

Safety Management System Modules

An introduction to the Modules

Background

ONRSR acknowledges that the Tourist and Heritage sector of the rail industry in Australia is diverse, both in the scope and nature of operations, but also when considering infrastructure and rollingstock assets, geographic location, the level of interaction with other operators, and the number and type of safety interfaces.

As such, ONRSR has included the sector as one of its national priorities and has commitment from ONRSR's Chief Executive and Executive Team to support the sector.

Although a number of tools are available to the sector, there is an acknowledgement by both industry and ONRSR that 'one size does not fit all', and ONRSR is now developing a framework (See Appendix 1) for use by smaller Tourist and Heritage operators that may have less-complex operations.

These operations are typically represented by some or all of the following criteria¹:

- > operate on a branch line or isolated line, without other rail operators on the same track,
- > have a small uniform fleet of rollingstock,
- > operate at slow speeds of less than 40 km/h,
- > manage a yard or sidings only may carry passengers,
- > are often run by volunteers and have a limited and changing workforce,
- > are usually smaller and everyone and everything is in one general location,
- > often have limited resources.

Legal Requirements

The RSNL sets out the legal requirements that all rail transport operators must meet to demonstrate they are managing the safety of their railway operations. Key to this is a Safety Management System (SMS).

An SMS is a living, breathing set of policies and procedures that describes how safety is managed in an organisation. It should be appropriate for the organisation that is using it and components of it should be used on an everyday basis.

The law outlines twenty-nine (29) elements that should be addressed. Together these elements should provide an overall description of what an operator does to manage safety risks.

Each operator will have a unique SMS, depending on the nature and scope of their operations – a section car operator will have a different SMS to an operator of rail motors.

Although some hazards will exist across all operators, regardless of the scope of their operations, the risk and associated controls will vary accordingly.

¹ As defined at the T&H workshop, September 2019

Modules

In response to feedback from the Tourist and Heritage sector, and supported by further stakeholder engagement, ONRSR has now developed a number of individual modules which will provide support to the sector to meet their regulatory obligations.

These modules have been developed as a mechanism for less complex operators and provide information as to how the sector can customise and combine modules to develop a safety management system that is specific and appropriate to the scope and nature of their operations and their accreditation.

It should be noted that the modules are not to replace existing Safety Management systems that are in place, are effective and are in use to manage safety. They are provided as a guide to smaller less-complex operators who may require additional support in developing an appropriate SMS.

The modules can be used as a checklist to assist smaller less-complex operators to assess their existing SMS and identify areas of potential improvement.

Format

In the first instance, template modules have been developed, with a single module for each of the twenty-nine (29) SMS elements. The format of the modules is based on the following principles:

Some of the prescribed elements interface, and to assist operators, mapping of these interfaces is included as an Appendix to this document.

What and Why

Details of the operator's obligations and why this element of an SMS is important.

How

What ONRSR expects from a smaller less complex rail operator.

Who

Information on roles and responsibilities under the law, as well as suggestions for good practice.

When

Indictive timelines, discussion points to consider timeliness of actions.

List of relevant documents (internal)

Types of internal documents that should be in place so that the SMS is a living suite of documents which is in use every time operations occur.

Links (external)

List of relevant external documents that are useful guidance or support materials for the sector.

Depending on the element, modules may contain:

- > thought provokers/ questions for consideration;
- > details of mandatory requirements;
- > scalable options to identify appropriate responses;
- > example suggested documents for inclusion in an SMS, or information about what documents should include.

