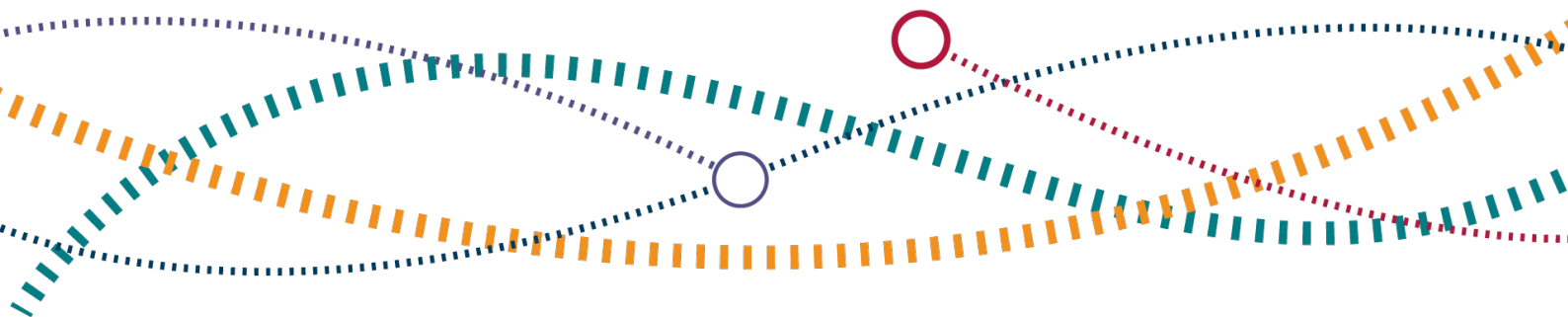




# Guiding Principles for Great British Railways' (GBR) Health and Safety Management System

27 April 2026



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# Introduction

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The Office of Rail and Road (ORR) have been actively engaged in rail reform since the publication of the Williams Rail Review and the establishment of the Rail Transformation Programme. Since 2022, ORR's Railway Safety Directorate has worked in partnership with the Great British Railways Transition Team (GBRTT), the Department for Transport (DfT), Network Rail (NR), DfT Operator (DfTO), RSSB, Trade Unions and wider industry partners to understand, influence and support the management of health and safety risks arising from rail reform.

This engagement has included senior leadership secondments into GBRTT, participation in the Rail Transformation Programme Safety Working Group (SWG), and collaboration across industry to identify system-level safety risks, potential mitigations and credible transition assumptions. This shared body of work provides a foundation for understanding the health and safety implications of reform and informs ORR's expectations of Great British Railways' (GBR) Health and Safety Management System (HSMS).

The creation of Great British Railways (GBR) represents the most significant structural transition in the GB rail system since privatisation. It aims to bring together infrastructure management, passenger operations, long-term planning, the coordinated application of standards, and performance oversight under a single directing mind.

This consolidation has the potential to reshape how safety responsibilities are coordinated and how system-level decisions are made. It also provides opportunities to build on existing strengths by clarifying accountability, integrating safety leadership, and improving the consistency of risk management. Done well, reform can support a more integrated and coordinated approach to identifying and managing risk, close long-standing gaps at organisational and operational interfaces, and enable timelier, joined-up responses to priority safety issues. There are also significant opportunities to evolve safety culture, and create a more inclusive, diverse workforce that attracts and retains the brightest talent.

This document sets out the guiding principles for the HSMS that GBR must establish as it assumes this central role. These principles apply to both Day 1 arrangements and the long-term HSMS that will govern GBR as it evolves.

The principles are intended to support a controlled and proportionate transition to GBR, maintaining effective risk control while allowing the HSMS to mature. ORR has developed these principles and set out the minimum evidence required by drawing on the collective work undertaken by SWG to understand the health and safety implications of rail reform. They reflect systemic risks associated with rail reform such as unclear accountability, complex interfaces, uneven organisational maturity, and the potential for degraded safety performance during transition.

These principles are not intended to prescribe organisational structures or detailed design solutions nor are they exhaustive. Instead, they articulate what the GBR HSMS must demonstrate in terms of effective risk control, clear responsibility and robust assurance, consistent with all the statutory requirements of ROGS and the principles of the Health and Safety at Work etc. Act 1974 (HSWA).

