

### What and Why

It is important that changes are managed properly, with a consistent and structured approach that considers anyone who will be impacted by the change. Failing to consider all relevant stakeholders may result in an introduction of a change that adversely impacts safety.

Each operator is expected to have a component of their Safety Management System that describes how the operator manages change. This may take the form of a simple risk-based process that describes the steps to be taken.

The procedure should also include reference to the changes that are required to be reported to ONRSR. These are listed in Regulation 9 of the Rail Safety National Regulations, which also states when the change should be notified. The changes to be notified are:

1. A decision to design or construct, or to commission the design or construction of, rolling stock or new railway tracks
2. The introduction into service of rolling stock of a type not previously operated by the operator or the re-introduction into service of rolling stock not currently operated by the operator.
3. A change to a safety critical element of existing rolling stock.
4. A change to 1 or more of the classes of rail infrastructure used in the operator's railway operations.
5. A change to a safety standard for the design of rail infrastructure or rolling stock.
6. The decision to adopt a new safety standard for the design of rail infrastructure or rolling stock.
7. A change to the frequency of, or procedures for, the inspection or maintenance of railway infrastructure or rolling stock.
8. A change to the network rules relating to the conduct of the operator's railway operations.
9. A decision to introduce a new network rule relating to the conduct of the operator's railway operations.
10. A decision to change any work scheduling practices and procedures set out in the operator's fatigue risk management program
11. The replacement or a change in the contact details of any person appointed under regulation 8(b).
12. A change in the operator's name or residential address, or the operator's business or trading name, or in the case of a body corporate, a change in the name or registered business address of the body corporate.

### How

A simple process can be considered when managing change with details of the process followed and captured in an SMS document. This will be a record of all the factors that have been considered:

#### ***Is the change material?***

Operators should consider:

- Does the change impact the scope and nature of the accreditation held?
- Is the proposed change reportable to ONRSR?
- What is the impact/risk of the change?
- What are the impacts/risks if the change is not introduced correctly?
- What needs to be changed if a process or task is changed?

- Are changes to procedures required? – operating, maintaining, inspection, certifying.
- How to communicate the change to workers.

Examples could include:

1. Change to management/governance structure;
2. Change to the design of infrastructure or rolling stock (including changes to the design of their individual components);
3. Change to infrastructure and rolling stock inspection and maintenance practices;
4. Introducing a new item of rollingstock to service (including an item which has undergone extensive restoration from static display or a state previously unfit for purpose);
5. Changes to operating rules.

#### ***Identify who will be impacted by the change.***

- Who needs to know about the change – internally and externally;
- Are new skills required? - Will training and competency assessment be required?
- Are new tools required

#### ***Managing the risk of change***

Operators would be expected to carry out a risk assessment as part of considering the change. It would be reasonable to consider:

- What are the new risks that will be introduced by the change?
- Will current risks be changed?
- What needs to happen to manage new or existing risks?
- Who will be responsible for ensuring that controls are applied?
- How will success be measured?

### **Who**

Operators should document all changes and risk assessments as safety records and ensure that the SMS is updated accordingly.

Demonstration of consultation with key stakeholders is an essential component of change.

Operators are required to submit notifications of some types of change to ONRSR. This also includes submission of an application to vary accreditation where the scope and nature of the accreditation is proposed to be changed.

The Executive Committee/ Board may wish to sign off on these procedures as part of their governance processes.

ONRSR may not respond to a notification of change, unless further information is required.

ONRSR will respond to an application to vary accreditation, and this may include a compliance audit or inspection if necessary.

## When

Risk Assessments should be considered for all changes.

The operator should ensure that any reportable change is submitted to ONRSR within the appropriate timeframes using the notification of change form, or by submitting a variation to the operator's accreditation (if necessary). Where practicable, the change form or application for variation should be submitted through the ONRSR Portal.

Prior to the introduction of the change, operators should ensure that all related documents are updated and distributed accordingly, with appropriate training in place (as necessary).

## List of relevant documents (internal)

Element 13 – Consultation

Element 16 – Risk Management

Risk Assessment Template

Change Management Plan

## 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 Change Policy](#)

[ONRSR Portal](#)

[ONRSR Application to vary accreditation](#)

[ONRSR Application form for variation to accreditation](#)

## Appendices / Examples

None