

### What and Why

Managing risk is all about understanding what can go wrong when undertaking an activity, the consequences if something happens while doing that activity, the likelihood of something going wrong and what can be done to prevent or reduce the likelihood and consequence if something does go wrong.

This includes how the rail operator minimises the consequences (i.e. managing or controlling the risk), and regularly monitoring and reviewing all those things to make sure that rail operations continue to be done safely.

Rail safety accreditation is based on several key criteria which are detailed in the Law and regulations. A rail operator must meet these criteria to gain accreditation to operate – in effect, the licence to operate a railway.

One of these criteria is that the operator must be able to demonstrate their competence and capacity to manage the risks to safety associated with its railway operations So Far As Is Reasonably Practicable (SFAIRP).

SFAIRP and its principles are defined in an ONRSR Guideline which can be found on the ONRSR website. Building a suite of actions assists in showing that the rail operator has taken all reasonable care to eliminate or manage its safety risks SFAIRP.

This element of the SMS describes how to go about identifying, assessing, eliminating (wherever possible), minimising and managing those risks to safety associated with railway operations, and which underpins all of the other elements of the SMS. For example, completing regular maintenance on rolling stock and track infrastructure, and ensuring the competency, health and fitness of rail safety workers are all 'controls' to prevent the 'risk' of a serious rail safety event, such as a derailment or collision.

Engineering standards and procedures for rolling stock and rail infrastructure, operational systems procedures, rail safety worker competency, health and fitness and fatigue management are all elements required as part of the SMS.

This element of the SMS should include:

- > Procedures and systems in place to identify, assess and manage risks – This involves eliminating or minimising the risks through the implementation of adequate controls;
- > A current risk register informed by the risk management activities conducted, that includes:
  - Likelihood, consequence and risk rating of each risk;
  - Controls used to manage the risks;
  - Details of who is responsible for managing those risks and implementing the controls;
  - Where in the SMS more details of the controls can be found;
  - Procedures for keeping the risk register current; and
- > Details of which controls were considered in risk assessments, but rejected for the management of risk and the reason each control was rejected;

> Procedures in place for monitoring, reviewing and revising the adequacy of controls.

There is an International Standard for risk management (ISO 31000 Risk management – Guidelines), and many operators have adopted this standard as the basis for how they manage risk. If this is the case, operators must clearly demonstrate that they are following the details of the Standard by way of documented risk management processes and procedures within their SMS. If operators elect to use an alternate approach to risk management, they must be able to demonstrate why that approach is an acceptable alternative.

Contemporary safety management is based on good risk management practice and adopting risk management principles – if you eliminate or minimise safety risks, then safety performance will potentially improve.

## How

This element of the SMS should describe the process that the rail operator follows when assessing and managing safety related risks.

As indicated, by documenting and following a robust risk process, rail operators are able to build a safety system that shows that they are managing risk SFAIRP. The safety system is developed from reasonable actions taken at a specific time to identify, assess, eliminate or manage risk in a way that was reasonably able to be done, using all available methods so long as the cost is not grossly disproportionate to the safety benefit gained.

Irrespective of risk rating, a risk is not mitigated to SFAIRP if there is more that can be reasonably done to control it. As part of the risk assessment process, people should always ask what more can be done to reduce the likelihood and consequence of a risk arising.

A systematic and logical SMS risk management procedure should describe how the operator:

1. Identifies Hazards and Risks – What can go wrong and why?
2. Helps the operator to work out what causes things to go wrong that will require managing;
3. Helps the operator analyse and assess the risks;
4. Identifies Hazards and Risks – What can go wrong and why?
5. Helps the operator to work out what causes things to go wrong that will require managing;
6. Helps the operator analyse and assess the risks;
7. Gives instruction to help the operator evaluate the risk and decide what to do next;
8. Advises that a plan should be developed for implementing additional controls (where they are necessary);
9. Describes how to communicate and consult about risk;
10. Describes how to check and review those identified risk levels, by monitoring and reviewing if controls are working properly;
11. Requires everything to do with risk management to be recorded and describes what is to be reported and to who.

See Appendix D for further detail on what a procedure should look like.

## Who

Boards and/or Executive Committees should review organisational risk registers as part of their governance obligations.

Managers and Supervisors should understand the risk assessment process.

Managers and Supervisors should ensure that risk assessments are carried out for all rail related activities.

