Inspection Manual

Validation of ROGS Safety Management Systems.

ORR Guidance for HMRI Inspectors

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Contents

Introduction

1. This guidance covers HMRI/ORR arrangements for validation of dutyholders Safety Management Systems (SMS) required under the Railway and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS).
2. Although it is primarily aimed at those dutyholders required to hold safety certificates or authorisations, the principles can be applied to those dutyholders only required to have a SMS.
3. This guidance links with the arrangements for inspection of dutyholder initial integrity processes under safety verification and change management arrangements, which contributes directly to the validation of the risk evaluation and control element of the SMS. (ROGS Initial integrity - Inspection of Transport Operators safety verification and change management arrangements)
4. These arrangements have been developed by a cross ORR working group and approved by Railway Inspectorate Senior Managers (RISM).

Overview of the process

5. A high level flowchart of the process is shown on the next page.
6. The aim of SMS validation is for us to develop a robust view of a dutyholder's SMS over the 5-year life of a certificate/authorisation. This will:
   - Identify the strengths and weaknesses in a dutyholders SMS.
   - Inform the certificate/authorisation renewal process.
   - Provide information to feed back to the European Rail Agency.
7. The validation process will build on our certificate/authorisation assessment and be proportionate to the risks managed by the dutyholder.
8. Validation of SMSs will be informed by our knowledge of dutyholders, particularly that gained from safety cases, inspections, investigations, and assignments.
9. ROGS regulations 5 & 6 and schedule 1 (See Annex 1 for a copy of schedule 1) set out the requirements of a ROGS SMS and identify the elements that need to be in place. The validation process focuses on these.
   - For major dutyholders we will look at all elements of the SMS over the five year life of the certificate/authorisation.
   - For other dutyholders we will look at a proportionate sample of the elements.
10. Building on our current risk and topic based approach to inspection we will integrate the validation of SMS elements into our contacts with dutyholders (e.g. inspections, investigations, assignments etc). As part of almost every inspection, investigation and assignment we will track issues back to the relevant element of the dutyholder's SMS and form a view of its adequacy

and application. Our assignment protocols will be developed to identify the SMS elements and issues that are relevant to the assignment. We may also carry out specific SMS inspections where we identify a need.

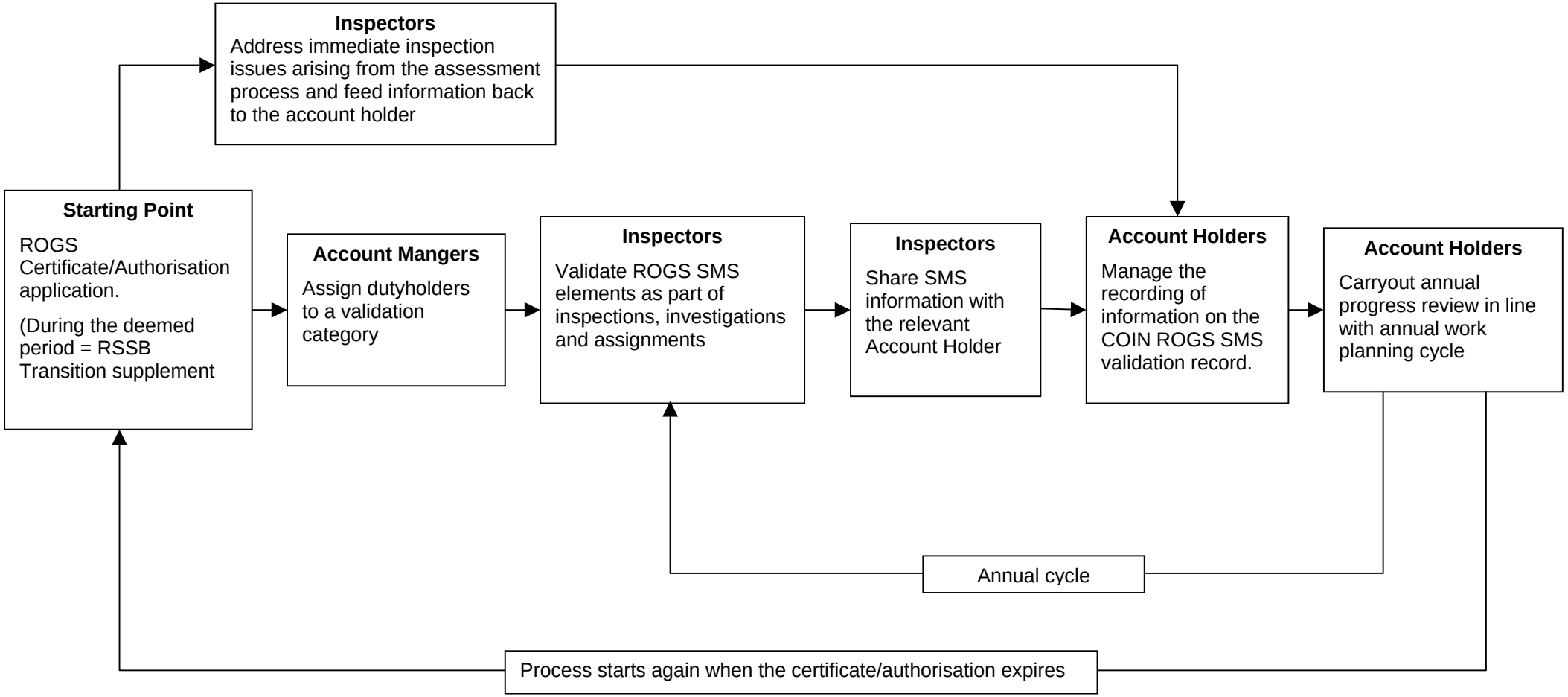
11. Information we gain on a dutyholder's SMS from other sources such as RAIB investigation reports should also be used to inform the validation process.

