

# Safety Management System Modules

## Element 10 – Safety Audit Arrangements

### What and Why

All operators are required to assess that their Safety Management System (SMS) remains appropriate and effective. There are a number of ways that this can be done internally, which includes:

- SMS Review;
- Document or procedural reviews; and
- Internal Audits.

External audits may also be carried out **by** the operator and **on** the operator. Regulatory audits and compliance inspections are usually carried out by ONRSR.

Operators may:

- Have a contractor conduct the audits;
- Have someone from another rail operator conduct the audits;
- Audit contractors;
- Be audited by ONRSR;
- Be subject to compliance inspections by ONRSR;
- Be audited by other stakeholders such as suppliers of rollingstock or Rail Infrastructure Managers;

The best and most effective way to assess the SMS is to test it, and this is most commonly done by audit. The purpose of carrying out audits (separate from ONRSR's audits) is to check that the processes documented in the SMS are in fact being carried out.

Audits do not have to be intensive or include the entire SMS. The requirement to review the SMS does not mean every element has to be audited every year.

Although ONRSR will conduct its own regulatory activities, the operator should not use this as the only mechanism to audit the SMS.

### How

Audits can focus on key components of the SMS, that is where the risk is highest, and test these areas as a priority to ensure risks are being managed properly.

This means that the risk register, which has been developed should be the starting point for an audit schedule. As the risk register is reviewed and changes, so should the focus points for subsequent audits.

The law expects all operators to have an audit program. This can take the form of a documented procedure in the SMS that includes information about:

- Why audits are scheduled (so that they are not missed);
- How often, and when, audits are scheduled;
- Where to focus the audit based on the operator's risks;
- What the audit process is;
- Who is able to conduct audits;
  - are they independent from the area being audited?

- Do they have the skills and experience to audit?
- How audit findings are communicated, to whom and when;
- Whether an audit template is available;
- How audit findings are managed as corrective actions;
- Who should attend internal and external audits.

Examples of areas to audit may include:

- A check that trains are being operated according to the operating rules;
- Confirming pre-start checks and inspections of the rolling stock and infrastructure are being carried out and recorded;
- Confirming that detailed periodic inspections of infrastructure track, formation, drainage, bridges, level crossing equipment) and individual items of rolling stock are being carried out as scheduled;
- Checking health assessments are up to date;
- Records exist to demonstrate the training provided to and competency assessment of rail safety workers;
- Checking that any corrective actions or faults identified by routine maintenance inspections, previous audits, investigations or routine review have been implemented;
- A check that the effectiveness of the SMS is being reviewed and recorded;
- A check that the risk register is kept current.

## Who

Audits should be carried out by people independent of the area being examined to remove any biases.

Auditors should have some skill and/or experience in the area that they are auditing so that they can ask relevant questions.

The Executive Committee/ Board may wish to include all audit reports in their regular meetings to fulfil their governance obligations.

Audits and corrective actions should be included in the SMS Review process.

All persons who are required to implement corrective actions should do so in line with Element 11 – Corrective Actions.

ONRSR will conduct a combination of Regulatory Audits and Compliance Inspections on the operator. The frequency and type of actions taken by ONRSR will depend on the operator's level of risk.

## When

The audit schedule will note when audits are to be conducted. The audit schedule may be reviewed as part of the SMS review for ease.

Audits should be conducted as scheduled. This is seen as a commitment to safety and to contributing to a positive safety culture.

Audit reports/findings can be tabled at Executive Committee/Board meetings for endorsement and/or information.

#### List of relevant documents (internal)

Element 8 – SMS Review

Element 11 – Corrective Actions

SMS Audit Schedule

#### Links (external)

[ONRSR – Guideline – Small isolated line heritage operations – Safety Management System \(SMS\)](#)

[ONRSR Website – Guideline - Safety Management System](#)

[ONRSR Website – Rail Safety National Law](#)

[ONRSR Website – Compliance and Enforcement Policy](#)

[ONRSR Website – The ONRSR Way](#)

[ONRSR Website – Audits](#)

[ONRSR Website – Rail Safety Officer Visits](#)

[Workplace Health and Safety Queensland – SMS Audits](#)

#### Appendices

A. [Example Audit Schedule](#)