Attendees at risk assessments should have skills/competence and /or experience relative to the matter being risk assessed.

All rail safety workers should have some understanding of risk management and why it is relevant to them.

## When

Where a risk committee exists, any new or reviewed risk assessments should be tabled for the information of the committee and possible approval and acceptance.

Whenever material change occurs (see Element 12 - Management of Change), including prior to commencement of new or changed operations.

As a component of developing or reviewing interface agreements.

When commencing an activity where the risk has not yet been assessed. That is, in any conditions where the safety risk has not previously been assessed.

Following an incident or accident, either internal or external, which might cause an operator to reconsider or re-evaluate its hazards and risks, or might identify a weakness in the operator's procedures or processes and system deficiencies.

As part of the SMS Review process (see Element 8 – SMS Review).

When risk controls change.

## List of relevant documents (internal)

All SMS Elements

Risk Register template

Risk Assessment template

Interface Agreement template

Change management plan templates

Operator governance procedures

## Links (external)

[ONRSR Website – Meaning of duty to ensure safety SFAIRP Guideline](#)

[ONRSR Website –SMS Guideline](#)

[ONRSR Website –Interface Agreements](#)

Various private safety websites for example (and not endorsed by ONRSR)

[Small Business Development Corporation \(WA\)](#)

[Australian Government - Business](#)

[SafeWork Australia](#)

[SAI Global](#)

## Appendices

- A. Risk Matrices
- B. [Risk Assessment Template](#)
  - a. Summary
  - b. RA Template
  - c. Drop Down List
- C. [Risk Register Template](#)
- D. Additional procedural content

## Appendix A – Risk Management (Developing a Risk Matrix)

### 1 Introduction

This document is being provided as part of a suite of modules developed to support Tourist & Heritage, and smaller less-complex rail operators demonstrate compliance with the requirements and obligations of the Rail Safety National Law and Regulations.

Each operator has a legal requirement to ensure safety through the elimination and minimisation of risk. To do this, operators should ensure that the descriptions used to assess risks are appropriate for their specific operations.

If this is not done, it will mean that the risks that are being assessed may not be appropriate to the specific operations and it is unlikely that the operator's risks will be managed properly. This will mean that there is an increased potential that people will be harmed, but also that the operator will not be able to show that they are meeting their legal obligations.

As compliance with rail safety legislation is based on the demonstration of competence and capacity to manage risks to safety associated with the railway operations, the operator may be subject to a range of enforcement actions from ONRSR, as a result of failing to demonstrate the required competence and capacity.

This document provides simple examples of likelihood and consequence ratings or measures to trigger discussion about the appropriate descriptors of these ratings that would be suitable for a less complex heritage rail operator. It should be noted that a qualitative approach to risk management is adopted – that is that the assessment of risk is subjective and based on the knowledge, experience and judgement of subject matter experts, and is therefore not based on a scientific, quantitative or mathematical approach.

An International Standard (ISO) for risk management exists (ISO 31000 Risk management - Guidelines) which provides guidelines on managing any types of risks faced by an organisation. This document (i.e. Appendix A) is based on the risk management principles as outlined in this standard.

### 2 Likelihood Rating

Likelihood is often also called Frequency or Probability.

Likelihood ratings will vary significantly by organisation. A larger metropolitan passenger rail operator has a much greater exposure to specific hazards and consequences due to the high frequency and high capacity nature of its operations (i.e. carrying hundreds of passengers on high-speed train services on dense lines) when compared with a smaller, less complex rail operator. A smaller, less complex rail operator generally carries less passengers, potentially on a single train trip on a given day at a lower speed and on a lower frequency line. It is therefore extremely important to have a likelihood range that is appropriate, and suitable for, the scope and nature of the operations performed.

There is no requirement to break likelihood into a set number of levels, though traditionally between 4 to 6 is considered reasonable and appropriate. The number of levels of likelihood must equal the number of levels of consequence.

*In order to develop the descriptors that you will measure likelihood against, you should try to prepare a list that describes the likelihood/frequency of risks occurring in your operations and other like operations in Australia and possibly overseas. The list needs to be appropriate to your operations. Things to consider are:*

- > *How long has the business been established?*
- > *How often have different types of incidents occurred in the past?*
- > *Other like or similar operators: How often have you heard of incidents that occurred that could also happen in your operation?*
- > *The frequency of your operations – Daily, Weekly, Monthly, Quarterly, Yearly?*
- > *What does your workforce look like?*
- > *How often can a risk occur before it affects the rail operator’s capacity to operate?*

Some example likelihood ratings and descriptors for smaller, less complex rail operators are included here as a starting point for discussion and/or consideration. There is no intent for adoption of any, or all, of these examples - they are provided for information only.