12. We will record the SMS findings of inspections, investigations and assignments on our Corporate Operational Information system (COIN) in a structured format which involves:

    - An overarching ROGS SMS validation case record where views on SMS elements are captured in a template document.
    - The cases that record the specific inspections, investigations or, assignments where the SMS issues were covered, being linked to the overarching ROGS validation SMS case.

13. To ensure that progress is being made, as part of the annual planning process Account Holders will review with their managers the SMS elements covered with the elements that need further attention being identified.

High level flowchart of the ROGS SMS validation process.



Roles and responsibilities

14. Our delivery of the ROGS SMS validation process requires contributions from across HMRI, and the key roles and responsibilities are summarised below.

Role	Key responsibilities
RISM	Provision of resource for SMS validation via the delivery planning process.
General Managers	Promote and oversee the consistent adoption of the SMS validation approach in their GM.
Team Managers (National Expertise Team (NET) and Area Team Managers)	Promote and oversee the consistent adoption of the SMS validation approach in their team. Annually review progress on SMS validation with their Account Holders
Account Managers	Allocate dutyholders to validation categories. Incorporate SMS validation into delivery plans. Build SMS validation into assignments. Monitor consistency of application of the validation process.
Account Holders	For their dutyholders: • Check the validation category assigned to their dutyholder and raise any concerns with the relevant Account Manager. • Manage the SMS validation. • Manage the COIN SMS validation record. • Monitor progress in covering SMS elements via an annual review.
All Inspectors (Area Team, Network Rail Team, NETs etc)	Integrate SMS validation into inspection, investigation and assignments. Share with relevant Account Holder SMS information from inspections, interventions etc. Clearly identify SMS issues in reports on inspections, investigations and assignments.
SMS Topic Strategist & Human, Organisational and Risk National Expertise Team (HORNET)	Ensure SMS topic strategy takes account of ROGS. Provide support and guidance to Inspectors on SMS issues.
Legislative development – Operational Policy	Create the initial COIN SMS validation records for all relevant dutyholders. As process owner monitor and review the SMS validation process with the Account Managers.

Validation

15. Our aim with SMS validation is to develop a robust view of a dutyholder's ROGS SMS over the 5-year life of a certificate/authorisation by building on our assessment of their Safety certificate/authorisation. Validation of SMS's will be informed by our knowledge of dutyholders and be proportionate to the risks managed by the dutyholder.

16. ROGS regulations 5 & 6 and schedule 1 (Annex 1 contains a copy of regulation 5 & 6 and schedule 1) set out the requirements of a ROGS SMS and identify the elements that need to be in place. The validation process focuses on these elements and should be undertaken as an integrated part of our inspections, investigations and assignments with dutyholders.

Building on the assessment process

17. Building on the safety certificate/authorisation assessment process we will validate the dutyholders SMS by testing the arrangements described in their certificate/authorisation application.

