

# Safety Management System Modules

## Element 7 – Document Control and Information Management

### What and Why

Policies and procedures that make up the components of a safety management system are usually created after risk assessments have been completed. These risk assessments will have determined the correct and safest processes for people to follow.

A good SMS will have systems in place to review documents and forms periodically and as a result of the findings of an incident investigation, as well as changes to legislation.

It therefore follows that for an operator to ensure that people, and rail operations are safe, the most up to date procedures and/or policies should be followed.

Document control helps ensure people always have access to and use most recent version of any document, and following the most recent version will help people stay safe.

### How

The simplest way to do this is to create a document control procedure, which includes:

- A naming /numbering convention for all documents, including policies, procedures and forms that are included in the SMS (See Appendix 1);
- A description of what documents are 'controlled', and this would normally be those that are 'safety records'. It is not essential to include all the operators processes in the safety management system if they do not relate to safety;
- A reference to a controlled document register;
- A statement of the process to create and record safety procedures/documents;
- A simple process that describes how documents are reviewed (and this could just refer to the SMS Review module of the SMS);
- Details of how changes to documents are communicated. This could also refer to the internal communication module of the SMS;
- A description on how these SMS documents are stored – electronically or physically. This should include a statement on how physical records such as completed forms are kept and for how long.

To ensure that the most up to date version of a document is recorded, a controlled document register should be developed:

- This can be created as a simple document that lists the document name, number, version number and version date.
- All controlled documents should be listed in that register (See Appendix 2).
- A number, a name, a version date and version number for each document should be created and recorded;
- Every time a document is amended, the register should be updated with the new details;
- Naming and numbering conventions may be kept simple. Each document should have its own number.

Things to consider include:

- Some operators create template documents so that all documents look the same;
- When documents are created from a template, such as a risk assessment or interface agreement, then they should also be allocated a number. Operators may wish to include a statement in the document control procedure about how these are numbered, and whether they have their own register;
- Some operators will allocate responsibility for certain documents to specific role holders. For example, the Operations Manager may be responsible for ensuring that all Operations procedures are up to date. In this instance, documents should also include details of that position holders title (use titles not personal names to prevent rework if people leave);
- Tracking who has paper or other copies of the SMS, procedures, work instructions, forms etc so that when they are changed, or updated they can be replaced with current versions;
- Putting procedures in place so that the SMS is not subject to un-authorised change;
- Making sure files are secure so that access to original controlled documents is limited;
- Staff need to know how to access current SMS documents – This could be by the posting of the most recent controlled document on a central noticeboard, tool box meetings, or by using the operator's website or volunteer management software;
- Some operators elect to have official versions of documents authorised/signed for use;
- Changes, removal and addition of documents to the SMS must be notified to all relevant persons, and the controlled document register is updated;
- Where documents are reviewed but not updated, it is advisable to keep a record of this so that operators can demonstrate that they have reviewed the documents in line with the SMS procedures;
- Official backup files should be kept of key safety documents where possible.

## Who

Details of the roles and responsibilities for document control should be noted in job /role descriptions. However, generally:

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

The role that has the responsibility for the implementation of the SMS should ensure that document control procedures detailed in the SMS are followed.

Managers and supervisors should ensure that the procedures actually being performed in the workplace are the same as the most up to date written procedures, and that all persons are aware of any changes to procedures since they last worked.

Everyone knows how to report errors in documents or procedures, and who to.

Only people who are authorised to change documents can change them.

Rail safety workers, volunteers and visitors have an obligation to follow current procedures. It is therefore essential that they are aware of them, and any changes that would impact them. This is particularly important if they have not attended the operator for a while.

## When

Document control should be introduced when a SMS is developed. If, however, an SMS has been developed without document control arrangements in place, operators should adopt a risk-based approach to introduce a document control process into the SMS. In this case, operators should refer to the Element 12 – Change Management.

All newly created and approved documents should be included in the SMS.

Documents should be reviewed in line with the document control procedures and the SMS review process (which are linked).

Document Distribution is a vital part of document control. Even the best SMS document will be ineffective if it is not distributed correctly. Distribution goes beyond printing/posting on a web site and includes briefing and training of those who need to use it.

When documents are removed or deleted.

## List of relevant documents (internal)

All SMS Elements

Document Review Procedure

Controlled Document Register

Interface Agreement Register

## Links (external)

[ONRSR Website –SMS Guideline](#)

[ONRSR Website –Interface Agreements](#)

## Appendices

- A. [Example Template for Controlled Document \(Portrait\)](#)
- B. [Example Template for Controlled Document \(Landscape\)](#)
- C. [Example Controlled Document Register](#)
- D. [Example Sign On Sheet](#)