Implementation

1. Develop scope and nature statement.
2. Establish risk management program – design or adopt a risk matrix with appropriate descriptors for Likelihood and Consequence for the scope and nature of the operations.
3. Provide training or awareness for others in the risk assessment methodology.
4. Develop procedures and risk assessment templates that meet contemporary risk management requirements.
5. Perform risk assessments for key areas of the business, with key people who are knowledgeable and have relevant skill sets. A logical approach may be to risk assess each discrete operation or component of the operations. Examples could be:
 - > Multiple risk assessments for each single operation from start to finish including the stages of operations – rail safety worker sign on, light up, train preparation, train inspection, shunting and marshalling, operating train from start to end of journey and anything that can go wrong, on boarding and offloading customers, stabling and rail safety worker sign off.
 - > Same as above for specific train configurations
 - > Maintenance risk assessments – by category of assets (Rollingstock and locomotives), in workshop and in field, by different categories of maintenance, including use of tools and equipment, skills of rail safety workers etc.
 - > By above and/or below rail.
6. Whatever the approach, risk assessments should take into account the following:
 - > Governance and management – type of organisation, funding, constitution, board /committee requirements, Board /committee member skills and expertise, processes for information flow and decision making.
 - > Operations – location, frequency, time of operation, asset type and level of uniformity, different asset combinations for services.
 - > Rail safety workers required – above and below rail, maintenance, drivers, station masters, customer service attendants.

- > Fitness for duty - Identify classification of RSWs for health assessments, D&A management and fatigue management.
 - > Human Resources – structure and role development, Job /position descriptions, training requirements and competence.
 - > Maintenance – carried out internally or externally, types of rollingstock (trams, carriages, wagons, section cars, trolleys), locomotive types (diesel, steam, electric), workshop arrangements, tools and equipment, skill sets required.
 - > Emergency response and security.
 - > Incident notification and investigation.
7. Check that all aspects of the 29 elements are included in risk assessments.
 8. Review risk assessments to see if any additional controls can be added.
 9. Identify procedures required in light of the 29 elements required.
 10. Start to populate a document with the relevant headings that you will include.
 11. Create document control procedures including naming/numbering conventions.
 12. Identify and document mechanisms of consultation and appropriate stakeholders.
 13. Document procedures for review and consultation.
 14. Ensure ongoing consultation so that procedures are applicable, relevant and appropriate for the scope and nature of the operations.

SMS Structure

Each operator will define the structure of their own SMS, so that it complements and enhances the scope and nature of the operations. In contemporary safety risk management, a typical SMS structure is made up as a result of an initial organisational risk assessment which would identify the areas of risk experienced by that organisation. Each of these areas of risk would form part of a hierarchy of documents, that would typically look like this:

1. An overarching safety policy;
2. Several individual programs that reflect the key areas of risk in the operations;
3. Programs:
 - > will describe what the operator does to manage that aspect of their operations;
 - > may each have their own specific policy (eg Drug and Alcohol Management), although others may not;
 - > will refer to procedures and/or processes related to the subject matter;
 - > will refer to forms that are related to the subject matter.

Where an SMS is required under law, and that law has defined the requirements for the contents of the SMS, in order to comply the operator's SMS must contain details for each of those areas, as a minimum.

In Australia, it means that regardless of what else an operator wishes to have in their SMS, the 29 elements must be addressed in the SMS.

How those elements are presented are entirely up to the operator, and this document provides only one example of many options available to operators for their SMS. Each operator should establish an SMS structure that complements their own operations and approach.

Where an operator elects to use a typical SMS structure as that described here, the 'programs' can be created in a style or approach that complements the operations.

For example, an operator may choose to have individual programs for Drug and Alcohol Management, Fatigue Management and Health Assessments. Another operator may choose to combine all three (3) into a single program entitled "Fitness for Duty" that has a Fitness for Duty Policy (reflecting all three elements).

SMS structure is traditionally formed as a result of an initial risk assessment. Taking the approach described in the "implementation" section of this document, the results of the initial risk assessment should assist in identifying any additional areas of risk (and ultimately, any additional programs) that must be controlled.

For ease, an example of a typical SMS structure is included at Appendix B of this document.

Appendices

- A. Inter-relationship of SMS Modules
- B. Example of a typical SMS Structure

Appendix A – Introduction to SMS Modules (Inter-relationship of SMS Modules)

As indicated in this document, a number of modules are related and can be grouped together within areas of commonality. This diagram provides a high-level representation of these groupings.