18. The safety certificate and authorisation assessment manual and associated criteria document set out the criteria that we assess the dutyholders certificate/authorisation against. These criteria summarise what dutyholders should have in place and when taken with the dutyholders certificate/authorisation application provide our starting point when testing SMS issues during validation. Annex 2 Identifies which assessment criteria are relevant to which SMS element.

19. For dutyholders operating under deemed certificates/authorisations we can and should start validation before full ROGS certificates and authorisations have been issued. This will in effect gives us a validation period of slightly longer than 5 years for some dutyholders. Although in the early part of the deemed period we won't have received certificate/authorisation applications the majority of dutyholders have indicated they will be using the RSSB Railway Safety Case Holder ROGS Transition Supplement to demonstrate how they are implementing ROGS, so we can use this to start the validation process.

Immediate inspection issues identified during assessment.

20. The assessment process may generate issues that require some immediate inspection or follow up work. In most cases these issues will be able to contribute to the validation of the SMS and should be recorded on the COIN SMS validation record (see paragraphs 38 & 39)

Dutyholder validation categories.

21. In order to take a proportionate approach to SMS validation based on the risks managed by dutyholders, we have defined 3 categories of validation.

- Category 1 = All SMS elements to be covered over the five year life of the certificate/authorisation

- Category 2 = 7 SMS elements to be covered over the five year life of a certificate/authorisation.
- Category 3 = 4 SMS element to be covered over the five year life of a certificate/authorisation

22. Account Managers will allocate dutyholders to a validation category. Their allocation will be based on a range of factors including the size, scale, complexity, local issues and existing knowledge of the dutyholder.
23. It is suggested that Account Managers discuss and agree their allocations to achieve a consistent approach across dutyholders.
24. Account Holders should check the validation category assigned to their dutyholder and discuss any concerns with the relevant Account Manager.
25. Indicative examples of dutyholders that may be appropriate for different categories are:

- Category 1 = Network Rail, Major TOCs and FOCs, LUL.
- Category 2 = Non franchised operations running on the mainline, contractors, other metros.
- Category 3 = Airport people movers, heritage railways operating above 40kph.

Company Groups

26. For dutyholders operating in a company group (e.g. First Group, Stagecoach etc) where some or all of the SMS is common across the group we may have opportunities to validate the SMS (or parts of the SMS) on a group basis rather than for each company in the group.

Dutyholders with certificates and authorisations

27. For dutyholders that have both a certificate and authorisation that use the same SMS we can validate the SMS as one across both aspects of the operation. Where this is done only one COIN case will be required. (See COIN validation record section)

Priority of SMS elements

28. The SMS elements set out by ROGS cover a wide range of areas. To support the dutyholder categorisation approach we have reviewed the SMS elements to identify those which should be considered a priority for the category 2 & 3 dutyholders (i.e. those dutyholders where not all elements are to be inspected). This prioritisation may also help with inspection planning for category 1 dutyholders. The priority of the elements is set out in annex 3
29. The aim of the prioritisation is to assist in identifying key areas for SMS validation and needs to be considered alongside our knowledge and experience of the dutyholder.
30. Some of the SMS elements cover a wider range of issues than others, for example element d covers a number of aspects of risk assessment such as control of risks relating to supply of maintenance and material, control

of risks relating to the use of contractors and taking into account of risks arising as a result of activities carried on by other persons. Where elements have wide coverage we should aim to validate across the range of issues covered.

Integrated validation

31. Our primary approach to validating SMS under ROGS is that we will test the elements of the SMS as an integral part of our normal inspections, investigations and assignments. We will track issues covered in an inspection, investigation, assignment back to the relevant element of the dutyholder's SMS and to form a view of its adequacy and application. This view will then be shared with the relevant Account Holder who will manage the recording on the COIN SMS validation record. (see paragraphs 38 & 39)The following will support this process:

- Identification in assignment protocols of the SMS elements relevant to the assignment.
- Clearly identifying SMS issues in inspection, investigation and assignment reports. A specific section in the report on SMS issues would be helpful.

32. Although specific SMS inspections/interventions will not be the norm we may carry them out where we identify a need.

Inspection of Safety Verification arrangements

33. Safety Verification is a specific requirement of ROGS under regulations 5 & 6 and schedule 4. Specific arrangements for the inspection of Safety Verification have been developed and guidance on this available in "ROGS Initial integrity - Inspection of Transport Operators safety verification and change management arrangements".