The principles outlined here are aligned to statutory obligations under the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS) and the principles of the Risk Management Maturity Model (RM3), requiring a standardised level of maturity and a commitment to continuous improvement.

Specifically, this document is intended to:

- provide clarity on ORR's expectations to assist GBR in designing and implementing a robust HSMS
- support early and constructive engagement between ORR, GBR and the wider rail industry
- enable proportionate assurance and efficient statutory permissioning
- provide a clear and consistent reference point for regulatory oversight during transition and into steady-state operation

Together, these principles provide a clear, shared foundation for assessing the design, implementation, and ongoing development of the GBR HSMS, ensuring it remains robust, scalable, and capable of sustaining safe and reliable railway operations throughout reform and into steady-state operations. The overarching regulatory principle is the GBR HSMS should demonstrate that:

**Risk is controlled, responsibility is clear, and safety management remains stable and effective through reform, transition, and integration.**

# HSMS Themes and Guiding Principles

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The following sections of this document set out the guiding principles for the GBR HSMS across the key themes listed below:

- Safety Policy, Leadership & Governance
- Risk Management
- Change Management
- Organisation, Interfaces & Operational Control
- Competence, Culture & Workforce
- Cooperation & Coordination
- Monitoring, Assurance & Learning
- Emergency Preparedness & Resilience

These principles describe the outcomes ORR will look for as GBR designs and implements its HSMS during transition and into steady-state operation. They are intended to support the ongoing GBR HSMS work to develop coherent, effective, and proportionate safety arrangements building on the existing good practice.

In applying these principles, GBR must ensure full alignment with the statutory requirements of the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS)<sup>1</sup> and associated health and safety statutory obligations which remain the legal foundation for all duty holders.

The ROGS Safety Certificate and Safety Authorisation Mainline Assessment Criteria<sup>2</sup> provide detailed guidance on how these legal duties should be evidenced and should be used to inform the development of the GBR HSMS. Our Assessment Manual<sup>3</sup> sets out the processes that ORR will follow to assess an application for a Safety Certificate and/or an Authorisation.

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<sup>1</sup> [The Railways and Other Guided Transport Systems \(Safety\) Regulations 2006 \(as amended\) consolidated with amendments](#)

<sup>2</sup> [Assessment criteria for mainline railway safety certificate and safety authorisation applications](#)

<sup>3</sup> [ROGS Safety Certificate and Safety Authorisation Assessment Manual - Sixth Edition - March 2026](#)

This document does not replace or supersede ROGS; rather, it highlights the HSMS areas most affected by the transition to GBR and clarifies ORR's regulatory expectations for how these areas should be managed to support system-wide safety and resilience.

# 1. Safety Policy, Leadership & Governance

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- 1.1 GBR's governance landscape brings together organisational elements that have historically operated under separate leadership structures, decision pathways, and oversight arrangements. Integrating the legacy governance of Network Rail, franchised operators and departmental oversight presents inherent risks, including misalignment of priorities, blurred accountability, and inconsistent escalation routes for safety issues.
- 1.2 Without clear structures and a strong, unifying safety policy, there is a significant risk that governance decisions may not fully reflect operational realities and frontline risk intelligence. A mature and integrated governance framework is therefore required to maintain coherence, clarity of authority, and strategic leadership throughout ongoing structural evolution.

## Guiding Principles

- 1.3 The GBR HSMS should demonstrate that accountability for safety is clearly defined, understood, and actively exercised at every level of the organisation. ORR expects GBR to implement governance arrangements that ensure transparent decision-making, clear delegation of authority and strong senior-level sponsorship of safety.
- 1.4 Leadership should actively reinforce the safety policy, provide strategic direction, and cultivate a working environment where health and safety concerns are raised, scrutinised and acted upon without obstruction. These arrangements should remain resilient during organisational transitions, ensuring continuity of risk control and a consistent approach to safety management across the system.