Please note that no two examples are the same:

<b>Example Likelihood Descriptors</b>	<b>Rating No</b>
More than ten times a year	5
Between one and nine times a year	4
Once every two to five years	3
Once every five to ten years	2
Less than once every ten years	1

<b>Example Likelihood Descriptors</b>	<b>Rating No</b>
Expected to occur (multiple times a year)	5
Will probably occur (once a year)	4
May occur (once a year to five years)	3
Could occur (once every five - ten years)	2
Occurs only in exceptional circumstances (once in eleven or more years)	1

<b>Example Likelihood Descriptors</b>		<b>Rating No</b>
Almost Certain	Expected to occur most times operations occur	5
Very Likely	This has been known to happen in the past	4
Likely	It could happen. It is easy to imagine it happening. Hasn't happened to us but to other similar operators in Australia or overseas.	3
Unlikely	To occur it would take the failure of a number of controls	2
Rare	There is little or no chance of this occurring, and a significant number of factors would have to fail simultaneously	1

Example Likelihood Descriptors		Rating No
Almost Certain	Often Occurs / once a week	5
Very Likely	Could easily happen / once a month	4
Likely	Could happen or known to happen / once a year	3
Unlikely	Hasn't happened yet but could / once every 10 years	2
Very Unlikely	Conceivable but only on extreme circumstances / once in 100 years	1

Figure 1 – Example Likelihood Descriptors and Ratings

Rail operators that elect to mimic the likelihood descriptors in use by other organisations should ensure that they are appropriate to their own operations first and make adjustments accordingly.

### 3 Consequence Rating

Consequence is also often called Severity or Impact.

The severity or impact of consequences can differ significantly by organisation. For example, even though both a large, state-wide passenger operator and a smaller, less complex operator may experience the same consequence of multiple injuries resulting from a rail incident (e.g. derailment), the impact of this on the operators will vary significantly, including the associated financial loss.

An example could include a death of a person. This may result in the permanent closure of a smaller less-complex operator which would thus be 'Catastrophic'. A single fatality for a major metropolitan passenger operator would be considered a 'Serious' event which would not result in the operator ceasing operations.

Financial loss of \$250,000 may not be significant to a large, state-wide passenger operator but may lead to insolvency of a smaller T&H operator. Therefore, if one the consequence descriptors includes financial loss, it may be 'Major' or 'Catastrophic' for a small operator but only 'Medium', 'Moderate' or 'Serious' for a large operator.

All of these aspects need to be taken into consideration when developing the consequence descriptors, while retaining a focus on safety as the priority.

It is often recommended that consequence descriptors include multiple categories and therefore ways the operator may be adversely impacted, by the same hazard or risk. This could include a financial cost amount as well as a safety outcome (e.g. injuries and fatalities). Some larger, more complex operators may also include environmental outcomes, reputation outcomes (e.g. local or national media coverage), operational (e.g. delays or interruptions to services and operations) and legal / regulatory outcomes (e.g. penalties, accreditation impact) in their consequence descriptors, depending on their risk maturity.

There is no requirement to break consequence into a set number of levels, though traditionally between 4 to 6 is considered reasonable and appropriate. The number of levels of consequence must equal the number of levels of likelihood.

*Think about all of the factors that would lead to the development of a list that describes the consequence/severity of risks occurring in your operations. The list needs to be appropriate to your operations. Remembering that this risk matrix is required to manage safety, things to consider are:*