34. Inspection of Safety Verification arrangements contribute directly to the validation of element (d) risk evaluation and control and we should feed information from these inspections into the SMS validation process.

Annual review of progress

35. To ensure we deliver the required SMS validation it is important that progress is made in each year of the life of the certificate/authorisation. To achieve this the Account Holder should carry out an annual review of progress and discuss it with their team manager as part of the annual planning process. The review should consider:

- Which elements have been covered so far and which are outstanding.
- The depth and quality of information gathered for each element and whether further information is required.
- Which elements should be the priority for the coming work year.
- Opportunities available for SMS validation via assignments and other planned inspection activities in the coming work year.

- Whether adequate progress is being made to cover the required SMS elements by the end of the certificate/authorisation.

Enforcement

36. During the validation process we may identify areas of the SMS that require improving. In these cases we should follow normal enforcement processes as set out in the ORR Health and Safety Enforcement Policy Statement and the enforcement management model.

Resources

37. As part of the delivery planning process RISM will allocate resource for SMS validation. When doing this RISM will take into account that adopting this integrated approach will require additional time for carrying out and recording inspections, investigations and assignments. Until the process is bedded in it is difficult to assess accurately the resources required so this will be reviewed as we gain experience.

COIN SMS validation record

38. Following the approach of integrating SMS validation with inspection, investigation and assignments requires us to keep a record of our findings for each of the SMS elements. We will keep this record on COIN, and it will be managed by the Account Holder. It will be added to regularly during the life of the certificate/authorisation, building up a comprehensive picture of a dutyholder's SMS performance.

39. A copy of the SMS validation record template is at annex 4. The document is designed to be updated as new information becomes available, so there should only be one live document for this information on COIN. Account Holders may identify a need at key points in the validation process to archive a copy of the document. It is suggested that a copy of the document is saved on COIN and re titled to identify it as archived including the archiving date.

Structure of SMS validation COIN record

- SMS validation record document will be attached to COIN via a support case linked to a customer/company record.
- COIN support case category = inspection.
- COIN support case speciality type = permissioning.
- Title of support case to be "ROGS SMS validation record".
- Document to be attached on the notes tab page.
- Document summary field text = "Document to track progress on validation of ROGS SMS elements".
- Document title = "ROGS Safety Management System validation record".
- Document to be updated as new information added i.e. only one document not a series of documents.

40. COIN SMS validation case records for each certificate and authorisation holder will be centrally set up by Legislative Development – Operational Policy with an unpopulated document attached.

41. Where dutyholders have both a certificate and authorisation two COIN cases will be created. Where the SMS is common for the certificate and authorisation and we are validating them as one across both aspects of the operation only one COIN case will be required. When this is the situation one of the cases should be closed recording common validation as the reason.

Linking inspections, investigations and assignments to the SMS Validation case

42. The COIN cases recording inspections, investigations, assignments etc that provide SMS information should be related to the dutyholders' ROGS SMS validation case in a parent child relationship, the ROGS SMS validation case being the parent case.

Support and Guidance

43. Guidance on the ROGS SMS requirements is available in the Guidance on the Regulations and the Safety Certificate and Authorisation Assessment Manual and Criteria.

44. Guidance on SMS is available from HORNET, Successful health and safety management- HSG 65 and Management of Health and Safety at Work Regulations 1999 Approved Code of Practice and guidance – L21

Monitoring, reviewing and auditing the process

45. To help the validation process bed in consistently across the wide range of dutyholders covered by ROGS, Account Managers together with Legislative development – Operational Policy will:

- Monitor the take up of the process and how it is working and provide support to inspectors.
- Review the process and the consistency of its application, providing advice and revising the process where required.
- Provide reports to RISM on the operation of the process.

46. ORR periodically audits samples of its processes. The SMS validation process would be within scope of this internal audit process and is likely in due course to be one of the processes sampled.

Annex 1 – ROGS SMS requirements.