## Minimum Evidence (ROGS)

- MTU/MIM<sup>4</sup> F — Distribution of responsibilities: Clear mapping of responsibilities for safety-related tasks, demonstrating post-holders have the authority, competence and resources required
- MTU/MIM G — Management control: Procedures showing how management supervises safety-critical work and maintains oversight of performance

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<sup>4</sup> MTU – Mainline Transport Undertaking MIM – Mainline Infrastructure Manager

- MTU/MIM J — Safety policy: A written, CEO-approved safety policy appropriate to GBR's scope and effectively communicated

## Minimum Evidence (RM3)

- SP3 — Governance: Structured governance that supports decision clarity, independent scrutiny, and effective escalation
- OC1–OC3 — Structure, roles, and responsibilities: Coherent organisation structure with clearly defined authority boundaries and reporting lines

## 2. Risk Management

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- 2.1 As GBR brings together infrastructure management and passenger operations into a single organisation, the overall risk environment becomes more complex and interdependent. System-level risk may arise from reform, including risks associated with interfaces, organisational boundaries, and deferring legacy approaches to risk management.
- 2.2 The integration of these functions, coupled with evolving operational boundaries and new organisational interfaces, creates the potential for hazards to emerge or change unnoticed. A coherent and system-wide approach to risk management is therefore essential to ensure that GBR maintains a clear understanding of its risks and implements consistent, effective, and proportionate controls across all parts of the railway during the transition and into steady-state operation.

### Guiding Principles

- 2.3 The GBR HSMS should set out a unified, structured, and proportionate framework for identifying, assessing, and controlling risks across the whole organisation. GBR should demonstrate that hazard identification is comprehensive and forward-looking, that risk assessments reflect operational realities and human factors, and that controls are selected, implemented, and monitored in a consistent and evidence-based manner. This should include Health and Safety by Design and the Management of Health and Safety Regulations 1999 hierarchy of risk controls, ensuring risks are eliminated or reduced at source where reasonably practicable, to prevent avoidable health and safety risk being embedded in the design decisions.
- 2.4 The HSMS should also demonstrate clear allocation of risk ownership, coordinated control of cross-boundary and system-level hazards, and timely escalation of emerging risks. Significant changes must be subject to appropriate evaluation, including application of the Common Safety Method for Risk Evaluation and Assessment (CSM-REA) where required. Risk controls should be regularly reviewed, verified, and adapted to remain effective throughout organisational transition and beyond.

### Minimum Evidence (ROGS)

- MTU/MIM A — Risk assessment and monitoring: systematic identification, evaluation and review of risks and controls

- MTU/MIM M2 — Significant change: Demonstration that CSM-REA is applied to changes meeting significance criteria.

## Minimum Evidence (RM3)

- PI1 — Risk assessment & management: Clear processes for hazard identification, risk evaluation, and selection of proportionate controls
- RCS1–RCS3 — Operational and asset risk controls: Evidence of safe systems of work, asset condition management, and structured change control
- OC5 — Interface management: Arrangements for identifying and controlling shared risks at organisational and operational boundaries
- MRA1–MRA5 — Assurance and learning: Proactive monitoring, independent audit, incident investigation, management review, and corrective action

## 3. Change Management

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- 3.1 The transition to GBR involves substantial organisational, operational, and technical changes. Changes to structures, roles, decision pathways, or asset responsibilities have the potential to alter risk profiles, disrupt established processes, and affect the capability of teams to maintain control of safety-critical activities if not managed in a systematic and proportionate manner.
- 3.2 The diversity of legacy practices and differing levels of organisational maturity further increase the importance of a stable and consistent approach to change management. Without clear arrangements to identify, assess and manage the safety implications of change, there is a risk that existing safeguards may be weakened or new hazards introduced unintentionally. A well-governed approach to managing change is therefore essential to protect safety performance throughout reform and into the future operating model.

### Guiding Principles

- 3.3 The GBR HSMS should set out a clear, disciplined, and proportionate approach to identifying, assessing, and managing all forms of change. ORR expects GBR to demonstrate a structured process that screens changes effectively, allocates responsibilities unambiguously and ensures that safety impacts are fully evaluated before changes are introduced.
- 3.4 Significant changes should trigger the Common Safety Method for Risk Evaluation and Assessment (CSM-REA), with robust evidence that risks have been identified, evaluated, and reduced to an acceptable level. Where changes are assessed as not significant, GBR should retain evidence of how the CSM-REA significance criteria have been applied and the basis for the conclusion.
- 3.5 The HSMS should demonstrate that change is managed in a controlled and staged manner, with clear explanation of what is changing, why the change is being made, and how impacts on interfaces, decision-making and risk control have been assessed. Arrangements should ensure that the effectiveness of control measures is monitored during and after implementation, and that learning from change is captured, reviewed and acted upon.