- > *What would be the impacts on the operations if there was:*
  - *A death or multiple deaths?*
  - *A single or multiple severe injury(ies)?*
  - *A significant rail related incident?*
    - *Is rail infrastructure still safe?*
    - *Can rollingstock still be used safely?*
    - *How long could we remain non-operational?*
  - *Workers Compensation Claims?*
  - *Significant damage to an asset?*
  - *Loss of an asset?*
    - *Are there other assets that can be used?*
    - *What response times for recovery would be needed?*
- > *What about reputational loss?*
  - *What would be the impacts from media fall out?*
  - *How would local media attention compare to national attention?*
  - *Would people stop coming?*
  - *How will you manage passenger safety?*
  - *What does that mean to the business?*
- > *What can the operations bear?*
  - *Financially? Ethically?*
  - *How much can the rail operator pay out if legal action is taken as a result?*
  - *What would be the financial limit before insolvency of the operator?*
  - *What is a catastrophic financial loss?*
  - *What impact has the loss of a life on operations and the operator?*
- > *What is the corporate insurance excess?*
  - *What would be the impact on premiums if a major incident occurred?*
  - *What are its limits of liability?*
  - *What can the business afford to pay over and above that covered by insurance?*
  - *Would claims be avoided due to the large excess?*
- > *Would the operations be able to continue? If not, what is the impact of down-time?*

Some example Consequence Ratings and Descriptors are included here as a starting point for discussion and/or consideration:

<b>Consequences</b>		
1	Insignificant	No Injuries / Minimal Financial Loss
2	Minor	First Aid Treatment / Medium Financial Loss
3	Moderate	Medical Treatment / Moderate Financial Loss
4	Major	Hospitalisation / Large Financial Loss
5	Catastrophic	Death / Massive Financial Loss



Consequences		
1	Insignificant	No Injuries / Financial Loss - Less than \$5,000
2	Minor	First Aid Treatment / Financial Loss - \$5,001 - \$9,999
3	Moderate	Medical Treatment / Financial Loss - \$10,000 - \$19,000
4	Major	Hospitalisation / Financial Loss - \$20,000 - \$49,999
5	Catastrophic	Death / Financial Loss - \$50,000 and over

Consequences		
1	Minor	Injury requiring First Aid treatment only. No lost time.
2	Medium	Injury requiring attention from medically qualified person. No lost time.
3	Serious	Life threatening injury requiring hospitalisation or medivac.
4	Major	Serious permanent disabling injury.
5	Catastrophic	A single fatality, or multiple fatalities.

Consequence	1	2	3	4	5
People / Safety	Minor injury or First Aid Treatment	Injury causing medical treatment	Serious injury causing hospitalisation	Life threatening injury or multiple severe injuries causing hospitalisation	Single or multiple deaths or multiple life-threatening injuries or severe permanent disabilities
Reputation	Unsubstantiated, low impact, low profile or 'no news' item	Substantiated, low impact, 'low news' profile	Substantiated public embarrassment, moderate impact, 'moderate' news profile	Substantiated, public embarrassment, high impact news profile, third party actions	Substantiated, public embarrassment, very high multiple impacts, widespread multiple third-party actions
Operation	Little Impact	Inconvenient delays	Significant delays to major operations	Non achievement of major operations	Non achievement of key objectives
Financial	< \$20,000	\$20,000 - \$150,000	\$150,000 - \$500,000	\$500,000 - \$2,000,000	>\$2,000,000

*Figure 2 – Example Consequence Descriptors and Ratings*

Rail operators that elect to mimic the consequence descriptors in use by other organisations should ensure that they are appropriate to their own operations first and make adjustments accordingly – a loss of \$2 million may be catastrophic to one operator, while a loss of \$20,000 is catastrophic to another. Consequences need to be real, relevant and applicable.

#### 4 Risk Matrix

A risk matrix assists the operator in considering the relationship between likelihood and consequence to determine the overall level of risk. The matrix will show how the various combinations of likelihood and consequence work together to describe different levels of risk. There is no defined requirement for layout – i.e. consequence or likelihood to be in rows or in columns. This is at the discretion of the operator, though some studies show that consequence is better as the row, and likelihood the column.

*When developing a risk matrix and what actions are required, questions to consider should include:*

- > *What do we want this matrix to tell us and what do different risk level descriptions, and therefore the risks, actually mean to our operations?*
- > *Is this risk matrix practical and appropriate for our operations?*
- > *At what point does the risk become unacceptable or intolerable?*
- > *Are the levels of risk that we have compiled suitable for our operations?*
- > *What levels of sign off (if any) are required for various levels of risk?*
- > *Who is required to sign off, approve or accept different levels of risk?*
- > *What is the level of governance or management oversight that is required?*
- > *Do we have processes in place to approve / authorise higher risk activities?*
- > *How will risk levels be monitored? And by who and when?*

The operator should review the descriptors for each likelihood and consequence and consider how they will rate the risk if the various combinations are made. This step is a direct link to what the operator can bear – what risks can be ‘tolerated’ and which cannot.