Regulation 5 - Safety Management System for the Mainline Railway

5.—1) *The requirements for a safety management system referred to in regulation 3(1)(a) are that–*

(a) subject to paragraph (2), it is established to ensure that the mainline railway system–

(i)can achieve the CSTs; and

(ii)is in conformity with relevant national safety rules and relevant safety requirements laid down in TSIs;

(b)it applies the relevant parts of CSMs;

(c)it meets the requirements and contains the elements set out in Schedule 1, adapted to the character, extent and other characteristics of the operation in question;

(d)subject to paragraph (2), it ensures the control of all categories of risk including new or existing risks associated with the operation in question which, without prejudice to the generality of the foregoing, shall include such risks relating to the–

(i)supply of maintenance and material;

(ii)use of contractors; and

(iii)placing in service of new or altered vehicles the design or construction of which incorporates significant changes compared to any vehicle already in use on that transport system and which changes would be capable of significantly increasing an existing risk to safety or creating a significant safety risk;

(e)it takes into account, where appropriate and reasonable, the risks arising as a result of activities carried on by other persons; and

(f)all parts of it are documented.

(2) The requirements in paragraphs (1)(a) and (d) shall be met where the safety management system of a transport operator or of an applicant for a safety certificate or a safety authorisation ("the first operator") taken with that of any relevant transport operator is capable of meeting the requirements of the paragraph in question.

(3) In paragraph (2), "relevant transport operator" means another transport operator whose operation is capable of materially affecting the safety of the operation carried on by the first operator.

(4)In paragraph 1(d)(iii) where such new or altered vehicles are intended to be placed in service, then before that placing in service the transport operator shall ensure that he has-

(a) an established written safety verification scheme which meets the requirements and contains the elements set out in Schedule 4; and

(b) appointed a competent person to undertake that safety verification, and the competent person has undertaken that safety verification in relation to the new or altered vehicles.

(5)Where a new or altered vehicle has been authorised under regulation 4(1)(a) of the Interoperability Regulations for the placing into service on the mainline railway, that authorisation shall be treated as satisfying the requirements of paragraph (4).

(6)In this regulation placing into service shall mean first placed into service for the provision of a transport service, and in ascertaining when this takes place no regard shall be had to any trials or testing that takes place to the relevant vehicle.

(7) The requirements for a safety management system referred to in regulation 3(2)(a) are the requirements in paragraphs (1) to (6) save that any reference to new or altered vehicles in those paragraphs shall be replaced with a reference to new or altered infrastructure and that–

(a) it ensures the control of all categories of risk associated with the placing into service of new or altered infrastructure the design or construction of which incorporates significant changes compared to any infrastructure already in use on that transport system and which changes would be capable of significantly increasing an existing risk to safety or creating a significant safety risk

(b) it takes into account the effects of operations of transport undertakings; and

(c) it contains provisions to ensure that the way in which the infrastructure manager carries out his operation makes it possible for any transport undertaking to operate in accordance with–

(i)relevant TSIs and national safety rules; and

(ii)the means adopted by the transport undertaking to meet the requirements referred to in regulation 7(4), of which the Office of Rail Regulation accepted that there was sufficient evidence upon issue or amendment of its safety certificate pursuant to these Regulations; and
(d)aims to co-ordinate the emergency procedures of the infrastructure manager or of the applicant for a safety authorisation with those of transport undertakings,

and in each case the requirements in sub-paragraphs (a) to (d) shall only apply in relation to transport undertakings that operate or will operate a train in relation to the infrastructure of the infrastructure manager or of the applicant for a safety authorisation in question.

Regulation 6 - Safety Management System for other Transport Systems

6. *(1) The requirements for a safety management system referred to in regulation 4(1)(a) and 4(2)(a) are that–*

(a) it is adequate to ensure that the relevant statutory provisions which make provision in relation to safety will be complied with in relation to the operation in question;

(b) subject to paragraph (7), it meets the requirements and contains the elements set out in Schedule 1, adapted to the character, extent and other characteristics of the operation in question;

(c)subject to paragraph (2), it ensures the control of all categories of risk to safety associated with the operation in question which, without prejudice to the generality of the foregoing, shall include such risks relating to the–

(i)supply of maintenance and material; and

(ii)use of contractors;and

(iii)placing in service of new or altered vehicles or infrastructure the design or construction of which incorporates significant changes compared to any vehicles or infrastructure already in use on that transport system and which changes would be capable of significantly increasing an existing risk to safety or creating a significant safety risk;

(d) it takes into account, where appropriate and reasonable, the risks arising as a result of activities carried on by other persons; and

(e) all parts of it are documented.