### Minimum Evidence (ROGS)

- MTU/MIM M1–M3 — Change procedures: Documented processes for organisational, operational, technical and interface changes, including defined roles and methods of assessment

- MTU/MIM M2 — CSM REA: Application of structured evaluation for all significant changes
- MTU/MIM A — Monitoring: Arrangements to monitor the effectiveness of controls during and after change

## Minimum Evidence (RM3)

- RCS3 — Change management: Evidence of systematic assessment, implementation, and verification of changes
- OC1 & OC3 — Role clarity and organisational structure: Demonstrated clarity of responsibilities during transition
- PI1 — Risk evaluation: Identification and assessment of hazards arising from change
- MRA1–MRA5 — Assurance: Monitoring, audit, investigation, and review of change effectiveness

## 4. Organisation, Interfaces & Operational Control

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- 4.1 GBR's end state operating model aims to bring together multiple internal functions and a wide range of external stakeholders, including freight and open access operators, devolved authorities, contractors, suppliers, and emergency responders. This creates a complex network of organisational and operational interfaces where risks are shared, and decision-making authority must be clearly understood.
- 4.2 Unclear roles, inconsistent communication pathways, or mismatched local practices can lead to gaps or duplication in safety responsibilities, particularly during degraded or time-critical operations. A well-designed organisational structure is therefore essential to ensure that operational control is exercised consistently and that all interfaces function effectively across the national railway.

### Guiding Principles

- 4.3 The GBR HSMS should clearly define the organisational structures, reporting lines, decision-making authority, and interface arrangements required to manage safety across the system. ORR expects GBR to demonstrate how responsibilities for operational control are allocated, how critical information flows across boundaries and how shared or cross-boundary risks are identified, owned, and controlled.
- 4.4 Arrangements should ensure that safety-critical decisions are taken by competent individuals with the necessary authority, supported by reliable communication and escalation routes. Interface management processes should be systematic, transparent, and consistently applied, ensuring that operational delivery remains coordinated across all business units and partner organisations during both normal operations and periods of disruption or structural change.

### Minimum Evidence (ROGS)

- MTU/MIM A — Cooperation & information sharing: Arrangements for effective exchange of safety-critical information with internal units and external duty holders
- MTU/MIM C — Supplier & contractor control: Defined responsibilities and oversight processes for managing interface risks linked to contracted activities

- MTU/MIM F — Allocation of responsibilities: Clear documentation of operational roles, authorities, and duties
- MTU/MIM O — Operational control: Demonstrated ability to maintain safe control of operations, including during degraded or abnormal situations.

## Minimum Evidence (RM3)

- OC1–OC3 — Structure, accountability & role clarity: Organisational arrangements that support safe operations and minimise ambiguity.
- OC4 & OC5 — Communication & interface management: Reliable communication flows and structured management of shared risks across boundaries.
- OC7 — Document & knowledge management: Accessible, accurate and controlled operational information.
- RCS1–RCS5 — Operational risk control: Evidence that safe systems of work, asset integrity, change processes and emergency arrangements function consistently across interfaces.

## 5. Competence, Culture & Workforce

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- 5.1 The transition to GBR brings together workforces with different organisational histories, operating practices, and cultural norms. Changes to organisational structures, reporting lines and roles have the potential to affect competence arrangements, retention of local knowledge and consistency of behavioural expectations if not managed carefully.
- 5.2 Changes to roles, reporting lines or team structures can weaken the stability and confidence needed for safe performance, while workforce-related factors, such as fatigue, workload, morale, and industrial relations, may directly affect vigilance and decision-making. Maintaining a capable, confident, and well-supported workforce is therefore fundamental to effective risk control through transition and beyond.