Numbering of descriptors may be used to provide an indicative ‘risk score’. Again, there is not a set requirement as to how the score is calculated. Most operators will either multiply the score (L1 x C4 = 4) or add them together (L1 + C4 = 5), or rank each box from 1 to 25 in order of priority.

The risk matrix is usually colour coded to visually indicate which combinations of likelihood and consequence are of higher or lower risk.

The risk score (or colour coding if used) should then link to actions to be taken and authorities to be applied for each level of risk, as indicated in the examples below:

Risk matrix with risk score:

		Likelihood				
		5	4	3	2	1
Consequence		Almost Certain	Very Likely	Likely	Unlikely	Rare
5	Catastrophic	25	20	15	10	5
4	Major	20	16	12	8	4
3	Moderate	15	12	9	6	3
2	Minor	10	8	6	4	2
1	Insignificant	5	4	3	2	1

Some operators choose to remove the numbers and add a description of the risk level:

		Likelihood				
		5	4	3	2	1
Consequence		Almost Certain	Very Likely	Likely	Unlikely	Rare
5	Catastrophic	Extreme	Extreme	Extreme	High	Medium
4	Major	Extreme	Extreme	High	Medium	Medium
3	Moderate	Extreme	High	High	Medium	Low
2	Minor	High	Medium	Medium	Medium	Low
1	Insignificant	Medium	Medium	Low	Low	Low

Risk matrix with risk priority ranking from 1 to 25:

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Catastrophic
Almost Certain	16	10	6	3	1
Very Likely	19	14	9	5	2
Likely	22	18	12	8	4
Unlikely	24	20	17	13	7
Very Unlikely	25	23	21	15	11

Figure 3 – Example Risk Matrices

Colour & Risk Score	Level of Risk	Action Required
1-3	Low	Due diligence must be applied to ensure all controls remain effective and continue as normal.
4-9	Medium	Monitor risk controls to ensure they remain effective and routinely consider new or additional control options.
10-15	High	Regular review of all risk controls and their effectiveness and consideration of new or additional control options to reduce risk. Management attention and sign off required to continue activity.
16-25	Extreme	<b>Stop activity immediately</b> – Actions must be taken to minimise the risk before activity can commence or continue – Board / Executive Committee approval required to continue or commence activity.

Figure 4 – Example Risk Action Table

**It is very important to note that regardless of the level of risk, the operator must implement all controls that are reasonably practicable.**

## 5 Next Steps

Once these initial steps have been followed and the risk matrix is developed, it should be formally adopted and integrated into the documented risk management procedures as part of the SMS. Then risk assessments can then commence.

It is essential that those who conduct or attend risk assessments understand what needs to be done, and why they are being done – they are not an administrative exercise but will help to build a safety culture and safer working environment, as well as demonstrating legal compliance.

Each operator should ensure that their procedures reflect what they do now, and not what they would like to do. Like all procedures, risk management procedures will be part of regular reviews and can change in line with changes in the operations.

## Appendix D – Risk Management (Additional Procedural Content)

### 1 What can go wrong and why?

- Procedures should include all parts of the operations:
  - technical /engineering (e.g. maintaining rolling stock and rail infrastructure);
  - operations (e.g. operating passenger services on running days, shunting activities, etc.); and
  - organisational (e.g. governing, oversighting and managing the rail operator's business).
- Examples of what can go wrong will typically include:
  - collision – with rail infrastructure, with rollingstock, with people or animals;
  - derailment – on the mainline or within a siding;
  - fire and explosion – on rollingstock, around infrastructure (including buildings);
  - falls from height, slips & trips, electrocution:
  - exposure to fumes or smoke or hazardous materials, etc.

### 2 Helps an operator to work out what causes things to go wrong that will require managing

Some examples could include:

- a locomotive, carriage, trolley or tram breakdown or removal from service because of defective passenger doors or train parting;
- track and/or civil infrastructure needs repair or has spread;
- a runaway carriage;
- exceeding the limits of authority given;
- breaching a network rule/ safeworking procedure;
- an issue associated with fatigue, drugs and alcohol use, health and fitness, or even layout of the locomotive cab that could impact rail safety worker performance.