(2) The requirement in paragraph (1)(c) shall be met where the safety management system of a transport operator or an applicant for a safety certificate or a safety authorisation ("the first operator") taken with that of any relevant transport operator is capable of meeting the requirements of the paragraph in question.

(3)In paragraph (2), "relevant transport operator" means another transport operator whose operation is capable of materially affecting the safety of the operation carried on by the first operator.

(4)In paragraph 1(c)(iii) where such new or altered vehicles or infrastructure are intended to be placed in service, then before that placing in service the transport operator shall ensure that he-

(a) has an established written safety verification system which meets the requirements and contains the elements set out in Schedule 4; and

(b)has appointed a competent person to undertake that safety verification and the competent person has undertaken that safety verification in relation to the new or altered vehicle or infrastructure.

(5)In this regulation placed in service shall mean first placed in service for the provision of a transport service, and in ascertaining when this takes place no regard shall be had to any trials or testing that takes place to the relevant vehicle or infrastructure.

(6) In this regulation the requirements of paragraph (4) shall apply in the absence of a transport operator to a responsible person as they would apply to a transport operator.

(7)Paragraph 2(c) of Schedule 1 shall apply in relation to transport systems other than the mainline railway as if it read as follows–

"(c) procedures–

(i) to meet relevant technical specifications; and

(ii) relating to operations or maintenance,

insofar as they relate to the safety of persons, and procedures for ensuring that the procedures in sub-paragraphs (i) and (ii) are followed throughout the life-cycle of any relevant equipment or operation;".

ROGS Schedule 1

SCHEDULE 1 Regulations 5(1)(c), and 6(1)(b)

SAFETY MANAGEMENT SYSTEM

(This Schedule substantially reproduces the provisions of Annex III to the Directive)

Requirements on the safety management system

1. The safety management system shall—

(a) describe the distribution of responsibilities, within the operation, for the safety management system;

(b) show how control of the safety management system by the management on different levels is secured;

(c) show how persons carrying out work or voluntary work directly in relation to the operation and their representatives on all levels are involved with the safety management system; and

(d) show how continuous improvement of the safety management system is ensured.

Basic elements of the safety management system

2. The basic elements of a safety management system are—

(a) a statement of the safety policy which has been approved by the chief executive and communicated to all persons carrying out work or voluntary work directly in relation to the operation;

(b) qualitative and quantitative targets for the maintenance and enhancement of safety and

plans and procedures for reaching those targets;

(c) procedures to meet relevant technical and operational standards or other requirements as

set out in—

(i) TSIs;

(ii) national safety rules;

(iii) other relevant safety requirements; and

(iv) decisions of the Office of Rail Regulation addressed to the transport operator in question,

and procedures to ensure compliance with the requirements listed in this paragraph throughout the life-cycle of any relevant equipment or operation which is subject to the requirement in question.

(d) procedures and methods for carrying out risk evaluation and implementing risk control measures when—

(i) there is a change in the way in which the operation in question is carried out; or

(ii) new material is used in the operation in question,

which gives rise to new risks in relation to any infrastructure or the operation being carried out;

(e) provision of programmes for training of persons carrying out work or voluntary work directly in relation to the operation and systems to ensure that the competence of such persons is maintained and that they carry out tasks accordingly;

(f) arrangements for the provision of sufficient information relevant to safety—

(i) within the operation in question; and

(ii) between the operator in question and any other transport operator or an applicant for a safety certificate or a safety authorisation who carries out or who intends to carry out operations on the same infrastructure;

(g) procedures and formats for the documentation of safety information;

(h) procedures to control the lay out of, and changes to, vital safety information;

(i) procedures to ensure that accidents, incidents, near misses and other dangerous occurrences are reported, investigated and analysed and that necessary preventative measures are taken;

(j) provision of plans for action, alerts and information in the case of an emergency which are to be agreed with any public body, including the emergency services, that may be involved in such an emergency; and

(k) provisions for recurrent internal auditing of the safety management system.

Annex 2 - ROGS SMS elements and related assessment criteria.

The criteria set out in the "Assessment Criteria for Safety Certificate and Authorisation applications made under ROGS" summarise what dutyholders should have in place and when taken with the dutyholders certificate/authorisation application provide a starting point when testing SMS issues during validation.