### Guiding Principles

- 5.3 The GBR HSMS should set out clear, consistent, and robust arrangements for ensuring that staff in all safety-critical and operational roles remain competent, informed and equipped to carry out their duties safely. ORR expects GBR to define required competencies, provide training and assessment aligned to risk, and ensure that changes to roles or processes do not result in capability gaps.
- 5.4 The HSMS should demonstrate how safety culture is promoted and sustained across the organisation. It should present how GBR maintains relevant local operational knowledge within competence arrangements, promotes open communication, and actively fosters a positive, aligned safety culture. Workforce risks must be identified, monitored, and managed as part of GBR's overall safety framework, ensuring that behaviours, attitudes and working conditions support safe performance across all parts of the organisation.

### Minimum Evidence (ROGS)

- MTU/MIM N — Competence: Systematic arrangements for assessing, training, and maintaining competence for safety-critical roles
- MTU/MIM F — Responsibility: Clear allocation of responsibilities for competence and workforce safety arrangements
- MTU/MIM A — Communication: Effective communication of competence requirements, expectations and learning across all relevant groups

## Minimum Evidence (RM3)

- OP1 & OP2 — Worker involvement & competence management: Evidence that staff are engaged, informed, and supported through structured competence processes
- OC6 — Culture: Leadership actions that reinforce a positive and consistent safety culture across GBR
- OC4 & OC7 — Communication & knowledge management: Reliable systems for sharing safety-critical information and retaining essential operational knowledge

## 6. Cooperation and Coordination

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- 6.1 GBR will operate within a broad, complex and interdependent railway system that includes freight and open access operators, devolved authorities, suppliers, contractors, emergency services, and other duty holders. This operating environment creates shared and inherent risks that require effective communication and coordination to ensure that safety is managed consistently across organisational boundaries.
- 6.2 Without clear arrangements for coordination and information exchange, there is a risk of inconsistent standards, fragmented decision-making, and reduced visibility of emerging system hazards. Effective cooperation is therefore essential to maintaining coherent, system-wide safety performance and ensuring all parties understand their roles in managing shared risks.

### Guiding Principles

- 6.3 The GBR HSMS should set out structured and reliable arrangements for coordinating safety management across organisational and operational boundaries. ORR expects GBR to demonstrate how shared risks are jointly identified and controlled, how safety-critical information is exchanged, and how decisions that affect multiple operators are aligned.
- 6.4 The arrangements should recognise that GBR will interface with a number of duty-holders who will remain independent ROGS duty holders with their own SMSs. Cooperation should be consistent, inclusive, and proactive, ensuring that all non GBR duty holders remain integral to safety governance and operational planning. These arrangements should support a unified approach to safety, reduce duplication or gaps, and enable timely escalation of issues that span more than one organisation.

### Minimum Evidence (ROGS)

- MTU/MIM A — Cooperation & information exchange: Processes enabling relevant safety information to be shared across internal and external duty holders
- MTU/MIM C — Contractor & supplier control: Defined expectations and oversight for managing safety at contracted interfaces
- MTU/MIM P — Operational rule harmonisation: Demonstration that operational rules and instructions are coordinated and applied consistently across duty holders

## Minimum Evidence (RM3)

- OC5 — System safety & interfaces: Evidence of structured arrangements for managing shared and cross boundary risks
- OC4 & OC7 — Communication & documentation: Reliable mechanisms for sharing safety-critical information and maintaining accurate, accessible documentation
- OP1 — Worker involvement: Engagement of staff and representatives in cooperative safety processes involving external organisations

## 7. Monitoring, Assurance and Learning

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- 7.1 As GBR transitions into a unified system operator, maintaining consistent oversight of safety performance becomes increasingly critical. Structural changes, shifting responsibilities and evolving operational processes can affect reporting lines, assurance arrangements and visibility of safety-critical information if not managed carefully.
- 7.2 Without robust monitoring, assurance and learning arrangements, emerging risks may go undetected, latent system weaknesses may remain unresolved and incident trends may not be recognised in time to prevent recurrence. An integrated approach to monitoring and learning is therefore essential to ensure controls remain effective and that organisational change does not erode the stability of the HSMS.

