS would form part of a business or quality management system that is formally documented and clearly identifies the requirements of the CMS and its periodic review on a timed basis. Organisations should adopt a system of internal review and audit that ensure that the processes, standards and procedures are operating in accordance with their requirements and to ensure that they are not becoming redundant or out of date.

The outcome of the internal review and audit should ensure that any non-compliance of standards is addressed by raising corrective action(s). Corrective action(s) should take account of both prevention and re-occurrence and maintain a balanced approach dependent upon the seriousness and severity of the non-compliance. Any corrective actions raised should feed into an annual review of the CMS that would form part of the development process to ensure that the CMS is valid, relevant and up to date. Recommendations or other outputs from the review should focus on improving areas of concern and analysis of preventative actions implemented throughout the year for effectiveness.

A suggested checklist follows on page 19 for use by both suppliers and RISABs during assessment to determine the adequacy of a Competency Management System in relation to the principles and guidance given in this document.

Image credits:

The photo of Rugby IECC on the front cover and at the top of page 8, as well as the photo of track workers on page 6, appear courtesy of Network Rail.

The photo of the freight train at the top of page 9 appears courtesy of DB Schenker.

Checklist

RSP1 Phase	RSP1 Principles	Suggested Assessment Questions	What 'good' looks like (from RSSB GPG)
Phase 1: Establish requirements for the CMS	<p>Principle 1: Identify activities and assess risks</p> <p>Principle 2: Select standards</p>	<p>To what extent has the CMS been designed around the business plan and current and future workload of the company?</p> <p>To what extent do the requirements of the CMS continue to evolve in response to business events (as opposed to an isolated/inherited ex-BR scheme, done because it has to be)?</p> <p>How are the requirements for the CMS linked to an assessment of risk (in the broadest sense) arising from business operations?</p>	<p>Business plans, aims and objectives show clear links to the requirements for the CMS and these are regularly reviewed.</p> <p>CMS needs to be formally documented in the Business Management system including requirements for periodic review on a timed basis</p> <p>The list of standards for the CMS are identified/under development (eg RITC, Eng Council, NSARE, SI-C NVQ)</p> <p>Use of Risk-Based Training Needs Analysis to devise assessment and competency needs.</p>
Phase 2: Design the CMS	<p>Principle 3: Develop procedures and methods</p> <p>Principle 4: Decide how to meet the standards</p> <p>Principle 5: Establish requirements for training, development and assessment</p> <p>Principle 6: Maintain managers' competencies</p>	<p>What is the ethos behind the CMS (perceived or tangible). What emphasis is put on non-technical skills?</p> <p>What type of training and assessment methods have been adopted and how appropriate are these to the nature of the work being done?</p> <p>How good is the coverage across all technical areas (ie not just welding and NDT, both of which typically have specialist schemes)?</p> <p>How much are staff encouraged to 'self help' and take charge of their own competency development?</p> <p>How are the training and assessment needs of supervisors and managers addressed, as opposed to just artisans?</p>	<p>Competence is viewed as a continuous process with ownership/input of the individual (as opposed to something that is 'done to you' periodically) and equal emphasis on ongoing development of all employees' non technical skills (NTS).</p> <p>Frequency of re-assessment and refresher training designed around a formal assessment of the needs of the organisation, job and the individual (as opposed to a prescriptive, standard-led approach).</p> <p>CMS assurance processes, procedures and methods show clear links with other areas of the business management system. KPI's identified for the CMS, relevant competence standards identified eg 'BTEC D Modules', reference to and evidence of involvement with eg the National Skills Academy for Railway Engineering (NSARE)</p> <p>Use of e-learning, job shadow and other techniques to encourage staff to take charge of their own development.</p> <p>Development of Line and Support Managers is afforded equal priority within the CMS with links to the competence development of the staff that report to them.</p>

RSP1 Phase RSP1 Principles Suggested Assessment Questions What 'good' looks like (from RSSB GPG)

<p>Phase 3: Implement the CMS</p>	<p>Principle 7: Select and recruit staff</p> <p>Principle 8: Train, develop and assess staff</p> <p>Principle 9: Control activities undertaken</p>	<p>How has the current competency status of each individual been established?</p> <p>What element of grading is there in terms of the determination of the level of competence?</p> <p>Who has carried out the training and assessment to determine the level of competence and what has been their training/qualification to do this?</p> <p>How is competence against non-technical skills captured?</p> <p>How is the structure of the CMS linked into other business systems?</p>	<p>Competence is measured as a continuum with people at various stages along it such as novice, not yet competent, competent, proficient and expert.</p> <p>Measurement of competence draws upon external qualification standards; for example, the GoSkills NVQ framework for Railway Engineering units or criteria required from professional bodies, eg IMechE, ICE, IPM etc.</p> <p>A combined approach to determination of competence whereby both dedicated assessors and line managers contribute the evaluation of both technical and non-technical skills.</p> <p>Assessors and Line Managers have been trained against the adopted/devised CMS standards and methods.</p> <p>CMS records are recorded on a database which links into other business systems (eg workforce planning and attendance monitoring).</p>
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4 The competency cycle

RSP1 Phase	RSP1 Principles	Suggested Assessment Questions	What 'good' looks like (from RSSB GPG)
Phase 4: Maintain and develop competence	<p>Principle 10: Monitor and reassess staff performance</p> <p>Principle 11: Update the competence of individuals</p> <p>Principle 12: Manage sub-standard performance</p> <p>Principle 13: Keep records</p>	<p>What range of assessment techniques are used to determine current competence of individuals?</p> <p>How is the ongoing competence of personnel managed in response to emerging events?</p> <p>What degree of flexibility is there to modify (extend/reduce) assessment interventions on an individual basis?</p> <p>What level of ongoing interaction is there with line management to encourage continuous development and what input can individuals have to managing their ongoing competence?</p>	<p>Assessment Techniques include a blend of observation; questioning; review of business process data (Incidents, HR data, etc); professional discussion.</p> <p>Monitoring of competence includes review of incidents and issues arising (regarded as learning opportunities), measures non-technical skills and identifies areas for improvement.</p> <p>A 'bottom up' or 'self help' approach to competence is encouraged (eg e-learning). Individuals play an active part in identifying and collecting their own evidence (eg by keeping a log book)</p>
Phase 5: Verify, audit and review the CMS	<p>Principle 14: Verify and audit the CMS</p> <p>Principle 15: Review and feedback</p>	<p>To what extent do internal audit and review activities assess the applicability of the CMS as opposed to ongoing compliance with it?</p> <p>How much of an input to management review does the CMS form and are there recognised outputs from review that can be traced to changes/modifications to the system?</p>	<p>Results from assessment and monitoring are fed into the review of the CMS to decide whether the standards or assessment and monitoring methods should be amended</p> <p>The CMS is subject to periodic review and also following/ before introduction of change (organisational, process, production, legislative, standards etc).</p> <p>The CMS KPIs are used as an input to a Capability Maturity Model, linked in turn to the Safety Culture Toolkit.</p>

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