This annex maps:

- The general SMS requirements from ROGS schedule 1 to the relevant schedule 1 elements
  and
- The schedule 1 elements to the key relevant assessment criteria.

General SMS requirements from schedule 1 The safety management system shall-		**Schedule 1 element(s)**
a	Describe the distribution of responsibilities, within the operation, for the safety management system.	a, f
b	Show how control of the safety management system by the management on different levels is secured.	a
c	Show how persons carrying out work or voluntary work directly in relation to the operation and their representatives on all levels are involved with the safety management system.	a
d	Show how continuous improvement of the safety management system is ensured.	b, k

SMS Elements from schedule 1 The basic elements of a safety management system are—		**Assessment criteria**
a	A statement of the safety policy which has been approved by the chief executive and communicated to all persons carrying out work or voluntary work directly in relation to the operation	MTU 2 MIM 2 NTU 2 NIM 2
b	Qualitative and quantitative targets for the maintenance and enhancement of safety and plans and procedures for reaching those targets;	MTU 4 MIM 4 NTU 6 NIM 5
c	Procedures to meet relevant technical and operational standards or other requirements as set out in—	MTU 5,13,14,15 MIM 5, 13, 14, 15

	SMS Elements from schedule 1 The basic elements of a safety management system are—	**Assessment criteria**
	(i) TSIs; (ii) national safety rules; (iii) other relevant safety requirements; and (iv) decisions of the Office of Rail Regulation addressed to the transport operator in question, and procedures to ensure compliance with the requirements listed in this paragraph throughout the life-cycle of any relevant equipment or operation which is subject to the requirement in question.	NTU 5, 14, 15 NIM 13,14,15,16
d	Procedures and methods for carrying out risk evaluation and implementing risk control measures when— (i) there is a change in the way in which the operation in question is carried out; or (ii) new material is used in the operation in question,which gives rise to new risks in relation to any infrastructure or the operation being carried out;	MTU 3, 6, 12 MIM 3, 6, 7, 13 NTU 4, 7, 13 NIM 4, 6, 7, 14
e	Provision of programmes for training of persons carrying out work or voluntary work directly in relation to the operation and systems to ensure that the competence of such persons is maintained and that they carry out tasks accordingly	MTU 7 MIM 8 NTU 8 NIM 8
f	Arrangements for the provision of sufficient information relevant to safety— (i) within the operation in question; and (ii) between the operator in question and any other transport operator or an applicant for a safety certificate or a safety authorisation who carries out or who intends to carry out operations on the same infrastructure.	MTU 8, 12 MIM 6, 9 NTU 9, 13 NIM 6, 9
g	Procedures and formats for the documentation of safety information.	MTU 8 MIM 9 NTU 9 NIM 9
h	Procedures to control the lay out of, and changes to, vital safety information.	MTU 8 MIM 9 NTU 9 NIM 9
i	Procedures to ensure that accidents, incidents, near misses and other dangerous occurrences are reported, investigated and analysed and that necessary preventative measures are taken.	MTU 9 MIM10 NTU 10 NIM 10
j	Provision of plans for action, alerts and information in the case of an emergency which are to be agreed with any public body, including the emergency services, that may be involved in such an emergency.	MTU 10, 12 MIM 6, 11 NTU 11, 13

	SMS Elements from schedule 1 The basic elements of a safety management system are—	**Assessment criteria**
		NIM 6, 11
k	Provisions for recurrent internal auditing of the safety management system.	MTU 11 MIM 12 NTU 12 NIM 12

Annex 3 - Priority of SMS elements

This priority assessment is based on the perceived potential for impact in reducing risks to those involved in railway operations. It is a simple three category ranking of the basic elements of a Safety Management System identified in Schedule 1 of the Railways and Other Guided Transport Systems (Safety) Regulations 2006.

The aim of this prioritisation is to assist in identifying key areas for SMS validation, particularly for dutyholders in categories 2 & 3 where not all SMS elements will be validated over the life of the certificate/authorisation.