### Guiding Principles

- 7.3 The GBR HSMS should provide a coordinated, risk-based approach to monitoring the effectiveness of safety controls, verifying compliance, and driving continuous improvement. ORR expects GBR to demonstrate that performance is monitored proactively, that independent audits are conducted systematically and that incident investigations identify underlying causes rather than symptoms.
- 7.4 The HSMS should also show how corrective actions are prioritised, tracked and evaluated for effectiveness, and how learning from incidents, audits, or operational observations is shared across all parts of GBR, and interfacing organisations. It should demonstrate how learning is translated into action, rather than relying solely on the identification of issues or the generation of improvement initiatives.
- 7.5 These arrangements should remain stable during transition and mature into a consistent assurance framework during steady-state operation.

### Minimum Evidence (ROGS)

- MTU/MIM A — Monitoring of controls: Evidence that GBR systematically reviews the effectiveness of safety risk controls
- MTU/MIM P — Audit processes: Demonstration of structured internal audit arrangements supporting compliance and improvement

- MTU/MIM S — Incident reporting and investigation: Clear processes for capturing, investigating, and learning from incidents and near misses

## Minimum Evidence (RM3)

- MRA1–MRA5 — Monitoring, audit, investigation, management review & corrective action: Proactive monitoring, independent auditing, robust investigation methodologies, leadership review of findings and effective tracking and closure of corrective actions

## 8. Emergency Preparedness and Resilience

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- 8.1 As GBR's organisational structures, roles and operational boundaries evolve, it is essential that emergency preparedness arrangements remain clear, robust and effective. Changes affecting command pathways, communication routes, geographical responsibilities, or local operational knowledge have the potential to affect the ability of staff and partners to respond effectively to incidents if not managed carefully.
- 8.2 Fragmented or outdated emergency arrangements risk slowing decision-making, reducing coordination with external responders, and compromising the protection of passengers, staff, and the public. A resilient and coordinated approach to emergency preparedness is therefore essential to maintain system safety through transition and into steady-state operation.

### Guiding Principles

- 8.3 The GBR HSMS should demonstrate that emergency planning, response and recovery arrangements remain robust, coordinated, and capable of functioning under pressure. ORR expects GBR to maintain clear and consistent command structures, ensure competent responders are in place across all operational areas and provide reliable communication channels for incident escalation and coordination.
- 8.4 Emergency plans should be appropriate to the scale and nature of operations, clearly documented, readily accessible, and regularly tested with relevant partners, including emergency services and interfacing duty holders. GBR should also ensure that reform does not erode local knowledge or access to critical operational information. These arrangements should support prompt, effective and collaborative incident management, with regular exercises driving continual improvement.

### Minimum Evidence (ROGS)

- MTU/MIM R — Emergency plans: Documented and tested emergency arrangements covering foreseeable scenarios
- MTU/MIM N — Competence: Evidence that staff involved in emergency activities are trained, assessed and capable

- MTU/MIM F — Responsibilities: Clear assignment and understanding of roles in emergency response
- MTU/MIM P — Communication: Reliable dissemination of emergency procedures and information

## Minimum Evidence (RM3)

- RCS5 — Emergency planning: Risk-based, coordinated, and regularly exercised arrangements
- OC4 — Communication: Effective communication channels supporting timely incident coordination
- OC7 — Knowledge management: Controlled, accessible and up-to-date emergency information
- OP2 — Competence: Demonstrated capability and readiness of staff performing emergency roles

# Conclusion

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This document represents the guiding principles for the GBR's HSMS. They focus on the outcomes required under ROGS, rather than prescribing organisational structures or detailed design solutions. The document sets out ORR's minimum evidence expectations, ensuring that the statutory duties of duty-holders remain central as GBR transitions to its new role.

By articulating these principles, ORR aims to create a shared regulatory position that supports:

- Permissioning of GBR's safety certificates and authorisations
- Constructive engagement with GBR on HSMS development
- Early regulatory oversight, ensuring risks associated with reform are identified and managed effectively

Together, these principles provide a clear foundation for assessing the design, implementation, and continual improvement of the GBR HSMS, ensuring it remains robust, legally compliant, and capable of supporting safe and reliable railway operations throughout transition and into steady-state operation.

ORR will continue to work closely with all the parties undertaking this work throughout this change process to support, advise and aid the creation of GBR and its future operation.



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