### 3 Helps the operator analyse and assess the risks

The procedures should:

- Describe how the operator assesses the degree of harm or consequence if the hazard occurs, with agreed definitions for differing levels of consequences;
- Describes how the operator assesses the likelihood/frequency of the hazard or risk happening, with agreed definition of differing levels of likelihood;
  - Use a documented matrix that shows the various combinations and what actions will need to be taken as a result, for each combination;
- States that the operator is to document all risk controls that were considered to eliminate or reduce risks:
  - those that are adopted; and

- those that are rejected and the reason why;
- States that the operator will consider what else can be done to minimise the risk, and if it is reasonable to do so:
  - What do other like operators do?
  - What is good practice?
  - What standards are available here and overseas? Are they appropriate?
- Instructs the operator to consider what other controls are available, suitable and effective to reduce the risk further; and
- Looks at the cost versus the benefit of the controls (i.e. the cost of additional controls to further reduce the risk is disproportionate to the safety benefit gained);

#### 4 Gives instruction to help the operator evaluate the risk and decide what to do next

- How to check that the risk is managed SFAIRP - does more need to be done?
- Thinks about whether higher level risks need to be reduced further by adding more controls;
- Clarifies who is responsible for managing the various risks, and:
  - at what point they can decide that they have done all that can be reasonably be expected to be done to manage each risk; or
  - that the risk is so great it cannot be tolerated, and the activity must be ceased.
- How to set priorities for any additional controls that are still to be put in place;
- Shows the level of authority that is required to accept the risk – i.e. acceptance of those risks that are extreme or high can only be approved by the Board or Executive Committee?

#### 5 Advises that a plan should be developed for implementing additional controls

- Once documented, the plan will be used to record and track who is responsible for implementing the plan;
- Includes:
  - due dates;
  - allocates responsibility for action; and
  - is updated regularly to show the current status of the control (e.g. not started, in progress, delayed).
- An example should be, the operator uses a short platform for one of its passenger services.

This means that a single carriage door does not line up with the platform at this station. The operator should assess various options to prevent passengers falling from this single carriage door onto the track.

This could include major civil works to extend the station platform to align with the maximum train length. The cost of these works would be quite significant. However, there may be other effective and cheaper options to prevent passengers from falling which include shortening the train by a carriage, or ensuring all passengers are supervised departing the train by alternate means (e.g. this may involve a guard or passenger service attendant manning the door or locking it while passengers are guided to use the front door of the carriage).

## 6 Describes how to communicate and consult about risk

- Procedures should be promoting awareness and understanding of risk throughout the operations at all levels of the operator's operations; and
- disseminates information to people responsible for implementing controls.
- Requires those who carry out risk assessment are competent to do so; and to ensure that they are attended by people who have the appropriate skills and qualifications to comment on the matter being assessed;

Examples could be:

- rolling stock maintainers and engineers participate in risk assessments about workshop activities;
- train crew are included in risk assessments about rail operations;
- all volunteers and staff are included in tool box talks in preparation for event days;
- the Board/Executive Committee has a dedicated risk sub-committee.

## 7 Describes how to monitor and review those identified risk levels

The risk management procedure:

- May include a requirement for higher risks to be monitored more closely or frequently;
- Ways to monitor could include:
  - audits (internal and external);
  - regular reviews of risk assessments; or
  - when changes occur;
  - as part of the SMS review process;
  - after an incident or near miss.
- Allocates responsibility to a specific role to ensure the risk register is kept up to date.

Examples could include an incident that occurs because a control failed:

- a guard failed to close a door and a passenger fell out;
- the driver wasn't competent and exceeded his authority;
- a maintainer certified the club car as fit for purpose when he didn't have the authority to do so;
- the locomotive was operated when maintenance had not been carried out when it was due;
- The platform signage was not clearly visible, and a customer fell onto the track.

## 8 Requires everything to do with risk management to be recorded, and describes what is to be reported and to who

The procedure could include provisions:

- for applying the procedure to the management of risk;
- Using agreed templates for risk assessment and consolidated risk register;
- Includes a formal process for escalation of risk, e.g. to the Board or Management Committee to assist with awareness and communication of risks across the operations;
  - resulting in a governance framework for the reporting of risk;
  - forms part of the requirement under the Law to report on the safety performance to:
    - inform those with responsibility and accountability for risk management activities,
    - and those who need to understand the risk profile of the railway operations carried out.
- Explains that following this approach will provide for adequate and safe decision making, including:
  - committing resources;
  - prioritising actions;
  - managing risks SFAIRP.