High Priority Elements	
Schedule 1 element	**Schedule 1 description**
(d)	Procedures and methods for carrying out risk evaluation and implementing risk control measures when— (i) there is a change in the way in which the operation in question is carried out; or (ii) new material is used in the operation in question, which gives rise to new risks in relation to any infrastructure or the operation being carried out.
(e)	Provision of programmes for training of persons carrying out work or voluntary work directly in relation to the operation and systems to ensure that the competence of such persons is maintained and that they carry out tasks accordingly.
(f)	Arrangements for the provision of sufficient information relevant to safety— (i) within the operation in question; and (ii) between the operator in question and any other transport operator or an applicant for a safety certificate or a safety authorisation who carries out or who intends to carry out operations on the same infrastructure.
(i)	Procedures to ensure that accidents, incidents, near misses and other dangerous occurrences are reported, investigated and analysed and that necessary preventative measures are taken

Medium Priority Elements	
Schedule 1 element	**Schedule 1 description**
(c)	Procedures to meet relevant technical and operational standards or other requirements as set out in— (i) TSIs; (ii) national safety rules; (iii) other relevant safety requirements; and (iv) decisions of the Office of Rail Regulation addressed to the transport operator in question, and procedures to ensure compliance with the requirements listed in this paragraph throughout the life-cycle of any relevant equipment or operation which is subject to the requirement in question.
(j)	Provision of plans for action, alerts and information in the case of an emergency which are to be agreed with any public body, including the emergency services, that may be involved in such an emergency.
(k)	Provisions for recurrent internal auditing of the safety management system.

Low Priority Elements	
Schedule 1 element	**Schedule 1 description**
(a)	A statement of the safety policy which has been approved by the chief executive and communicated to all persons carrying out work or voluntary work directly in relation to the operation.
(b)	Qualitative and quantitative targets for the maintenance and enhancement of safety and plans and procedures for reaching those targets.
(g)	Procedures and formats for the documentation of safety information.
(h)	Procedures to control the lay out of, and changes to, vital safety information.

Annex 4 – ROGS Safety Management System (SMS) validation record.

Company name	
Company address	
COIN customer number	
COIN case number	
Certificate/Authorisation number(s)	
Account holder	

ROGS SMS element (a) - Safety Policy. A statement of the safety policy which has been approved by the chief executive and communicated to all persons carrying out work or voluntary work directly in relation to the operation.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (b) –Targets. Qualitative and quantitative targets for the maintenance and enhancement of safety and plans and procedures for reaching those targets.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (c) –Technical and operational standards. Procedures to meet relevant technical and operational standards or other requirements as set out in— (i) TSIs; (ii) national safety rules; (iii) other relevant safety requirements; and (iv) decisions of the Office of Rail Regulation addressed to the transport operator in question, and procedures to ensure compliance with the requirements listed in this paragraph throughout the life-cycle of any relevant equipment or operation which is subject to the requirement in question.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (d) –Risk evaluation and control. (Note – The Inspection of dutyholder safety verification and change management arrangements feed directly into this element) Procedures and methods for carrying out risk evaluation and implementing risk control measures when— (i) there is a change in the way in which the operation in question is carried out; or (ii) new material is used in the operation in question, which gives rise to new risks in relation to any infrastructure or the operation being carried out;		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (e) – Training. Provision of programmes for training of persons carrying out work or voluntary work directly in relation to the operation and systems to ensure that the competence of such persons is maintained and that they carry out tasks accordingly		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (f) – Provision of information.

Arrangements for the provision of sufficient information relevant to safety—

(i) within the operation in question; and

(ii) between the operator in question and any other transport operator or an applicant for a safety certificate or a safety authorisation who carries out or who intends to carry out operations on the same infrastructure.

Insp/Inv/Assignment COIN case No/ Reference	Brief summary of findings from the intervention regarding the SMS element	Overall view of the SMS element – Strengths & weaknesses.

ROGS SMS element (g) – Documentation of safety information. Procedures and formats for the documentation of safety information.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (h) – Changes to safety information. Procedures to control the lay out of, and changes to, vital safety information.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (i) – Accident reporting and investigation. Procedures to ensure that accidents, incidents, near misses and other dangerous occurrences are reported, investigated and analysed and that necessary preventative measures are taken.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (j) – Emergency plans. Provision of plans for action, alerts and information in the case of an emergency which are to be agreed with any public body, including the emergency services, that may be involved in such an emergency.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**

ROGS SMS element (k) – Auditing. Provisions for recurrent internal auditing of the safety management system.		
Insp/Inv/Assignment COIN case No/ Reference	**Brief summary of findings from the intervention regarding the SMS element**	**Overall view of the SMS element – Strengths & weaknesses.**