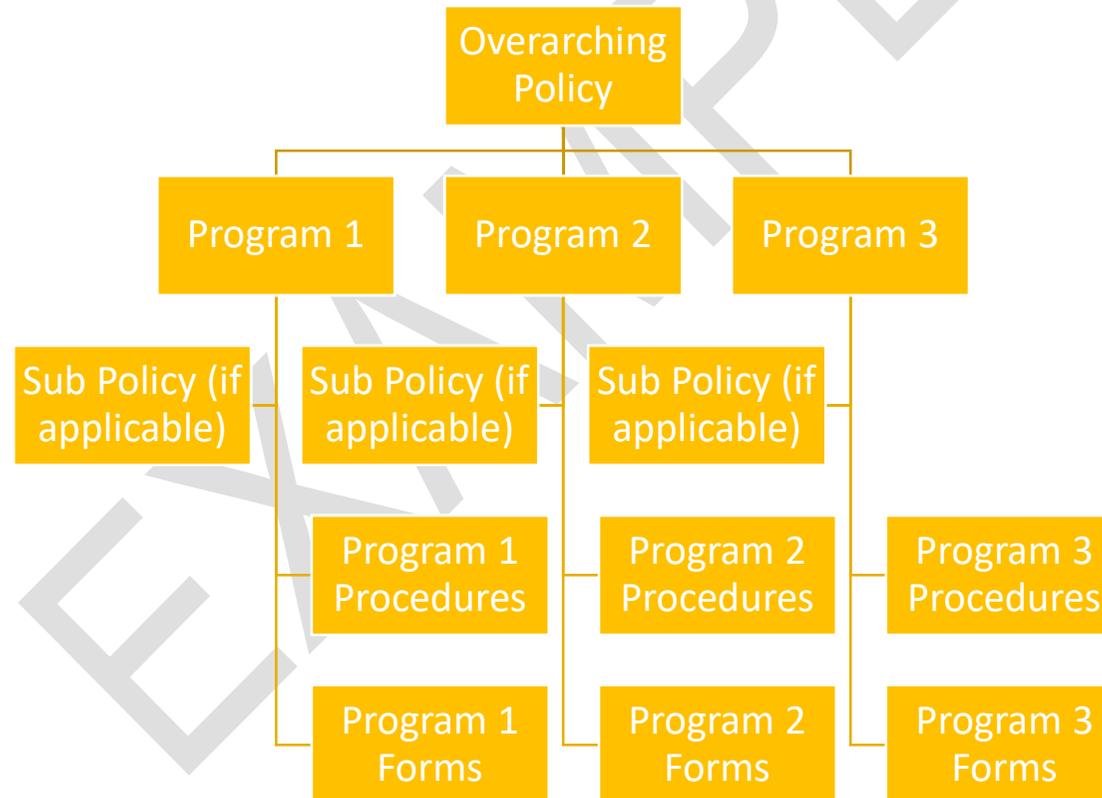
	Area	Grouped Elements
Processes for Implementation & Management	Structure and Responsibility	Management Responsibilities Governance and Internal Controls Resource Availability
	Competence Management	RSW Competence Human Factors Training and Instruction
	Information Management	Safety Interface Coordination Consultation
	Documentation	Internal Communication Document Control Arrangements Written SMS
Operational Activities	Operational Arrangements and Procedures	Regulatory Compliance General Engineering & Operations System Safety Procurement & Contract Management Human Factors Process Control
	Operational Risk Management	Health & Fitness Drug and Alcohol Fatigue Risk Management Manage Notifiable Occurrences Safety Interface Coordination Risk Management Asset Management
	Emergency & Contingency Response	Emergency Management Risk Management Safety Interface Coordination Security Management
Processes for Design and Improvement	Monitoring	Data Collection and Analysis Accident and Incident Reporting Safety Audit Arrangements
	Organisational Learning	Review of SMS Management of Change Corrective Action Safety Performance Measures
	Management of Risk	Regulatory Compliance Risk Management Management of Change Asset Management Safety Interface Coordination Human Factors
	Leadership	Safety Policy Safety Culture Safety Performance Measures Governance and Internal Controls Management Commitment (Safety Policy)

Appendix B – Example of a Typical SMS Structure

1 Introduction

This document is to provide members of the Tourist and Heritage sector with an example of one of many typical contemporary SMS structures for consideration when designing or reviewing their organisation's Safety Management System. Each organisation should determine the structure of their own SMS to manage specific risks appropriate to their own operations.

2 Example Typical SMS Structure



3 Example of expanding out a SMS Program (Drug & Alcohol Management)

